

## 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 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

<b>Name of proposal</b>	Increase in fees and Charges Regulatory Services
<b>Service area</b>	Environment and Neighbourhoods Regulatory Services
<b>Officer completing assessment</b>	Gavin Douglas
<b>Equalities/ HR Advisor</b>	Lucy Fisher
<b>Cabinet meeting date (if applicable)</b>	
<b>Director/Assistant Director</b>	Stephen McDonnell/ Eubert Malcolm

## 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 four main discretionary services relates to pest control, food hygiene, contaminated land and mortuary fees. Pest Control and food hygiene have public health benefits.

### Pest Control

The proposal is for pest control charges in general to be competitive with the market and ensure cost recovery. The service is not mandatory.

Increases to pest control charges are all in line with inflation, except for the Pharaoh Ants charge (12%). This was found to be uncompetitive with the market.

There is no change to the current concession reduction rate of 40% reduction, which is granted via those on benefits. These benefits are means tested and include: Income support, pension credit, working tax credit, council tax credit and housing benefit. These reductions go some way to cover marginal costs only and reflects an overall commitment to reducing negative impacts on those on benefits in the lower income groups.

The scoping exercise showed that the proposed concession rate, even taking into account the fee increase, is mainly lower than the average offered by neighbouring boroughs. Findings showed that many neighbouring boroughs either do not have concessions in pest control or have a higher charge.

### Mortuary

Regulatory increase in fees in the Mortuary are in line with inflation. These fees are charged to the London Borough of Enfield for the use of our mortuary services. This increase is to ensure cost recovery of managing the service and delivery of the service. This has been screened using the equalities monitoring tool and, given that the changes are in line with inflation, there are no equalities concerns. The proposal is not expected to have a disproportionate impact on any protected group, and additionally the costs are paid for by London Borough of Enfield rather than an individual.

### Contaminated Land Search

Contaminated land search fees have been screened using the equalities monitoring tool. The fee increase of 12% will have a low impact overall and is not expected to have a disproportionate impact on any protected groups. Fees will be generally paid by developers when purchasing land. There are only around 12 requests in one year.

### Food Hygiene Rating Revisits

Food Hygiene rating revisits are not mandatory service and businesses can choose this service. The increase is 18%. This has been screened using the equalities monitoring tool and is not expected to have a disproportionate impact on protected groups.

Other fees related to pollution and food have been increased in line with inflation to the nearest pound and are therefore not expected to have a disproportionate effect on any protected characteristic group.

### **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.*

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

**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.*

Equalities monitoring data is currently not collected for people using these services, and nor is this data available at the regional or national level. However, given that those most affected by poverty are most likely to be impacted by certain price increases, the proposals are evaluated in the context of data on poverty and deprivation in Haringey, and how those relate to protected characteristic groups.

Based upon the general population [census data](#) of Haringey, we are aware that Haringey have a slightly younger than average population with high ethnic diversity. Therefore, it is likely that any changes to fees and charges will impact on these groups.

#### Pest Control

Based upon census analysis, we can see that females are more likely to be in poverty than males<sup>1</sup>. In addition to this, those with long term disabilities<sup>2</sup> and from BAME communities<sup>3</sup> are more likely to have lower income, and so are less able to afford increased fees. While this means females may be more likely to be impacted by the increased costs for pharaoh ants treatment, the concession rate acts as a way to mitigate this as concessions are given to lower income groups on means tested benefits and those in work through credits.

#### Mortuary

No discrimination identified. The fees charged to the London Borough of Enfield reflect the cost of the Mortuary. The London Borough of Enfield like all local government collects its income from a range of services including Council Tax and Business rates. Fees are only increasing by inflation and Enfield have the discretion to use Haringey Mortuary or consider best value for its residents elsewhere. There is no equality monitoring data related to the mortuary service. Fees are not paid by individuals.

#### Contaminated land fees

No discrimination identified. The service does not collect equality monitoring data from people using these services, however it is not expected that any protected characteristic group would be disproportionately affected, as typically, fees will be paid by developers when purchasing land for development. There are only around 12 requests in one year.

#### Food Hygiene revisits

The service does not currently collect equalities monitoring data of Businesses using this service. While certain protected characteristic groups may be more likely to be business owners in Haringey, there are currently 3 businesses that request the service a year in Haringey, and therefore it is not expected that there will be a disproportionate impact on any one group.

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

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

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

**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

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 EqIA guidance

*As noted above, equalities monitoring data is not currently collected for people using these services, and nor is this data available at the regional or national level. However, given that those most affected by poverty are most likely to be impacted by certain price increases, the proposals are evaluated in the context of data on poverty and deprivation in Haringey, and how those relate to protected characteristic groups.*

**1. Sex**

Pest control

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 of 40% for those on benefits.

Concessions, include those in in-work poverty who will experience the increase in fees and charges. The Council has made every effort to minimise the negative impact on those who are not eligible for concessions, by keeping the charges at market rates and ensuring a quality, transparently costed service that is discretionary.

**Mortuary**

There is no evidence of impact. Fees are not increasing above inflation and are not paid for by a user that has a protected characteristic.

**Contaminated Land fees and Food Hygiene revisits**

These are fees charged to Businesses. This is not expected to have a disproportionate impact on protected characteristic groups.

Positive		Negative	X	Neutral impact		Unknown Impact	
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**2. Gender reassignment**

Data on gender reassignment is not currently collected in the census or locally. Nevertheless, LGBT+ residents are more likely to be impacted by unemployment and poverty, and as such are more likely to be negatively impacted by this proposal.

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 and keeping increase to inflation rates. Concessions rates also apply to those in in-work poverty, helping to minimise the impact of the increase in fees and charges. The Council has made every effort to minimise the negative impact on those who are not eligible for concessions, by keeping the charges at market rates and ensuring a quality, transparently costed service that is discretionary.

Positive		Negative	X	Neutral impact		Unknown Impact	
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**3. Age**

**Pest Control**

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 at a 40% reduction to those on benefits. Concessions rates also apply to those in in-work poverty, helping to minimise the impact of the increase in fees and charges. The Council has made every effort to minimise the negative impact on those who are not eligible for concessions, by keeping the charges at market rates and ensuring a quality, transparently costed service that is discretionary.

**Mortuary**

There is no evidence of impact. Fees are not increasing above inflation and are not paid for by a user that has a protected characteristic

**Contaminated Land fees and Food Hygiene revisits**

These are fees charged to Businesses. This is not expected to have a disproportionate impact on protected characteristic groups.

Positive		Negative	X	Neutral impact		Unknown Impact	
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**4. Disability  
Pest Control**

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 and keeping increase to inflation rates. Concessions rates also apply to those in in-work poverty, helping to minimise the impact of the increase in fees and charges. The Council has made every effort to minimise the negative impact on those who are not eligible for concessions, by keeping the charges at market rates and ensuring a quality, transparently costed service that is discretionary.

Mortuary

There is no evidence of impact. Fees are not increasing above inflation and are not paid for by a user that has a protected characteristic.

Contaminated Land fees and Food Hygiene revisits

These are fees charged to Businesses. This is not expected to have a disproportionate impact on protected characteristic groups.

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

Certain ethnic groups 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 of 40% for those on benefits. Concessions rates also apply to those in in-work poverty, helping to minimise the impact of the increase in fees and charges. The Council has made every effort to minimise the negative impact on those who are not eligible for concessions, by keeping the charges at market rates and ensuring a quality, transparently costed service that is discretionary.

Mortuary

There is evidence of impact. Fees are not increasing above inflation and are not paid for by a user that has a protected characteristic

Contaminated Land fees and Food Hygiene revisits

These are fees charged to Businesses. This is not expected to have a disproportionate impact on protected characteristic groups.

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. Nevertheless, LGBT+ residents are more likely to be impacted by unemployment and poverty, and as such are more likely to be negatively impacted by this proposal.

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 and keeping increase to inflation rates. Concessions rates also apply to those in in-work poverty, helping to minimise the impact of the increase in fees and charges. The Council has made every effort to minimise the negative impact on those who are not eligible for concessions, by keeping the charges at market rates and ensuring a quality, transparently costed service that is discretionary.

Positive		Negative	X	Neutral impact		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. Residents from certain religious groups are more likely to be impacted by unemployment and poverty, and as such will benefit from mitigating measures taken by the Council, such as concessionary fees and maintaining fees below market rates.

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 and keeping increase to inflation rates. Concessions rates also apply to those in in-work poverty, helping to minimise the impact of the increase in fees and charges. The Council has made every effort to minimise the negative impact on those who are not eligible for concessions, by keeping the charges at market rates and ensuring a quality, transparently costed service that is discretionary.

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

#### Pest Control

As women are more 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 of a 40% reduction of the full rate.

Concessions rates, include those in in-work poverty who will experience the increase in fees and charges. The Council has made every effort to minimise the negative impact on those who are not eligible for concessions, by keeping the charges at market rates and

ensuring a quality, transparently costed service that is discretionary.

Mortuary

There is evidence of any impact directly or indirectly. Fees are not increasing above inflation and are not paid for directly by a user that has a protected characteristic

Contaminated Land fees and Food Hygiene revisits

These are fees charged to Businesses. This is not expected to have a disproportionate impact on protected characteristic groups.

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. It is not anticipated that either group will be disproportionately affected by these proposals.

Positive		Negative	X	Neutral impact		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. However, the Council’s steps to mitigate any financial disadvantage for individuals should lessen this impact, through the concessionary rate of a 40% reduction of the full rate. Concessions rates also apply to those in in-work poverty, helping to minimise the impact of the increase in fees and charges.

**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?**

**Pest Control**

The concession % discount of 40% of the standard full rate means 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 less likely to be reduced. Public Health pests can spread across all types of housing tenure which have different protected characteristics or groups and therefore it could help reduce any tensions between those effected by pests and their neighbour or adjoined properties.

**Mortuary**

There is no evidence of impact. Fees are not increasing above inflation and are not paid for by a user that has a protected characteristic. No indirect discrimination is thought to affect protected characteristics. This fee is discretionary, and Enfield are free to use other services

**Contaminated Land fees and Food Hygiene revisits**

These are fees charged to Businesses. This is not expected to have a disproportionate impact on protected characteristic groups.

**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
<p><b>No major change to the proposal:</b> 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. negative impacts have been mitigated for those on means related concessions (both in and out of work benefits. We have also minimised the impact by providing a clearly costed quality service at market rates).</u></p>	y
<p><b>Adjust the proposal:</b> 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</p>	n
<p><b>Stop and remove the proposal:</b> the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.</p>	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

**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:**

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.

**7. Authorisation**

EqIA approved by ..... (Assistant Director/ Director)	Date .....
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**8. Publication**

*Please ensure the completed EqIA is published in accordance with the Council's policy.*

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