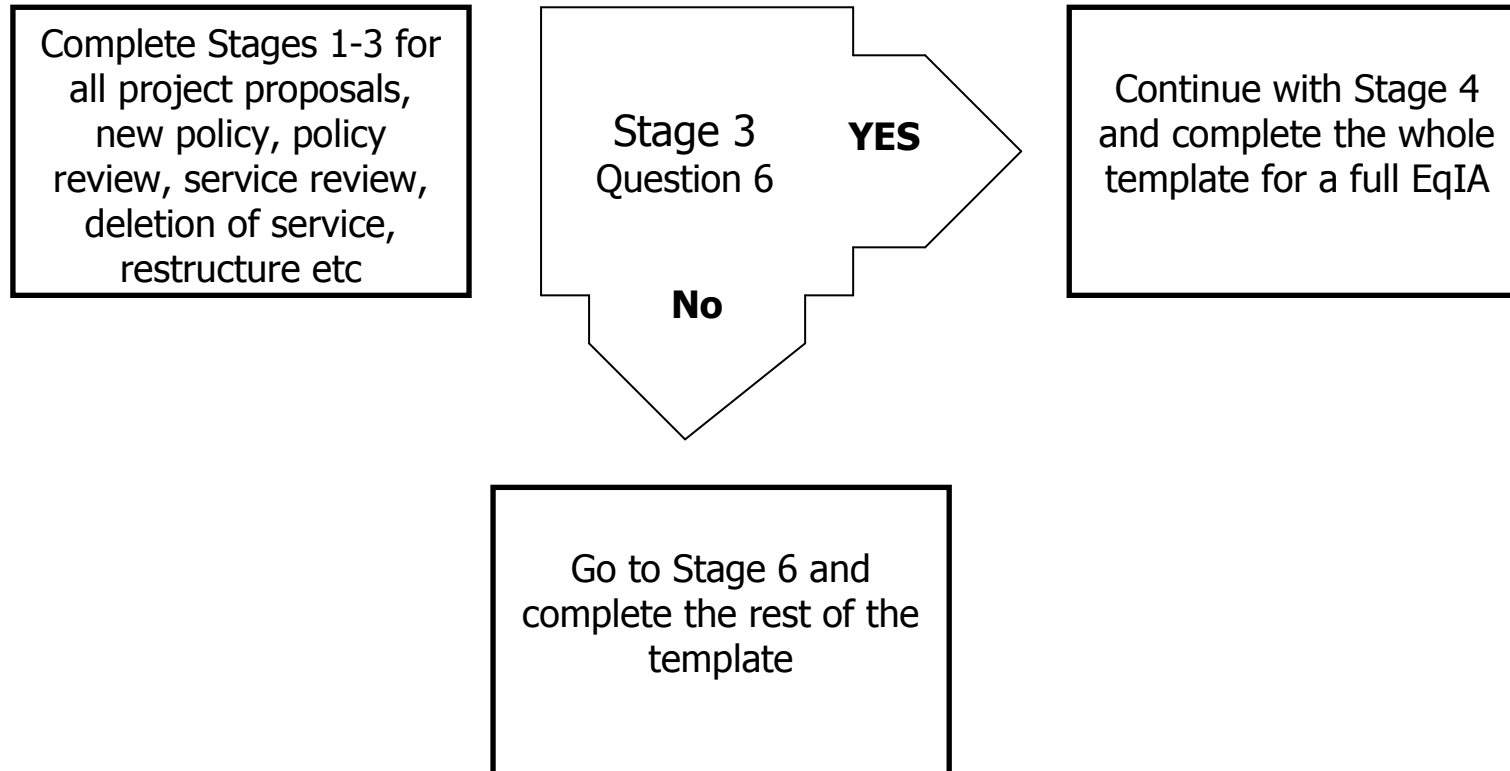


Equality Impact Assessment Template

The Council has revised and simplified its Equality Impact Assessment process. There is now just one Template. Project Managers will need to complete **Stages 1-3** to determine whether a full EqIA is required and the need to complete the whole template.



Equality Impact Assessment (EqIA) Template

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 assessment.

It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:		Tick	Type of Decision:	Tick
Transformation			Cabinet	
Capital			Portfolio Holder	
Service Plan			Corporate Strategic Board	
Other			Other	
Title of Project:		Review of the Corporate Debt Recovery Policy		
Directorate / Service responsible:		Resources Directorate Collections and Housing Benefits		
Name and job title of lead officer:		Fern Silverio, Head of Service, Collections and Housing Benefits		
Name & contact details of the other persons involved in the assessment:		Bernie Beckett, Consultation Project Manager BBeckett@harrow.gov.uk Tel: 020 8736 6726		
Date of assessment:		This EqIA has been updated throughout the review of the Corporate Debt Policy. The most recent update has been carried out on the 25 th October, 2013		

Stage 1: Overview

<p>1. What are you trying to do?</p> <p>(Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)</p>	<p>The Corporate Debt Recovery Policy was agreed by the Council in 2009. An extensive review of the policy has been carried out to specifically ensure the policy reflects concerns raised by elected members at the Councils Scrutiny Committee and their following recommendations:</p> <p>Recommendation 1</p> <p>The central debt recovery service should develop a process for the identification of vulnerable residents and reviewing their cases at appropriate stages in the central debt recovery process.</p> <p><i>A draft vulnerability criteria has been developed through a public consultation and</i></p>
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engagement with a multi-agency Community Reference Group, multi-agency Debt Collection Sub Group and through internal discussions within an Officer Debt Collection Sub Group and the Welfare Reform Governance Structure. The vulnerability criteria is included within the draft Corporate Debt Recovery Policy, pages 5-7, attached at Appendix B to the Cabinet Report.

Services have agreed that proposed checkpoints will be put in place at key stages of the Debt Collection processes to capture vulnerability. 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. The learning from this pilot will influence the plan for implementation across all debt collection services. 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. The costs and processes required to update this system is not yet known.

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 draft Debt Recovery Policy at Appendix A.

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 8) within the draft policy shows the hierarchy of debts that was agreed by Cabinet within the Corporate Debt Recovery Policy in 2009. There are no plans to change the hierarchy of debts however a secondary financial assessment (Table 2 page 9 of the draft policy) has been updated to reflect the feedback from the public consultation.

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 level of debts within the community as part of the overall monitoring of the changes within the welfare reforms. 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 working closely with the voluntary sector to support an understanding of the level of debts 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 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, Facebook and telephone. The advice portal is intended to increase the reach and cost effectiveness of advice and support services across Harrow. A link to the portal will sit within the Help Scheme.

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.

Key features of change – Corporate Debt Recovery Policy

The activity explained above in response to the recommendations made by Councillors has shaped the review of the Corporate Debt Recovery Policy. This document has been developed in partnership with multi-agency reference group, representation from internal debt recovery services and through a public consultation. The policy includes the following key features:

The principles of the policy - have been updated and are:

- To maximise income for the provision of services in Harrow whilst collecting debt responsibly, sensitively and effectively across all of our debt collection services
- We aim to pay particular emphasis on the early identification of debt with early contact with the debtor to prevent debt occurring. We will work with debtors to ensure they maintain a minimum payment to ensure arrears do not increase.

Within the draft policy (pages 2 and 3) at Appendix B to the Cabinet Report the Council also outlines what customers can expect from the Council to deliver these principles effectively and the principles that the Council would expect customers to follow who have a responsibility to pay a charge to the Council or have a debt to the Council.

Vulnerability criteria – is a new feature within the Corporate Debt Recovery Policy and is detailed starting page 3 of the draft Policy.

Management of financial affairs criteria – Within the vulnerability criteria some people are only considered vulnerable if they are not able to manage their financial affairs effectively. The criteria has been developed to help Debt Recovery Services understand when a person may not be able to manage their financial affairs effectively and is detailed on page 7 of the draft policy.

Assessment of Ability to pay – We will continue to work with people to ensure their income is maximised by providing advice on available benefits. Where customers are unable to pay their debts in one lump sum the Council will work with the customer to prioritise their repayments. The hierarchy of debts was included within the previous policy and will not be changed. Once the priority debts have been considered a secondary financial assessment will be carried out which is new to the policy. Detail on the secondary assessment is included in Table 2, page 9 of the draft policy.

Enforcement – Whilst the Council will make reasonable efforts to recover debts without enforcement action, if the debt remains unpaid enforcement action will be taken forward. The action taken is explained on page 9 of the draft policy and will not change as a result of the review.

Once the draft Corporate Debt Recovery Policy has been agreed all Debt Recovery Services within the Council will update their policies to reflect the changes agreed.

The Council does not have one IT system for debt collection and therefore it will be difficult for services to automatically understand vulnerability and whether multiple debts are owed to Council Services. The effectiveness of this policy will depend upon services sharing information on a regular basis. A pilot is taking place between

	<p>Council Tax Collection and Adult Services to understand the resources and processes required to ensure the policy works effectively. Further to the completion of the pilot the process for identifying vulnerability will be expanded across other debt collection services, with data sharing agreements put in place as appropriate.</p> <p>It is likely however that the policy supports Financial Exclusion positively. Specifically it supports the lowering of financial exclusion costs, which are not always just economic. Financial Inclusion is also about fairness and social justice. It is not acceptable that the most vulnerable members of society, should face avoidable costs such as:</p> <ul style="list-style-type: none"> - Experiencing the stress – financial and otherwise of over indebtedness which could have been avoided with timely advice and support - Paying additional costs, charges or fees because of lack of information or warnings as to the repercussions of further recovery actions - Risking intimidation and violence to say nothing of the extortionate cost, at the hands of illegal loan sharks, because no advice regarding payment plans or sign posting to affordable borrowing options are available. <p>Improved financial inclusion will not only improve customer satisfaction, but it will also benefit Council staff. In particular, frontline staff, who can be demoralised by conflict with debtors and other customers, and by constantly dealing with them in crisis due to financial problems. Adopting the revised policy which supports the delivery of financial inclusion interventions, may increase the skills and motivation of staff, improving recruitment and retention.</p>					
<p>2. Who are the main people / Protected Characteristics that may be affected by your proposals? (all that apply)</p>	Residents / Service Users		Partners		Stakeholders	
	Staff		Age		Disability	
	Gender Reassignment		Marriage and Civil Partnership		Pregnancy and Maternity	

	Race	Religion or Belief	Sex
	Sexual Orientation	Other	
<p>3. Is the responsibility shared with another directorate, authority or organisation? If so:</p> <ul style="list-style-type: none"> • Who are the partners? • Who has the overall responsibility? • How have they been involved in the assessment? 	<p>This policy has not been developed in isolation. There has been close working with internal debt recovery services and with external agencies such as Harrow Citizens Advice Bureaux (CAB), Harrow Mencap, Harrow Association of Disabled Persons (HAD), Mind in Harrow, Harrow Age UK, The Law Centre, Jobcentre Plus through the Community Reference Group. The policy has also been updated to reflect feedback from consultation.</p> <p>The overall responsibility for the delivery of the Corporate Debt Recovery Policy lies with the Head of Service, Collections and Benefits, Resources Directorate.</p> <p>The responsibility for development, implementation 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. <p>All services are represented on the Corporate Debt Collection Group and have been involved in shaping the draft policy.</p>		

Stage 2: Evidence / Data Collation

4. What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys; complaints etc. Where possible include data on the nine Protected Characteristics.
 (Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)

Age (including carers of young/older people)	<p>Harrow profile: 20 per cent of Harrow's residents are aged under 16 (48,200)¹ whilst this signifies a small percentage change from 2010 estimates (0.7% change), in actual numbers it is an increase of 3,600 young people.</p> <p>65.9 per cent (158,400) of Harrow's population fall within the working age bracket (16 to 64) and 14.1 per cent</p>
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¹ Source: mid-year population estimates 2011

(33,900) of Harrow's residents are 65 years of age and older. The average (median) age in Harrow is approximately 36 years, which ranks Harrow 284th out of 348 local or unitary authorities for age, depicting a younger average than the majority of local authorities².

Council Tax currently have approximately 7,000 to 8,000 debtors and the total level of debt outstanding is £4.1m to the 31.3.13. The total arrears equates to 3.4% of the total Council Tax yield raised annually. As a comparison Council Tax Support arrears to the 31st March, 2013 equate to £863,000 or 10% of the total Council Tax yield raised for this category of tax payer. Even without Council Tax Support coming in this particular sector, which previously received Council Tax Benefit (before the scheme changed to CTS) was already having payment difficulties as highlighted by the higher arrears outstanding, and will no doubt have further challenges trying to pay the higher amounts of Council Tax now demanded of them. We recognise these challenges and have factored in a 70% collection rate against this particular sector as opposed to a 98.5% collection rate for everybody else.

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). Applying this information directly to those cases with rent arrears the data does exist and is explained below:

Tenants with arrears over £300								
Age Groups								
0-15	16-24	25-34	35-44	45-54	55-64	65+	No DoB	DoB held
4	31	81	134	180	73	28	66	527
0.67%							11.06%	88.27%

Do we have any figures for Accounts payable and Adult Services
 The majority of the welfare reforms impact working age households, particularly those families with over 3 children.
 The vulnerability criteria is a new addition to the policy and puts in place additional support for those groups of people who meet the criteria. In relation to the protected characteristic 'age' the criteria captures the following:

² Source: 2011 Census briefing note 3: September 2012; Sue Kaminska

- Elderly persons may be considered vulnerable for the purposes of debt collection. This will be in cases where they are frail, ill and living on a limited income or where they have recently suffered the death of a partner who has previously managed their family finance
 - Families with children may be vulnerable if they have complex needs and are unable to manage their financial affairs effectively without support. Where the family's needs are so complex that they are allocated a Social Worker or lead professional the family would be considered as vulnerable.
- Where a person is highlighted as vulnerable within the debt collection process their case will be looked at individually and the action taken forward will depend on their circumstances.

Harrow profile: 17.3% of Harrow's working age population (16-64) classified themselves as disabled within the 2011-12 period (July to June), a total of 26,600 individuals. This signifies a decrease of 4.6% for the same period in 2010-11. 13,800 (17.3%) are men and 12,900 (17.7%) are women³

This data is currently not available and is unlikely to be able to be captured within the current Council Tax IT system.

Housing Tenants – Arrears over £300

Disability				
Yes	No	Prefer not to say	Rel % held	% Blank
32	94	0	126 21.11%	471 78.89%

People with disability are impacted by the Welfare Reforms and therefore are likely to receive less income as a result of 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

The vulnerability criteria is a new addition to the policy and puts in place additional support for those groups of people who meet the criteria. In relation to the protected characteristic 'Disability' the criteria captures the following groups of people:

- People with physical and/or sensory disability, mental illness, learning disability, autism and serious illness will be considered vulnerable if their disability prevents them from managing their financial affairs effectively and need support.
- Carers who are unable to manage their financial affairs effectively and need support

Disability (including carers of disabled people)

³ Source: Nomis: Annual Population Survey

	Where a person is highlighted as vulnerable within the debt collection process their case will be looked at individually and the action taken forward will depend on their circumstances.															
Gender Reassignment	This data is currently not available and is unlikely to be able to be captured within the current IT systems across all debt collection services															
Marriage / Civil Partnership	This data is currently not available and is unlikely to be able to be captured within the current IT systems across all debt collection services															
Pregnancy and Maternity	This data is currently not available and is unlikely to be able to be captured within the current IT systems across all debt collection services															
Race	<p>Harrow profile: Harrow is one of the most diverse places in the country. At the time of 2001 Census 49.9% of Harrow residents were classified as White British. 2011 figures reveal that the White British category now includes only 30.9% of Harrow's population, 69.1% of residents are therefore classified as belonging to a minority ethnic group⁴ The most significant minority ethnic group, at 26.4% is Asian/Asian British: Indian, ranking Harrow as second in England and Wales for its Indian population. Another significant group is classified as Asian/Asian British: Other Asian, making up 11.3% of residents and ranking Harrow 1st within this classification; this group is largely comprised of Sri Lankan community. All Asian/Asian British groups have increased since 2001.</p> <p>White Other is another group which has grown, from 4.49% in 2001 to 8.2% in 2011. Within this group there are 3,868 residents who were born in Poland and 4,784 residents born in Romania, making it the largest Romanian community within England and Wales⁵. Harrow still has a high Irish born population, ranked 7th in 2011. Whilst Black/African/Caribbean/Black British is not particularly dominant we have the highest number of Kenyan born residents (this can be attributed to a number of migrants from Kenya who are of Asian descent). In relation to the debt collection services this data is not available and unlikely to be able to be captured within the current IT systems across all debt collection services.</p> <p>This data is currently not available and is unlikely to be able to be captured within the current Council Tax IT system.</p> <p>Housing Tenants – Arrears over £300</p> <table border="1"> <tr> <td>Blank</td> <td>81</td> <td>13.57%</td> </tr> <tr> <td>Not disclosed</td> <td>83</td> <td>13.90%</td> </tr> <tr> <td>Held</td> <td>433</td> <td>72.53%</td> </tr> <tr> <td>Total tenants</td> <td>597</td> <td></td> </tr> <tr> <td>Total tenanted properties</td> <td>511</td> <td></td> </tr> </table>	Blank	81	13.57%	Not disclosed	83	13.90%	Held	433	72.53%	Total tenants	597		Total tenanted properties	511	
Blank	81	13.57%														
Not disclosed	83	13.90%														
Held	433	72.53%														
Total tenants	597															
Total tenanted properties	511															

The vulnerability criteria within the policy does capture people with language difficulties where the person does not understand either written or spoken English, especially where they do not have the support from family who can speak or read English. The vulnerability criteria also captures non-European Economic Area (EEA) and refugees who may be considered as vulnerable if they are unable to manage their financial affairs effectively without support.

Where a person is highlighted as vulnerable within the debt collection process their case will be looked at individually and the action taken forward will depend on their circumstances.

Harrow profile: The 2001 Census showed that Harrow had the highest level of religious diversity of any local authority in England and Wales. This means that there is a 63 per cent chance that two people at random would be from different religious groups. We do not yet have comparative data for 2011, but the 2011 Census ranked Harrow 1st for persons of Hindu religion, Jain and Unification Church, 2nd for Zoroastrian and 6th for Jewish. Out of 348 areas in England and Wales Harrow has the 2nd lowest ranking of residents with no religion and 5th lowest for Christians (37.3%). Harrow is ranked 24th for Muslim faith residents, who account for 12.5% of the population⁶

Housing Tenants – Arrears over £300

Agnostic	Baha’i	Buddist	Christian	Hindu	Humanist	Jain	Judaism	Islam
14	0	0	7	9	0	0	1	32
Rastafarian	Sikh	Zoro	Other	Prefer not to say	Total Rel/ Beliefs	Blank		
0	0	0	0	6 1.01%	63 10.55%	528 88.44%		

Where a person is highlighted as vulnerable within the debt collection process their case will be looked at individually and the action taken forward will depend on their circumstances.

Of Harrow’s total population (240,500), 118,900 (49.4%) are male and 121,600 (50.6%) are female⁷

This information is not currently available and unlikely to be able to be captured within the current Council Tax IT system

Housing Tenants – Arrears over £300.

Sex/Gender	Person data			Equalities data		
	Male	Female	None	Gender Reassignment	Prefer not to say	
	192	404 99.83%	1 0.17%	0	0	597

Religion and Belief

Sex / Gender

Where a person is highlighted as vulnerable within the debt collection process their case will be looked at individually and the action taken forward will depend on their circumstances.

Harrow profile: The 2011 census did not have a question on sexual orientation; however 306 persons declared living in a same sex couple, an increase of 84 couples. It is estimated that 6% of the UK population are lesbian, gay and bisexual (LGB), which would equate to approximately 14,430 of our residents belonging to the LGB community

Since their inception, a total 121 Civil Partnership ceremonies have taken place in Harrow.

This information is not currently available and is unlikely to be able to be captured within the current IT systems across the majority of debt collection services.

Housing Tenants – Arrears over £300

Bisexual	Man	Woman	Heterosexual	Other	Prefer not to say/not disclosed	% Held	% Blank
0	1	0	119	0	4	120 20.10%	473 79.23%

Harrow profile: In comparison to other areas Harrow was relatively less deprived in 2010 than it was in 2007. It is now ranked 203rd out of 354 boroughs in England (where 1 is the most deprived) compared with x in 2007. In London, Harrow retains its position as 7th least deprived borough (out of 33). The indicator showing the most deprivation in Harrow is Barriers to Housing where it is ranked 54th most deprived nationally.

Sexual Orientation

Socio Economic

5. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?
List the Title of reports / documents and websites here.

The following information has helped to inform this EqIA:
The Corporate Debt Collection Policy 2009
Council Tax Recovery Policy
Identify titles of both the Sundry Debts and Housing policies
Publishing Equalities Information Meeting the Public Sector Duty January 2013
Harrow Council Our Harrow Our Story – 2013 -
http://www.harrow.gov.uk/info/200041/equality_and_diversity/863/public_sector_equality_duty

Stage 3: Assessing Potential Disproportionate Impact

6. Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?

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

YES - If there is a risk of disproportionate adverse Impact on any **ONE** of the Protected Characteristics, continue with the rest of the template.

§ **Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA

§ It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

NO - If you have ticked 'No' to all of the above, then go to **Stage 6**

§ Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7

Stage 4: Collating Additional data / Evidence

7. What additional data / evidence have you considered to further assess the potential disproportionate impact of your proposals? (include this evidence, including any data, statistics, titles of documents and website links here)

8. What consultation have you undertaken on your proposals?

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).
The consultation was held with	Consultation booklet and survey	The feedback from the	The consultation feedback has been

<p>the following:</p> <ul style="list-style-type: none"> - Council Tax payers and Council Tax Support claimants - Council Tenants - Voluntary Sector - Staff from Council Debt Collection Services 	<p>that could be completed:</p> <ul style="list-style-type: none"> - Hard copy and free post - Web - Telephone - Email <p>Face to face through workshop</p>	<p>consultation influenced the development of the policy. The policy provides some additional support, not previously provided, to ensure that people who are seen as vulnerable in relation to the criteria within the policy will ensure that their circumstances are looked at before progressing with action.</p> <p>In relation to the collection of debt there was some feedback from the consultation that the Council's internal prioritisation of debt could put people at risk of action against debts owed to external organisations and is not specific to any protected characteristic.</p>	<p>used to update the draft policy which is being put to Members for decision at January 2014 Cabinet.</p> <p>The Council has a responsibility to all residents to collect monies owed to fund Council Services. However where an officer identifies that a person has a multitude of debts they will signpost to an advice and support organisation who will be able to give independent support.</p>
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Stage 5: Assessing Impact and Analysis

9. What does your evidence 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	Adverse	Positive	<p>Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.</p> <p style="color: red;">Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9</p>	<p>What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 7)</p>
Age (including carers of young/older)				

people)				
Disability (including carers of disabled people)				
Gender Reassignment				
Marriage and Civil Partnership				
Pregnancy and Maternity				
Race				
Religion or Belief				
Sex				
Sexual orientation				
10. Cumulative Impact – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic? If yes, which Protected Characteristics could be affected and what is the potential impact?	Yes		No	
10a. Any Other Impact – Considering what else is happening within the	Yes		No	

Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion?

If yes, what is the potential impact and how likely is to happen?

11. Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic 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) available on [Harrow HUB/Equalities and Diversity/Policies and Legislation](#)

	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 6: Decision

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

Outcome 1 – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.	
Outcome 2 – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA. <i>List the actions you propose to take to address this in the Improvement Action Plan at Stage 7</i>	
Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. In this case, the justification needs to be included in the EqIA 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 EqIA is assessed as outcome 3 or you have ticked 'yes' in Q11 , explain your justification with full reasoning to continue with your proposals.	

Stage 7: 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 EqIA.					
Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan

Whilst the vulnerability criteria is an addition to the policy its effectiveness is dependent on services sharing information regularly in relation to both vulnerability and debts. If this information isn't shared the vulnerable groups could be at risk.	A pilot project is currently taking place between Council Tax Recovery and Adult Services to understand the resources required and processes that need to be put in place to identify vulnerability within the debt collection process. Once this pilot is complete the learning will be shared with all debt collection services.			Fern Silverio Paul Young	
There may be instances where vulnerability is not highlighted as it is not known by any Council Services.	The Council is working closely with external agencies to help ensure these instances are minimised.			Fern Silverio Linda D'Souza Toni Burke Donna Edwards	

Stage 8 - Monitoring

The full impact of the proposals may only be known after they 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? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	The Corporate Debt Recovery Policy will be monitored through the Welfare Reform Governance structure which includes both internal groups and the multi-agency Community Reference Group
15. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	The results of the monitoring will be reported through the Welfare Reform Governance structure

16. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.	None
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Stage 9: Public Sector Equality Duty

17. How do your proposals contribute towards 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
The Corporate Debt Recovery has been developed to ensure a fair and consistent approach to debt across the Local Authority. Vulnerability criteria has been put in place to help identify the most financially vulnerable and ensure their individual circumstances are taken into account when considering further debt recovery action	<p>The policy covers are groups of people who may find themselves in debt and provides a fair and consistent approach.</p> <p>The vulnerability criteria captures the most financially vulnerable groups and this criteria has been developed through consultation</p>	<p>All protected groups could potentially find themselves in debt at some time to the Council.</p> <p>The development of the policy ensures a fair and consistent approach to debt collection for all groups of people.</p> <p>The vulnerability criteria has been developed through partnership working and consultation and acknowledges that the criteria is not exhaustive and if a persons individual circumstances are highlighted consideration will be given.</p>

Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)

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

18. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	EqIA Quality Assurance Group
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Signed: (Lead officer completing EqIA)	Fern Silverio	Signed: (Chair of DETG)	
Date:	29 th November, 2013	Date:	
Date EqIA presented at the EqIA Quality Assurance Group		Signature of ETG Chair	