

## 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)		
<b>Type of Decision:</b>	<input type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input checked="" type="radio"/> Other (state)	
<b>Title of Proposal</b>	Change to the Housing Benefit and Council Tax Support Evidence Verification procedure	<b>Date EqIA created</b> 1 Mar 2021
<b>Name and job title of completing/lead Officer</b>	Jenny Townsley, Housing Benefit Service Manager	
<b>Directorate/ Service responsible</b>	Resources, Collections & Benefits	
Organisational approval		
<b>EqIA approved by Directorate Equalities Champion</b>	<b>Name</b> Alex Dewsnap	<b>Signature</b> <input checked="" type="checkbox"/> <b>Tick this box to indicate that you have approved this EqIA</b>  <b>Date of approval</b> 9 June 2021

## 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 change the evidence verification procedure in the administration of Housing Benefit and Council Tax Support

Claims for Housing Benefit and Council Tax Support require verification of information declared by the claimant. Changes to the face to face service in the Council and capacity issues following an increase in the Council Tax Support caseload due to Covid-19 have resulted in a need for the level of verification to be reviewed.

Reasons for change are:

- Reduced face to face services – the face to face service in Access Harrow is no longer available to customers to be able to have original documents copied and returned while on site. The only alternative for customers is to send/receive their original documents by post.
- Customer service – Benefits is largely an online service. This offers a better level of service for those who are able to transact electronically. Requiring original documents prevents the maximum benefits of using an online service. Relying on the postal system for customers to submit/receive original documents carries risk of those documents getting lost and the level of customer contact complaining about the process has increased.
- Cost of handling original documents – verifying, scanning and returning original documents carries a cost to the Council. The high-risk nature of handling these documents also requires high standards of quality assurance which carry a further cost plus the cost of using recorded delivery to return valuable items.
- Speed of processing – obtaining originals delays the speed of processing claims
- Help mitigate impact of increasing caseload on resources – The Council Tax Support caseload increased by 19% in 2020/21 due to the Covid-19 pandemic. This has resulted in capacity issues within the Benefits service. Reducing verification requirements helps to ease the pressure on resources
- Increase rent collection in temporary accommodation – due to the volatile nature of many homeless households, the Housing department have found it difficult to obtain original documents from claimants in temporary accommodation. Housing Benefit can then not be paid which results in arrears carried by the Council. Reducing the requirement for originals will allow more Housing Benefit claims to be paid and consequently increase rent income to the Council for temporary accommodation

While above are all positive reasons for changing the evidence verification procedure, it should be noted that verification is required to prevent fraud from entering the Housing Benefit/Council Tax Support system. Any change must therefore continue

to mitigate the risk of fraud. The focus of the changes are therefore on interrogation of the information available, in place of obtaining original documents in as many circumstances, for example cross reference national insurance number against claim form, DWP system and HMRC system to ensure accuracy.

The table below sets out the current procedure and the change in procedure

Claim type	Evidence type	2020/21	New procedure from 1 April 2021
CTS or HB in receipt of means tested benefit	Identity	<p>CTS Universal Credit – use DWP system for all information held by DWP.</p> <p>All other claim types in this category – original identity proof required for Housing Benefit, copies for Council Tax Support</p>	Use DWP system to verify identity
CTS or HB not in receipt of means tested benefit or entitlement of this benefit cannot be verified through DWP system	Identity	Original identity proof for Housing Benefit, copies for Council Tax Support	Original identity proof
HB in receipt of means tested benefit	Other evidence	All benefits information taken from DWP system including earnings and private pensions	All benefits information taken from DWP system including earnings and private pensions

CTS in receipt of means tested benefit except Universal Credit		Evidence not held by DWP e.g. rent proof, obtained as original for Housing Benefit, copies for Council Tax Support	Evidence not held by DWP e.g. rent proof, to be accepted as copies unless there is cause for concern	
CTS in receipt of Universal Credit	Other evidence	DWP system used for all information held by DWP including earnings.  Any information not held by DWP obtained as copies	DWP system used for all information held by DWP including earnings.  Any information not held by DWP obtained as copies unless there is cause for concern	
CTS or HB not in receipt of means tested benefit or entitlement of this benefit cannot be verified through DWP system	Other evidence	Benefits, earnings, and private pension information taken from DWP system  Council rents taken from Council rent system	Benefits, earnings, and private pension information taken from DWP system  Council rents taken from Council rent system	

		<p>Housing Association rents taken from HAs</p> <p>Council Tax liability taken from council tax system</p> <p>Any other information obtained from customer as originals for Housing Benefit, copies for Council Tax Support</p>	<p>Housing Association rents taken from HAs</p> <p>Council Tax liability taken from council tax system</p> <p>Any other information obtained from customer as copies unless there is cause for concern</p>	
<p><b>b) Summarise the impact of your proposal on groups with protected characteristics</b></p> <p>The changes set out above will benefit groups of Housing Benefit and Council Tax Support claimants. The only group that will see no change in respect to the provision of original identity are those making a new claim who are not on means tested benefits. This group will benefit from not having to provide originals of other documents to support their claim, but will see not change to the existing requirement to provide original identity proof.</p> <p>Working Age claimants in receipt of Universal Credit will also see no change as the claims are already verified through the DWP system as far as possible.</p> <p>The groups benefiting most will therefore be working age households with an ongoing claim for Housing Benefit who are in work/self-employed, households with non-dependants, people in private sector accommodation, people in supported accommodation, people in temporary accommodation, pensioners submitting new claims to Housing Benefit and any non-Universal Credit Council Tax Support new claimant.</p> <p>Process to be reviewed after 6 months to understand whether all groups are accessing benefits of change</p>				

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

No negative impacts on groups with protected characteristics have been identified

<b>2. Assessing impact</b>					
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to <a href="#">borough profile data</a> , <a href="#">equalities data</a> , 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 <b>each</b> 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			
<b>Protected characteristic</b>	For <b>each</b> 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	<b>Negative impact</b>		No impact
			Minor	Major	
<b>Age</b>	All people in this characteristic will benefit from the changes if claiming Housing Benefit or Council Tax Support.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Disability</b>	All people in this characteristic will benefit from the changes if claiming Housing Benefit or Council Tax Support.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Gender reassignment</b>	All people in this characteristic will benefit from the changes if claiming Housing Benefit or Council Tax Support.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Marriage and Civil Partnership</b>	All people in this characteristic will benefit from the changes if claiming Housing Benefit or Council Tax Support.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Pregnancy and Maternity</b>	All people in this characteristic will benefit from the changes if claiming Housing Benefit or Council Tax Support.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



<b>Race/ Ethnicity</b>	All people in this characteristic will benefit from the changes if claiming Housing Benefit or Council Tax Support.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Religion or belief</b>	All people in this characteristic will benefit from the changes if claiming Housing Benefit or Council Tax Support.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Sex</b>	All people in this characteristic will benefit from the changes if claiming Housing Benefit or Council Tax Support.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Sexual Orientation</b>	All people in this characteristic will benefit from the changes if claiming Housing Benefit or Council Tax Support.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input 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?**

Yes                      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 <b>each</b> 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

#### 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

These changes advance equality of opportunity between people from different groups by applying the change across all claim types where the balance of risk to potential fraud allows. It is only where there has been no prior verification by DWP that original documents to evidence identity will be requested. This requirement is based on the need to protect the public purse and reduce the risk of fraud from entering the Benefit system so cannot be avoided.

#### 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