

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"/> Cabinet <input type="radio"/> Portfolio holder <input checked="" type="radio"/> Other (state)	
Title of Proposal	ASC Policy Review	Date EqIA created: 26.09.2019
Name and job title of completing/lead Officer	Ian Farrer	
Directorate/ Service responsible	ASC	
Organisational approval		
EqIA approved by Directorate Equalities Lead	Name	Signature <input type="checkbox"/> Tick this box to indicate that you have approved this EqIA Date of approval

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?

Policy review and amendment – 7 changes proposed:

1. implementation of Provisional Assessments for Non-Residential financial assessments
2. implementing a Minimum Assessed Charge of £5 per week for Non-Residential financial assessments
3. implementing Set Up Fees and Annual Administration Fees for self-funders for both Residential and Non-Residential care and support services
4. Use Couples rate instead of Single person's rate for calculating MIG+25% for couples under retirement age (18 – 64) for Non-Residential financial assessments
5. Replace Single person rate with Couples rate for those aged 65 and above for Non-Residential financial assessments
6. removing the 50% disregard on Private/Occupational Pensions & Annuities income, so the full amount of the pension will be included within the financial assessment
7. Removing the additional 25% allowance provided to those in receipt of Employment and Support Allowance (ESA) Premium Rate and who receive care and support in their own homes.

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

Reduction in disposable income for those affected by removal of local allowances and disregards. Some citizens will benefit by having charges removed or reduced:

- All clients will be provisionally assessed, however only those who can afford to contribute towards the cost of their care will be required to do so.
- 26 clients (out of 1,750) assessed to contribute less than £5 per week (or less than £20 per 4-weekly billing cycle) will benefit by the introduction of the minimum assessed charge.
- Using Couples rate instead of Single person's rate for calculating MIG+25% for couples under retirement age (18 – 64) for Non-Residential financial assessments will have a beneficial impact on 41 citizens' disposable income, to the tune of £23.30 per week.
- Replacing Single person rate with Couples rate for those aged 65 and above will affect 444 citizens, reducing their disposable income by £1.45 per week.
- Of 191 (vast majority are 65+) that receive Occupational Pensions, the change will affect 138 citizens to the tune of an average of £60

per citizen per week (£3k pa).

- Of those in receipt of ESA Premium rate aged 18 – 24: 85 citizens will be worse off by £3.86 per week (£200 per annum).
- Of those in receipt of ESA Premium rate aged 25 – 64: 536 will be adversely effected by circa £9.11 weekly (£473 per annum).

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

Complaints regarding the removal of local allowances and disregards, which will reduce disposable income for those affected. Transitional Protection will be offered to all those who are affected by an increase in their assessed contribution of more than £10 per week. See also Communications Plan.

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	Withdrawal of local disregard of 50% of Occupational Pensions/ Annuities will affect circa 140, majority over pension age (65). Funds generated will see services continue for those most vulnerable, when services might otherwise have suffered further cuts.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Disability	Withdrawal of local disregard of 25% of Employment and Support Allowance (ESA) Premium Rate. Funds generated will see services continue for those most vulnerable, when services might otherwise have suffered further cuts.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	As part of this consultation, no evidence has been presented to suggest that the proposals would have a negative impact on this protected characteristic.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Marriage and Civil Partnership	Change in financial assessment in respect of married couples will be of benefit to some & have a negative impact on others' disposable income.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pregnancy and Maternity	As part of this consultation, no evidence has been presented to suggest that the proposals would have a negative impact on this protected characteristic.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Race/ Ethnicity	A large percentage of citizens originate from BAME communities within Harrow, therefore there is potential for citizens within these protected characteristics to be affected.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Religion or belief	A large percentage of citizens originate from BAME communities within Harrow, therefore there is potential for citizens within these protected characteristics to be affected.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sex	As part of this consultation, no evidence has been presented to suggest that the proposals would have a negative impact on this protected characteristic.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sexual Orientation	As part of this consultation, no evidence has been presented to suggest that the proposals would have a negative impact on this protected characteristic.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>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?</p> <p><input checked="" type="checkbox"/> Yes No <input type="checkbox"/></p>					
<p>Together with other efficiencies implemented and being sought across the council and its agencies, as well as with changes to the Welfare Benefits system, there is a chance that these proposals may have an affect on some, if not all, of the protected groups above.</p>					
<p>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?</p> <p><input checked="" type="checkbox"/> Yes No <input type="checkbox"/></p>					
<p>As per 2.1 above</p>					

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
Loss or reduction of disposable income	Benchmarking confirms proposals will bring Harrow in line not only with neighbouring boroughs, but countrywide. Transitional Protection proposed to lessen the immediate burden.	Negative impact cannot be removed, only mitigated, via Transitional Protection, as recommended. No citizen will have their disposable income reduced below Minimum Income Guarantee (MIG) + 25%, as required by the Care Act 2014.	06.12.2019	IF
Loss or reduction of disposable income	As above	As above	06.12.2019	IF
<ul style="list-style-type: none"> a. Loss of or reduction in disposable income b. Increase in disposable income 	As above	As above	06.12.2019	IF

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

1. These proposals have been drafted in accordance with the Council's duties under the Equality Act 2010 and the Public Sector Equality duty and the Care Act 2014.
2. These Proposals are aimed at removing local disregards and allowances from our current policy that were more generous than the Council is required to provide, which will bring Harrow in line with our neighbours and also the majority of councils nationwide. This meets the requirement of the Care Act 2014, which intends that people, irrespective of group, receiving care and support services are treated in a fair and consistent manner countrywide.

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.