

Equality Impact Assessment (EqIA)



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

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

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

Equality Impact Assessment (EqIA)

Type of Decision:		<input type="radio"/> Portfolio holder <input checked="" type="radio"/> Other (state)
Title of Proposal	Removal of Risk Based Verification in the administration of Housing Benefit and Council Tax Support	Date EqIA created 22/11/19
Name and job title of completing/lead Officer		
Directorate/ Service responsible		
Organisational approval		
EqIA approved by Directorate Equalities Lead	Name Alex Dewsnap	Signature <input type="checkbox"/> Tick this box to indicate that you have approved this EqIA Date of approval

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

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

a) What is your proposal?

To remove the use of Risk Based Verification in the administration of Housing Benefit and Council Tax Support with effect from 1st April 2020.

Risk Based Verification is an automated process that risk assesses new claims to target those at higher risk of fraud and error. By incorporating it into the electronic new claim process claims receive a classification of low, medium or high. Verification of evidence to support the claim is based upon the risk classification as below:

Low risk	Medium risk	High risk
Original evidence of identity and proof of national insurance number required All other information declared by the claimant is accepted without further evidence	Original evidence of identity and proof of national insurance number required Copies of all other evidence	Original evidence of all information declared and invited to attend an interview where further clarification is required

It is proposed to replace Risk Based Verification with the following evidence verification procedure for new claims:

Housing Benefit

Original evidence of all required documentation to be obtained for all new Housing Benefit claims.

Where evidence can be obtained from services within the Council e.g. Housing, or from DWP, then this will always be the first point of contact before requesting information from the claimant.

Proof of identity will always be requested from the claimant in original format.

Housing Associations are trained as verification officers by the Council. They will therefore use the evidence upload form (when available) to provide all information they have available to support a tenant's claim.

Council Tax Support:

Proof of identity will always be requested from the claimant in original format.

All other evidence to follow the procedure set out below.

Evidence will be obtained from sources other than the claimant e.g. DWP/HMRC or copies accepted unless stated otherwise. The term 'copies' is used to mean photocopies or evidence submitted electronically e.g. from a photograph on a mobile phone, self-scanned or received by the claimant electronically

e.g. bank statements. Customers will be encouraged to provide evidence electronically whenever viable.

Universal Credit

When the claimant is in receipt of Universal Credit:

- When claimants are in receipt of Universal Credit then all evidence that can be obtained from DWP will be accepted through this route.
- Evidence of non-dependant income will need to be obtained from the claimant if it is not available from Universal Credit

VEP (WURTI) – DWP/HMRC online system

- Earnings and private pension information should always be obtained from VEP in the first instance.
- If information is not going to be available until a point in the future, e.g. next months pay slip, then a template letter will be sent to the claimant informing them of this and that if the information is not available from VEP they will be required to provide proof. Letter to state they do not need to do anything now unless they believe their information won't be available in VEP
- If earnings/private pension information not available in VEP either for known reasons or unknown reasons:
 - Obtain original payslips/letter from employer
 - Request additional verification e.g. bank statements to show transactions
 - Contact employer to confirm employment
 - Check Companies House
 - Speak to claimant and potentially invite them in to discuss if still have concerns

 - Consent will need to be obtained before contacting employers directly. This should be requested from the claimant if it is not already held.

Other income

Copies are acceptable in all other scenarios unless there is cause for concern or conflicting information is provided. This will include:

- Student finance
- Self-employed
- Annuities
- Dividends
- Miscellaneous e.g. support from friends/family
- Income from lodgers
- Child benefit
- Tax Credit for more than 2 children
- Non-dependant income

Capital

Proof of capital is to be accepted as copies unless there is cause for concern or conflicting information is provided

Rent

Proof of rent is to be accepted as copies unless there is cause for concern or conflicting information is provided.

Expenditure

Proof of expenditure is to be accepted as copies unless there is cause for concern or conflicting information is provided.

Clarification and additional information sought

- Where any clarification is sought a telephone conversation must be held by making an outbound call and by leaving a voicemail message and a

note in Northgate that claimant can be put through to assessor.

- The type of scenarios that would require additional clarification, but not exclusively, are:
 - Any discrepancies over information provided
 - Earnings should be in VEP but aren't
 - Living off income below applicable amount
 - Declare nil income but expenses indicate otherwise e.g. regular travel across London
- Original documents may be requested in these scenarios if it is believed that this will help to clarify the claimants circumstances

As Universal Credit has rolled out in Harrow, the number of new claims has reduced over the last year. The Council now only receives Housing Benefit claims for pensioners, supported or temporary accommodation and, in the short term, claimants who receive a Severe Disability Premium. Due to the complexity of the supported and temporary accommodation cases they are normally treated as being medium or high risk and therefore do not benefit from the Risk Based Verification process. It is only pensioners who after risk assessment would fall into one of the categories above. There are around 20 new claims for Housing Benefit received from pensioners each month. Approximately half of these are in receipt of a passported benefit so the majority of information will be obtained directly from Department of Work and Pensions. Around 10 claimants a month would therefore currently see a difference to how their claim is verified under the current system compared to the proposed new system.

Harrow's Council Tax Support scheme is due to change from April 2020. This change will mean that new majority of new Council Tax Support claims made by people on Universal Credit will be made using the Universal Credit notification issued to the Council by Department of Work and Pensions. These claims will therefore not go through the Risk Based Verification process. Due to the simplification of the working age Council Tax Support scheme for Universal Credit claimants, most verification will be carried out directly with DWP. It is therefore only Pensioners who could be impacted by this proposal. As with Housing Benefit as a high proportion of these claims are on passported benefits, verification can largely be carried out with no additional contact with the claimant than under the current Risk Based Verification process. There are approximately 10 claims a month from pensioners who are not passported and may need to provide more evidence than they do currently, although due to the access to the online HMRC system, private pensions can also be verified directly

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

As this proposal is in respect to new claims, the data of who the new claimants are is not available until the point at which they make the claim. It is therefore difficult to understand any impacts on groups with protected characteristics. It is known however that this proposal is expected to be low impact across all households for the following reasons:

- Majority of working age claims for housing costs are now made to Universal Credit, not Housing Benefit
- The Risk Based Verification process is often not applicable to the complex residual working age Housing Benefit claims (supported and temporary accommodation)
- Most working age Council Tax Support claims will be made using the Universal Credit notification from April 2020, so will not go through the Risk Based Verification process
- More information can be obtained directly from DWP/HMRC using online systems and data matching schemes than when Risk Based Verification was implemented in 2014
- Around half of the pensioner claims received are in receipt of passported benefits allowing information to be obtained from DWP/HMRC

It is estimated there will be 10 claims a month from pensioners who may be required to provide more evidence to verify their Housing Benefit/Council Tax Support claim than under the current procedure.

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

Approximately 10 new claims a month from pensioners are expected to be required to provide more information than they do currently. Most of these will already need to provide some evidence e.g. identification.

The proposed new evidence procedure sets out a minimum standard which mitigates the risk to fraud and error while not making the task of providing the information too onerous for the claimant. In the first instance the Council will always seek to obtain the information required directly from DWP/HMRC systems where it is available. Where possible electronic provision will be accepted, assisting those pensioners who are willing and able to use this channel either independently or with the support of friends/family. This group of claimants often live in social housing where additional support with the claim process is available and evidence is already verified by the landlord on behalf of the Council. The Benefits service is aware that there are some vulnerable residents who are unable to provide evidence independently and do not have access to any additional support to do so. In these instances a home visit will be arranged to assist.

2. Assessing impact					
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to borough profile data , equalities data , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on each group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact			
Protected characteristic	For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact
			Minor	Major	
Age	<p>Approximately 10 pensioner claimants a month are forecast to need to provide more information to support their claim than they do under the Risk Based Verification process.</p> <p>This is expected to be low impact for the majority of claimants as the Council will obtain the information from DWP/HMRC wherever viable and is aware that there is already a lot of support available to this group to support them in providing evidence. In exceptional circumstances where this support is not available the Benefits service will arrange a home visit to assist</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	No impact identified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Gender reassignment	No impact identified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Marriage and Civil Partnership	No impact identified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Pregnancy and Maternity	No impact identified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Race/ Ethnicity	No impact identified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Religion or belief	No impact identified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sex	No impact identified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sexual Orientation	No impact identified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Yes No

If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below

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

<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If you clicked the Yes box, Include details in the space below

3. Actions to mitigate/remove negative impact				
Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.				
In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.				
State what the negative impact(s) are for each group, identified in section 2. In addition, you should also consider and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact please state below.	Deadline date	Lead Officer
Approximately 10 pensioner households a month will be required to provide more evidence than they are currently	<ul style="list-style-type: none"> Seek to obtain information required directly from DWP/HMRC systems where it is available. Where possible electronic provision will be accepted Ensure social registered landlords verification training is up to date In exceptional circumstances where no assistance is available, 	Monitor the number of claims closed due to no response to information requests Monitor complaints in respect to the evidence provision procedure	6 months	Jenny Townsley

	a home visit will be arranged			

4. Public Sector Equality Duty

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

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

Include details in the space below

The procedures already in place in the service ensure that the Public Sector Equality Duty is met e.g. through changes to the Council Tax Support scheme which makes claiming Council Tax Support easier for working age people. Risk Based Verification is virtually redundant and removal of it is very low impact

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

Outcome 1

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

Outcome 2

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

Outcome 3

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

Include details here