

TEMPLATE 2 - Full Equality Impact Assessment (EqIA)

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this form and assessment.

What are the proposals being assessed? (Note: ‘proposal’ includes a new policy, policy review, service review, function, strategy, project, procedure, restructure)	Review of the Corporate Debt Collection Policy
Which Directorate / Service has responsibility for this?	Collections and Housing Benefits - Finance
Name and job title of lead officer	Fern Silverio – Head of Service, Collections and Housing Benefit
Name & contact details of the other persons involved in the EqIA:	Bernie Beckett, Consultation Project Manager Tel: 020 8736 6726 Email: bernie.beckett@harrow.gov.uk
Date of assessment:	Version 1 Version 2 – updated 8 th August, 2013 to reflect updated activity and support Overview and Scrutiny Report to be presented at Committee on the 17 th September, 2013. Version 3 – updated 15 th August, 2013 with information from Housing Version 4 – Updated 16 th August 2013 following Corporate Debt Collection Meeting Version 5 – Updated 3 rd September, 2013 with data from Housing and further to comments from the Welfare Reform Project Board.

Stage 1: Overview

<p>1. What are the aims, objectives, and desired outcomes of your proposals? (Explain proposals e.g. reduction / removal of service, deletion of posts, changing criteria etc)</p>	<p>The review of the Council Tax Debt Recovery Policy falls within a programme of mitigations that are being taken forward to support people affected by the changes within the Welfare Reforms. The review has been taken forward to specifically address concerns raised by members and addresses the following recommendations:</p> <p>Recommendation 1</p> <p>The central debt recovery service should develop a process for the identification of vulnerable</p>
---	---

residents and reviewing their cases at appropriate stages in the central debt recovery process.

A draft vulnerability criteria has been developed through engagement with a multi-agency Community Reference Group, multi-agency Debt Collection Sub Group and through discussions within the Welfare Reform Governance Structure. This criteria is included within the draft Corporate Debt Recovery Policy, attached at Appendix B to the Overview and Scrutiny report dated 17th September, 2013.

Services have agreed that proposed checkpoints will be put in place at key stages of the Debt Collection processes. A pilot will be taken forward with Council Tax Recovery and data from Adult Services to trial the process for identifying vulnerability at the initial checkpoint stages for Council Tax Collection, to identify how the process will work operationally and the resources required to deliver before full implementation. When these processes are in place a data sharing agreement will be drawn up that shows the detail of the information to be shared, and, if it is necessary to transfer data between services, how it will be transferred, stored and how long it will be retained by the receiver service.

The Sundry Debtor system would require configuration of the system to allow flags to be inserted to identify vulnerability.

Recommendation 2

The integration of all debt recovery services with the central recovery service should be implemented but not until:

The central service has been able to introduce a process for identification of vulnerable residents as above

The Housing service has been able to clarify its own strategic approach to debt recovery for implementation by the central service

This review has not considered the centralisation of all debt recovery services. However the review has aligned the debt recovery processes for all Debt Collection services. A flowchart showing the Enforcement for all Debt Collection Services is attached to the Scrutiny Report at Appendix E.

There are some specific legislative requirements in relation to seeking possession through the courts for Council tenants or seeking an order in relation to leasehold service charge that require officers to have

detailed knowledge of housing law as well as best practice and the regulators requirements to operate. It should also be noted that with co-regulation our tenants have a right to determine income recovery.

Where multiple debts are highlighted the Council will work with the debtor to prioritise the debts that will have the most serious consequence if they are not paid. Table 1 (page 7) within the report to Scrutiny shows the hierarchy of debts.

Recommendation 3

The Council should improve communication processes within the organisation and with external agencies in order to facilitate a greater understanding of the level and impact of debt within the community. Lessons learnt, processes and procedures should be shared.

The Welfare Reform Governance structure, which includes the multi-agency Reference Group will be monitoring the impacts of welfare reforms where information which will include the levels of debt across the Council. Welfare Reform Awareness sessions have been carried out, both internally within the Council, and externally with the Voluntary Sector, Community Groups, GPs and Heads from local schools. The Council is hoping, that through this activity, feedback will be provided on the impacts of the changes and the levels of debt within the community.

The Housing Service is also represented on the West London Welfare Reform Group which is a forum specifically established to share lessons learnt, processes and procedures and good practice.

Recommendation 4

The council should show how it will improve how it signposts residents who are experiencing financial/debt difficulties to sources of advice and advocacy in the borough

The Harrow Help Scheme has been developed to support people impacted by the Economic situation and welfare reforms. The scheme brings together discretionary pots of funding that provide support to people in difficult financial circumstances.

The Council is also working with a Voluntary Sector Consortium to develop an advice portal, Harrow Advising Together (HAT), which will be available to all residents through the web, email, live chat with an advisor, Facebook and telephone. The advice portal is intended to increase the reach and cost

	<p>effectiveness of advice and support services across Harrow. A link to the portal will sit within the Help Scheme.</p> <p>The Housing Service has extended a project that funds the CAB to target households identified by the service as in need of priority advice and support.</p>
<p>2. What factors / forces could prevent you from achieving these aims, objectives and outcomes?</p>	<p>Lack of commitment from internal debt collection services Lack of involvement from external agencies Feedback from the consultation does not agree with the proposals</p>
<p>3. Who are the customers? Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc.</p>	<p><u>Internal</u> Staff from all Debt Collection Services which include the following:</p> <ul style="list-style-type: none"> - Accounts Payable - Revenues - Housing - Community Health and Wellbeing (Adults) <p>will all be required to sign up to the Corporate Debt Collection Policy</p> <p><u>External</u> Customers who are experiencing financial difficulties and who have debts with Council Services External agencies who liaise with the Council regarding customers who have debt with the Council</p>
<p>4. Is the responsibility shared with another department, authority or organisation? If so:</p> <ul style="list-style-type: none"> • Who are the partners? • Who has the overall responsibility? 	<p>Overall responsibility for the development of the Corporate Debt Collection Policy is led by the Collections and Housing Benefit Service. The responsibility for development and delivery of the changes is shared with the following services:</p> <ul style="list-style-type: none"> - Accounts Payable - Revenues, - Housing - Community Health and Wellbeing (Adults) <p>In relation to the delivery and development of a Corporate Vulnerability Policy and effective Data Sharing all services have responsibility to help shape and deliver the Vulnerability Policy and ensure effective data sharing is carried out</p>

<p>4a. How are/will they be involved in this assessment?</p>	<p>An internal Corporate Debt Working Group has been set up to take forward the changes and includes representation from the following services:</p> <ul style="list-style-type: none"> - Revenues - Housing - Accounts Payable - Community Health and Wellbeing (Adults) - Children's - Access Harrow - Risk, Audit and Fraud - Legal <p>This group meets on a regular basis and has to date developed the draft Corporate Vulnerability Criteria which is being taken to the meeting of Scrutiny on the 4th June, 2013. The group's activity feeds in to the multi-agency Debt Collection Sub Group which then in turn feeds through the Welfare Reform Governance Structure.</p> <p>The multi-agency Debt Collection Sub Group has been developed to help inform and shape the changes and this group includes representation from the following internal/external services:</p> <ul style="list-style-type: none"> - Councillors - Housing - Revenues - Community Health and Wellbeing - Children's - Access Harrow - Harrow Association of Disabled People (HAD) - The Law Centre - CAB - Age Concern - Bailiffs (Chandlers Ltd and Newlyns plc) <p>This group meets on a regular basis and has fed in to changes in the Council Tax Debt Recovery Policy and is now feeding in to the corporate debt collection activity. Outcomes from this group are taken through</p>
---	--

the Welfare Reform governance structure.
There will be a consultation to give stakeholders the opportunity to shape the Corporate Debt Collection Policy

Stage 2: Monitoring / Collecting Evidence / Data

5. What information is available to assess the impact of your proposals? Include the actual data, statistics and evidence (including full references) reviewed to determine the potential impact on each equality group (protected characteristic). This can include results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys, workforce profiles, service users profiles, local and national research, evaluations etc

(Where possible include data on the nine protected characteristics. Where you have gaps, you may need to include this as an action to address in the action plan)

Age (including carers of young/older people)	<p>Council Tax currently have – info to be provided 3.9.13</p> <p>Housing have 487,793 debtors and the level of debt outstanding is £1,319,461. There is currently minimal information in terms of the 9 characteristics held on the Housing Service database but this is an ongoing piece of work which is being monitored with targets having been set for the end of the year. Currently 100% information is held for gender, 86% ethnicity and 87% for age (date of birth) Whilst applying this directly to those cases with rent arrears the data does exist for a report to be run, this would require a report request being raised in plenty of time and was not achievable within this report timescale.</p> <p>The numbers of vulnerable people as defined in the draft vulnerability criteria are currently unknown as the policy is not yet in place however figures will be gathered (where possible within the current IT systems) when the policy is agreed and operational</p>
Disability (including carers of disabled people)	<p>People with disability are impacted by the changes. Whilst the Council Tax Support Scheme gives some additional support to people with disabilities they still have to pay at least 10% of their Council Tax.</p>
Gender Reassignment	<p>This information is not currently available and is unlikely to be able to be captured within the current IT systems across all debt collection services</p>
Marriage / Civil Partnership	<p>This information is not currently available and is unlikely to be able to be captured within the current IT systems across all debt collection services</p>

Pregnancy and Maternity	This information is not currently available and is unlikely to be able to be captured within the current IT systems across all debt collection services
Race	This information is not currently available and is unlikely to be able to be captured within the current IT systems across all debt collection services. However the vulnerability criteria includes people who have language difficulties because they do not understand either written or spoken English especially where they do not have enough support from their family who can speak or read English.
Religion and Belief	This information is not currently available and is unlikely to be able to be captured within the current IT systems across all debt collection services
Sex / Gender	This information is not currently available and is unlikely to be able to be captured within the current IT systems across all debt collection services
Sexual Orientation	This information is not currently available and is unlikely to be able to be captured within the current IT systems across all debt collection services
<p>6. Is there any other (local, regional, national research, reports, media) data sources that can inform this assessment?</p> <p>Include this data (facts, figures, evidence, key findings) in this section.</p>	<p>The Welfare Reforms will impact residents in Harrow as the total amount of benefit received in the borough will be reduced by approximately £8m however this could increase as we do not understand whether there will be any further impacts through the introduction of Universal Credit and Personal Independent Payments.</p> <p>The figures available currently on the impacts of these changes are:</p> <p>Council Tax Support – Working age households – 11,000 impacted</p> <p>Size Criteria – Working age households living in Council and Housing Association properties – 583 impacted</p> <p>Benefit Cap – Working age households not in receipt of certain benefits which include Working Tax Credit and Disability Living Allowance – 687 impacted</p> <p>Universal Credit – All working age households claiming benefits – numbers not</p>

	<p>known</p> <p>Personal Independent Payments – Working age Disability Living Allowance recipients – numbers not known.</p> <p>The Localisation of Council Tax Support EqIA that was put to members at Cabinet in December 2012 shows the impact of the changes to the localisation of Council Tax to Council Tax Support claimants and is attached at Appendix C.</p> <p>The Debt Collection Policy is being reviewed as a result of the welfare changes and concerns raised by members at Scrutiny Committee regarding vulnerability and alignment of processes.</p> <p>The draft Vulnerability Criteria will support the identification of vulnerable debtors to the Council and will ensure that appropriate actions are taken forward in respect of individual circumstances.</p>
--	--

7. Have you undertaken any consultation on your proposals? (this may include consultation with staff, members, unions, community / voluntary groups, stakeholders, residents and service users)	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
--	------------	--------------------------	-----------	--------------------------

NOTE: If you have not undertaken any consultation as yet, you should consider whether you need to. For example, if you have insufficient data/information for any of the protected characteristics and you are **unable** to assess the potential impact, you may want to consult with them on your proposals as how they will affect them. Any proposed consultation needs to be **completed before** progressing with the rest of the EqIA. **Guidance on consultation/community involvement toolkit can be accessed via the link below**
http://harrowhub/info/200195/consultation/169/community_involvement_toolkit

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different equality groups (protected characteristics)?	What action are you going to take as a result of the consultation? This may include revising your proposals, steps to mitigate any adverse impact. <i>(Also Include these in the Improvement Action Plan at Stage 5)</i>
Currently the draft policy is being	Consultation booklet and		

<p>developed in partnership with all internal services and with an multi-agency Debt Collection Sub Group and the Community Reference Group.</p> <p>A consultation is planned over the period 23rd September, 2013 to 1st November, 2013</p>	<p>questionnaire will be placed on the Councils website and responses can be made through hard copy/email/telephone/completion on the web</p> <p>Consultation booklet and questionnaire will be circulated to all members of the Community Reference Group and Debt Collection Sub Group</p> <p>Face to face consultation with Debt Advice Agencies and Voluntary Sector Workshops to be advertised</p>		

Stage 3: Assessing Impact and Analysis

8. What does your information tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact?

Protected Characteristic	Positive	Adverse	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.	What measures can you take to eliminate or reduce the adverse impact(s)? E.g. consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 5)
Age (including carers of young/older people)			To be completed when the consultation is complete.	
Disability				

(including carers of disabled people)				
Gender Reassignment				
Marriage and Civil Partnership				
Pregnancy and Maternity				
Race				
Religion or Belief				
Sex				
Sexual Orientation				
Other (please state)				

<p>9. Cumulative impact – Are you aware of any cumulative impact? For example, when conducting a major review of services. This would mean ensuring that you have sufficient relevant information to understand the cumulative effect of all of the decisions.</p> <p>Example: A local authority is making changes to four different policies. These are funding and delivering social care, day care, and respite for carers and community transport. Small changes in each of these policies may disadvantage disabled people, but the cumulative effect of changes to these areas could have a significant effect on disabled people’s participation in public life. The actual and potential effect on equality of all these proposals, and appropriate mitigating measures, will need to be considered to ensure that inequalities between different equality groups, particularly in this instance for disabled</p>	<p>The review of the Debt Collection Policy has been put in place to mitigate the impact of welfare reforms and therefore should have a positive impact ensuring that residents who are in debt to the council are dealt with in a consistent and transparent manner and vulnerability is highlighted at an early stage in the debt collection process.</p> <p>Many people impacted by the welfare reforms will experience a cumulative impact as they will be affected by more than one of the changes to benefits.</p> <p>The breakdown of the numbers affected by the changes within the welfare reforms are shown in Section 6 of this EqIA.</p> <p>Through working with public health on the impacts of the welfare reforms a</p>
---	--

people, have been identified and do not continue or widen. This may include making a decision to spread the effects of the policy elsewhere to lessen the concentration in any one area.	diagram showing the possible implications to health for people living in poverty. This diagram is attached to this EqlA at Appendix A.
--	--

10. How do your proposals contribute towards the requirements of the Public Sector Equality Duty (PSED), which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups.

(Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)

Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups	Foster good relations between people from different groups	Are there any actions you can take to meet the PSED requirements? <i>(List these here and include them in the Improvement Action Plan at Stage 5)</i>

11. Is there any evidence or concern that your proposals may result in a protected group being disadvantaged (please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act)?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes									
No									

If you have answered "yes" to any of the above, set out what justification there may be for this in Q12a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)

If the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.

If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. (select outcome 4)
 If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. (select outcome 4)

Stage 4: Decision

12. Please indicate which of the following statements best describes the outcome of your EqlA (tick one box only)

Outcome 1 – No change required: when the EqlA has not identified any potential for unlawful conduct or adverse impact and all opportunities to enhance equality are being addressed.	
Outcome 2 – Minor adjustments to remove / mitigate adverse impact or enhance equality have been identified by the EqlA. <i>List the actions you propose to take to address this in the Improvement Action Plan at Stage 5</i>	
Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to enhance equality. In this case, the justification needs to be included in the EqlA and should be in line with the PSED to have ‘due regard’. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. (explain this in 12a below)	
Outcome 4 – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)	

12a. If your EqlA is assessed as **outcome 3** or have ticked ‘yes’ in Q11, explain your justification with full reasoning to continue with your proposals.

Stage 5: Making Adjustments (Improvement Action Plan)

13. List below any actions you plan to take as a result of this impact assessment. This should include any actions identified throughout the EqlA.

Area of potential adverse impact e.g. Race, Disability	Action proposed	Desired Outcome	Target Date	Lead Officer	Progress
--	-----------------	-----------------	-------------	--------------	----------

Stage 6 - Monitoring

The full impact of the decision may only be known after the proposals have been implemented, it is therefore important to ensure effective monitoring measures are in place to assess the impact.

14. How will you monitor the impact of the proposals once they have been implemented? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 5)</i>				
15. Do you currently monitor this function / service? Do you know who your service users are?	Yes		No	
16. What monitoring measures need to be introduced to ensure effective monitoring of your proposals? <i>(Also Include in Improvement Action Plan at Stage 5)</i>				
17. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 5)</i>				
18. Have you received any complaints or compliments about the policy, service, function, project or proposals being assessed? If so, provide details.				

Stage 7 – Reporting outcomes

The completed EqlA must be attached to all committee reports and a summary of the key findings included in the relevant section within them.

EqlA's will also be published on the Council's website and made available to members of the public on request.

19. Summary of the assessment

NOTE: This section can also be used in your reports, however you must ensure the full EqlA is available as a background paper for the decision makers (Cabinet, Overview and Scrutiny, CSB etc)

What are the key impacts – both adverse and positive?

Are there any particular groups affected more than others?

Do you suggest proceeding with your proposals although an adverse impact has been identified? If yes, what are your justifications for this?

What course of action are you advising as a result of this EqlA?

20. How will the impact assessment be publicised? E.g. Council website, intranet, forums, groups etc**Stage 8 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)**

The completed EqlA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.

21. Which group or committee considered, reviewed and agreed the EqlA and the Improvement Action Plan?

Signed: (Lead officer completing EqlA)

Signed: (Chair of DETG)

Date:

Date:

Appendix A.

