

Equality Impact Assessment (EqIA) November



You will need to produce an Equality Impact Assessment (EqIA) if:

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the [guidance notes](#) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

Equality Impact Assessment (EqIA)

Type of Decision: Cabinet			<input type="radio"/> Cabinet	<input type="radio"/> Portfolio holder	<input checked="" type="radio"/> Other (state)
Title of Proposal	Moving to a "cash-lite" Council	Date EqIA created 30th September 2022			
Name and job title of completing/lead Officer	Jonathan Milbourn – Head of Customer Services & Modernisation				
Directorate/ Service responsible	RESOURCES				
Organisational approval					
EqIA approved by Head of Equality, Diversity and Inclusion	Shumaila Dar			Signature <input checked="" type="checkbox"/> Tick this box to indicate that you have approved this EqIA Date of approval 04/10/22	

1. Summary of proposal, impact on groups with protected characteristics and mitigating actions

(to be completed after you have completed sections 2 - 5)

a) What is your proposal?

A programme of work is in place over the next six months to reduce the amount of cash accepted by the Council for the payment of services. This will include:

- (i) The closure of the payment kiosks at the Civic Centre once the building is closed by the end of the year (2020).
- (ii) The reduction of cash payments (but cash payments will be still allowed) as an option for outlying buildings and services including:
 - Registrars
 - Libraries
 - Harrow Arts Centre
 - Harrow Museum
- (iii) The move to cashless parking whereby all parking pay and display machines will be removed for both on and off-street parking and parking sessions can only be made using the current PaybyPhone option available or using a new paypoint solution implemented in local businesses where appropriate. At locations where paypoint locations are not within 5 minutes walk a card payment machine will still be located in the vicinity to provide a alternate solution to PaybyPhone or there will be some free parking.

Engagement is underway with those residents most affected and the feedback received will be used to update the EqIA and inform how to assist all residents in making payments without cash.

b) Summarise the impact of your proposal on groups with protected characteristics

The EqIA will be monitored and updated after these measures have been put in place so that the impact on those with protected characteristics can be further incorporated and any further possible mitigations included.

- (i) Closure of the payment kiosks

The number of people using the kiosks fell during Covid and has not risen since restrictions were lifted. The table below shows the demand on the payment kiosks for the last financial year.

Service	Cash Transactions 2021/22	Debit/Credit Card Transactions 21/22
Council Tax	6,330	3,520
Housing Rents	1,380	1,035
Car Parking Fines	336	596
AR Invoice	90	117
HB Overpayments	60	39
Car Parking Permits	17	53
Highways	2	7
NNDR	17	8
Waste Collection	5	7
Account Payers	0	4
Licensing	14	1
Adult Social Care	13	12
	8,252	5,399

Since February 2022, the Kiosks located in the civic centre have not taken any cash payments or cheques. This has seen minimal customer resistance and no formal complaints have been made. March and April are the busiest time for payments and to date there have been no adverse impact on collection rates. The Customer Services team spoke to 1,335 customers who came into the Civic Centre to use the kiosks.

WHY DO YOU USE THE CASH KIOSK

Easy to use	12.1%
Need support to use online services	43.8%
Do not have bank account	0.9%
Paying for someone else	5.3%
Exercise/Social interaction	7.6%
Convenience	10.9%
Want a receipt	8.5%
Do not trust internet	10.9%
	100.0%

Nationally, 4% of the population do not have access to a bank account but less than 1% of those interviewed used the kiosk for that reason. Over 50% of those spoken to were not confident in using the website so the staff talked them through the alternative payment methods and supported them to make the payment online where appropriate.

HOW DID YOU PAY DURING THE PANDEMIC?

The Bank	18.6%
Automated Telephone line	33.3%
Online	9.3%
Other	38.8%
	100%

The characteristics of those people interviewed are embedded within section 2.

Engagement with Council Tax and Housing (which account for 93% of kiosk payments) has commenced to target resident uptake of Direct Debit, online and telephone payments. The Communications team has begun to draw up a plan to ensure residents are engaged and alternative payment methods are promoted

The table below highlights the early success in transitioning residents to alternative payment methods

	PAYMENT KIOSK	PAYMENT LINE	WEB PAYMENTS
1 APRIL to 30 JUNE 2021	3,574	48,113	52,638
1 APRIL to 30 JUNE 2022	2,081	48,903	58,967
% Difference	-41%	+2%	+12%

(ii) The reduction of cash payments as an option for outlying buildings and services

Harrow Arts Centre & Harrow Museum – Cash will not be fully phased out so cash in transit will remain however card payments will be encouraged

Library Network – The libraries already have Biblioteca kiosks installed which take card payments. Cash will not be fully phased out so cash in transit will remain however card payments will be encouraged

Registrars – The Registry Office only takes cash payment when the chip and pin machines are not available or functioning. A robust internet connection will be in place for the handheld devices as part of the move to Greenhill Cash will not be fully phased out so cash in transit will remain however card payments will be encouraged

CA Site – The CA site moved to chip & pin machines during the pandemic and there are no plans to revert to cash payments

(iii) The move to cashless parking

Currently the Council has 218 Pay and Display Machines

- 31 in car parks
- 187 on street

Remove all pay and display machines across the borough and replace with alternative payment options based on location as follows:

- PaybyPhone and PayPoint (& Shops within 5 minutes' walk)
-
- Paybyphone and payment machine(in areas where there is no paypoint facility within 5 minutes walk)
- Max Stay Only (Revenue does not cover operating costs)

This will ensure the option of cash payment remains at the majority of key locations.

- Currently 65% of parking payments are already made using PaybyPhone who provide the cashless parking service in the borough. This is mainly because the current free 1-hour parking is only available via the pay and display machines which still encourages the use of cash for parking sessions.
- The intention is that the current free 1-hour parking session will be moved to PaybyPhone and PayPoint except in locations where there will be implemented a maximum stay free parking period
- The Parking team have already commenced a review of all pay and display machine locations to draft list of recommendations based on the option proposals above.
- A number of existing PayPoint providers for example shops in the vicinity of pay and display machines have been provided by PaybyPhone and these will be instructed and trained on how to process parking sessions for free and paid periods.
- Locations where potential PayPoint providers have been identified in the vicinity of pay and display machines will be passed to PaybyPhone to arrange for them to liaise with PayPoint to have these locations set up as providers.
- In some locations where there is a reasonable level of revenue generated but there are no suitable locations which could provide a PayPoint service will be amended to provide 1-hour free parking only using PaybyPhone with a pay and display machine in the vicinity. However, It should be noted that at these locations the 1 hour free session would not be available from the machine. This is a reverse of the current arrangements where the 1 hour is only available at the machine but not using PaybyPhone.
- A visit to another London Borough that is cashlite has been undertaken
- Paypoint providers to take cash payments have been located in conjunction with PaybyPhone
- Initial engagement with Communications team has begun to ensure when the project is rolled out residents are informed understand the changes and the options for making payments
- New potential paypoint shops have been identified and paypoint will be onboarding them directly during October/November
- For the Leisure Centre site, its proposed that the onsite facilities will have access to book free parking

c) Summarise any potential negative impact(s) identified and mitigating actions

As below

2. Assessing impact					
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to borough profile data , equalities data , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on each group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact			
Protected characteristic	For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact
			Minor	Major	
Age	<p>20.6% of Harrow's residents are under 16.</p> <p>64.2% of Harrow's population are of working age (16 to 64) and 15.2% of Harrow's residents are 65 or older. The average (median) age is 37.4 years, lower than many other places.</p> <p>As with most areas in the country, the borough has an aging population. It is expected that the number of residents aged 65 plus will increase by 41% and those aged 85 plus could increase by over 67% by 2031.</p> <p>It is also expected that the number of children (0-15) will also increase by 14% during the 10 year period between 2014 and 2024.</p> <p>There may be a limited number of people who are still unable to pay without using cash and the engagement will enable us to better understand who these people are and how they can be best supported.</p> <p>For those who are less confident with mobile phone technology a helpline does exist for cashless parking, and the process of setting up an account can be accessed at a more relaxed pace online. PaybyPhone sessions can be made by phone call, text or using an App</p> <p>This will be mitigated by considering the location of a machine to be deactivated carefully, and special consideration will be given to any nearby services that might make</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<p>it more likely for older people to wish to use those parking spaces in particular. It is intended that the furthest alternate pay option to PaybyPhone will be no more than 5 minutes walk away from the location</p> <p>Older people may also be more affected by mobility and the convenience of the cash payment locations moving further away. This will be mitigated by the implementation of 10 minute observation period before a parking penalty is issued. Where users are able to make use of the cashless option they will find it more convenient and safer than having to take cash to a parking machine.</p> <p>The age profile of the 1,335 residents interviewed was as follows</p> <p>AGE PROFILE</p> <table data-bbox="456 595 1120 882"> <tr><td>18-24</td><td>0.0%</td></tr> <tr><td>25-34</td><td>6.8%</td></tr> <tr><td>35-44</td><td>10.2%</td></tr> <tr><td>45-54</td><td>25.4%</td></tr> <tr><td>55-64</td><td>23.7%</td></tr> <tr><td>65-74</td><td>23.7%</td></tr> <tr><td>75+</td><td>10.2%</td></tr> <tr><td></td><td>100%</td></tr> </table>	18-24	0.0%	25-34	6.8%	35-44	10.2%	45-54	25.4%	55-64	23.7%	65-74	23.7%	75+	10.2%		100%				
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	100%																				
<p>Disability</p>	<p>13.7% of Harrow's working age population classified themselves as disabled, a total of 22,100 people. 6,470 individuals, 2.6% of the total population, receive Personal Independence Payments (PIPs).</p> <p>A total of 2302 people received long term social care services primarily for physical support needs during 2016-17. This is about 1% of the total resident population. An additional 86 people received long term support primarily for sensory impairments.</p> <p>There were 575 Harrow residents receiving long-term social care support from Harrow Adult Social Care Services for learning disabilities during '16-17. 518 (approximately 90%) were younger adults under the age of 65. (source: SALT). 18% of younger adults with learning disabilities were in paid employment during the year. In comparison to London (7.2%) and England (5.7%), Harrow has a high number of LD clients who are in employment. In 2016-17, 73% younger adults with learning disabilities were in settled</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																

	<p>accommodation (with security of tenure). This is slightly below the England average (76%), but is above that of London (71%).</p> <p>There are 4,826 Housing Benefit/Council Tax Support claimants in receipt of PIPs, Severe Disablement Allowance or Employment Support Allowance (Support Component) as classified under the regulations.</p> <p>BLUE BADGE HOLDERS</p> <p>There is no information on ability to drive or access to a vehicle, or on mobile phone take up, amongst disabled groups, and there is very little on the proportions without a bank account. Therefore it has not been possible to assess this in detail for the parking cashlite options. However, blue badge holders have the ability to park for free in any paid for parking locations in the borough now and this will continue post the cashlite project. Blue badge holders have 3 hours free on single yellow lines and free unrestricted parking in resident and shared use bays bays.</p> <p>There may be a limited number of people who are still unable to pay without using cash and the engagement will enable us to better understand who these people are and how they can be best supported.</p> <p>Of the 1,335 residents interviewed at the Civic Centre 17% identified as having a disability</p>				
Gender reassignment	<p>There is insufficient data regarding gender reassignment in Harrow</p> <p>There is no evidence to show any negative impact regarding gender reassignment as in all scenarios the gender of the customer is not accounted for in the process.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Marriage and Civil Partnership	<p>54% of Harrow residents are married, the highest level in London.</p> <p>As of 31st December 2016, there have been 142 Civil Partnerships in Harrow, 19 of which have been converted to marriage. There have been 32 same sex marriages in Harrow since inception on 29th March 2014.</p> <p>The marital status of the 1,335 customers engaged with is as follows</p> <p>MARITAL STATUS</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>Single 4.4%</p> <p>Married 53.3%</p> <p>Separated 8.9%</p> <p>Divorced 15.6%</p> <p>Widowed 17.8%</p> <p>Same sex civil partnership 0.0%</p> <p>100%</p> <p>There is no evidence to show any negative impact regarding Marriage and Civil Partnership as in all scenarios the marital status of the customer is not accounted for in the process.</p>				
<p>Pregnancy and Maternity</p>	<p>In 2016 there were 14.5 live births per 1000 population which is higher than the UK average of 11.8. For women under the age of 18, the birth rate was 3.7 per 1000 population which is in line with the London average of 3.8 and lower than the UK average of 5.7.</p> <p>Harrow has the lowest levels of live births outside of marriage in the country (19.4%)</p> <p>There is no evidence to show any signifant negative impact regarding pregnancy or maternity as in all scenarios the pregenancy or maternity factors of the customer is not accounted for in the process. The minor adverse impact that may adversely affect pregnant women or women with young children is the additional distance that they may need to walk to pay for parking with cash.</p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>

Race/ Ethnicity	The ethnic origin of the 1,335 residents spoken to is as follows			
	ETHNIC ORIGIN			
	Asian/Asian British: Afghan	4.0%		
	Asian/Asian British: Bangladeshi	0.0%		
	Asian/Asian British: Chinese	0.0%		
	Asian/Asian British: Indian	12.0%		
	Asian/Asian British: Pakistani	2.0%		
	Asian/Asian British: Sri Lankan	8.0%		
	Black/Black British: African	10.0%		
	Black/Black British: Caribbean	22.0%		
	Black/Black British: Somali	8.0%		
	White: English/Welsh/Scottish/Northern Irish	16.0%		
	White: Irish	2.0%		
	White: Gypsy or Irish Traveller	0.0%	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	White: Jewish	0.0%	<input type="checkbox"/>	<input type="checkbox"/>
	Arab	4.0%		
	Iranian	2.0%		
	Romanian	4.0%		
	Polish	0.0%		
	White and Asian	2.0%		
White and Black African	2.0%			
White and Black Caribbean	2.0%			
	100%			
61.8% of residents classify themselves as belonging to a minority ethnic group. The White British group forms the remaining 38.2% of the population, (down from 50% in 2001).				
26.4% of Harrow's residents are of Indian origin – the largest minority ethnic group in the borough, followed by Kenyans and Sri Lankans. Harrow is home to the largest Sri Lankan born community in the country.				

	<p>In 2015/16 Harrow recorded its 2nd highest levels of migration in a decade signifying a significant change in population make up since the 2011 census. The top three nationalities of these most recent arrivals are Romanian, Indian and Polish.</p> <p>The top 5 most recorded community languages in Harrow are: English, Gujarati, Tamil, Romanian, Arabic and there are over 155 languages spoken in Harrow schools.</p> <p>The website can be translated into many languages through 'Google Translate' ensuring that online payments are accessible</p> <p>Currently, residents who do not speak English as a first language either bring a relative to the Civic Centre or speak to one of a number of staff who are bi-lingual. Many engage with a community group for assistance.</p> <p>Where race is an indicator of a group that may not have English as a first language they may have difficulty accessing the phone service, however a telephone helpline does exist to help people who can speak, but not read English, and the online option is also there allowing users to register for the service in a more relaxed manner. Once set up, the action of using the associated mobile phone app or sending a text to use a parking session requires no more fluency in English than operating a parking machine.</p>				
<p>Religion or belief</p>	<p>Harrow is also said to be the most religiously diverse borough in the country. The borough had the highest proportion of Hindus, Jains and members of the Unification Church, the second highest figures for Zoroastrianism and was 6th for Judaism.</p> <p>37% of the population is Christian, the 5th lowest figure in the country. Muslims accounted for 12.5% of the population.</p> <p>In Greenhill and Wealdstone there are proportionately more followers of Islam and slighter lower Hindus. There is a higher proportion of Bangladeshi and Pakistanis in these wards.</p> <p>There is no evidence to show any negative impact regarding religion or belief as in all scenarios the religion or belief of the customer is not accounted for in the process.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Sex</p>	<p>49.9% of the population are male and 51.1% are female</p> <p>Of the 1,335 residents interviewed at the Civic Centre 65% were female</p> <p>There is no evidence to show any negative impact regarding sex as in all scenarios the sex of the customer is not accounted for in the process.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Sexual Orientation	It is estimated that 10% of the UK population are lesbian, gay and bisexual (LGB), which would equate to approximately 24,713 of our residents	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	There is no evidence to show any negative impact regarding sexual orientation as in all scenarios the sexual orientation of the customer is not accounted for in the process.				

2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?

Yes No

This may change as engagement takes place with various customer groups

2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc), could your proposals have an impact on individuals/service users, or other groups?

Yes No

Benefit Claims are paid into the bank

3. Actions to mitigate/remove negative impact

Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for each group, identified in section 2. In addition, you should also consider and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact please state below.	Deadline date	Lead Officer
Closure of the payment kiosks	<p>Alternative methods of payment available</p> <ul style="list-style-type: none"> • Direct Debit • Bank transfer • Telephone • Online payment • Chip & pin <p>Continued engagement with residents to understand any issues paying over the telephone or internet, and support to train them to do so. This would include support for residents for whom English is not their first language.</p>	<ul style="list-style-type: none"> • Track income collection to ensure that payments are made • Review engagement feedback at Civic Centre • Review feedback received at Greenhill library 		Fern Silverio
Reduction in cash payments for Council services	<p>Alternative methods of payment available</p> <ul style="list-style-type: none"> • Direct Debit • Bank transfer • Telephone • Online payment Chip & pin 	<ul style="list-style-type: none"> • Track income collection to ensure that payments are made • Review customer feedback 		Fern Silverio
Introduction of cashlite parking	<ul style="list-style-type: none"> • One hour free parking available • Blue Badge holders are eligible for 3 hours free parking • Paypoint 	<ul style="list-style-type: none"> • Review customer feedback 		Ian Slaney

<p>Introduction of cashlite parking</p>	<p>Older, disabled and pregnant residents may also be more affected by mobility and the convenience of the cash payment locations moving further away. This will be mitigated by the implementation of 10 minute observation period before a parking penalty is issued.</p> <p>Where users are able to make use of the cashless option they will find it more convenient and safer than having to take cash to a parking machine. All payment shops are within 5 minutes walk.</p>	<ul style="list-style-type: none"> • Review customer feedback • Monitor feedback and challenges to parking tickets 		<p>Ian Slaney</p>
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4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

Include details in the space below

There will be ongoing support for residents at Greenhill library whereby trained Customer Service staff will be available to discuss alternative payment methods and assist using the telephone and online services.

5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies

Outcome 1

No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed

Outcome 2

Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4

This EqIA will be updated to take into account the consultation responses.

Outcome 3

This EqIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.

Include details here