



### 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 (EqlA)		
<b>Type of Decision:</b>	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
<b>Title of Proposal</b>	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	<b>Date EqlA created 1.2.2022</b>
<b>Name and job title of completing/lead Officer</b>	Neil Gann – Service Manager - Revenues	
<b>Directorate/ Service responsible</b>	Collections & Benefits	
Organisational approval		
<b>EqlA approved by Directorate Equalities Champion</b>	<b>Name</b>	<b>Signature</b> <input type="checkbox"/> <b>Tick this box to indicate that you have approved this EqlA</b>  <b>Date of approval</b>

## 1. Summary of proposal, impact on groups with protected characteristics and mitigating actions (to be completed after you have completed sections 2 - 5)

The primary objective is the procurement of up to 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.

The contract is for a three-year period with an option to extend for two further periods of two years (i.e. to provide for up to seven years in total) at its discretion subject to satisfactory performance. The contact commencement date is 8<sup>th</sup> November 2022

This is a retender for two service providers, as this is a current method of collection.

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 under 95,000 Council Tax and just under 5,500 Business Rate properties. In 2021-22, the average Council Tax (Band D) is £1962.36. Harrow collects £175m in Council Tax, £54m in business rates and £9.6m in Parking PCN income yearly.

Annually, the Council expects to obtain 16,000 Liability Orders, of which:

- 15,000 are for Council Tax
- 1,000 are for Business Rates
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Taking 2019/20 as the last “normal” recovery year, the Council issued just over 10,000 Council Tax and 500 Business Rates Liability Orders to Enforcement Agents.

The Council can also take 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 174,000 Penalty Charge Notices (PCN’s) resulting in some 42,000 warrants being issued for enforcement yearly (based on 2019/20)

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.

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

There is no identified impact on any of the groups with protected characteristics. The specification will ask that the contractors comply with the Equalities Act and have suitable processes where any vulnerability is identified. It is proposed that a specific method statement on equalities and diversity will be part of the tender process.

This will look to include

- Induction training to include equalities and diversity for all staff working on the Harrow contract
- Regular refresher training throughout the contract on equalities and diversity

Evaluation of the tender and future contract management and contractor reports together with complaints and other data available will be used to identify any disproportionate impact should it occur.

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

None

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 <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			
Protected characteristic	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	Negative impact		No impact
			Minor	Major	
<b>Age</b>	<p>Neither Council Tax nor Business Rates are calculated based on age and the records do not hold or show this information.</p> <p>There are 252,338 people in Harrow according to the ONS UK Population estimates Mid 2020 of which</p> <ul style="list-style-type: none"> <li>- 62,776 of the population between 0 – 18 years of age</li> <li>- 151,478 of the population between 19 - 65 years of age</li> <li>- 38,084 of the population above 66 years of age</li> </ul> <p><b>Source Harrow Vitality Profiles</b></p> <p>Harrow’s ranking for income deprivation affecting children has improved in 2019 to 199 out of 317 local authorities compared with 140 out of 326 local authorities in 2015.</p> <p>Harrow’s ranking for income deprivation affecting older people has improved slightly since 2015 but it is still a relatively poor ranking as the 65<sup>th</sup> most deprived local authority out of 317. In February 2018 6,500 of Harrow’s residents were in receipt of</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>Pension Credits. Harrow’s claim rate of 18% is greater than the national of 15.8% but lower than the London rate of 21%.</p> <p>Under 18’s are not liable for Council Tax, but may be indirectly affected as part of the household. However, where the only residents are under 18 an exemption can be claimed.</p> <p>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.</p> <p>Under Council Tax regulations, subject to certain criteria, if a property is left empty due to the last resident (being either an owner or tenant of the property concerned) either receiving or providing care, a full exemption can be applied, so these council taxpayers would not be affected. As at 1<sup>st</sup> February 2022 there were 13 households in receipt of this exemption. In addition, if the property is left empty due to the last resident (being either an owner or tenant of the property concerned) being in hospital or a care home, regardless of age, a full exemption can be applied so these council taxpayers would not be affected. As at 1<sup>st</sup> February 2022, there were 68 households in receipt of this exemption.</p> <p>Where the carer is resident in the property, subject to certain criteria, a 25% discount can be awarded. As at 1<sup>st</sup> February 2022 there are 69 households in receipt of this discount.</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>Figures as at 1<sup>st</sup> February 2022 show that 4,710 of the Council Tax Support recipients are pensioners and of these 3,521 are on full CTS so would not be impacted by this procurement.</p>				
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	<p>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 they are 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 has different applicable amounts for older people and households with young children.</p> <p><b>The Contract will</b> require the Enforcement Agents to comply with the Equalities Act and follow the CIVEA Code of Conduct and Good Practice and requirements of The Debt Respite Scheme (Breathing Space Moratorium and Mental Health Crisis Moratorium) (England and Wales) Regulations 2020 (SI2020/1311).</p>				
<p><b>Disability</b></p>	<p><b>Source 2019 English Indices of Deprivation</b></p> <p>Harrow is ranked 207<sup>th</sup> out of 317 Local Authorities which is a slightly worsened position from 2015 when Harrow was ranked 213<sup>th</sup> out of 326 Districts in England.</p> <p><b>Source Vitality Profiles 2019</b></p> <p>Harrow’s health Deprivation and Disability position has improved and Harrow is now placed in the top 10% of all 317 Authorities.</p> <p>In February 2018 5,740 people were in receipt of Disability Living Allowance which is 2.3% of the total population at the time. Harrow’s claimant rate is lower than London (2.5%) or England (3%).</p> <p>In February 2018 5,812 people were in receipt of Employment Support Allowance, Income Support, Incapacity Benefit or Severe Disability Allowance which is 3.6% of the</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>total population at the time. Harrow’s claimant rate is lower than London (4.6%) or England (5.5%).</p> <p>In February 2018, 3,859 of Harrow’s working age residents were claiming Personal Independence Payment (PIP); this rate of 2.4% is lower than London (2.9%) and England (4%).</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 1<sup>st</sup> February 2022 there are 463 households claiming a disabled band reduction.</p> <p>The corporate vulnerability policy does not specify disability as a vulnerability unless it impacts on the person’s ability to manage their financial affairs effectively and the person needs 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>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 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 the last resident (being either an owner or tenant of the property concerned) either</p>				
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	<p>receiving or providing care, a full exemption can be applied, so these council taxpayers would not be affected. See above figures under Age.</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 taxpayers would not be affected. As at 1<sup>st</sup> February 2022 there were 405 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 1<sup>st</sup> February 2022 there are 249 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 they are 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 has different applicable amounts for disabled households. There are specific rules concerning carers which limit the impact live-in carers may have on any entitlement, which may result in households comprising disabled residents, being less likely to have an overpayment and impacted by this procurement.</p>				
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	<p>As at 1<sup>st</sup> February 2022 the Council Tax Support case load was 13,048 and this is broken down as below: -</p> <table border="0"> <tr> <td>Maximum Universal Credit (UC)</td> <td>1550</td> </tr> <tr> <td>Pensionable</td> <td>4710</td> </tr> <tr> <td>UC Couple no children</td> <td>114</td> </tr> <tr> <td>UC Couple with up to 2 children</td> <td>536</td> </tr> <tr> <td>UC Couple with 3 or more children</td> <td>292</td> </tr> <tr> <td>UC Single claimant</td> <td>430</td> </tr> <tr> <td>UC Single claimant with up to 2 children</td> <td>702</td> </tr> <tr> <td>UC Single claimant with 3 or more children</td> <td>266</td> </tr> <tr> <td>Vulnerable</td> <td>3240</td> </tr> <tr> <td>Work Age Employed</td> <td>826</td> </tr> <tr> <td>Work Age Other</td> <td>382</td> </tr> </table> <p>Each category except Pensionable can receive a maximum CTS award of between 70% and 86% depending on their circumstances and allowances. Further details of the current Council Tax Support scheme are available on line at <a href="http://www.harrow.gov.uk/benefits">www.harrow.gov.uk/benefits</a></p> <p><b>Operating procedures</b> will ensure that where the Council Tax Office has been made aware of a Council Tax Payer’s vulnerability, a list will be provided to the Enforcement Agent at the time the instruction is provided, so that this can be managed in accordance with their vulnerable persons processes and in compliance with statutory provisions regarding the same. Specific arrangements in relation to “vulnerability” from the CEA perspective, are intended to be sought and evaluated as part of the tender arrangements.</p>	Maximum Universal Credit (UC)	1550	Pensionable	4710	UC Couple no children	114	UC Couple with up to 2 children	536	UC Couple with 3 or more children	292	UC Single claimant	430	UC Single claimant with up to 2 children	702	UC Single claimant with 3 or more children	266	Vulnerable	3240	Work Age Employed	826	Work Age Other	382				
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<p><b>Gender reassignment</b></p>	<p>There is limited national data collected for this characteristic. We will need to consider the inequalities and discrimination experienced for this protected group when data becomes available.</p> <p>The charity GIRES estimated in their Home Office funded study in 2009 the number of transgender people in the UK to be between 300,000 and 500,000. More recently Stonewall advised that it is estimated that around 1% of the population might identify as trans, including people who identify as non-binary. This would represent about 600,000 trans and non-binary people in Britain and about 2,500 people in Harrow.</p> <p>None of these debt types are calculated based on gender or gender reassignment and information regarding this is not held on any of the collection systems.</p> <p><b>The contract will</b> require regular awareness training on equality and diversity to ensure that where appropriate staff are skilled to ensure any customers with this protected characteristic are not disadvantaged and are given the necessary support.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Marriage and Civil Partnership</b></p>	<p>At the time of the 2011 Census 54% of Harrow's residents were married, which was the highest level in London. 21% of households were married, or in same-sex civil partnerships, with dependent children, the highest level in London. As at October 2020, there had been 144 Same Gender Civil Partnerships in Harrow, 25 of which subsequently converted to a Marriage. There had been 8 Opposite Gender Civil Partnerships and 57 Same Sex marriages.</p> <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 1<sup>st</sup> February 2022 there are 21,992 households claiming this reduction.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<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> <p>It is unlikely that this procurement and contract will lead to differential impact for people based on this protected characteristic.</p>				
<p><b>Pregnancy and Maternity</b></p>	<p>ONS births figures show Harrow as having 3,526 live births in 2019. 14 live births per 1000 population is higher than the England &amp; Wales average of 10.8.</p> <p>The borough has the worst infant mortality rate in London, at a rate of 5.1 deaths per 1000 live births, which is a strong indicator of poverty and inequality in the borough.</p> <p>Nationally, women have faced discrimination during pregnancy and maternity in the workplace. EHRC Survey data shows that around one in nine mothers (11%) reported that they were either dismissed; made compulsorily redundant, whereas others in their workplace were not.</p> <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 1<sup>st</sup> February 2022, there are 21,992 households claiming this reduction.</p> <p>There are different rules applied under the Council Tax Support scheme for single households with children decreasing the amount payable under Council Tax.</p> <p>It is unlikely that this procurement and contract will lead to differential impact for people based on this protected characteristic.</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>

<p><b>Race/ Ethnicity</b></p>	<p>Harrow is one of the most culturally diverse local authorities in the UK, with over 60% of residents from the Black, Asian, and Multi-Ethnic backgrounds and an estimated 20% from the Eastern European community, which is fast growing<sup>1</sup>. Black African (notably the Somali Community) groups have been fast growing over the past 6 years, as has the Afghan community.</p> <p>Unemployment rates are significantly higher in certain areas of the borough, particularly in the Wealdstone and Marlborough wards (central Harrow) and Roxbourne (south Harrow), focused in and around the Rayners Lane estate and among residents classified as Black and Other ethnic groups. These areas are also ranked high on the indices of deprivation for the UK.</p> <p>BAME residents are more likely to experience barriers to employment due to lack of English language, functional and digital skills.</p> <p>Over 94% of Harrow businesses are classed as micro-businesses. There is limited data on the profile of business ownership by protected characteristics. Anecdotal evidence suggests that most retail businesses in Harrow’s town centres are BAME- owned. In the majority of these cases where it is a single business, they will be entitled to 100% small business relief which will mean the debt will be zero and so they will not be affected by this contract.</p> <p><b>Source: 2011-13 Vitality Profile</b></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</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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	<p>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 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.</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).</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 Jamaican).</p> <p>None of the collection systems hold ethnicity or race on its records so this information will not be used to select cases for enforcement agent referral.</p> <p><b>The contract will</b> require regular awareness training on equality and diversity to ensure that where appropriate staff are skilled to ensure any customers with this protected characteristic are not disadvantaged and are given the necessary support.</p>				
<p><b>Religion or belief</b></p>	<p>Religious diversity is strong in Harrow. At the 2011 Census Harrow was the most religiously diverse borough in the country. Harrow had the highest number (and proportion) of Hindu followers in the country (25.3%), the highest number of Jains (2.2%) and the second highest number of Zoroastrians. Harrow's Jewish community was the</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>

	<p>sixth largest nationally. 37.3% of residents were Christians (the 5th lowest proportion in the country) and 12.5% were Muslims. Harrow had the 2nd lowest ranking for ‘no religion’.</p> <p>As the population’s ethnic composition changes, rates of participation in various religions are also likely to change.</p> <p>There is limited data on employment/unemployment rates for Harrow by religion and this may impact on the ability to pay the charges however the Council Tax Support scheme allows for persons who are on low incomes or out of work to claim a reduction in their Council Tax due.</p> <p>Data for London suggests that educational attainment and employment among the capital’s Muslim community is lower than those from other faith groups located in the borough.</p> <p><b>Source 2011-13 Vitality Profile</b></p> <p>Christianity is Harrow’s most common religion 37.3% (89,181) of the borough followed by</p> <ul style="list-style-type: none"> <li>- 25.3% (60,407) as Hindu,</li> <li>- 12.5% (29,881) as Muslim</li> <li>-1.1% (2,700) as Buddhist</li> <li>- 1.1% (2,752) as Sikh and</li> <li>- 4.4% (10,538) as Jewish.</li> </ul>				
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	<p>The remaining 2.5% or 5,945 residents follow other religions which is the highest proportion across the country for residents who follow other religions or beliefs.</p> <p>22,871 (9.6%) of the residents did not identify with any religion and 14,781 (6.2%) did not state their religion.</p> <p>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.</p> <p>Religion and belief are not held on the records for Council Tax or Business Rates and are not considered 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><b>The contract specification</b> will be seeking an awareness of faith key dates to be built into tenderers' training and processes.</p>				
<p><b>Sex</b></p>	<p>The Government's population estimates as of mid-2019 show that the total population of Harrow is now 251,200, made up of 125,800 men and 125,400 women. Overall, the number of males and females living in Harrow is very similar.</p> <p>Economic activity among Harrow's male population is higher than the London average at 86%, compared with 83%<sup>2</sup>. However, economic activity among females in the borough is lower than the London average at 72%.</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>



	<p>Based upon NOMIS Official Labour Market Statistics 2021, Harrow is a low wage borough, with both men and women that are employed in a full time capacity within the borough earning £609.10 on average, which is less than the London average of £766.60. Women employed on a full time basis, earn less on average than men employed on a full time basis within the borough. Average gross weekly earnings among women working in Harrow is £512.80, nearly 27% lower than the London average of £701.50.</p> <p>20% of Harrow businesses are female led.</p> <p>While the pandemic may have negatively impacted both sexes, the shift to home working may have had a positive impact in enabling women to return to work, as they are able to share childcare responsibilities.</p> <p>The Council Tax Support scheme allows for persons who are on low incomes or out of work to claim a reduction in their Council Tax due.</p> <p>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.</p> <p>It is not expected that this procurement or contract will have a negative impact on the people who have this protected characteristic.</p>				
<p><b>Sexual Orientation</b></p>	<p>The Office for National Statistics estimated in 2014, 2.6% of Londoners identify as lesbian, gay, or bisexual, the highest of any UK region. There is no official data on sexual orientation for Harrow in relation to employment.</p> <p>LGBT people are also likely to be underrepresented among business owners within Harrow.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p><b><u>Impact</u></b></p> <p>The policy will aim to support residents and local businesses regardless of their sexual orientation.</p> <p>It is unlikely that the proposal will lead to differential impact for people based on this protected characteristic</p> <p>This information is not held so will not be passed to the contractor and is not used to calculate the charge.</p>				
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**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

Charges for each of these collection streams are not calculated based on any of the protected characteristics and information is not held on any of the legacy systems of any of the characteristics except for Housing Benefit Overpayment Debts which do hold data regarding a debtor's age. The process to move cases to enforcement agent collection is in the main a bulk automated process which does not consider any of the characteristics as they are not held. Each debtor will receive warning notices explaining what will happen next before cases are referred to the enforcement agents and this will include, where applicable, signposting to our webpages and policies as well as different support agencies.

The procurement will be carried out in accordance with the current procurement rules and will comply with the Council's own financial regulations and standards. Support will be provided to the procurement team by representatives from the Corporate Procurement Team and Legal team.

Any contractor will be required to comply with the Equalities Act as well as their own Code of Conduct. As part of this procurement a method statement on how they will do this will be evaluated.

#### 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

Appendix 1 – EqIA - Cabinet Report for Authority to Procure Civil Enforcement Agent Services

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