

Equality Impact Assessment / Equality Analysis

(Updated December 2022)

Item name	Details
Title of service or policy	Crisis and Resilience Fund (FSM vouchers)
Name of directorate and service	Finance, Revenues and Benefits
Name and role of officers completing the EIA	Damian Peak, Revenues and Benefits Manager
Date of assessment	09/03/2026

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council’s website.

1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
<p>1.1 Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<p>The Free School Meal (FSM) voucher scheme provides supermarket vouchers to households with children eligible for Free School Meals during school holiday periods. Historically this support was delivered via the Household Support Fund (HSF).</p> <p>From April 2026, FSM vouchers form part of the Crisis and Resilience Fund (CRF), administered by the Welfare Support team. The CRF integrates crisis response with longer-term preventative and resilience-building support and is delivered in partnership with the Community Wellbeing Hub (CWH) and third-sector organisations.</p> <p>Under this proposal:</p> <p>Blanket FSM voucher provision will be retained until the end of the Summer holiday period 2026 only, as a transitional measure.</p> <p>From Autumn 2026 onwards, support will be delivered through targeted, application-based crisis payments and resilience services, rather than automatic blanket provision.</p> <p>The intended outcomes are to:</p>

	<ul style="list-style-type: none"> - Provide transitional support during the period of highest financial pressure for families - Ensure compliance with DWP CRF guidance - Maintain effective crisis provision for families experiencing acute financial hardship - Shift support toward financial resilience and sustainability
<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? ● Is it a national requirement?). ● How much room for review is there? 	<p>This is a review of an existing scheme, required due to the transition from HSF to the CRF.</p> <p>The policy is strongly influenced by national DWP guidance, which limits the use of blanket crisis provision and requires a move toward targeted, needs-assessed support.</p> <p>Local discretion exists over allocation within the CRF strands, but continuation of blanket FSM vouchers beyond limited transitional arrangements is not permitted.</p>
<p>1.3 Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>The proposal supports:</p> <p>The design and objectives of the Crisis and Resilience Fund DWP policy direction toward resilience-focused provision</p> <p>Continuation of a 13-week FSM voucher offer beyond Summer 2026 would conflict with both the purpose of the CRF and DWP grant conditions.</p>

2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
<p>2.1 What equalities training have staff received to enable them to understand the needs of our diverse community?</p>	<p>No formal equalities training completed by all staff — add to action plan. Advice sought from B&NES Equalities Team.</p>
<p>2.2 What is the equalities profile of service users?</p>	<p>FSM-eligible households include:</p> <ul style="list-style-type: none"> Single parents (majority women) Families on Universal Credit/low income Disabled parents/children BAME families (over-represented in low-income cohorts) Larger families (higher food cost burden) Households experiencing multiple deprivation <p>4,743 children are expected to be eligible under new UC criteria from September 2026.</p>
<p>2.3 Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?</p>	<p>No formal satisfaction surveys exist for FSM vouchers. However, feedback to the Welfare Support team and CWH indicates:</p> <ul style="list-style-type: none"> A high reliance on vouchers in long holiday periods. Families welcome the choice of supermarkets available through the current voucher product. Families expect continued support, especially during summer holidays.
<p>2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>There has been engagement with:</p> <ul style="list-style-type: none"> Citizens Advice / Clean Slate / Bath Mind Community Engagement Team The Holiday Activity Fund steering group B&NES Public Health team Schools (informal feedback channels) Welfare Support officers

	<p>Feedback highlighted:</p> <ul style="list-style-type: none"> - The importance of maintaining summer support - Increasing pressure during winter and energy-cost peaks - The need for strong, accessible crisis provision - The value of resilience-building interventions - Concerns about increasing demand during winter energy peaks
<p>2.5 If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?</p>	<p>No future planned consultation but further engagement will take place during implementation, including:</p> <ul style="list-style-type: none"> - Direct communications to FSM households - Messaging via schools and partner organisations - Equality considerations built into all communications

3. Assessment of impact: ‘Equality analysis’

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equalities groups

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
<p>3.1 Issues relating to all groups and protected characteristics</p>	<p>Blanket support maintained during Summer 2026. Crisis Fund available year-round with 48-hour turnaround target. Cash-first payments offering flexibility.</p>	<p>Reduced automatic support during shorter holiday periods may affect vulnerable families, but Crisis Fund access (via a shared referral system such</p>

	“Warm Hand-Off” model from partners reduces barriers.	as Riviam), resilience referral, and targeted partner support will mitigate this.
3.2 Sex – identify the impact/potential impact of the policy on women and men.	Support maintained for majority-women single-parent households until the end of the 2026 academic year.	Single mothers may feel impact most due to reduced blanket support. However, there will be transitional provision until the Summer 2026 holidays. Crisis Fund and resilience services focused on income maximisation, mental wellbeing and financial health (Clean Slate, Mindline) will mitigate.
3.3 Pregnancy and maternity	Cash first crisis payments will help households with infants and school age children with more choice over how support is prioritised for their families.	Households with new or expectant parents may experience increased financial pressure, but this can be mitigated by Crisis fund access and Referral pathways to Health Visitors, Family Support and the Community Wellbeing Hub.
3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people	No identified specific impact	
3.5 Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)	Continuation of summer support until 2026 protects disabled families with higher food/energy costs and allows time to move away from potential dependency.	Disabled parents may struggle with applications for crisis support. This will be mitigated by availability of telephone and in person applications; Community Wellbeing Hub warm hand-offs and mediated applications; advocacy via CA/Mind. Disabled residents may experience second hand negative impacts because the HSF currently funds a scheme administered by the Carer’s Centre to

		support carers in financial crisis with financial support for bills and living costs, including household items. This will in part be mitigated by an increase in Crisis Fund provision delivered by the Welfare Support team, and there may be an opportunity for the Carers Centre to bid for funding from the Community Engagement team to provide resilience support to their clients.
3.6 Age – identify the impact/potential impact of the policy on different age groups	Direct support for children during summer 2026.	Children may have less food to eat in shorter school holidays. This will be partly mitigated by an enhanced Crisis Fund. There will also be increased eligibility for FSM from September 2026 onwards.
3.7 Race – identify the impact/potential impact on across different ethnic groups	Neutral.	Minority ethnic households may experience disproportionate financial pressure and access barriers. This can be mitigated by accessible comms, translation options and partner outreach. Increase in community support grants through CRF (this is a separate strand), will mitigate and enable those in financial crisis who may be disproportionately affected to apply for Crisis payments.
3.8 Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people	Neutral	
3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	Yes it does	

<p>3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.</p>	<p>Neutral</p>	
<p>3.11 Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).</p>	<p>The Main focus of the CRF is resilience-building. This includes income maximisation, employment support and better outcomes in the long-term.</p>	<p>Reduced blanket provision might increase short term pressure. The expansion of the Crisis fund, employment support, targeted communication and a focus on long-term resilience should mitigate short term income pressure.</p>
<p>3.12 Rural communities* identify the impact / potential impact on people living in rural communities</p>	<p>A focus on cash-first crisis payments will allow for awards which can be used to help with transport costs which will be higher for residents living in rural communities and allow residents to use support to shop locally rather than in large supermarkets. Provision of a fuel fund specifically for heating oil costs will benefit rural communities.</p>	<p>Travel barriers in rural areas may make accessing crisis support harder. This can be mitigated through Phone-based applications, digital forms, and outreach support from partners.</p>
<p>3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions,</p>	<p>Neutral</p>	<p>No specific negative impacts identified; crisis pathway remains open</p>

particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).		
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*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

** The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
Lack of staff equalities training	Introduce equalities refresher for Welfare Support team	Training scheduled and completed	Damian Peak	July 2026
Risk of confusion about FSM changes	Clear comms plan + school/HUB messaging, and emails direct to parents.	Comms issued before Easter 2026 and throughout the academic year	Rob John	April 2026

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5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by:

(Divisional Director or nominated senior officer)

Date: