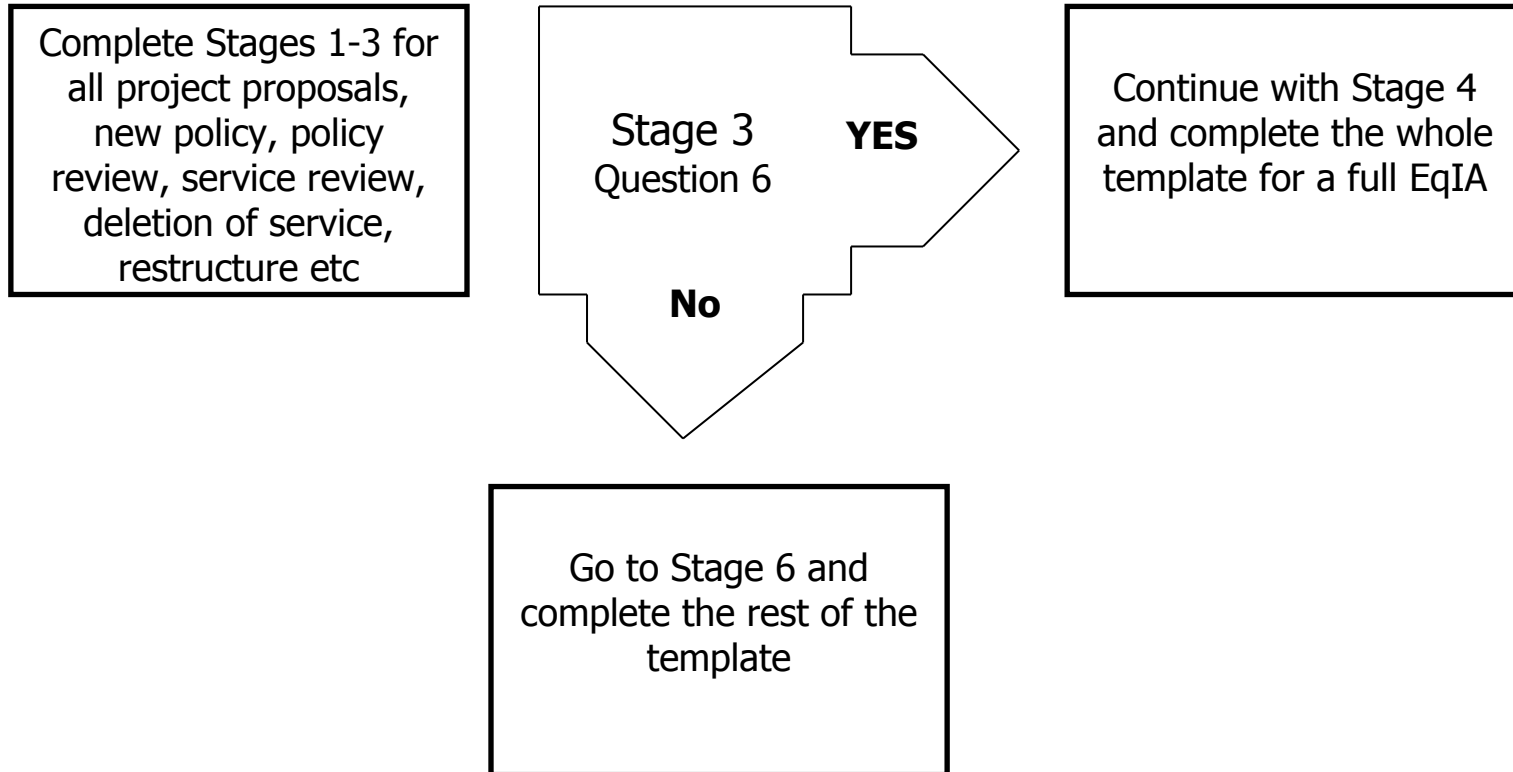# Equality Impact Assessment Template

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.

Complete Stages 1-3 for all project proposals, new policy, policy review, service review, deletion of service, restructure etc

Stage 3
Question 6

YES

No

Continue with Stage 4 and complete the whole template for a full EqIA

Go to Stage 6 and complete the rest of the 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:	Implementation of Risk Based Verification (RBV) and Electronic Claims Policies for Housing Benefit and Council Tax Support Assessments
Directorate / Service responsible:	Collections and Housing Benefits, Resources Directorate
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:	Jennifer Townsley, Service Manager, Housing Benefits Ben Jones, Senior Project Manager, Customer Services
Date of assessment:	2nd January 2014

Stage 1: Overview

1. What are you trying to do? (Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)	The implementation of a Risk Based Verification (RBV) and Electronic Claims policies for Housing Benefit and Council Tax Support Assessments. The RBV policy puts in place an IT system that reduces the need for low risk Housing Benefit and Council Tax Support applicants/claimants to provide original documents to support their claim. The policy will allow targeting of resources from low risk cases to those cases that are at higher risk of potential fraud and error. It is not possible, in advance of the policy being implemented, to identify the groups of people that fall within low, medium or high risk categories. Implementation of the policy will be monitored.

	The Electronic Claims policy enables Housing Benefit and Council Tax Support claimants to apply and notify a change of circumstance electronically. This change in process supports identification of savings within the Resources Directorate within the Channel Migration strategy. Both policies will apply to all new claims initially and will extend to change of circumstances. The Department of Work and Pensions (DWP) permits RBV as a method of verification in Circular HB/CTB S11/2011. Electronic claims are allowed under legislation as detailed in DWP Circular A18/2006 and the Direction of the Acting Head of Paid Services. The implementation of these policies will result in a reduction in processes and expensive channels for customers to contact the Benefit service, and therefore allow savings to be realised within the Resources Directorate. Whilst implementation will cost £15,000 to the Local Authority the savings will be equivalent to 1.5 FTE within the Resources Directorate resulting from a reduction in customer contact and requests for information.					
2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✔ all that apply)	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			
3. Is the responsibility shared with another directorate, authority or organisation? If so: • Who are the partners? • Who has the overall responsibility? • How have they been involved in the assessment?	Housing Benefit is administered by the Local Authority on behalf of DWP and therefore is adhering to DWP guidance in respect to delivery which will reduce any risk to the subsidy claim. The implementation of the RBV and Electronic Claims policies are the responsibility of the Resources Directorate.					

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)	**Harrow profile**: 20 per cent of Harrow's residents are aged under 16 (48,200). 65.9 per cent (158,400) of Harrow's population fall within the working age bracket (16 to 64) and 14.1 per cent (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 authorities.
	The Housing Benefit /Council Tax Support caseload is made up of 15,032 (73%) working age households and 5,652 (27%) pensioner.
	An average of 5,500 new claims are made every year of which 85% are made by working age households, and 15% by pensioners.
	It is not known which RBV category this group will fall within, nor is there is any evidence to indicate that people within this protected characteristic will be detrimentally impacted by the introduction of RBV or electronic claiming.
	Risk Based Verification (RBV)
	As pensioners are less likely to have a change in their circumstance that results in the need to make a new claim, they are less likely to be affected by the introduction of RBV
	The implementation of this policy will have a positive impact for low risk Housing Benefit and Council Tax Support applicants/claimants as they will be required to produce less evidence in support of their claim.
	Medium risk applicants will remain the same.
	High risk applicants/claimants will be required to produce the same information as they currently produce in

	support of their claim however the authority will carry out additional checks such as credit reference to determine any discrepancies to the application form.
	Electronic claims
	Claimants may find the introduction of online claiming beneficial as it offers additional channels for contact and reduces the need to attend Council offices to submit a claim/notify the council of a change in circumstance.
	Analysis of Experian segmentation for the borough and the Housing Benefit caseload has been carried out to identify any key groups who are more likely to be detrimentally impacted. The Experian segmentation is not broken down into protected characteristics. It was found that Segments E and H were less likely to use the internet and therefore may find it harder to access online benefit claims. Segments C and G do use the internet, but are not frequently for online services and as such will require additional focus to ensure they have equal access to online claims. Analysis is held at appendix A.
	Liaison with stakeholders will be carried out to ensure that agencies are in a position to support clients in making an application on line. This will include identification of and signposting to IT literacy training for residents to help them develop the required skills to transact online.
	Assistance will be available in Access Harrow to support residents using the self-service terminals.
	A stock of hard copy claim forms will be retained for any circumstances that cannot be addressed by the above methods.
Disability (including carers of disabled people)	**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 women
	Housing Benefit/Council Tax Support claimants in receipt of Disability Living Allowance, Severe Disablement Allowance or Employment Support Allowance (Support Component) are classified disabled under the regulations. 4,826 households fall under this category.
	It is not known which RBV category this group will fall within, nor is there is any evidence to indicate that people within this protected characteristic will be detrimentally impacted by the introduction of RBV or electronic claiming.

	Risk Based Verification The implementation of this policy will have a positive impact for low risk Housing Benefit and Council Tax Support applicants/claimants as they will be required to produce less evidence in support of their claim. Medium risk applicants will remain the same. High risk applicants/claimants will be required to produce the same information as they currently produce in support of their claim however the authority will carry out additional checks such as credit reference to determine any discrepancies to the application form. **Electronic claims** Claimants may find the introduction of online claiming beneficial as it offers additional channels for contact and reduces the need to attend Council offices to submit a claim/notify the council of a change in circumstance. Analysis of Experian segmentation for the borough and the Housing Benefit caseload has been carried out to identify any key groups who are more likely to be detrimentally impacted. The Experian segmentation is not broken down into protected characteristics. It was found that Segments E and H were less likely to use the internet and therefore may find it harder to access online benefit claims. Segments C and G do use the internet, but are not frequently for online services and as such will require additional focus to ensure they have equal access to online claims. Analysis is held at appendix A. Liaison with stakeholders will be carried out to ensure that agencies are in a position to support clients in making an application on line. This will include identification of and signposting to IT literacy training for residents to help them develop the required skills to transact online. Assistance will be available in Access Harrow to support residents using the self-service terminals. A stock of hard copy claim forms will be retained for any circumstances that cannot be addressed by the above methods.
Gender Reassignment	This data is not currently available for the Harrow profile or claimants of Council Tax Support and Housing Benefit.

It is not known which RBV category this group will fall within, nor is there is any evidence to indicate that people within this protected characteristic will be detrimentally impacted by the introduction of RBV or electronic claiming.

Risk Based Verification

The implementation of this policy will have a positive impact for low risk Housing Benefit and Council Tax Support applicants/claimants as they will be required to produce less evidence in support of their claim.

Medium risk applicants will remain the same.

High risk applicants/claimants will be required to produce the same information as they currently produce in support of their claim however the authority will carry out additional checks such as credit reference to determine any discrepancies to the application form.

Electronic claims

Claimants may find the introduction of online claiming beneficial as it offers additional channels for contact and reduces the need to attend Council offices to submit a claim/notify the council of a change in circumstance.

Analysis of Experian segmentation for the borough and the Housing Benefit caseload has been carried out to identify any key groups who are more likely to be detrimentally impacted. The Experian segmentation is not broken down into protected characteristics. It was found that Segments E and H were less likely to use the internet and therefore may find it harder to access online benefit claims. Segments C and G do use the internet, but are not frequently for online services and as such will require additional focus to ensure they have equal access to online claims. Analysis is held at appendix A.

Liaison with stakeholders will be carried out to ensure that agencies are in a position to support clients in making an application on line. This will include identification of and signposting to IT literacy training for residents to help them develop the required skills to transact online.

Assistance will be available in Access Harrow to support residents using the self-service terminals.

	A stock of hard copy claim forms will be retained for any circumstances that cannot be addressed by the above methods.
Marriage / Civil Partnership	This data is not currently available for the Harrow profile or claimants of Council Tax Support and Housing Benefit It is not known which RBV category this group will fall within, nor is there is any evidence to indicate that people within this protected characteristic will be detrimentally impacted by the introduction of RBV or electronic claiming. Risk Based Verification The implementation of this policy will have a positive impact for low risk Housing Benefit and Council Tax Support applicants/claimants as they will be required to produce less evidence in support of their claim. Medium risk applicants will remain the same. High risk applicants/claimants will be required to produce the same information as they currently produce in support of their claim however the authority will carry out additional checks such as credit reference to determine any discrepancies to the application form. Electronic claims Claimants may find the introduction of online claiming beneficial as it offers additional channels for contact and reduces the need to attend Council offices to submit a claim/notify the council of a change in circumstance. Analysis of Experian segmentation for the borough and the Housing Benefit caseload has been carried out to identify any key groups who are more likely to be detrimentally impacted. The Experian segmentation is not broken down into protected characteristics. It was found that Segments E and H were less likely to use the internet and therefore may find it harder to access online benefit claims. Segments C and G do use the internet, but are not frequently for online services and as such will require additional focus to ensure they have equal access to online claims. Analysis is held at appendix A.

	Liaison with stakeholders will be carried out to ensure that agencies are in a position to support clients in making an application on line. This will include identification of and signposting to IT literacy training for residents to help them develop the required skills to transact online.

Assistance will be available in Access Harrow to support residents using the self-service terminals.

A stock of hard copy claim forms will be retained for any circumstances that cannot be addressed by the above methods. |
| Pregnancy and Maternity | This data is not currently available for the Harrow profile or claimants of Council Tax Support and Housing Benefit

It is not known which RBV category this group will fall within, nor is there is any evidence to indicate that people within this protected characteristic will be detrimentally impacted by the introduction of RBV or electronic claiming.

Risk Based Verification

The implementation of this policy will have a positive impact for low risk Housing Benefit and Council Tax Support applicants/claimants as they will be required to produce less evidence in support of their claim.

Medium risk applicants will remain the same.

High risk applicants/claimants will be required to produce the same information as they currently produce in support of their claim however the authority will carry out additional checks such as credit reference to determine any discrepancies to the application form.

Electronic claims

Claimants may find the introduction of online claiming beneficial as it offers additional channels for contact and reduces the need to attend Council offices to submit a claim/notify the council of a change in circumstance.

Analysis of Experian segmentation for the borough and the Housing Benefit caseload has been carried out to identify any key groups who are more likely to be detrimentally impacted. The Experian segmentation |

	is not broken down into protected characteristics. It was found that Segments E and H were less likely to use the internet and therefore may find it harder to access online benefit claims. Segments C and G do use the internet, but are not frequently for online services and as such will require additional focus to ensure they have equal access to online claims. Analysis is held at appendix A. Liaison with stakeholders will be carried out to ensure that agencies are in a position to support clients in making an application on line. This will include identification of and signposting to IT literacy training for residents to help them develop the required skills to transact online. Assistance will be available in Access Harrow to support residents using the self-service terminals. A stock of hard copy claim forms will be retained for any circumstances that cannot be addressed by the above methods.
Race	**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 group. 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. 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 Wales. 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). Of the 11,989 (58%) of the Housing Benefit/Council Tax Support caseload that have provided ethnicity data, 43% have classified themselves as White or White British and 40% as Asian or Asian British. The highest groups within these classifications are White British (20%) and Asian or British from any other background (13%).

It is not known which RBV category this group will fall within, nor is there is any evidence to indicate that people within this protected characteristic will be detrimentally impacted by the introduction of RBV or electronic claiming.

Risk Based Verification

The implementation of this policy will have a positive impact for low risk Housing Benefit and Council Tax Support applicants/claimants as they will be required to produce less evidence in support of their claim.

Medium risk applicants will remain the same.

High risk applicants/claimants will be required to produce the same information as they currently produce in support of their claim however the authority will carry out additional checks such as credit reference to determine any discrepancies to the application form.

Electronic claims

Claimants may find the introduction of online claiming beneficial as it offers additional channels for contact and reduces the need to attend Council offices to submit a claim/notify the council of a change in circumstance.

Analysis of Experian segmentation for the borough and the Housing Benefit caseload has been carried out to identify any key groups who are more likely to be detrimentally impacted. The Experian segmentation is not broken down into protected characteristics. It was found that Segments E and H were less likely to use the internet and therefore may find it harder to access online benefit claims. Segments C and G do use the internet, but are not frequently for online services and as such will require additional focus to ensure they have equal access to online claims. Analysis is held at appendix A.

Liaison with stakeholders will be carried out to ensure that agencies are in a position to support clients in making an application on line. This will include identification of and signposting to IT literacy training for residents to help them develop the required skills to transact online.

Assistance will be available in Access Harrow to support residents using the self-service terminals.

	A stock of hard copy claim forms will be retained for any circumstances that cannot be addressed by the above methods.
Religion and Belief	**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 population

This data is not currently available for claimants of Council Tax Support and Housing Benefit

It is not known which RBV category this group will fall within, nor is there is any evidence to indicate that people within this protected characteristic will be detrimentally impacted by the introduction of RBV or electronic claiming.

Risk Based Verification

The implementation of this policy will have a positive impact for low risk Housing Benefit and Council Tax Support applicants/claimants as they will be required to produce less evidence in support of their claim.

Medium risk applicants will remain the same.

High risk applicants/claimants will be required to produce the same information as they currently produce in support of their claim however the authority will carry out additional checks such as credit reference to determine any discrepancies to the application form.

Electronic claims

Claimants may find the introduction of online claiming beneficial as it offers additional channels for contact and reduces the need to attend Council offices to submit a claim/notify the council of a change in circumstance. |

	Analysis of Experian segmentation for the borough and the Housing Benefit caseload has been carried out to identify any key groups who are more likely to be detrimentally impacted. The Experian segmentation is not broken down into protected characteristics. It was found that Segments E and H were less likely to use the internet and therefore may find it harder to access online benefit claims. Segments C and G do use the internet, but are not frequently for online services and as such will require additional focus to ensure they have equal access to online claims. Analysis is held at appendix A.

Liaison with stakeholders will be carried out to ensure that agencies are in a position to support clients in making an application on line. This will include identification of and signposting to IT literacy training for residents to help them develop the required skills to transact online.

Assistance will be available in Access Harrow to support residents using the self-service terminals.

A stock of hard copy claim forms will be retained for any circumstances that cannot be addressed by the above methods. |
| Sex / Gender | **Harrow profile:** Of Harrow's total population (240,500), 118,900 (49.4%) are male and 121,600 (50.6%) are female

Within the Housing Benefit and Council Tax Support caseload, 44% are male and 56% are female.

It is not known which RBV category this group will fall within, nor is there is any evidence to indicate that people within this protected characteristic will be detrimentally impacted by the introduction of RBV or electronic claiming.

Risk Based Verification

The implementation of this policy will have a positive impact for low risk Housing Benefit and Council Tax Support applicants/claimants as they will be required to produce less evidence in support of their claim.

Medium risk applicants will remain the same.

High risk applicants/claimants will be required to produce the same information as they currently produce in support of their claim however the authority will carry out additional checks such as credit reference to |

	determine any discrepancies to the application form.
	Electronic claims
	Claimants may find the introduction of online claiming beneficial as it offers additional channels for contact and reduces the need to attend Council offices to submit a claim/notify the council of a change in circumstance.
	Analysis of Experian segmentation for the borough and the Housing Benefit caseload has been carried out to identify any key groups who are more likely to be detrimentally impacted. The Experian segmentation is not broken down into protected characteristics. It was found that Segments E and H were less likely to use the internet and therefore may find it harder to access online benefit claims. Segments C and G do use the internet, but are not frequently for online services and as such will require additional focus to ensure they have equal access to online claims. Analysis is held at appendix A.
	Liaison with stakeholders will be carried out to ensure that agencies are in a position to support clients in making an application on line. This will include identification of and signposting to IT literacy training for residents to help them develop the required skills to transact online.
	Assistance will be available in Access Harrow to support residents using the self-service terminals.
	A stock of hard copy claim forms will be retained for any circumstances that cannot be addressed by the above methods.
Sexual Orientation	**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
	This data is not currently available for claimants of Council Tax Support and Housing Benefit
	It is not known which RBV category this group will fall within, nor is there is any evidence to indicate that people within this protected characteristic will be detrimentally impacted by the introduction of RBV or electronic claiming.

Risk Based Verification

The implementation of this policy will have a positive impact for low risk Housing Benefit and Council Tax Support applicants/claimants as they will be required to produce less evidence in support of their claim.

Medium risk applicants will remain the same.

High risk applicants/claimants will be required to produce the same information as they currently produce in support of their claim however the authority will carry out additional checks such as credit reference to determine any discrepancies to the application form.

Electronic claims

Claimants may find the introduction of online claiming beneficial as it offers additional channels for contact and reduces the need to attend Council offices to submit a claim/notify the council of a change in circumstance.

Analysis of Experian segmentation for the borough and the Housing Benefit caseload has been carried out to identify any key groups who are more likely to be detrimentally impacted. The Experian segmentation is not broken down into protected characteristics. It was found that Segments E and H were less likely to use the internet and therefore may find it harder to access online benefit claims. Segments C and G do use the internet, but are not frequently for online services and as such will require additional focus to ensure they have equal access to online claims. Analysis is held at appendix A.

Liaison with stakeholders will be carried out to ensure that agencies are in a position to support clients in making an application on line. This will include identification of and signposting to IT literacy training for residents to help them develop the required skills to transact online.

Assistance will be available in Access Harrow to support residents using the self-service terminals.

A stock of hard copy claim forms will be retained for any circumstances that cannot be addressed by the above methods.

	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). 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.
	Claimants of Housing Benefit and Council Tax Support will by nature of the service be in low socio economic groups as they are in receipt of means tested benefits.
	Risk Based Verification
	The groups of people that will fall within the different categories under risk based verification are unknown.
	The implementation of this policy will have a positive impact for low risk Housing Benefit and Council Tax Support applicants/claimants as they will be required to produce less evidence in support of their claim.
	Medium risk applicants will remain the same.
Socio Economic	High risk applicants/claimants will be required to produce the same information as they currently produce in support of their claim however the authority will carry out additional checks such as credit reference to determine any discrepancies to the application form.
	Electronic claims
	Claimants may find the introduction of online claiming beneficial as it offers additional channels for contact and reduces the need to attend Council offices to submit a claim/notify the council of a change in circumstance.
	Analysis of Experian segmentation for the borough and the Housing Benefit caseload has been carried out to identify any key groups who are more likely to be detrimentally impacted. The Experian segmentation is not broken down into protected characteristics. It was found that Segments E and H were less likely to use the internet and therefore may find it harder to access online benefit claims. Segments C and G do use the internet, but are not frequently for online services and as such will require additional focus to ensure they have equal access to online claims. Analysis is held at appendix A.
	Liaison with stakeholders will be carried out to ensure that agencies are in a position to support clients in

	making an application on line. This will include identification of and signposting to IT literacy training for residents to help them develop the required skills to transact online. Assistance will be available in Access Harrow to support residents using the self-service terminals. A stock of hard copy claim forms will be retained for any circumstances that cannot be addressed by the above methods.	

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:

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

Housing Benefit and Council Tax Support data system

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	✓	✓	✓	✓	✓	✓	✓	✓	✓

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).

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 ✓	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur. Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9	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)
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 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?	Yes		No	

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. *List the actions you propose to take to address this in the Improvement Action Plan at Stage 7*	
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

Ensure all groups within the protected characteristics have access to the appropriate support to enable them to transact electronically	Planned publicity campaign, liaison with voluntary & community sector, working in partnership with internal services such as Housing and Childrens as well as external Housing Associations. Furthermore access to self-serve terminals with floating support will be made available and IT literacy training will be identified and publicised. A stock of hard copy forms will be retained should a resident be in the unforeseen position where any of above are not sufficient to enable them to transact online	Liaison with stakeholders to ensure no groups are prevented from accessing Housing Benefit/Council Tax Support	April 2015	Fern Silverio/Jenny Townsley	
Feedback has been provided that for residents experiencing mental health problems or those for whom English is not their first language, this may have detrimental impacts.	Currently Access Harrow will continue to provide the same level of support to residents, including those experiencing mental health problems or where English is not their first language, plus the implementation of additional PC terminals in the one stop shop with floating support. It is expected that for some residents within these groups, the implementation of electronic claims will be positive as they will be able to access services remotely, potentially from home, and with the support of friends/family where this is currently relied upon.				
It is unknown whether any specific groups within the protected characteristics will fall	Monitoring will be carried out to identify whether any groups within the protected characteristics fall within specific categories and if the need arises	Performance measure		Fern Silverio/Jenny Townsley	

within the low, medium and high risk categories within the Risk Based Verification Policy	mitigations will be put in place.				

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? *(Also Include in Improvement Action Plan at Stage 7)*	Random sampling will be employed to ensure that cases from the low and high risk categories are treated as medium risk thus requiring to test and refine the software assumptions. A baseline will be set against which the effectiveness of the RBV propensity modelling software will be monitored monthly. Monitoring will include the split of cases by per cent across each risk category and the levels of fraud and error detected in each. The Housing Benefit and Council Tax Support caseload will be monitored to identify any changes in claim volumes following the implementation of electronic claims.
15. How will the results of any monitoring be analysed, reported and publicised? *(Also Include in Improvement Action Plan at Stage 7)*	Outcomes of the monitoring activity will be reported to the Housing Benefit Service Manager.
16. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.	No

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 implementation of the automated system would remove human intervention at the first point of claim and allows an automated risk assessment to target high risk claims. Electronic claiming provides a new channel of access to the Housing Benefit and Council Tax Support service	Communications will be carried out with the relevant stakeholders.	Process will be in place to ensure public resources are targeted appropriately reducing the risk of fraud.

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?			
Signed: (Lead officer completing EqIA)	Fern Silverio	Signed: (Chair of DETG)	Alex Dewsnap
Date:	10/3/2015	Date:	17/3/2015
Date EqIA presented at the EqIA Quality Assurance Group		Signature of ETG Chair	