

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

Name of proposal	Registrars fees review
Service area	Registrars
Officer completing assessment	Paul Oram
Equalities/ HR Advisor	Emma Carroll
Cabinet meeting date (if applicable)	
Director/Assistant Director	Bernie Ryan

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

The proposal is to change some of the fees charged by the Haringey Registration and Citizenship Service (Register Office) for people getting married, forming a civil partnership, registering births and deaths or attending citizenship services. A summary of the key fee changes can be found in the following table:

Fee	Key changes
Statutory Fees	<p>Most fees charged by the service are statutory and set by Central Government. Each service area has at least one statutory fee, these include: ceremonies and certificates. The local service does not have the ability to change these fees but can exercise discretion on the basis of compassion and hardship.</p> <p>Statutory fees ensure that every person has access to the service for an equal reasonable fee. Statutory fees are complimented by other fees, should a person require a more enhanced service</p>
Certificates	<p>All fees for certificates were increased by government to a standard fee of £11 during the 2019/20 financial year, previously the fee ranged from £4 at the time of registration through £7 to £10 once a register is full. The service cannot change this fee but there is an option to issue a certificate for free on the grounds of compassion and hardship.</p>
Wedding fees	<p>Central Government increased the cost of a basic statutory wedding or civil partnership from £50 to £57 (including £11 for one certificate) during the 2019/20 financial year. There is no obligation to purchase a certificate meaning the basic cost of a statutory registration is £46.</p> <p>The fee for Weddings and Civil Partnerships, held at George Meehan House, are proposed to increase by up to 33.33% for 2020/21. E.g. the Saturday service fee is proposed to increase from</p>

	<p>£225.00 to £300.00.</p> <p>The proposed fee increase has been informed through benchmarking for fees charged across London Boroughs. While the Haringey registrar service are proposing a fee increase for non-statutory ceremonies, the fee increase remains below the London average. All benchmarking information is published in the public domain and available on the relevant Local Authority websites.</p> <p>The fee increase will allow the service to stabilise its budget which has traditionally been loss making and help protect the supply of appointments for statutory services.</p> <p>The service move from the Civic Centre to the newly refurbished George Meehan House, has seen an increased demand for services. At the time of transition, the registrar's service continued to charge the old Civic Centre fee structure.</p> <p>Now that the building is established at George Meehan House it is in a position to charge market rates fees. Charging market rate fees will allow the service to compete whilst allowing statutory services to be delivered at a frequency that meets customer needs. These fees are essential for ensuring accessibility and sustainability within the service.</p> <p>Fees for ceremonies at venues away from the register office are being increased by inflation only as these fees are already competitively priced.</p> <p>The service continues to offer excellent access to people needing a ceremony, with a range of times and options. If adopted the increased fees will enable this choice to continue</p>
<p>Fees for corrections and divorce processing</p>	<p>These are statutory fees and are not changing in 2020/2.</p>

All service areas have a statutory fee that ensures that every person is able to access services for an affordable price. A range of legislation governs the setting of statutory fees including the Births and Deaths Registration Act 1953 and the Marriage Act 1949. Marriage laws give scope for the service to set its own fees at cost recovery levels for non-statutory wedding and civil partnership ceremonies.

The service has not been able to cover its costs for successive years and is not permitted to make a profit, any additional income by increasing fees will be used to ensure that the service remains sustainable, is able to fulfil its statutory obligations, remain accessible and recover its costs. The service is continuously evolving in response to customer feedback and requests and adjustments are made to make service provision as personalised as is practical to deliver. The service continues to offer choice far beyond what is offered in many areas including the option to choose different scripts and make ceremony entrances (which in many areas is a charged add on). The result of this flexibility is that the service attracts customers from a wide area extending far beyond the borough boundary.

The fees structure aims to be fair and proportionate and to enable the delivery of a sustainable and competitive service. The diversity of actual and possible future demands on the service, including the introduction of opposite sex civil partnerships and changes to how ceremonies are registered has been considered when setting the fees.

The Register Office serves a diverse range of customers consisting of both Haringey residents and people who live outside the borough. Life events must be registered in the area where the event occurred and statutory fees for services are the same across all register offices in England and Wales. People can get married or form a civil partnership in any area of their choosing and the service anticipates continuing to attract customers from a diverse range of backgrounds. The service does not anticipate this fees proposal affecting the diverse mix of customers that the service serves.

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 EqlA which is available on the HR pages.

Registration data is captured on the national registration system that is controlled by the General Register Office which is part of the Home Office. A range of data is captured and locked into the national registration system including customer nationality, age and occupation. Access to this data is controlled by the Registrar General and is shared with the Office of National Statistics. The service is unable to publish its own data in order to protect the national records. This EqlA will therefore make use of published data, available in the Borough Plan EqlA and 'State of the Borough'

Haringey does not have a hospital and a consequence of this is that the service registers

very few births and deaths, the majority of the services business relates to ceremonies and the administration of ceremonies. A birth or death is registered in the area where the event occurred and not where the person lived. The fee for these certificates is collected by the borough where the event occurred. Data on birth and death registrations cannot be shared as it is the property of HM Government.

Protected group	Service users	Staff
Sex	Data from Haringey at a glance – State of the Borough, July 2018	N/A
Gender Reassignment	<p>The General Registrar’s Office sets out and expects compliance from the local service (LB Haringey) in the use of their technology and systems to record registration data.</p> <p>There is no requirement to record gender reassignment data, however, the service is aware of transgender people using the service.</p> <p>Data from Haringey at a glance- State of the Borough, July 2018 is used to give an overall borough perspective.</p>	N/A
Age	Data from Haringey at a glance – State of the Borough, July 2018	N/A
Disability	Data from Haringey at a glance – State of the Borough, July 2018	N/A
Race & Ethnicity	Data from Haringey at a glance – State of the Borough, July 2018 Observations from the Notice Book	N/A
Sexual Orientation	Data from Haringey at a glance – State of the Borough, July 2018 Borough Plan EQIA	N/A
Religion or Belief (or No Belief)	Office for National Statistics Borough Plan EQIA	N/A
Pregnancy &	Census 2011	N/A

Maternity		
Marriage and Civil Partnership	Census 2011	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.

The proposal to change the fees will have a negative impact of the protected characteristic of Pregnancy and Maternity, as well as Age, however this will not be disproportionate, given the small numbers of registration in the borough.

An increase in fees for non-statutory Wedding and Civil Partnership services will have a negative impact on a range of groups, across all protected characteristics. However, this proposal has been formed through extensive benchmarking to bring their service in line with the London Average. It is worth noting that the service cannot be profit making, and the increase in fees charged will be used to develop and expand the existing service offer.

Services are offered in accordance with registration legislation and Haringey equalities procedures and principles are followed. The services are fully accessible, adjustments made as required. These include the use of translations and low-level desks.

Haringey is unique in that it does not have a hospital, as a consequence it registers very few deaths and even fewer births. The majority of the services business is registering marriages and civil partnerships, with a large of amount of this work relating to couples that are subject to immigration.

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 interacts with all groups that need to register a birth, death, marriage or civil partnership under its statutory obligation to provide registration services. As life events affect all groups equally any consultation or engagement covers all sections of society.

Services are delivered in accordance with rules, regulations and processes set by statute and are underpinned by statutory fees to ensure accessibility and fairness to all service users and the proposal does not affect the basic statutory fees for these services. A change of fees will have no impact on staff.

The service has a customer engagement strategy which is agreed with the General Register to cover engagement with its customers. The strategy includes reviewing complaints, analysing government / official data and customer feedback.

Services is continuously evolving in response to customer feedback, with examples including website information being updated when a customer finds a webpage is unclear.

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?

The service has high rates of customer compliance with their obligations to register life events, which indicates that the service is accessible to all groups. Customer satisfaction is high and complaint rates are low. The General Register Office, that oversees registration, is satisfied with the services performance and current customer engagement strategy.

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

The collection of data on people coming in to register life events is governed by the procedures, rules and regulations that the General Register Office requires a registrar to follow. There is no routine statutory obligation to capture details on the protected characteristics of a person coming in to register a life event and any information collected is not accessible for analysis afterwards owing to the data being locked into the national registration system.

Any person coming in to register a birth, death, marriage or civil partnership is required to do so by law. The General Register Office provides data on the public's compliance with their statutory obligations and Haringey has good performance levels which indicates that

the service is accessible. The service is flexible and allows people to register deaths as a walk-in in addition to a wide range of short notice appointments over six days a week. Individual adjustments will always be made to facilitate any particular customer need and to compensate for any protected characteristics if applicable and permissible by law.

1. Sex

Haringey has slightly more male residents than female residents, however there is a roughly 50/50 split. There is a statutory obligation for all people to register life events and this this proposal will have a neutral impact on the protected characteristic of sex.

Positive		Negative		Neutral impact	X	Unknown Impact	
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2. Gender reassignment

There is very little robust data on Haringey or the UK’s trans population. However, it is estimated that there are between 200,000 and 500,000 people who identify as trans in the UK.

There is a statutory obligation to register life events regardless of a person protected characteristics or not, however due to a lack of data this impact of those with the protected characteristic of gender reassignment is unknown.

Positive		Negative		Neutral impact		Unknown Impact	X
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3. Age

There is a statutory obligation to register life events regardless of a persons protected characteristics.

There is likely to be a small negative impact on a fee increase for younger people and those who have retired, as a service fee will take up more of their income than an older working person.

Fees are set by government and regardless of impact the same fee applies. The services does have discretion to waiver a fee on the grounds of compassion and hardship. Although some data on people coming in to register life events is collected this information is locked into the national registration system and so is not readily available.

Typically, those registering births are in the age range of the 20s and 30s. As Haringey does not have a hospital it registers very few deaths but as a percentage Haringey’s ratio of trauma or unexpected deaths to expected and elderly person deaths is higher. A consequence of this is that the average age of people coming in to register deaths is lower in Haringey than in other boroughs.

Positive		Negative	X	Neutral impact		Unknown Impact	
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4. Disability

Over 19,500 people aged 16 to 64 in Haringey have a physical disability; this equates to approximately 10% of the population aged 16-64.

In Haringey 4,500 people have a serious physical disability; 15,700 adults have a moderate or severe hearing impairment; and almost 5,000 people have sight loss which impacts on daily life.

An estimated 5,700 Haringey residents aged 14 and over are estimated to have a learning disability, and around 2,100 residents are estimated to have autism.

There is a statutory obligation to register life events regardless of disability. The service provides a range of appointment times and days. As George Meehan House has been recently opened its refurbishment was done to take into account the councils statutory obligations under the Equalities Act 2010. A range of statutory provision is provided including the ability to register and conduct marriage and civil partnership ceremonies in a person's home to meet accessibility needs. The service will always do whatever it can to meet the needs of customers including waiving fees on the grounds of compassion and hardship when required.

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

There is a statutory obligation to register life events regardless of race or ethnicity. The service provides a range of support tools including scripts in different languages and of varying complexities. Services are provided on different days and times to meet individual needs; a faith burial service is also provided at weekends and bank holidays. The proposal will have a neutral impact on people registering from all faith and ethnic groups.

Positive		Negative		Neutral impact	X	Unknown Impact	
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6. Sexual orientation

There is a statutory obligation to register life events regardless of a persons protected characteristics or not. Marriages and Civil Partnerships are open to all same sex couples and from 31/12/19 Civil Partnerships will be open to heterosexual couples because of a change in the law. The service charges the same fee for a marriage and a civil partnership.

According to the 2011 census, 1,191 residents were in a same-sex civil partnership. ONS Census 2011

Since 2014, when same-sex marriage was legalised, the proportion of same-sex marriages taking place in Haringey has remained constant at just over 2%, substantially lower than the proportion of same-sex marriages taking place in London overall.

Of the same-sex marriages that took place in 2015 there was a year-on-year increase in male same-sex marriages compared to a reduction in female same-sex marriages. This may have been impacted by the fact that same-sex marriage was legalised at the end of March 2014, and so the data for the full year was not comparative.

Year on year the number of Civil Partnerships for same-sex couples have been decreasing since 2006. The sharpest decline was between 2013 and 2014 when civil partnerships in Haringey decreased by 75%. This may have been due to the legalisation of same-sex marriage in 2014. Overall the ratio of male same-sex civil partnerships is greater than female same-sex civil partnerships.

There is no cost differentiation between a civil partnership and marriage ceremony, meaning the increase in fees will have a neutral impact on the protected characteristic of sexual orientation.

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

Two out of three residents in Haringey are practicing a religion with Christians (45%) and Muslims (14%) being the largest resident groups. (Borough Plan EqIA)

There is a statutory obligation to register life events regardless of religion or belief, this proposal relates to fees for civil services with no religious content with the exception of the statutory fee to go out and register a wedding in a religious building. The service provides a range of services to support people of different religions or beliefs including a faith out of hour's death support service, responding to the diverse population of Haringey and those wishing to access services in the borough. Appointments are available at different times and days to meet individual needs and preferences. All services are provided in a civil non-religious manner except when registering at a religious venue where the service is open to all faiths.

Positive		Negative		Neutral impact	X	Unknown Impact	
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8. Pregnancy and maternity There is no maternity hospital in Haringey and as births are registered where a baby is born and not where the parent(s) very few births are registered in Haringey (approximately 60 per year). *The service provides a range of appointment times and days to be as flexible as possible towards those coming in to register. There is an obligation to register a birth within 42 days and the service will allow people to register a birth as a walk-in in order to allow a person's statutory obligation to register to be met.*

While an increase in fees for birth certificates will have a negative impact of the protected characteristic of pregnancy and maternity, it is important to note that the impact of this in

Haringey is minimal. Haringey does not have a Hospital with a maternity unit, meaning that the majority of births for Haringey residents are registered in neighbouring boroughs. Haringey does however register a small number of home births per year. It must also be noted that the fee increase for a certificate was made by government and is a statutory fee. The fee increase has already taken effect.

Numbers are broadly consistent with the national percentage for home births which is 2.1%.¹ While the increase in fees is the result of national legislation, the service will continue to provide a flexible and welcoming service for residents registering home births. The excellent availability of appointments that this fees proposal will help protect will ensure that any couple needing to marry or enter into a civil partnership before a baby is born will be able to get their wish in the majority of cases.

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

There is a statutory obligation to register life events regardless of a person's marital status or not.

The service is opening up civil partnerships to all couples once they become law and all couples are charged the same fee for the same ceremony category. This means the proposal will have a neutral impact on the protected characteristic of Marriage and Civil Partnership.

Will the increase in fees for non-statutory Wedding and Civil Partnership services will have a negative impact on a range of people (both within and outside Haringey), the fee increase does not differentiate between Marriage and Civil Partnership.

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

Our groups of customers are very diverse with many people covering multiple protected characteristic areas, the service aims to be accessible to all, with the fee increase used to develop the service offer.

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?

¹ Birth Characteristic in England and Wales. 2017. Available from: <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/bulletins/birthcharacteristicsinenglandandwales/2017>

- 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?

This proposal will not have a disproportionate impact for any group that shares a protected characteristic, registration services are delivered in compliance with government rules, regulation and law. While the fee increase will have a negative impact for the protected characteristic of pregnancy and maternity and age, the small numbers being registered in the borough suggest the impact will be minimal.

Statutory fees are available to ensure accessibility and amending some the fees will not affect the statutory provision for the services offered by the registration team. All fees are charged the same regardless of group although statutory fees are available to ensure accessibility. This fees proposal will enable a fair and sustainable service to be delivered with a range of appointment days, times and variation of services to meet specific needs.

On a different aspect, new laws enabling opposite sex civil partnerships will address the final pieces of potential discrimination in relation to registration.

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	N

<p>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.</p>	<p>N</p>
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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><i>Age, Ethnicity, Pregnancy and Maternity</i></p>	<p><i>The registrars service will continue to provide and accessible and affordable service to all those who are required by law to access the service.</i></p> <p><i>While the price for non-statutory wedding and civil partnerships will increase this remains below the London average and does not discriminated between service type.</i></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.

N/A

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

The service will continue to monitor the mix of customers coming in to use the service and customer engagement strategy will be amended as necessary and scrutinised and approved by the General Register Office.

Any areas of concern will be addressed in accordance with legislation, equality policy and in agreement with the General Register Office where necessary.

7. Authorisation

EqlA approved by
(Assistant Director/ Director)

Date
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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.