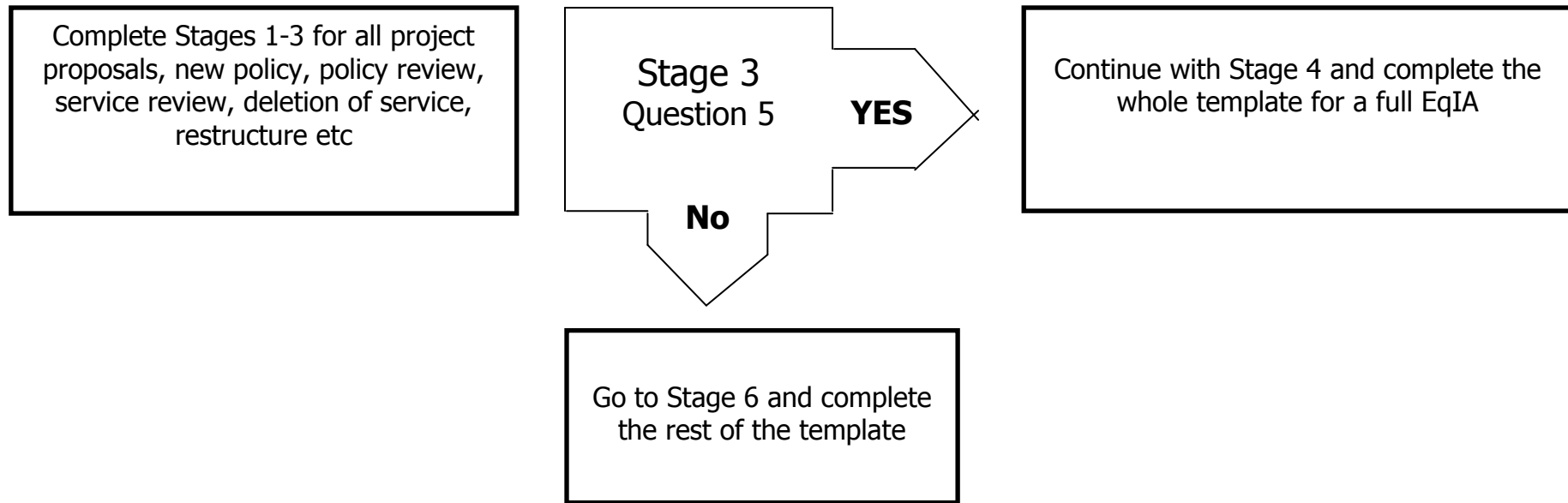


Equality Impact Assessment Template

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



- In order to complete this assessment, it is important that you have read the Corporate Guidelines on EqIAs and preferably completed the EqIA E-learning Module.
- You are also encouraged to refer to the EqIA Template with Guidance Notes to assist you in completing this template.
- SIGN OFF: All EqIAs need to be signed off by your Directorate Equality Task Groups.
- Legal will NOT accept any report without a fully completed, Quality Assured and signed off EqIA.
- The EqIA Guidance, Template and sign off process is available on the Hub under Equality and Diversity

Equality Impact Assessment (EqIA) Template

Type of Decision: Tick ✓	✓	Cabinet		Portfolio Holder		Other (explain)
Date decision to be taken:	17 th November 2016					
Value of savings to be made (if applicable):						
Title of Project:	Procurement for provision of Enforcement Agent Services for the recovery of Council Tax, Business Rates, Parking Enforcement (Penalty Charge Notices{PCN}), Sundry Debt and Overpaid Housing Benefit					
Directorate / Service responsible:	Commercial & Resources					
Name and job title of Lead Officer:	Fern Silverio					
Name & contact details of the other persons involved in the assessment:	<p>Lynn Allaker Revenues Service Manager- 020 8424 1920 (ext 2920) email: lynn.allaker@harrow.gov.uk</p> <p>Adeel Rajput Commercial Business Officer – 020 8416 8686 (ext 8686) email: Adeel.rajput@harrow.gov.uk</p> <p>Richard Palmer – Principal Court Officer – 020 8424 1155 (ext 2155) email: Richard.palmer@harrow.gov.uk</p> <p>Carlie Hurley – Senior Enforcement & Support Officer Parking – 020 8416 8350 (ext 8350) email: carlie.hurley@harrow.gov.uk</p>					
Date of assessment (including review dates):						
Stage 1: Overview						
<p>1. What are you trying to do?</p> <p>(Explain your proposals here 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 primary objective is the procurement of 2 companies to provide Enforcement Agent services for the collection of Council Tax, Business Rates, Parking Penalty Charge Notices, Other Sundry Debts and Overpaid Housing Benefit.</p> <p>The contract is for a three year period with an option to extend for a further two years at its discretion subject to satisfactory performance. The contact commencement date is 1st October 2017.</p> <p>This is a re tender for two service providers as this is a current method of collection.</p>					

These proposals do not involve any changes in collection policy, vulnerability definition or any changes to the way in which debts are passed to the Enforcement Agent for collection.

London Borough of Harrow is an outer-London Borough with just over 90,000 Council Tax and 5,500 Business Rate properties. In 2016-2017, the average Council Tax (Band D) is £1559.61. Harrow collects £132m in Council Tax, £52m in business rates and £8.2m in Parking PCN income yearly.

Annually, the Council expects to obtain 13,000 Liability Orders, of which:

- 12,000 Council Tax
- 1,000 Business Rates

On average the Council issues 9,500 Council Tax and 850 Business Rates Liability Orders to Enforcement Agents annually.

The Council also takes committal proceedings and in this respect expects to issue some 40-100 warrants of arrest per year [mostly without bail]

Regarding Unpaid Penalty Charges under the RTA and TMA, the Council issues over approximately 155,000 Penalty Charge Notices (PCN's) resulting in some 15,000 warrants being issued for enforcement yearly.

The DWP's real time information initiative (RTI) has also meant that housing benefit overpayment cases have increased significantly over the past two years. It is expected that approximately 500-1000 cases a year will be issued to contractors with an individual average monetary value of £500.

The systems used do not hold equality data and so it is not possible to run any analysis reports to see debts where the debtor has a protected characteristic have been sent to enforcement agents.

2. Who are the main groups / Protected Characteristics that may be affected by your proposals? (✓ all that	Residents / Service Users	✓	Partners		Stakeholders	
	Staff		Age	✓	Disability	✓

apply)	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>Overall responsibility will remain with Fern Silverio as Head of Collections and Benefits as the Contract Manager however Access Harrow and our partners Northgate Public Services will be impacted as users of the contract.</p> <p>Whilst this contract is expected to be a corporate one, it is not anticipated that there will be many sundry debt cases to action and for tender purposes should assume no more than 100 such cases per year.</p>					

Stage 2: Evidence & Data Analysis

4. What evidence is available to assess the potential impact of your proposals? 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, press reports, letters from residents and complaints etc. Where possible include data on the nine Protected Characteristics.

(Where you have gaps (data is not available/being collated for any Protected Characteristic), you should include this as an action to address in your Improvement Action Plan at Stage 6)

Protected Characteristic	Evidence	Analysis & Impact
Age (including carers of young/older people)	<p>Sources: 2015 ONS Mid-Year Population Estimates Demographic Briefing Note August 2016 & 2011-13 Vitality Profile</p> <p>36,950 (14.9%) of the population are aged 65 or over. All pensioner households were 18% or 15,083.</p> <p>159,400 (64.5%) are within the working age group defined as 16-64 years old. This has reduced slightly</p>	<p>Neither Council Tax nor Business Rates are calculated based on age and the records do not hold or show this information.</p> <p>Under 18s are not liable for Council Tax but may be indirectly affected as part of the household. There are 62,030 of the population between 0 – 19 years of age. However where the only residents are under 18 an</p>

from the 2011-13 vitality profile where the figure was 65.7%.

In 2011-13 there were 36.3% or 30,660 households with dependent children which was substantially higher than the London and England average. Lone Parent households accounted for 5,560 of these.

There are 22.6% or 19,008 single person households in the borough of which 47% or 8,985 were residents over 65.

142 clients age 18 to 64 were receiving care outside of the borough. The number of adults receiving care has remained constant with an increase of just 0.8% compared to March 2009.

exemption can be claimed.

The corporate vulnerability policy does not specify age as a vulnerability but does cover Elderly people, Families with children, young people leaving care and carers.

Under Council Tax regulations, subject to certain criteria, if a property is left empty due to either receiving or providing care, a full exemption can be applied so these council tax payers would not be affected.

Where the carer is resident in the property, subject to certain criteria, a 25% discount can be awarded. As at 1st October 2016 there are 66 households in receipt of this discount.

Staff and any Enforcement Agents are expected to comply with the vulnerability policy and some services have checkpoints in place before referral to EA's.

Figures as at 1st August 2016 show that 5988 of the Council Tax Support recipients are pensioners and 3675 are on pass ported benefits with no non-dependants and so on full CTS so would not be impacted by this procurement. This represents nearly 41% of the pensioner households.

There is a historic scheme under concessionary travel which allowed more flexibility for older persons to park and travel subject to certain regulations which may result in them being less likely to receive a PCN and so less likely to be impacted by this procurement in the event of non-payment.

		<p>The calculation of Housing Benefit is set by regulation and has different applicable amounts for older people and households with young children. There are specific rules around carers which limit the impact live in carers may have on any entitlement which may result in them less likely in having an overpayment and being impacted by this procurement.</p>
<p>Disability (including carers of disabled people)</p>	<p>Sources : 2011-13 Vitality Profile Income Deprivation 2015 . Harrow is 277th out of 326 nationally and 31 out of 33 London Boroughs for Health Deprivation and Disability which measures risk of premature death and the impairment of quality of live through poor physical or mental health.</p>	<p>Council Tax, Business Rates nor Parking Penalty Charge Notices are calculated based on disability and the records do not show this information unless applications for disabled band reductions have been made.</p> <p>As at 1st September 2016 there are 465 households claiming a disabled band reduction of which only 7 cases have been sent to the Enforcement Agents since 2012.</p> <p>The corporate vulnerability policy does not specify disability as a vulnerability unless it impacts on their ability to manage their financial affairs effectively and need support.</p> <p>Staff and any Enforcement Agents are expected to comply with the vulnerability policy and some services have checkpoints in place before referral to EA's.</p> <p>Files are data shared with Adults and Children's services when summonses are issued for CT to allow a hold to be placed on cases where the relevant expert feels that is relevant.</p> <p>Where flagged notices from both the Northgate system and Civica W2 can be produced in large print and where required in braille.</p> <p>The Harrow website allows customers to self-serve and</p>

		<p>incorporates Accessibility tools which enables access to MyHarrow Account where customers can view their Council Tax and Business Rate Accounts and receive alerts for payment and when notices are updated. This is also where the recovery policies are held.</p> <p>Under Council Tax regulations, subject to certain criteria, if a property is left empty due to either receiving or providing care, a full exemption can be applied so these council tax payers would not be affected.</p> <p>Under Council Tax regulations, subject to certain criteria, if a property is occupied solely by someone who is deemed Severely Mentally Impaired, a full exemption can be applied so these council tax payers would not be affected. As at 1st October 2016 there are 310 households where this exemption applies.</p> <p>In addition to the above where the household has other occupiers, in some circumstances a 25% discount can be awarded, as at 1st October 2016 there are 200 households where this is being claimed.</p> <p>In either circumstance regulations require any person who is liable for Council tax and also severely mentally impaired, not to be held as a liable party which means any enforcement action or notices will not be issued to them.</p> <p>There are various schemes under concessionary travel which allow persons with mobility issues to park and travel subject to certain regulations which may result in them being less likely to receive a PCN and so less likely to be impacted by this procurement in the event of non-payment.</p> <p>The calculation of Housing Benefit is set by regulation and</p>
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		has different applicable amounts for disabled households and there are specific rules around carers which limit the impact live in carers may have on any entitlement which may result in them less likely in having an overpayment and being impacted by this procurement.
Gender Reassignment		No information held however none of these debt types are calculated based on gender or gender reassignment.
Marriage / Civil Partnership	22.6% of households are single person households (19,008)	<p>There is a 25% single person reduction under Council Tax regulations which reduces the amount owing which supports single occupancy household where there may be more difficulty paying the full tax. As at 1st October 2016 there are 20,582 households claiming this reduction.</p> <p>Regulations allow for all partners to be held jointly and severally liable regardless of their marital status.</p> <p>Information is held on titles but this is not used to select cases to be referred for enforcement action.</p>
Pregnancy and Maternity		No information held however none of these debt types are calculated based on these circumstances.
Race	<p>2011-13 Vitality Profile</p> <p>Nearly 48.5% of the 2,025 residents who cannot speak English are aged 65 or over and a further 2,353 do not speak English very well.</p> <p>English is the main language for 71.5% of Harrow's residents which is below the London level of 77.9%. Gujarati is Harrow's most commonly spoken language after English with 8.9% (20,386 residents) followed by Tamil at 3.6% (8,304 residents). Proficiency in English has been added to the education, skills and training</p>	<p>Race is not held on the Council system records and is not taken into account in the calculation of any of the debt types.</p> <p>Corporately documents are no longer held in a variety of different languages however Access Harrow are able to provide translation services where required.</p> <p>None of the services are calculated on the basis of race and this information is not held on the Northgate or Parking systems.</p>

	<p>deprivation indices information which confirms that Harrow is one of the least education, skills and training deprived local authorities in the country</p> <p>42.2% of Harrow's population is White (100,991). This is broken down further into White British which is 73,826 and other which is 19,648 the majority of whom are from other parts of Europe with a large proportion from Eastern Europe particularly Romania and Poland. The remaining 7,336 is made up of the Irish community. This is a reduction of 20.3% since 2001.</p> <p>44% of Harrow's population is Asian (105,225) which is broken down into Indian 26.4% (63,051) and Pakistani 3.3% (7,797) This is an increase of 59.7% since 2001.</p> <p>9.7% of Harrow's population is Black (23,105) of which 8,526 are African (2,241 Somalian) and 6,812 are Caribbean (1,691 Jamacian). This is an increase of 56.5% since 2001.</p>	<p>Part of the specification covers notices to be in Plain English and the requirement that all employees, processes and systems comply with the requirements of the Equalities Act.</p> <p>The specification requires an awareness of faith key dates to be built into their training and processes.</p> <p>The specification requires compliance with Harrow's vulnerability policy which specifies that the debtor must understand the process and be given time to seek support to understand the process.</p> <p>The Taking Control of Goods regulations and the CIVEA code of conduct state that where vulnerability is identified the case must be held whilst the debtor seeks support and, any fees incurred wound back to compliance stage. This may cover where there is misunderstanding due to language barriers.</p>
Religion and Belief	<p>Christianity is Harrow's most common religion 37.3% (89,181) of the borough followed by</p> <ul style="list-style-type: none"> - 25.3% (60,407) as Hindu, - 12.5% (29,881) as Muslim and - 4.4% (10,530) as Jewish. <p>The remaining 4.8% or 11,397 residents follow other religions which is the highest proportion across the country for residents who follow other religions or beliefs.</p>	<p>Religion and belief are not held on the records for Council Tax, Business Rates and are not taken into account in the calculation of any of the debt types.</p> <p>All staff undertake equalities and diversity training on an annual basis and enforcement agents have a parallel training requirement including cultural and celebration specific days and habits.</p> <p>The specification requires an awareness of faith key dates to be built into their training and processes.</p>

	22,871 or 9.6% of the residents gave no religion. This was a voluntary question in the 2011 Census and 14,781 (6.2%) chose not to answer of whom 53.4% were of White ethnicity and 29% were Asian/Asian British	
Sex / Gender	50.6% of Harrow's residents are female. 49.4% male.	The title of the debtor would be passed to the contractor but details of sex and gender are not held on the records and are not used to calculate the charge.
Sexual Orientation		This information is not held and is not used to calculate the charge.

Stage 3: Assessing Potential Disproportionate Impact

5. 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, complete a FULL EqIA.

- **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 6

Stage 4: Further Consultation / Additional Evidence

6. What further consultation have you undertaken on your proposals as a result of your analysis at Stage 3?

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? E.g. revising your proposals
No staff affected no TUPE	N/a	N/a
CAB User Data Q4 2015/16 and Q1 2016/17	That the majority of Council Tax service users:- <ul style="list-style-type: none"> - are female (86 compared to 44 male) - the main age bracket is 40-54 - are Asian/Asian, Black or Black British-African, White British or White Other - that 6 were disabled (4.6%) - that 33 declared a long term health condition (25%) 	The data provided is too small to give an informed view. Evaluation of the specification has been revised to require evidence of signposting to free debt advice, equalities and diversity training and how this is embedded in their processes and systems.

	There were only 16 Parking Service users and the only trend identified was a 50% disabled or long term health condition declared. Note this includes congestion charges as well as PCN.	
CITA report on CT Arrears collection	That those people who have lost support via the changes to the CTS scheme are increasing CT arrears. This includes both those people in receipt of DWP benefits and also those on low paid work who are not receiving CTS.	<p>Implemented software that automatically carries out checks to the CTS system before bulk moving cases to be referred to Enforcement Action for individual officer review.</p> <p>This process also checks to see if an attachment to earnings has been in place previously for individual officer review.</p> <p>Carried out vulnerability refresher training for Revenues staff and planned sessions for Access Harrow and HBOP staff.</p> <p>Evaluation of the specification has been revised to include where signposting to free debt advice will be carried out and referring cases for attachments to benefits and earnings where appropriate.</p>
Taking Control of Goods regulations	The regulations now state that if vulnerability is identified when it is being dealt with via the enforcement agent process, any fees incurred must be 'rewound' back to the compliance fee of £75.00 only if there is evidence that the debtor did not understand the process or has not had the opportunity to seek support to understand the process.	<p>Any contractor procured will have to adhere to the relevant regulations.</p> <p>The evaluation of the specification has been revised to require reports on any debtors identified as vulnerable will be required on a monthly basis. Internal processes will require this to be reviewed and where fees are more</p>

Current Council Tax Support Caseloads 2.10.16	As at 2 nd October 2016 there are 12,926 households claiming which is broken down into 1473 vulnerable households 5574 pensioner households 2719 vulnerable 1641 working age employed 1519 working age other	than the £75.00 this can be challenged. Comments above state that the CTS and HB regulations allow for higher allowances to be considered when assessing claims for households where there are elderly, young, disabled or carers in the property. Of the 5574 pensioner households 3675 receive full CTS. Any amendment to the current CTS scheme would require a further consultation and EQIA and at that point the impact on the collection and recovery from potentially impacted debtors would be considered. This was previously done as part of the Welfare Reform board and resulted in the corporate vulnerability definition compliance with is included in this specification
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Stage 5: Assessing Impact

7. What does your evidence tell you about the impact on the different Protected Characteristics? Consider whether the evidence shows potential for differential impact, if so state whether this is a positive or an adverse impact? If adverse, is it a minor or major impact?

Protected Characteristic	Positive Impact ✓	Adverse Impact		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 7	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 6)
		Minor ✓	Major ✓		
Age (including carers of young/older people)					Evaluation of the tender and future contract management will use complaints and any other data available to review any disproportionate impact.

Disability (including carers of disabled people)					Evaluation of the tender and future contract management will use complaints and any other data available to review any disproportionate impact
Gender Reassignment				There is no gender reassignment data held within the Collections systems records although it is anticipated that there will not be any adverse impact arising from the proposals concerning this protected characteristic. None of the debt types are calculated based on this characteristic.	Evaluation of the tender and future contract management will use complaints and any other data available to review any disproportionate impact
Marriage and Civil Partnership					Evaluation of the tender and future contract management will use complaints and any other data available to review any disproportionate impact
Pregnancy and Maternity				There is no pregnancy or maternity data held within the Collections systems records although it is anticipated that there will not be any adverse impact arising from the proposals concerning this protected characteristic. None of the debt types are calculated based on this characteristic.	Evaluation of the tender and future contract management will use complaints and any other data available to review any disproportionate impact
Race					Evaluation of the tender and future contract management will use complaints and any other data available to review any disproportionate impact
Religion or Belief					Evaluation of the tender and future contract management will use complaints and any other data available to review any disproportionate impact

Sex					Evaluation of the tender and future contract management will use complaints and any other data available to review any disproportionate impact		
Sexual orientation				There is no sexual orientation data held within the Collections systems records although it is anticipated that there will not be any adverse impact arising from the proposals concerning this protected characteristic. None of the debt type are calculated based on this characteristic.	Evaluation of the tender and future contract management will use complaints and any other data available to review any disproportionate impact		
8. 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	✓
9. 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 it to happen?

Deprivation Indices 2015 indicate Harrow has improved its position since 2010 by 29 places nationally and 1 place within the 33 London Boroughs being the 6th least deprived borough.

Income deprivation has improved nationally by 42 places and 3 places within the London Boroughs. 16.9% of children live in families experiencing income deprivation (highest level is Wealdstone) but this is a reduction from the 2010 assessment which was 18%.

18.8% of older people (those over 60) are income deprived.

There are 13,000 households currently receiving CTS which implies a degree of financial vulnerability so claimants may be more likely to be impacted by this contract however both the CTS and the HB regulations do have different applicable amounts where households have occupiers who are:-

- Elderly
- Young
- Carer's
- Disabled

This is not a change in policy or process.

Stage 6 – Improvement Action Plan

List below any actions you plan to take as a result of this Impact Assessment. These should include:

- Proposals to mitigate any adverse impact identified
- Positive action to advance equality of opportunity

- Monitoring the impact of the proposals/changes once they have been implemented
- Any monitoring measures which need to be introduced to ensure effective monitoring of your proposals? How often will you do this?

Area of potential adverse impact e.g. Race, Disability	Proposal to mitigate adverse impact	How will you know this has been achieved? E.g. Performance Measure / Target	Lead Officer/Team	Target Date
All	Staff and any contractor will be required to complete equalities and diversity training on a regular basis	Corporate training records. Contractor tender submission and subsequent training records		
All	Corporate Vulnerability Policy	This is within the specification as a requirement. Adherence will be measured by reviewing monthly reports on any cases identified as vulnerable.		
All	The specification has been reviewed and updated to cover requirements of the Equalities Act to be within the contractors training, workforce, processes and procedures	Evaluation of the tender submission and contract monitoring.		
All	Corporate development of MHA and online forms collating and holding equalities data so that impact can be measured by cross referencing data from legacy systems which do not hold equality data against MHA records.	Data cross referencing being made available to service areas.		
All	Where vulnerability has been identified by either party this data will be shared with the contractors and Harrow to ensure this information can be considered when making	Exchange of person alert/vulnerable lists. Contract review meetings.		

	decisions about enforcement action on a case by case basis.			
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Stage 7: Public Sector Equality Duty

10. How do your proposals meet the Public Sector Equality Duty (PSED) to: <ol style="list-style-type: none"> 1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010 2. Advance equality of opportunity between people from different groups 3. Foster good relations between people from different groups 	
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Stage 8: Recommendation

11. 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 of opportunity are being addressed.	✓
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Outcome 2 – Minor Impact: Minor adjustments to remove / mitigate adverse impact or advance equality of opportunity have been identified by the EqIA and these are included in the Action Plan to be addressed.	
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Outcome 3 – Major Impact: Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality of opportunity. 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 Q12 below)	
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12. If your EqIA is assessed as outcome 3 explain your justification with full reasoning to continue with your proposals.	
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Stage 9 - Organisational sign Off

13. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	DETG
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Signed: (Lead officer completing EqIA)	Lynn Allaker	Signed: (Chair of DETG)	Alex Dewsnap
Date:	07 November 2016	Date:	07 November 2016
Date EqIA presented at Cabinet Briefing (if required)		Signature of DETG Chair (following Cabinet Briefing if relevant)	