

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 between those with a ‘relevant protected characteristic’ and those without one;
- Fostering good relations between those with a ‘relevant protected characteristic’ and those without one.

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 protected 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	Haringey’s Risk Based Verification Policy
Service area	Benefits
Officer completing assessment	Rupinder Shergill
Equalities/ HR Advisor	Lucy Fisher
Cabinet meeting date (if applicable)	08.10.19
Director/Assistant Director	Andy Briggs

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*

This EqIA accompanies a report seeking to approve a policy relating to Risk Based Verification (RBV). RBV is a method of applying different levels of checks to claims. Each claim would be given a risk category, Low, Medium or High. This risk determines the likelihood of fraud or error occurring on the claim. The risk profile is determined by specific software using statistical information gathered over many years about what type of claims represents what type of risk. Currently when a claim is received the customer will be asked to provide evidence to support the claim. All claims are required to provide some form of evidence to verify income and identity. Some customers may subsequently be asked to provide further proofs.

In line with DWP guidance (HB/CTB Circular S11/2011), a policy would be created to determine how the Benefits service would process claims that fall into each of the risk categories.

As claims are received, the amount of evidence that would be required for each claim would have been pre-determined according to the risk category assigned. The risk category is based on the type of claim submitted and is determined by specific software provided by a company working in partnership with our Housing Benefit software supplier. Each claim will automatically be assigned either a Low, Medium or High risk and then processed in line with the agreed policy for that category.

Based on the guidance provided by the DWP around a third of our claims would require less evidence that is currently requested i.e. they would be classified as low risk. The remaining two thirds, medium and high risk would remain broadly the same in terms of supporting evidence required.

The RBV report, policy and this document will be put before Corporate Committee for approval.

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	<p>Service data has been used to inform this EqIA.</p> <p>Reports and data are available on this protected group, but at this stage we are not able to provide a breakdown on which claim will fall into which risk category.</p> <p>Once the policy is Live we can collate data to identify which risk category this protected group is falling into. However, it is not expected that if this group is over-represented in any one category that this proposal will have a negative impact.</p>	Staff are not affected by this policy
Gender Reassignment	<p>Although the service does not hold data in relation to gender reassignment, at a national level we know that LGBT+ people are more likely to earn below £20,000 a year, and transgender people are less likely to have been in paid employment in the last 12 months, compared to non-transgender people. It is therefore likely that transgender residents are more likely to be claiming benefits than non-transgender residents. However, it is not expected that if this group is over-represented in any one category that this proposal will have a negative impact.</p>	Staff are not affected by this policy
Age	<p>Service data has been used to inform this EqIA.</p> <p>Reports and data are available on this protected group, but at this stage we are not able to provide a breakdown on which claim will fall into which risk category.</p> <p>Once the policy is Live we can collate data to identify which risk category this protected group is falling into. However, it is not expected that if this group is over-represented in any one category that this proposal will have a negative impact.</p>	Staff are not affected by this policy
Disability	<p>Service data has been used to inform this EqIA.</p> <p>Reports and data are available on this protected group, but at this stage we are not able to provide a breakdown on which claim will fall into which risk category.</p> <p>Once the policy is Live we can collate data to identify which risk category this protected group is falling into. However, it is not expected that if this group is over-</p>	Staff are not affected by this policy

	represented in any one category that this proposal will have a negative impact.	
Race & Ethnicity	Service data has been used to inform this EqIA. Reports and data are available on this protected group, but at this stage we are not able to provide a breakdown on which claim will fall into which risk category. Once the policy is Live we can collate data to identify which risk category this protected group is falling into. However, it is not expected that if this group is over-represented in any one category that this proposal will have a negative impact.	Staff are not affected by this policy
Sexual Orientation	Service data has been used to inform this EqIA. Although the service does not hold data in relation to sexual orientation, at a national level we know that LGBT+ people are more likely to earn below £20,000 a year. It is therefore likely that LGBT+ residents are more likely to be claiming benefits than non-LGBT+ residents. However, it is not expected that if this group is over-represented in any one category that this proposal will have a negative impact.	Staff are not affected by this policy
Religion or Belief (or No Belief)	Service data has been used to inform this EqIA. Although the service does not hold data in relation to religion or belief, across London we know that certain religions are more likely to earn below the LLW, with Muslims, Sikhs, Hindus and Buddhists most likely. It is therefore likely that residents from these faiths are more likely to be claiming benefits than other residents. However, it is not expected that if this group is over-represented in any one category that this proposal will have a negative impact.	Staff are not affected by this policy
Pregnancy & Maternity	Service data has been used to inform this EqIA. The service does not hold data in relation to pregnancy and maternity, though national data suggests that this group is more likely to be claiming certain benefits. However, it is not expected that if this group is over-represented in any one category that this proposal will have a negative impact.	Staff are not affected by this policy

Marriage and Civil Partnership	Service data has been used to inform this EqIA. The service does not hold data in relation to marriage and civil partnership, and there is no reason to think that this group could be disproportionately affected by the proposal.	Staff are not affected by this policy

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.

1. Sex

The current Housing Benefit and Council Tax Reduction caseload consists of 58% Female and 40% Male claimants, (2% are undeclared).

We cannot currently determine which risk category individuals in this group will be likely to fall into. If residents of a certain sex are found to be over-represented in any one category, the change to the service will either reduce waiting times or have no impact on them at all for this group. There are therefore no equalities concerns around the impact of this proposal on residents in this protected characteristic group.

There is no evidence to suggest that they will be impacted in a detrimental way with the introduction of RBV

2. Gender Reassignment

We do not currently hold any data relating to gender re-assignment.

While transgender residents may be over-represented in the overall cohort, if this group is found to be over-represented in any one category as a result of the change to the service, will either reduce waiting times or have no impact on them at all for this group. There are therefore no equalities concerns around the impact of this proposal on transgender residents.

3. Age

The current Housing Benefits/ Council Tax Reduction caseload is made up of 76% working age households and 24% Pensioners.

The implementation of this policy will have a positive impact for many pensioners as a large proportion will be in the low risk Housing Benefit and Council Tax Reduction cohort of claims and so will be required to produce less evidence to support their claim.

We cannot currently determine which risk category individuals in other age groups may be more likely to fall into, though there is currently no evidence to suggest that any certain age groups will be impacted in a detrimental way with the introduction of RBV. If any age groups are found to be over-represented in any one category, the change to the service will either reduce waiting times or have no impact on them at all for this group. There are therefore no equalities concerns around the impact of this proposal on residents in this protected characteristic group.

4. Disability

Within the current Housing Benefits/ Council Tax Reduction caseload 7.6% of applicants are in receipt of a Disability Benefit.

We cannot currently determine which risk category individuals in this group will be likely to fall into. If residents with a disability are found to be over-represented in any one category, the change to the service will either reduce waiting times or have no impact on them at all for this group. There are therefore no equalities concerns around the impact of this proposal on residents in this protected characteristic group.

5. Race & Ethnicity

Of the 30% of Housing Benefit/ Council Tax Reduction applicants who have declared their ethnicity, the breakdown was as follows:

18% White British

33% White Other

17% Black or Asian/ British

23% Black African/ Caribbean

5% Asian

4% Mixed

We cannot currently determine which risk category individuals of different ethnic groups will be likely to fall into. If residents of certain ethnicities are found to be over-represented in any one category, the change to the service will either reduce waiting times or have no impact on them at all for this group. There are therefore no equalities

concerns around the impact of this proposal on residents in this protected characteristic group.

6. Marriage & Civil Partnerships

We do not currently hold any data relating to Marriage & Civil Partnerships.

There is no evidence to suggest that residents in this protected characteristic group will be impacted in a detrimental way with the introduction of RBV.

7. Sexual Orientation

We do not currently hold any data relating to sexual orientation, and we therefore cannot currently determine which risk category individuals in this group will be likely to fall into. If LGBT+ residents are found to be over-represented in any one category, the change to the service will either reduce waiting times or have no impact on them at all for this group. There are therefore no equalities concerns around the impact of this proposal on residents in this protected characteristic group.

8. Religious Belief or No Belief

We do not currently hold any data relating to religious belief or non-belief. We cannot currently determine which risk category individuals in this group will be likely to fall into. If residents of a certain religion or belief are found to be over-represented in any one category, the change to the service will either reduce waiting times or have no impact on them at all for this group. There are therefore no equalities concerns around the impact of this proposal on residents in this protected characteristic group.

9. Pregnancy & Maternity

We do not currently hold any data relating to pregnancy and maternity. We cannot currently determine which risk category individuals in this group will be likely to fall into. If residents in this protected characteristic group are found to be over-represented in any one category, the change to the service will either reduce waiting times or have no impact on them at all for this group. There are therefore no equalities concerns around the impact of this proposal on residents in this protected characteristic group.

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 EqIA guidance

The service does not propose to consult with residents on the contents of the Risk Based Verification Policy.

The DWP have stated:

The information held in the policy, which would include the risk categories, should not be made public due to the sensitivity of its contents

It is not envisaged that this policy will have an adverse impact on people with protected groups or residents and service users. Conversely, the proposal is expected to positively impact certain protected characteristic groups who are more likely to claim benefits and are more likely to fall into the category of 'low risk', and whose waiting times for applications will therefore be reduced.

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?

Consultation has not taken place in relation to this policy

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 EqIA guidance

1. Sex

Claims falling into the Low Risk category will be impacted positively as they will be required to provide less evidence.

Those falling into Medium or High-Risk categories will remain broadly the same as

they are now.

It is not anticipated that anyone will be adversely affected, and some may be positively affected. At this stage we cannot determine which category individuals in this group will fall into.

Positive		Negative		Neutral impact		Unknown Impact	X
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2. Gender reassignment

Claims falling into the Low Risk category will be impacted positively as they will be required to provide less evidence.

Those falling into Medium or High-Risk categories will remain broadly the same as they are now.

It is not anticipated that anyone will be adversely affected, and some may be positively affected.

We do not hold data on gender re-assignment so we will not be able to determine which category individuals in this group will fall into.

Positive		Negative		Neutral impact		Unknown Impact	X
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3. Age

Claims falling into the Low Risk category will be impacted positively as they will be required to provide less evidence.

Those falling into Medium or High-Risk categories will remain broadly the same as they are now.

It is not anticipated that anyone will be adversely affected, and some may be positively affected, such as some pensioners. At this stage, however, we cannot determine which category individuals in this group will fall into.

Positive		Negative		Neutral impact		Unknown Impact	X
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4. Disability

Claims falling into the Low Risk category will be impacted positively as they will be required to provide less evidence.

Those falling into Medium or High-Risk categories will remain broadly the same as they are now.

It is not anticipated that anyone will be adversely affected, and some may be positively affected. At this stage we cannot determine which category individuals in this group will fall into.

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

Claims falling into the Low Risk category will be impacted positively as they will be required to provide less evidence.

Those falling into Medium or High-Risk categories will remain broadly the same as they are now.

It is not anticipated that anyone will be adversely affected, and some may be positively affected. At this stage we cannot determine which category individuals in this group will fall into.

Positive		Negative		Neutral impact		Unknown Impact	X
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6. Sexual orientation

Claims falling into the Low Risk category will be impacted positively as they will be required to provide less evidence.

Those falling into Medium or High-Risk categories will remain broadly the same as they are now.

It is not anticipated that anyone will be adversely affected, and some may be positively affected.

We do not hold data on sexual orientation so we will not be able to determine which category individuals in this group will fall into.

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

Claims falling into the Low Risk category will be impacted positively as they will be required to provide less evidence.

Those falling into Medium or High-Risk categories will remain broadly the same as they are now.

It is not anticipated that anyone will be adversely affected, and some may be positively affected.

We do not hold data on religious belief or non-belief so we will not be able to determine which category individuals in this group will fall into.

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

Claims falling into the Low Risk category will be impacted positively as they will be required to provide less evidence.

Those falling into Medium or High-Risk categories will remain broadly the same as they are now.

It is not anticipated that anyone will be adversely affected, and some may be positively affected.

We do not hold data on pregnancy and maternity so we will not be able to determine which category individuals in this group will fall into.

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

Claims falling into the Low Risk category will be impacted positively as they will be required to provide less evidence.

Those falling into Medium or High-Risk categories will remain broadly the same as they are now.

It is not anticipated that anyone will be adversely affected, and some may be positively affected.

We do not hold data on marriage and civil partnerships so we will not be able to determine which category individuals in this group will fall into.

Positive		Negative		Neutral impact		Unknown Impact	X
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10. Groups that cross two or more equality strands e.g. young black women

Claims falling into the Low Risk category will be impacted positively as they will be required to provide less evidence.

Those falling into Medium or High-Risk categories will remain broadly the same as they are now.

It is not anticipated that anyone will be adversely affected, and some may be positively affected. At this stage we cannot determine which category individuals that cross two or more equality strands will fall into

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 relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant 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 relevant protected characteristic and those who do not?

The Risk Based Verification Policy will make it easier for some people to make a claim in that they will be required to provide less documentation to support their claim. For others the level of evidence required will remain broadly the same.

The risk category for each claim is determined by specific software using statistical information gathered over many years about what type of claims represents what type of risk.

Once RBV is implemented we will monitor the caseload on an on-going basis to establish a breakdown of the various groups within each risk category.

The RBV policy must be reviewed every year and this should be accompanied and supported with an EqIA which provides a detailed breakdown of how protected groups have or have not been impacted. It should be noted that any impact should be a positive one.

In other local authorities where RBV has been implemented, a significant improvement in processing times has been established. By making payments to our customers quicker it will help the Council meet its objectives to reduce poverty and deprivation

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 EqIA guidance

Outcome	Y/N
No major change to the proposal: the EqIA 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 EqIA 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	

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.

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 relevant protected characteristics are impacted?	Action	Lead officer	Timescale

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.

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

No negative impact is expected for any protected characteristic group, as the proposal is expected either to reduce waiting times for applicants, or for waiting times to remain the same. This means that for all protected characteristic groups there will either be a positive impact or a neutral impact.

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7. Authorisation	
EqlA approved by (Assistant Director/ Director)	Date

8. Publication <i>Please ensure the completed EqlA is published in accordance with the Council's policy.</i>

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