

Equality Impact Assessment

Introduction

An Equality Impact Assessment (EIA) is required to ensure that equality is placed at the centre of policy development and review, as well as service delivery. The purpose of this EIA is to systematically analyse the likely impact of a service, policy or proposals on different community groups, and how the needs of such groups have been taken into account in developing those proposals.

The EIA can anticipate and recommend ways to avoid any discriminatory or negative consequences for a particular group, on the grounds of any protected characteristic. It provides the opportunity to demonstrate the potential benefits for equality target groups arising from a proposed policy or project.

The need for an EIA stems from the general duty placed on public authorities to eliminate unlawful discrimination in carrying out functions, and promote equality of opportunity. This is outlined in the Equality Act 2010, with specific public sector duties in place from April 2011.

1. Name of Policy or Service (existing or proposed)	
Revenues Services	
2. Responsible Manager	
Michael Fisher	
3. Date EIA completed	Review date
21.11.12	21.11.13
4. Description and aims of policy / service (including relevance to equalities)	
To provide an effective, customer focussed billing, administration and recovery service for Council Tax, Business Rates and Sundry Debtors.	
5. Who are the stakeholders?	
Customers and associated bodies, landlords, CAB, DWP, employees, Councillors	
6. What outcomes do we want to achieve?	
Provide a customer focussed billing and recovery service which treats customers with respect, but which is also effective in maximising collection rates.	
7. How will performance be measured?	
Collection rates	
Monitoring of Complaint's	
Selective sampling by Internal Audit	

8. Brief summary of research and background data

Census information 2001 (2011 not yet available)
Ongoing analysis of customer satisfaction data from Gateway
Ongoing analysis of customer complaints
Analysis of relevant data from the corporate consultation programme

9. Methods and outcome of consultation

10. Results of initial screening

The following questions have been considered in order to evaluate the various equality groups:-

Age – Is there any concern that these proposals could cause differential impact on the grounds of age? All age groups.

Disability – Is there any concern that these proposals could cause differential impact on the grounds of disability? Disability is recognised under the Equality Act as ‘a physical or mental impairment which has a substantial and long term effect on a person’s ability to carry out normal day to day activities.’

Gender Reassignment – Is there any concern that these proposals could cause differential impact on the grounds of gender reassignment? The Equality Act recognises this where a person is proposing to undergo, is undergoing, or has undergone a process (or part of a process) for changing sex.

Marriage / Civil Partnership – Is there any concern that these proposals could cause differential impact on the grounds of marriage or civil partnership? Under the Equality Act, no such protection exists for single or unmarried people.

Pregnancy / Maternity – Is there any concern that these proposals could cause differential impact on the grounds of pregnancy or maternity?

Race – Is there any concern that these proposals could cause differential impact on the grounds of race? Race is recognised under the Equality Act as a person’s skin colour, nationality or ethnic origin.

Sex – Is there any concern that these proposals could cause differential impact on the grounds of gender? Including men, women and transgender people.

Sexual Orientation – Is there any concern that these proposals could cause differential impact on the grounds of sexuality? Including heterosexual, gay, lesbian and bisexual people.

Religion or belief – Is there any concern that these proposals could cause differential impact on the grounds of religion or faith? All faiths recognised in the European Convention of Human Rights are included.

A commentary has been provided for each policy where appropriate – see Appendix A

11. Decisions and / or recommendations (including supporting rationale)

Customer contacts for Council Tax/Sundry Debt customers are dealt with via the Gateway Call centre and so this aspect of service provision will be covered by the Gateway EIA.

12. Is an Equality Action Plan required?

Yes – Hardship Payment, Localised Support for Council Tax Scheme

Appendix A – Results of initial screening

Policy / service	Protected Characteristics									Commentary
	Age	Disability	Gender reassignment	Marriage / civil p'ship	Pregnancy / maternity	Race	Religion or belief	Sex	Sexual Orientation	
Council Tax administration	O	O	O	O	O	O	O	O	O	The administration of Council tax is standardised for all customers and so no impact is recorded
Council tax recovery	O	P	O	O	O	P	O	O	O	The recovery process follows a set procedure which is laid down in recovery policy. There could be difficulties if people are disabled or do not have English as their first language and they fail to understand the process. The customer contacts for Council tax are dealt with via Gateway and are covered by their EIA.
Business Rates	O	P	O	O	O	P	O	O	O	The recovery process follows a set procedure which is laid down in recovery policy. There could be difficulties if people are disabled or do not have English as their first language and they fail to understand the process. Officers have the discretion to write off debts and so a full assessment is necessary.
Debtors	O	P	O	O	O	P	O	O	O	The recovery process follows a set procedure which is laid down in recovery policy. There could be difficulties if people are disabled or do not have English as their first language and they fail to understand the process. Officers have the discretion to write off debts and so a full assessment is necessary.

Symbol	Impact
+	Positive
O	Neutral / Negligible
-	Negative
P	Potential issue

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1. Name of Policy or Service (existing or proposed)	
Benefit Services	
2. Responsible Manager	
Michael Fisher	
3. Date EIA completed	Review date
21.11.12	21.11.13
4. Description and aims of policy / service (including relevance to equalities)	
<p>To provide a dignified service that is accessible for all and pays the right person, the right money at the right time, every time.</p> <p>To provide exceptional customer service, supported by the latest technology, that provides easy access for all, irrespective of need, in ways that delight customers and creates a professional and welcoming image of the Council</p>	
5. Who are the stakeholders?	
Customers and associated bodies, RSL's, CAB, DWP, employees, Councillors	
6. What outcomes do we want to achieve?	
A dignified service that is accessible for all and pays the right person, the right money at the right time, every time	

7. How will performance be measured?

National standards around speed and accuracy.
Local targets relating to customer satisfaction and benefit take up

8. Brief summary of research and background data

Census information 2001 (2011 not yet available)
Ongoing analysis of customer satisfaction data from Gateway
Ongoing analysis of customer complaints
Analysis of relevant data from the corporate consultation programme

9. Methods and outcome of consultation

10. Results of initial screening

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11. Decisions and / or recommendations (including supporting rationale)

Customer contacts for Benefits customers are dealt with via the Gateway Call centre and so this aspect of service provision will be covered by the Gateway EIA.

12. Is an Equality Action Plan required?

Yes – for appeals, discretionary housing payments, council tax support exceptional hardship and backdates

Appendix A – Results of initial screening

Policy / service	Protected Characteristics									Commentary
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Benefits processing	P	P	P	P	P	P	P	P	P	There is potential for benefits processing to be problematical as , typically, it is paid to disadvantaged groups. However, it is a national scheme and so the EIA has been completed by the DWP (benefit (miscellaneous amendments) regulations 2010). Local issues have been dealt with via the Gateway EIA
Appeals process	P	P	P	P	P	P	P	P	P	The claimant can appeal the benefit award decision and, in some cases, this can lead to a tribunal. Appeals can be subjective and are dealt with by the Team leaders
Discretionary Housing Payments	P	P	P	P	P	P	P	P	P	DHP requests are subjective.
Benefit backdate requests	P	P	P	P	P	P	P	P	P	Backdate requests are subjective in that the assessor makes a decision on 'good cause' based on the information to hand. This can lead to an appeal

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+	<i>Positive</i>
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1. Name of Policy or Service (existing or proposed)	
Corporate Debt Recovery Policy	
2. Responsible Manager	
Peter Haywood	
3. Date EIA completed	Review date
10 th November 2016	
4. Description and aims of policy / service (including relevance to equalities)	
<p>To set out the strategic context for how debts will be recovered and to provide a more detailed policy framework for the efficient collection of all debt types.</p> <p>The aims and objectives of this policy are to:</p> <ul style="list-style-type: none"> • Maximise income to the Council • Reduce the overall level of debt • Address customers debt problems and signpost to other organisations where appropriate • Maximise people's ability to pay by encouraging the take up of benefits, discounts, exemptions and reliefs • Take a different approach for those who can't pay and those who won't pay • Ensure that appropriate and early recovery action is taken and that the debtor's circumstances are taken into account when determining what action should be taken • Make best use of the Council's resources and improve performance • To be pro-active in collecting in year balances as well as managing arrears • Take into account all debts that are owed to the Council when arranging payment plans, and to determine which debts should be prioritised when undertaking recovery action 	

- To collect tax that is owed while remaining sensitive to the particular issues facing customers receiving Council Tax Support and those who are subject to other welfare reform changes.

5. Who are the stakeholders?

All council taxpayers, residents, benefit recipients, businesses, commercial tenants, service users and precepting authorities

6. What outcomes do we want to achieve?

To maximise income collection whilst dealing with accounts on an individual basis and taking an different approach to collection where appropriate.

7. How will performance be measured?

By the monitoring of in-year collection rates and the amounts of arrears that are collected in each year.

8. Brief summary of research and background data

Local Government Finance Act 1989
 Local Government Finance Act 1992
 Ministry of Justice - Taking Control of Goods: National Standards
 Tribunals, Courts and Enforcement Act 2007
 The Taking Control of Goods Regulations 2013
 Housing Benefit (Recovery of Overpayments) Regulations 1997
 Insolvency Act 1986

9. Methods and outcome of consultation

The policy reflects changes to legislation since the previous policy was adopted and has taken account of Ministry of Justice national standards on the treatment of vulnerable persons. The policy has taken account of national 'good practice' in the area of debt recovery, whilst the service has recently met with registered social landlords and the Citizens Advice Bureau on providing assistance and advice to residents who are experiencing difficulties with their finances.

10. Results of initial screening

The following questions have been considered in order to evaluate the various equality groups:-

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A commentary has been provided for each policy where appropriate – see Appendix A

11. Decisions and / or recommendations (including supporting rationale)

The Commentary at Appendix A and the elements of the policy that relate to vulnerability will be communicated to all relevant employees.

12. Is an Equality Action Plan required?

No

Appendix A – Results of initial screening

Policy / service	Protected Characteristics									Commentary
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Corporate Debt Recovery Policy	P	P	O	O	P	P	O	O	O	<p>Prior to undertaking enforcement action the Council will consider each case on its merits and recognise that a different course of action may be required where an individual may be considered as being vulnerable. These actions may include:</p> <ul style="list-style-type: none"> • Allowing longer to pay • Postponing recovery action • Providing assistance to claim benefits, discounts or other entitlements • Referring the person to sources of independent advice • Providing information in an accessible format • Agreeing to a temporary payment arrangement with a lower repayment level than would normally be agreed • Other action as appropriate to avoid the vulnerable person being at a disadvantage when

										compared to a non-vulnerable person.

Symbol	Impact
+	<i>Positive</i>
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