

## Enfield Equality Impact Assessment (EqIA)

### Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socio-economic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected eg equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups and consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.

**The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.**

## SECTION 1 – Equality Analysis Details

<b>Title of service activity / policy/ strategy/ budget change/ decision that you are assessing</b>	<b>Fair Income and Debt Strategy</b>
<b>Lead officer(s) name(s) and contact details</b>	<b>Geoff Waterton</b>
<b>Team/ Department</b>	<b>Resources</b>
<b>Executive Director</b>	<b>Fay Hammond</b>
<b>Cabinet Member</b>	<b>Cllr Mary Maguire</b>
<b>Date of EqIA completion</b>	<b>25<sup>th</sup> November 2020</b>

## SECTION 2 – Summary of Proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

**Please summarise briefly:**

What is the proposed decision or change?  
 What are the reasons for the decision or change?  
 What outcomes are you hoping to achieve from this change?  
 Who will be impacted by the project or change - staff, service users, or the wider community?

The council is seeking to agree a fair debt and income strategy to:

- Modernise debt recovery
- Maximise income
- Deliver fair and equitable treatment of our customers
- Improve access to benefit advice and debt support and reduce the escalation of charges

. The strategic objectives are to:

- a. Maximise collection
- b. Increase income
- c. Minimise the cost of collection
- d. Protect the vulnerable/low income households and sustain tenancies to minimise evictions from social housing
- e. Continue to provide reductions in fees and charges for low income and other households where economic to do so
- f. Provide easy, consistent access for customers to transact with the collection services, including local business.
- g. Protect the Public Purse

The strategy aims to deliver proactive data driven collection services which prioritises enforcement where there is evidence of deliberate non-payment and offers help and support for those that need it.

For customers this will mean protection from automatic court action, enforcement agents and additional costs for vulnerable or low-income households and specialist benefit and debt help and support when needed.

The new council debt strategy will help set a consistent measurable standard for all debt services across the council. This will include:

- Clear consistent processes across all debt services with standard escalation points in cases of default
- Agreed debt policies for each service to ensure customers are clear about the help available and consequences of default – see Appendix 3 for Sundry Income example
- A full range of internal and external collection and enforcement services is available across all services, including debt collection, tracing and legal support agencies to ensure income is maximised for all debts
- Consistent policies and procedures to protect vulnerable and low-income households with tailored collection services to meet customer needs
- Welfare and debt advice across all debt services
- Standard customer service standards, methods of payments and dispute and complaint management
- Standard digital service provision for all debts
- Standard processes to protect the public purse from fraud and error

The strategy will impact on the residents, businesses and other customers who pay for a council service and other agencies providing benefit and debt advice.

## SECTION 3 – Equality Analysis

This section asks you to consider the potential differential impact of the proposed decision or change on different protected characteristics, and what mitigating actions should be taken to avoid or counteract any negative impact.

According to the Equality Act 2010, protected characteristics are aspects of a person's identity that make them who they are. The law defines 9 protected characteristics:

1. Age
2. Disability
3. Gender reassignment.
4. Marriage and civil partnership.
5. Pregnancy and maternity.
6. Race
7. Religion or belief.
8. Sex
9. Sexual orientation.

At Enfield Council, we also consider socio-economic status as an additional characteristic.

“Differential impact” means that people of a particular protected characteristic (eg people of a particular age, people with a disability, people of a particular gender, or people from a particular race and religion) will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts, and, where possible, provide evidence to explain why this group might be particularly affected. If there is no differential impact for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one of the following protected characteristics.

### Age

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected.

The strategy aims to introduce modern on-line systems for customers able to use them whilst maintaining other channels for elderly and vulnerable residents who need to speak to a council officer. By better use of data, the council will also protect elderly and vulnerable residents from inappropriate debt enforcement and use other specialist methods to contact and assist residents with council debt issues.

### Mitigating actions to be taken

Not applicable. The strategy includes actions to positively impact elderly residents by protecting them from avoidable enforcement action

### Disability

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.

This could include:

Physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people with disabilities?

Please provide evidence to explain why this group may be particularly affected.

The strategy will provide modern on-line systems to administer debt and income. For residents unable to use on-line systems the council will maintain easy access to advice and guidance from council officers and work with the voluntary and community sector and other representatives and advocates to assist with any council debt issues

<b>Mitigating actions to be taken</b>
Not applicable – the strategy will deliver improved on-line services as well as a range of support services to help a person with a disability requiring additional help

<b>Gender Reassignment</b>
This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.
Will this change to service/policy/budget have a <b>differential impact [positive or negative]</b> on transgender people?
Please provide evidence to explain why this group may be particularly affected.
This strategy will not impact on transgender people unless they are elderly or vulnerable. Transgender people will not be specifically recorded within the council debt systems.
<b>Mitigating actions to be taken</b>
N/A – The general improvement of debt processes will positively impact all

<b>Marriage and Civil Partnership</b>
Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected

The legal status of married and civil partnerships is enshrined in council tax and tenancy law. Adherence to statutory provisions underpins this strategy

**Mitigating actions to be taken**

N/A

**Pregnancy and maternity**

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on pregnancy and maternity?

Please provide evidence to explain why this group may be particularly affected

The strategy recognises the importance of supporting pregnant or expectant mothers from unreasonable collection processes.

**Mitigating actions to be taken**

N/A

<p><b>Race</b></p> <p>This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.</p>
<p>Will this change to service/policy/budget have a <b>differential impact [positive or negative]</b> on people of a certain race?</p> <p>Please provide evidence to explain why this group may be particularly affected</p>
<p>The strategy will positively impact members of the Black, Asian and Minority Ethnic (BAME) communities who are in debt to the council</p>
<p><b>Mitigating actions to be taken</b></p>
<p>N/A</p>

<p><b>Religion and belief</b></p> <p>Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.</p>
<p>Will this change to service/policy/budget have a <b>differential impact [positive or negative]</b> on people who follow a religion or belief, including lack of belief?</p> <p>Please provide evidence to explain why this group may be particularly affected.</p>
<p>This Strategy recognises the importance of sensitive enforcement action at times of religious festivals</p>
<p><b>Mitigating actions to be taken</b></p>

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**Sex**

Sex refers to whether you are a man or woman.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on men or women?

Please provide evidence to explain why this group may be particularly affected.

The legal status of men and woman is enshrined in council tax and tenancy law. Adherence to statutory provisions underpins this strategy

**Mitigating actions to be taken**

N/A

**Sexual Orientation**

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with a particular sexual orientation?

Please provide evidence to explain why this group may be particularly affected.

The legal status of people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual is enshrined in council tax, benefit and tenancy law. Adherence to statutory provisions underpins this strategy

**Mitigating actions to be taken**

N/A

**Socio-economic deprivation**

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who are socio-economically disadvantaged?

Please provide evidence to explain why this group may be particularly affected.

The Fair Debt and Income Strategy will positively help people who are disadvantaged due to socio-economic factors

**Mitigating actions to be taken.**

N/A

## SECTION 4 – Monitoring and Review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

The Debt and Income Board will monitor the impact of the strategy as stated in the report



**SECTION 5 – Action Plan for Mitigating Actions.**

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments