

EQUALITY IMPACT ASSESSMENT

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity for those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protect characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment

Name of proposal	Increase in fees and Charges Regulatory Services
Service area	Commercial and Operations Regulatory Services
Officer completing assessment	Gavin Douglas
Equalities/ HR Advisor	Paul Green
Cabinet meeting date (if applicable)	
Director/Assistant Director	Stephen McDonnell

2. Summary of the proposal

Please outline in no more than 3 paragraphs

- The proposal which is being assessed*
- The key stakeholders who may be affected by the policy or proposal*
- The decision-making route being taken*

Regulatory Services cover a range of enforcement and Licensing services including Trading Standards, Pollution Control, Licensing (The Licensing Act 2003, Gambling Act 2005) London Local Authorities Act, Food Safety, Mortuary Services and Pest Control. Most fees are permissible by Acts of parliament. Some are fixed which cannot be varied and some must be in a range up to a maximum. The three main discretionary services relates to pest control, food hygiene training and mortuary fees. Pest Control and food hygiene have public health benefits.

The proposal is to increase pest control charges in general to be competitive with the market and ensure cost recovery. This includes a change the current concession reduction rate from 50% of the maximum cost to a 40% reduction of the maximum cost. This reduction of 40% reduction goes some way to cover marginal costs only and reflects an overall positive impact on lower income groups on means test benefits.

The scoping exercise showed that the proposed concession rate is mainly lower than the average offered by neighbouring boroughs. Findings showed that costs that many neighbouring boroughs either do not have concessions in pest control or have a higher charge. Pest Control fees are discretionary.

Other regulatory increases in the Mortuary 14% which is a service carried out for the London Borough of Enfield. This increase is to progress towards cost recovery of managing the service and delivery the service. This has been screened and not expected to have a disproportionate impact on protected group, the costs are paid for by London Borough of Enfield rather than an individual. Contaminated land search fees have been screened. This change will have a low impact overall and are not expected to have a disproportionate impact on any protected groups. A full EqIA is therefore not required in relation to these changes.

Other fees have been increased in line with inflation and therefore not expected to have a disproportionate effect.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	Census 2011 data	n/a
Gender Reassignment	No data collected nationally or locally available	n/a
Age	Census 2011 data	n/a
Disability	Census 2011 data	n/a
Race & Ethnicity	Census 2011 data	n/a
Sexual Orientation	No data collected nationally or locally available	n/a
Religion or Belief (or No Belief)	Census 2011 data	n/a
Pregnancy & Maternity	Census 2011 data	n/a
Marriage and Civil Partnership	Census 2011 data	n/a

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?

Explain how you will overcome this within the proposal.

Further information on how to do data analysis can be found in the guidance.

We do not currently collect equality monitoring data of people using the service. Based upon the general population [census data](#) of Haringey, we are aware that Haringey have a young population with high ethnic diversity. Therefore, it is likely that any changes to fees and charges will impact on these groups.

Based upon census analysis, we can see that women are more likely to be in poverty than men¹. In addition to this, those with long term disabilities² and from BAME

¹ <https://www.nomisweb.co.uk/census/2011/DC6203EW>

² <https://www.nomisweb.co.uk/census/2011/KS106EW/view/1946157250?cols=measures>

communities³³. These groups are likely to have lower income groups and so are less able to afford increased fees. The concession rate acts as a way to mitigate this as concessions are given to lower income groups on means tested benefits.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqlA guidance

No consultation undertaken. We have used information was gathered from existing costs, charges and concessions rates across boroughs via the internet to compare.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

N/A as no consultation was undertaken.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqlA guidance

³³ <http://www.poverty.org.uk/06/index.shtml>

1. Sex

Women are more likely to be in lower income groups and therefore will more likely be impacted by a change in fees and charges. However, the Council has taken appropriate steps to mitigate any financial disadvantage for individuals while making sure the service is financially sustainable by offering a concessionary rate that has gone from 50% of costs to 40% for those on benefits. However, this does not include those in in-work poverty who will experience the increase in fees and charges, but the Council has ensured that they are not disproportionate by keeping them below market rates.

Positive		Negative	X	Neutral impact		Unknown Impact	
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2. Gender reassignment

Data on gender reassignment is not collected in the census or locally.

We do not envisage this protected group to be disproportionately impacted by this decision.

Positive		Negative		Neutral impact	X	Unknown Impact	
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3. Age

Both young people and older people are more likely to be in lower income groups and therefore will more likely be impacted by a change in fees and charges. However, the Council has taken appropriate steps to mitigate any financial disadvantage for individuals while making sure the service is financially sustainable by offering a concessionary rate that has gone from 50% of costs to 40% for those on benefits. However, this does not include those in in-work poverty who will experience the increase in fees and charges, but the Council has ensured that they are not disproportionate by keeping them below market rates.

Positive		Negative	X	Neutral impact		Unknown Impact	
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4. Disability

Disabled people are more likely to be in lower income groups and therefore will more likely be impacted by a change in fees and charges. However, the Council has taken appropriate steps to mitigate any financial disadvantage for individuals while making sure the service is financially sustainable by offering a concessionary rate that has gone from 50% of costs to 40% for those on benefits. However, this does not include those in in-work poverty who will experience the increase in fees and charges, but the Council has ensured that they are not disproportionate by keeping them below market rates.

Positive		Negative	X	Neutral impact		Unknown Impact	
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5. Race and ethnicity (

Disabled people are more likely to be in lower income groups and therefore will more likely be impacted by a change in fees and charges. However, the Council has taken appropriate steps to mitigate any financial disadvantage for individuals while making sure the service is financially sustainable by offering a concessionary rate that has gone from 50% of costs to 40% for those on benefits. However, this does not include those in in-work poverty who will experience the increase in fees and charges, but the Council has ensured that they are not disproportionate by keeping them below market rates.

Positive		Negative	X	Neutral impact		Unknown Impact	
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6. Sexual orientation

Data on sexual orientation is not collected in the census or locally.

We do not envisage this protected group to be disproportionately impacted by this decision.

Positive		Negative		Neutral impact	X	Unknown Impact	
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7. Religion or belief (or no belief)

Haringey has a diverse religious population, with large Christian, Jewish and Muslim communities.

We do not envisage this protected group to be disproportionately impacted by this decision.

Positive		Negative		Neutral impact	X	Unknown Impact	
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8. Pregnancy and maternity

As women are likely to be on low incomes, this is likely to impact on women under this protected characteristic. However, the Council has taken appropriate steps to mitigate any financial disadvantage for individuals while making sure the service is financially sustainable by offering a concessionary rate that has gone from 50% of costs to 40% for those on benefits. However, this does not include those in in-work poverty who will experience the increase in fees and charges, but the Council has ensured that they are not disproportionate by keeping them below market rates.

Positive		Negative	X	Neutral impact		Unknown Impact	
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9. Marriage and Civil Partnership

The service will continue to treat those in a civil partnership the same as those in a marriage.

Positive		Negative		Neutral impact	X	Unknown Impact	
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10. Groups that cross two or more equality strands e.g. young black women
 It is likely that there is an intersectional impact between race, sex, age and disability because these are the groups most likely to be in poverty.

Outline the overall impact of the policy for the Public Sector Equality Duty:

- Could the proposal result in any direct/indirect discrimination for any group that shares the protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a protected characteristic and those who do not?

This includes:

- a) Remove or minimise disadvantage suffered by persons protected under the Equality Act
- b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
- c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low
- Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?

Whilst the concession % discount is being reduced overall concessions rates still remain and are below cost price, below benchmarked concessions and below the market rate. Having a concessions rate of public health pests means that a take up of service is more likely than not having a reduction. Public Health pests can spread

across all types of tenure which have different protected characteristics or groups and therefore it could help foster good relations.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EqlA guidance

Outcome	Y/N
No major change to the proposal: the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u>	y
Adjust the proposal: the EqlA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	n
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	n

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact and which protected characteristics are impacted?	Action	Lead officer	Timescale

<p>Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.</p>			
<p>6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:</p>			
<p>Impacts can be monitored by comparing monthly take up trend of the service against previous years and full paying customers. Any impact of the change can be monitored and considered against the need for cost recovery of a non statutory service</p>			

7. Authorisation

EqlA approved by (Assistant Director/ Director)	Date 14/10/17
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8. Publication
Please ensure the completed EqlA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EqlA process.

