

Brighton and Hove Outcome Assessment (EIA) Template - 2018

Clinical Commissioning Group

EIAs make services better for everyone and support value for money by getting services right first time.

EIAs enable us to consider all the information about a service, policy or strategy from an equalities perspective and then action plan to get the best outcomes for staff and service-users¹. They analyse how all our work as a council might impact differently on different groups². They help us make good decisions and evidence how we have reached these decisions³.

See end notes for full guidance. Either hover the mouse over the end note link (eg: Age¹³) or use the hyperlinks ('Ctrl' key and left click).

For further support or advice please contact:

- **BHCC: Communities, Equality and Third Sector Team on ext 2301**
- **CCG: Engagement and Equalities team (Jane Lodge/Meg Lewis)**

1. Equality Impact and Outcomes Assessment (EIA) Template

First, consider whether you need to complete an EIA, or if there is another way to evidence assessment of impacts, or that an EIA is not needed⁴.

Title of EIA⁵	Corporate Debt Policy	ID No.⁶	
Team/Department⁷	Corporate Debt Team, Business Operations		
Focus of EIA⁸	<p>The Corporate Debt Policy defines the council approach to collecting debt. The policy applies to the activities of all the services that have income or debt collecting function. The council has the dual responsibility to collect income to pay for services and to have appropriate regard for every household/business in terms of affordability, sustainability, vulnerability and hardship. This is particularly important in the context of the impact that welfare reforms have had in this city.</p> <p>This assessment is not a duplication of the EIAs that separately exist in some of the service areas or in relation to some of the mitigations that the council delivers (such as discretionary payments). It concentrates on the specific debt collection activities and considerations stated in the revised 2019 Policy, particularly in relation to protected groups.</p>		

	<p>The Corporate Debt Board meets regularly to bring together representatives from all the relevant service areas to ensure the principles of the policy are effectively maintained. There are escalation routes in the council to access support for households struggling with their debt repayment responsibilities. The main provision of this support sits within the 'Welfare Framework', a network of internal and voluntary sector services that combine to provide a comprehensive range of support. This structure is overseen by the Corporate Welfare Reform Board and includes, Welfare Rights, Benefit Cap Team, Discretionary Housing Payment, Discretionary Council Tax reduction and Local Discretionary Social Fund. There are strong links to the Debt Prevention Team in Revenues & Benefits and a similar offer within Housing Services. Increasingly, the emphasis is on Universal Credit. Externally, there is direct commissioning of budgeting advice in the third sector both in respect of Welfare Reform and Housing Services. The overall effectiveness of the combined efforts of the council and voluntary sector is managed through attendance of the Advice Services Network and Advice Partnership meetings.</p> <p>This assessment breaks down debt into two types: Household Debt and Business Debt. This assessment primarily concentrates on the former. There is less consideration of Business Debt because expenditure is normally considered as something that should be anticipated in a business model.</p> <p>Because households/businesses move out of the area, debts are incurred by households/businesses that are outside the area. Also, some businesses have central offices outside the area. The council conducts a considerable amount of debt collection activity across the country and sometimes beyond. Where this is the case, the debt impacts are less measurable and the mitigations available are limited. However, the principles within the policy, particularly in relation to affordability, still apply.</p>
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2. Update on previous EIA and outcomes of previous actions⁹

What actions did you plan last time? (List them from the previous EIA)	What improved as a result? What outcomes have these actions achieved?	What <u>further</u> actions do you need to take? (add these to the Action plan below)
There is no previous EIA.		

3. Review of information, equality analysis and potential actions

Protected characteristics groups from the Equality Act 2010	What do you know ¹⁰ ? Summary of data about your service-users and/or staff	What do people tell you ¹¹ ? Summary of service-user and/or staff feedback	What does this mean ¹² ? Impacts identified from data and feedback (actual and potential)	What can you do ¹³ ? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Age ¹⁴	<p>Brighton & Hove has an unusual age demographic. The average age of is lower than the national average with a noticeable peak in population in the range 20-44.</p> <ul style="list-style-type: none"> • 16 per cent (45,009) were estimated to be aged under 16 in 2011 • 70 per cent (193,632) were estimated to be aged between 16 & 64 • 13 per cent (36,684) were estimated to be aged 65 or more • In terms housing tenants the data for 2016/17 indicates that tenants aged 16-24 are at a higher risk of arrears. This group makes up 1% of tenants but accrues 3% of arrears. • 49% of tenants are aged 55 and over but this group collectively make up only 21% of outstanding arrears. • 51% of tenants aged 16-54 account for 79% of total arrears. 	<ul style="list-style-type: none"> • Staff report that welfare reforms are impacting in terms of debt most significantly on the younger working age population. • For the older pensioner population the fear is accessibility, exclusion and fixed incomes. • For those with children the problem is finding sustainable work and complimentary childcare as a solution to welfare reform impact/ debt. • Older housing tenants can be more distressed by letters about rent arrears. 	<ul style="list-style-type: none"> • Tenants of pensionable age are less affected by any of the government's welfare reforms. • Financial exclusion increases with age and older people of working age are more likely to be digitally excluded and be facing issues of debt, food and fuel poverty • Older people of working age are less likely to be able to find work or increase their hours, which would otherwise exempt them from the impact of welfare reform or address outstanding debt. • Young people are less likely to be aware of, or seek the help of support services or discretions. • Young people are more likely to be over-indebted than older age groups and less likely to seek advice. • Older people over pensionable age tend to be on fixed incomes with very limited capacity to increase their income. • Older people over pensionable age are less 	<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household address their budgeting pressures.</p> <p>The following mitigations are applied in addition:</p> <ul style="list-style-type: none"> • Focus digital inclusion on people of working age • Gather information on the age of those referred to MACS through the Housing Financial Inclusion and Universal Credit contracts • Engage with services that support working age people to ensure sure DHP literature is available to them • Engage with services that support young people to ensure DHP literature is available to them

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			capable of adjusting their expenditure on food or heating without compromising their health. <ul style="list-style-type: none"> • Older people over pensionable age are more likely to have a disability or a long term health problem • Single people under 35 affected by the welfare reforms have seen large reductions in their entitlement to housing benefit. • Single people under the age of 25 will be living on the lowest out-of-work income and so will be impacted more adversely than older people as shortfalls in Council Tax and Rent will be proportionately more of their total income. 	<ul style="list-style-type: none"> • To promote the single apprenticeship pathway to assist young people into work. • Ensure services that support and engage with people over pensionable age promote energy efficiency grants. • Housing Income Advisors to continue to provide support and advice to vulnerable housing tenants who need additional help to engage. • Support younger housing tenants through the Better Start Guide. • Apply for Alternative Payment Arrangements with the DWP where vulnerable housing tenants are on Universal Credit.
Disability¹⁵	9,012 known households (in receipt of HB or CTR) with at least one member of the household receiving Disability Living Allowance, PIP or Attendance Allowance. A further 2,197 Households are known to be in receipt of ESA. 7,469 households in total with one member in receipt of ESA.	<ul style="list-style-type: none"> • Information gathered by the welfare reform team indicates that there are several welfare reform changes that have potentially significant impact on disabled households. • Research suggests that the cumulative impacts of Welfare Reform will have a disproportionately larger impact on disabled people 	<ul style="list-style-type: none"> • Higher cost of living for Disabled people and parents of disabled children means that the increased shortfalls created by the Welfare Reforms could see these families disproportionately impacted. • Some disabled people and parents of disabled children will receive extra premiums in housing 	The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help households address their budgeting

<p>Protected characteristics groups from the Equality Act 2010</p>	<p>What do you know¹⁰? Summary of data about your service-users and/or staff</p>	<p>What do people tell you¹¹? Summary of service-user and/or staff feedback</p>	<p>What does this mean¹²? Impacts identified from data and feedback (actual and potential)</p>	<p>What can you do¹³? All potential actions to:</p> <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
	<ul style="list-style-type: none"> • In 2016/17 48% of council tenants were recorded as having a disability or long term health condition. 39% of rent arrears were incurred by tenants with a disability or health problem and they were issued 36% of all Notices of Seeking Possession. • In the same year 61% of the total arrears and 64% of the Notices of Seeking Possession were attributed to the 52% of tenants with no recorded disability or long term health condition. • This indicates that people with a disability are slightly less likely to be in arrears and issued a Notice of Seeking Possession than people with no known disability. 	<p>(and carers) and their families than others¹⁶.</p> <ul style="list-style-type: none"> • The B&H Child Poverty Needs Assessment identified that families with a child or parent with a disability have a higher risk of living in poverty and less capacity to repay debt • Information suggests people with a learning disability find the most helpful way to communicate is face to face. This isn't always easily accessible, particularly in relation to UC. 	<p>benefit which might increase the level of their award.</p> <ul style="list-style-type: none"> • Physical access issues to some advice services and financial products that would enable them to address debts. • Accessibility issues to online services, such as UC, may create income difficulties. It also inhibits access to lower cost products available via the internet. • Disabled non-dependents do not exempt a household from the Benefit Cap. This means that a claimant may be unable to work due to their care commitments within the household and so would be affected by the Benefit Cap. Anyone under the benefit cap has extremely limited capacity to address debt. • There are potential risks associated with vulnerable disabled people taking in a lodger to help pay for rent shortfalls caused by the Welfare Reforms. • In relation to higher likelihood of needing help with housing costs: 28% of disabled people are likely 	<p>pressures.</p> <p>The following mitigations are applied in addition:</p> <ul style="list-style-type: none"> • We will maintain a face to face service, including home visits, to support people with DHP applications where appropriate. • Where possible working with agencies, social services and NHS to monitor and feedback the impact to disabled people • When council is procuring advice contracts make sure that accessibility issues and outreach issues are included in contract specification. • Reorganisation of NHS services should make it easier for people with common Mental Health issues such as anxiety and depression to receive help. • We will look to identifying those in receipt of DLA who are also eligible for Adult Social Care services and link with care management • People affected by any of these new benefit policies,

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			<p>to be low paid (on less than £7/hour), compared with 19% of non-disabled people.</p> <ul style="list-style-type: none"> • Those households who fail reassessment over to PIP may then bring the household into the benefit cap, where previously they were exempt • Because of debt issues there is a risk of disabled people, or parents of disabled children, being faced with moving from a property that meets their need. There is a national shortage of accessible properties and so people in these situations may not be able to find a more affordable option that meets their needs. • A lack of affordable alternative housing may compound debt as well as impact upon the length of hospital admissions due to reduced availability of accommodation to discharge into. • Households with disabled children under the age of 5 will have caring commitments preventing them from work, but it is difficult to successfully 	<p>and who also contribute to the cost of social care services, can apply for a reassessment of their charges which may then be reduced.</p> <ul style="list-style-type: none"> • Apply for Alternative Payment Arrangements with the DWP where vulnerable housing tenants are on Universal Credit. • The Welfare Rights and Welfare Reform teams support households with issues of disability and long term ill health to access appropriate disability benefits, supporting with both the application process and through the appeals process. They will also support households with Non Dependents in receipt of disability benefits claim Carers Allowance, to exempt them from the Benefit Cap.

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			<p>apply for DLA because of the burden of proof. Therefore they may be required to job seek and/or not qualify for exemptions from certain Welfare Reforms.</p> <p>Learning Disabilities:</p> <ul style="list-style-type: none"> • People with learning disabilities are commonly in receipt of low rate DLA care. As there is no low rate under PIP Daily Living element, they could lose their entitlement to disability benefit when this transition comes in, hence reducing their ability to make up their rental shortfall • People with a Learning Disability may face more barriers in seeking advice, in budgeting, understanding Welfare Reforms and managing debt. • People with learning disability often have a representative to help them manage their financial affairs. E.g. An Appointee for benefits <p>Mental Health</p> <ul style="list-style-type: none"> • Being in debt may exacerbate anxiety and stress for some people 	

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			<ul style="list-style-type: none"> • People with mental health issues are commonly in receipt of low rate DLA care. As such they may be affected by the transition to PIP. This may mean they would be less able to manage any rent shortfalls or other debt. • Potential increase in demand for (already stretched) Mental Health Services. • National studies suggest that people with mental health issues may face disadvantage in terms of diagnosis by non-specialist staff and in relation to non-compliance with reassessment. This may, at least in the short term, lead to additional financial pressure. • People with mental health issues may face more barriers in seeking advice, in budgeting, understanding Welfare Reforms and managing debt. • Maintaining a claim of both ESA and UC require continued engagement and prompt communication management. Some people with anxiety and 	

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			mental health issues struggle to read or respond to communication, leaving them more open to sanction or ending of their entitlement.	
Gender reassignment ¹⁷	<ul style="list-style-type: none"> Brighton & Hove's State of the City report estimated that at least 14% (38,000 of the 2011 census population) of Brighton & Hove's adult residents are lesbian, gay, bisexual or transgender 0.3% of housing tenants identified as transgender. 	<ul style="list-style-type: none"> There is limited feedback around transgender issues because of the relatively low numbers. Issues of debt, benefits and access to appropriate housing, employment, advice and financial products are proportionately higher amongst this diversity group. 	Trans people face significant barriers to employment and may face discrimination in the workplace, therefore are more likely to be on lower incomes and be reliant on benefits. This may mean they are less able to meet shortfalls between benefit and rent or other debt.	<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household address their budgeting pressures.</p> <p>The following mitigations are applied in addition:</p> <ul style="list-style-type: none"> Share DHP/DCTR info with organisations that specifically support people for the transgender community through the Advice Services Network Where a persons assigned gender differs from their birth gender the Revenue and Benefits service are legally able to reflect this in decisions about housing benefit.

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Pregnancy and maternity¹⁸	<p>There were 2704 births in Brighton 7 Hove in 2017. A fertility rate of 1.26%, the third lowest in England and Wales. The national rate was 1.76%</p> <p>All 3rd and subsequent children born to households after 6th April 2017 are not eligible for further Child Tax Credit or UC child element payments.</p>	<p>The period around the birth of a child is one of financial pressure as well as emotional pressure and may be accompanied by difficult decisions in relation to accommodation, work and budgets.</p>	<ul style="list-style-type: none"> • Women who are pregnant and those with very young children will be less able to seek or increase their working hours, reducing their ability to self-mitigate in light of the reduced income caused by Welfare Reform. • With very young children couples adjust their working hours to account for their childcare arrangements. • A baby does not count in terms of family size until it is born. A family with a pregnant person in it who moves to accommodation of a size which takes into account the expected baby will not receive a level of housing benefit which pays for that property until the baby is born leaving a period of occupation where there will be a shortfall. 	<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household address their budgeting pressures.</p> <p>The addition of a child may mean accommodation changes for the household that may conflict with timing of benefit awards. In these circumstances DHP/DCTR is considered to address shortfalls.</p>
Race/ethnicity¹⁹ Including migrants, refugees and asylum seekers	<ul style="list-style-type: none"> • Equalities data including details of ethnicity are requested on each housing benefit application and DHP form. Unfortunately, the completion rate for these sections is poor and as such the total data held is 	<p>Customers who do not consider English as their first language have expressed that they find it easier to overcome language barriers when discussing issues face to face.</p>	<ul style="list-style-type: none"> • Some groups (particularly Pakistani and Bangladeshi) are less likely to have bank accounts. This will create a barrier to financial inclusion under Welfare Reform, particularly once Universal Credit is 	<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides</p>

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	<p>not reliable. The below figures are extrapolated from total data for the city compiled in the 2011 Census.</p> <ul style="list-style-type: none"> • The 2011 census reveals that one out of five Brighton & Hove residents are from a BME background, whilst one in twelve residents do not consider English to be their first or preferred language. • The main languages spoken in Brighton & Hove other than English are Arabic, Polish, Chinese, Spanish and French. • For 2016/17, housing tenants who identified as Black or Black British made up 3% of the total tenant group but were responsible for 4% of total arrears and 4% of all Notices of Seeking Possession issued. • Housing tenants who identified as Asian or Asian British made up 3% of the total tenant group. They were responsible for only 1% of total arrears but 2% of all Notices of Seeking Possession issued, indicating that the 		<p>introduced, and ability to repay debt using some of our standard methods. Without a bank account a household will not be able to set up direct debits. They may, therefore be more at risk at not maintaining repayments.*</p> <ul style="list-style-type: none"> • While every attempt is made to produce plain English documents the language around debt can be specialised and difficult to understand particularly if English is not a first language.* • In relation to higher likelihood of needing help with housing costs: nearly half of Bangladeshi and Pakistani employees are likely to be low paid (on less than £8.21/hour), compared with 25% of White British people (2013 DHP EIA figures extrapolated). • Gypsies and Travellers inability to access financial products and advice services as well as being affected by fuel poverty in light of reduced incomes. • Language barriers may prevent some households from understanding the 	<p>specific consideration for the support that can be put into place to help household address their budgeting pressures.</p> <p>The following mitigations are applied in addition:</p> <ul style="list-style-type: none"> • To improve the monitor and data on this diversity group making applications to DHP • To monitor the ethnicity data on those affected by the Benefit Cap. • To provide interpretation services for persons wishing to make an application for DHP who cannot do so using English language forms • Work with traveller liaison team to understand if their clients are affected.

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	<p>level of their arrears was higher than average.</p> <ul style="list-style-type: none"> • Housing tenants who identified as mixed ethnicity made up 1% of the total tenant group but were responsible for 2% of total arrears and 2% of all Notices of Seeking Possession issued. 		<p>information sent to them about the welfare reforms changes. This may result in them being less prepared than they need to be and not organised to prevent debt situations arising.</p> <ul style="list-style-type: none"> • Some different cultures will have different approaches to debt. • Potential for misinformation to be spread within a community, particularly in light of the shifting landscape of welfare reforms. • Employment patterns and earning levels are different for different ethnic groups which would affect the ability of some groups to self-mitigate in light of the reduction in their benefit income or as remedy for debt situations. • The reduction and capping of Local Housing Allowance has impacted disproportionately on black and minority ethnic communities as they are more likely to need larger accommodation due to family size. • Child poverty rates for 	

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			<p>black and minority ethnic families in the UK are higher than the national average.</p> <ul style="list-style-type: none"> Increased conditionality for working-age claimants is more likely to impact on black and minority ethnic claimants as they are disproportionately represented among workless households 	
Religion or belief ²⁰	<p>According to the 2011 census, more than two out of five residents are Christian. Two out of five residents also stated they had no religion. The Muslim community is the largest none Christian faith group in the city (2.2%).</p>	<p>We have had no specific feedback in relation to religion and belief and recovery of debt.</p>	<ul style="list-style-type: none"> Some religious groups experience different levels of disadvantage. Different religious group /cultures have different approaches to debt. Potential for misinformation to be spread within a religious community, particularly in light of the shifting landscape of welfare reforms and how to respond to financial pressure. 	<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household and businesses address their budgeting pressures.</p>
Sex/Gender ²¹	<ul style="list-style-type: none"> Taken from 2012 CTB caseload: Among CTB claimants and their partners, 58% are female and 42% are male, compared with a city profile of residents aged over 16 where 49% are male and 51% are female. For the year 2016/17 59% 	<p>Information gathered by the welfare reform team indicate that there several welfare reform changes that have potentially significant impact on single parent households</p>	<ul style="list-style-type: none"> Women are far more likely to be a lone parent (94%) and therefore managing on less income. In such cases they are less likely to be available for work, due to childcare commitments and therefore are limited in their debt remedy options. 	<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the</p>

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	<p>of housing tenants identified as female and 41% as male. These figures include the additional 0.3% of tenants who identified as transgender, depending on their gender identity.</p> <ul style="list-style-type: none"> • Tenants who identified as female were responsible for 64% of the total amount of rent arrears outstanding and of all the Notices of Seeking Possession issued. 		<ul style="list-style-type: none"> • In relation to higher likelihood of needing help with housing costs: 20% of women are likely to be low paid (on less than £8.21/hour), compared with 10% of men (2013 DHP EIA figures extrapolated). • High cost of childcare in the city poses a disproportionate barrier to women seeking work to avoid the impacts of welfare reform or address debt. • A third of women suffering Domestic Violence have no bank account – transactional / rent²² • Men have a higher risk of homelessness, alcohol and substance misuse and therefore being insecurely housed²³ 	<p>support that can be put into place to help household address their budgeting pressures.</p> <p>The following mitigation is applied in addition:</p> <ul style="list-style-type: none"> • To work with gender specific advice agencies (including through the CVS) and groups through the advice services network to ensure DHP is appropriately promoted to this group and there is access to debt advice.
Sexual orientation²⁴	<p>Brighton & Hove's State of the City report estimated that at least 14% (38,000 of the 2011 census population) of Brighton & Hove's adult residents are lesbian, gay, bisexual or transgender.</p>	<p>Count Me In Too Housing Report states that 22% of LGBT respondents had experienced homelessness at some point in their lives.</p>	<ul style="list-style-type: none"> • Stonewall survey of LGB people show that they are more likely to expect poorer treatment from public services including Social Housing, Criminal Justice and Health Services. • Issues of debt, benefits and access to appropriate housing, employment, advice and financial 	<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household</p>

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			<p>products are proportionately higher amongst sections of this group, particularly lesbians and disabled LGB people</p> <ul style="list-style-type: none"> • Single LGB people under 35 are more likely to be affected by the SRR change as many choose to live alone due to family breakdown or discrimination or harassment.²⁵ Therefore they are likely to have increased debt pressure. 	<p>address their budgeting pressures.</p> <p>The following mitigation is applied in addition:</p> <ul style="list-style-type: none"> • Share DHP/DCTR info with organisations that specifically support people for the LGBT community through the advice services network
Marriage and civil partnership²⁶	There are no known factors in debt and income collection that particularly relate to the marital status of a household	There can be issues relating to joint and several liability if a relationship ends	There are specific legislative requirements, depending on the type of debt, relating to liability or treatment of income and assets. Eg. care costs are individual, benefit assessments are household. However these do not discriminate between the marital status of the partnership.	
Community Cohesion²⁷	While debts are an individual household concern the setting of rent levels, council tax levels and business rate levels affect specific communities.	The levels of rent, council tax and business rates are too high and this affects their ability to repay debt.	Above inflation rises impact on household/businesses.	<ul style="list-style-type: none"> • Housing Services manage the specific relationship with their tenants through establish community liaison structures. • The budgeting processes that relate to Council Tax levels are fully and openly explained.

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				<ul style="list-style-type: none"> • The national budgeting processes that relate to Business Rate levels are fully and openly explained. • The Economy, Environment and Culture Directorate manage the Council's relationship with the business community through established structures.
Other relevant groups²⁸ Households with children	48000 households have children in B&H. 37% of all households (extrapolated figures). 22% of children living in B&H live in poverty, equating to approximately 10,500 children (DHP EIA 2013). Of those, 72.8% live in a lone parent household and 77.5% are out-of-work families. Women make up 94% of single parent families in B&H.	Households with children with low income often face complex financial situations balancing benefit entitlement, work and childcare.	<ul style="list-style-type: none"> • Single parent families are approximately twice as likely as couples to be living on a low income and claiming a benefit. Lone parents in the UK have an employment rate of 59% (compared with 71% for women in two-parent households and 90% for men in two-parent households). • Single parent families with young children are less likely to be able to look for work without support, and therefore mitigate the main impacts of the welfare reforms or have capacity to respond to debt. • The increasing gap between local Private Sector Rent and LHA may result in families in this tenure choosing to occupy accommodation smaller 	<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household address their budgeting pressures.</p> <p>The following mitigations are applied in addition:</p> <ul style="list-style-type: none"> • To use information on affected families to share, as appropriate and within the law, with Children's Services to ensure that the families most affected are accessing support that is both holistic and

Protected characteristics groups from the Equality Act 2010	What do you know¹⁰? Summary of data about your service-users and/or staff	What do people tell you¹¹? Summary of service-user and/or staff feedback	What does this mean¹²? Impacts identified from data and feedback (actual and potential)	What can you do¹³? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
			<p>than they require in an attempt to reduce shortfalls in rent / arrears/debt. This will have an impact on the amount of space these children may have to develop, play, study, or on having age or gender appropriate bedroom allocation.</p> <ul style="list-style-type: none"> • As welfare reform shortfalls increase, families may use other benefits to meet their rent and as a result have less money for food, fuel and other essentials. • The B&H Child Poverty Needs Assessment identified that families with a child or parent with a disability, families with larger numbers of siblings and BME families have a higher risk of living in poverty • Due to the lack of larger family homes in the Social Rented Sector, families with a large number of children may be less able to be suitably accommodated in the social rented sector and therefore be more likely to have a large shortfall 	<p>appropriate</p> <ul style="list-style-type: none"> • Feed information into the Stronger Families Stronger Communities project • Continue to work with Housing Options and Children's Services as part of our Homeless Prevention work • Make sure information on DHPs and benefit changes are available in all Children's Centres through the Family Information Service. • Where appropriate briefings to be sent out to Schools in regards to benefit changes so that teachers can be aware of any financial difficulties a family may be facing and be able to offer them appropriate signposting. • Automatic referral for Stronger Families Stronger Communities families to any Financial Inclusion services agreed as part of the Financial Inclusion Commission.

Protected characteristics groups from the Equality Act 2010	What do you know¹⁰? Summary of data about your service-users and/or staff	What do people tell you¹¹? Summary of service-user and/or staff feedback	What does this mean¹²? Impacts identified from data and feedback (actual and potential)	What can you do¹³? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
			between their rent and the reduced LHA. <ul style="list-style-type: none"> • Mental Health teams report that parents of children struggling with financial difficulties will inevitably see an impact on their mental health and their parenting. • There is a risk of children's education being disrupted if, due to debt issues, families must move mid-year outside of their school catchment area. 	
Carers	<p>1,768 households in receipt of Housing Benefit are also in receipt of Carers Allowance.</p> <p>Among all CTB caseload in 2012, approximately 4% of households have a person in receipt of Carer's Allowance.</p> <p>Approximately 25% of these live in the Private Sector under LHA rules, 25% in Housing Association properties and 46% in Council Housing.</p>		<ul style="list-style-type: none"> • Carers are struggling financially and significant numbers live in fuel and food poverty as a result of being in debt. • Young carers are likely to have reduced educational attainment and employment opportunities • Carers are less likely to seek access to advice services and financial products. • Carers of their partners, where there may be a medical or respite need for an additional bedroom, are affected by the SSSC and LHA rules which may place them into debt. • Carers affected by the Benefit Cap may be less 	<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household address their budgeting pressures.</p> <p>The following mitigation is applied in addition:</p> <ul style="list-style-type: none"> • To continue to engage with the Carers' Service to appropriately promote DHP.

Protected characteristics groups from the Equality Act 2010	What do you know¹⁰? Summary of data about your service-users and/or staff	What do people tell you¹¹? Summary of service-user and/or staff feedback	What does this mean¹²? Impacts identified from data and feedback (actual and potential)	What can you do¹³? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
			<p>able to find work that fits in with their caring role. If they cannot work, they cannot self-mitigate this impact.</p> <ul style="list-style-type: none"> • Research suggests that the cumulative impacts of Welfare Reform will have a disproportionately larger impact on disabled people (and carers) than others²⁹ • A high proportion of carers will also be experiencing some mental health difficulties. This will have an impact upon social care services if care relationships break down under additional stressors such as debt. 	
Domestic violence	We have no consistent data on this diversity group within the city's CTR or HB caseload.	The city completed a Domestic Violence Needs Assessment, undertaking as part of the Intelligent Commissioning Pilot 2010/11. This identified relevant issues, including the links between domestic violence, economic exclusion and work	<ul style="list-style-type: none"> • At the point of accessing a domestic violence service, up to a 1/3 of women who are victim/survivors have no bank account • Victim/survivors who flee domestic violence may not have access to ID (because they are unable to take it when they leave, or because the abuser has seized documents), making applications for benefits humiliating and difficult. • Due to the circumstances most people in this group 	<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household address their budgeting pressures.</p> <p>The following mitigations are applied in addition:</p>

Protected characteristics groups from the Equality Act 2010	What do you know¹⁰? Summary of data about your service-users and/or staff	What do people tell you¹¹? Summary of service-user and/or staff feedback	What does this mean¹²? Impacts identified from data and feedback (actual and potential)	What can you do¹³? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
			<p>will need support in order to manage any of the welfare reforms or make applications for benefits/crisis support. or address debt.</p> <ul style="list-style-type: none"> • Many victim/survivors will experience financial control and abuse, this can include control over their access to or use of benefits which increase their risk of economic exclusion and limit their ability to prevent debt situations arising or effectively address them. • Universal Credit is paid in full to one member of the household. This could limit a survivor's access to independent financial means that may enable them leaving the relationship. Requesting split payments may further endanger the survivor as this is not possible to do without alerting the partner to the change. • A significant number of those experiencing domestic violence (and other forms of violence against women and girl, including sexual violence) are likely to leave their 	<ul style="list-style-type: none"> • Specialist teams within Revenue and Benefits Services such as the Discretionary Help and Advice Team and the Special Accommodation Team will work closely with refuges in the city and the Council's own Crisis Intervention Team within Housing Options to ensure that those fleeing domestic violence and other forms of violence against women and girls (including sexual violence) are given access to all discretionary support available in the most consistent way and with a holistic approach. • Specialist teams have access to appropriate training around the identification and response to domestic violence and other forms of violence against women and girls (including sexual violence) • Engage with specialist services that support victim/survivors to ensure sure DHP/DCTR literature is available to them • We will continue to use all administrative discretion available to us to protect

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			<p>settled accommodation to escape it. This may create debt situations.</p> <ul style="list-style-type: none"> • Alternatively the abuser may leave or may be required to leave, which may reduce the resources available to the household and a possible unaffordable debt legacy. • If victim/survivors leave settled accommodation they may be 'hidden' because they spend time living with friends or relatives, or are sleeping rough. • Debts may escalate because they are a low priority in the context of the trauma being suffered. • Debts may escalate because the behaviour of the customer is effectively treated as avoidance in the absence of any information. • Debt problems may be difficult to address without compromising confidentiality. • Victim/survivors may not access services because they are not aware of what is available, their entitlements or are not able to do so. They may 	<p>the security of people affected by DV when making an application for Housing Benefit or DHP or addressing debt issues.</p> <ul style="list-style-type: none"> • To work with the Violence against Women and Girls Commissioner within relevant partnership structures to ensure the message is communicated as effectively as we can

Protected characteristics groups from the Equality Act 2010	What do you know¹⁰? Summary of data about your service-users and/or staff	What do people tell you¹¹? Summary of service-user and/or staff feedback	What does this mean¹²? Impacts identified from data and feedback (actual and potential)	What can you do¹³? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
			also have additional vulnerabilities (including mental health, substance use or immigration issues) <ul style="list-style-type: none"> • Victim/survivors may present at services, including those provided by the Council, in crisis or in distress. They may also make disclosures to Council Officers which need to be identified and responded to appropriately. 	
Cumulative impact³⁰	<ul style="list-style-type: none"> • Households 130,000 households • According to the Office of National Statistics British household debt is the highest level ever recorded • Businesses 10,000 businesses 	In the current economic and welfare reform environment both households and business are contacting the council because they are struggling to pay.	<ul style="list-style-type: none"> • We are making more long term arrangements to settle arrears. • This may mean it may take a longer period to address an individual debt and this may reflect in short term performance indicators. 	The Corporate Debt Policy specifically promotes best practice that incorporates a fairness in actions that is intended to incorporate the consideration of all protected characteristics. <ul style="list-style-type: none"> • Monitor application and take up of DHP/DCTR by protected characteristic, keep this under review and amend this assessment, and its mitigations as appropriate • The Revenues and Benefit and Housing services will continue to signpost customers affected by Housing Benefit shortfalls to appropriate channels of advice • Where the council has

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				information about a protected characteristic the council will take this into account when making a decision about DHP/DCTR. <ul style="list-style-type: none"> • The Revenues and Benefits team will continue to publicise and promote the DHP/DCTR scheme The Revenues & Benefits team will provide training and information to staff from other services who work with service users who may be able to claim DHP/DCTR. This may include staff working for the NHS who have direct or ongoing involvement with families.

Assessment of overall impacts and any further recommendations³¹

The Corporate Debt Policy specifically promotes best practice that incorporates a fairness in actions that is intended to incorporate the consideration of all protected characteristics. Collection of income and debt is an essential function to the council's financial health but the policy provides assurance that we recovery money with appropriate sensitivity to individual circumstances.

4. List detailed data and/or community feedback that informed your EIA

Title (of data, research or engagement)	Date	Gaps in data	Actions to fill these gaps: who else do you need to engage with? (add these to the Action Plan below, with a timeframe)
Financial Inclusion Strategy EIA: http://www.brighton-hove.gov.uk/downloads/bhcc/equalities/Financial_Inclusion_Strategy_EIA_Final.doc	2013	None	N/a
Council Tax Reduction Equality Impact Assessment	2018	None	N/a
http://raceequalityfoundation.org.uk/housing/new-research-on-the-impact-of-welfare-reforms/	2018	The EIA and these reports contain data sources from reports 2011 to date	Annually review the EIA with the most recent data available

Discretionary Housing Payment EIA	2013	None	N/a
Housing Income Management EIA	2018	None	N/a

5. Prioritised Action Plan³²

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.				
All groups	Ensured the Corporate Debt Policy is fully applied across the council	Improved collection performance and improved consideration of individual circumstances in designing recovery making suitable recovery arrangements	No incident of found complaint relating to inequality in the collection of debt on behalf of the council	Continuous
All groups	Ensure the Corporate Welfare Reform Team continues to implement a strategy that best mitigates the impact of welfare reforms with the resources available		Remedy, support or advice for every customer approaching the council with welfare reform related debt issues	Continuous
People of pensionable age	Welfare Reform Team to coordinate services to ensure that they support and engage with people over pensionable age promote energy efficiency grants.	Take up of grants	Increased take up of grants	To be considered straight away

EIA sign-off: (for the EIA to be final an email must sent from the relevant people agreeing it or this section must be signed)

Staff member completing Equality Impact Assessment: Graham Bourne

Date: 12.12.18

Directorate Management Team rep or Head of Service/Commissioning: David Kuenssberg

Date: 12.12.18

CCG or BHCC Equality lead: Sarah Tighe-Ford

Date: 12.12.18

Guidance end-notes

¹ The following principles, drawn from case law, explain what we must do to fulfil our duties under the Equality Act:

- **Knowledge:** everyone working for the council must be aware of our equality duties and apply them appropriately in their work.
- **Timeliness:** the duty applies at the time of considering policy options and/or before a final decision is taken – not afterwards.
- **Real Consideration:** the duty must be an integral and rigorous part of your decision-making and influence the process.
- **Sufficient Information:** you must assess what information you have and what is needed to give proper consideration.
- **No delegation:** the council is responsible for ensuring that any contracted services which provide services on our behalf can comply with the duty, are required in contracts to comply with it, and do comply in practice. It is a duty that cannot be delegated.
- **Review:** the equality duty is a continuing duty. It applies when a policy is developed/agreed, and when it is implemented/reviewed.
- **Proper Record Keeping:** to show that we have fulfilled our duties we must keep records of the process and the impacts identified.

NB: Filling out this EIA in itself does not meet the requirements of the equality duty. All the requirements above must be fulfilled or the EIA (and any decision based on it) may be open to challenge. Properly used, an EIA can be a tool to help us comply with our equality duty and as a record that to demonstrate that we have done so.

² Our duties in the Equality Act 2010

As a public sector organisation, we have a legal duty (under the Equality Act 2010) to show that we have identified and considered the impact and potential impact of our activities on all people with 'protected characteristics' (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage and civil partnership).

This applies to policies, services (including commissioned services), and our employees. The level of detail of this consideration will depend on what you are assessing, who it might affect, those groups' vulnerability, and how serious any potential impacts might be. We use this EIA template to complete this process and evidence our consideration.

The following are the duties in the Act. You must give 'due regard' (pay conscious attention) to the need to:

- **avoid, reduce or minimise negative impact** (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).
- **promote equality of opportunity.** This means the need to:
 - Remove or minimise disadvantages suffered by equality groups
 - Take steps to meet the needs of equality groups
 - Encourage equality groups to participate in public life or any other activity where participation is disproportionately low
 - Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary
- **foster good relations between people who share a protected characteristic and those who do not.** This means:
 - Tackle prejudice
 - Promote understanding

³ EIAs are always proportionate to:

- The size of the service or scope of the policy/strategy
- The resources involved
- The numbers of people affected
- The size of the likely impact
- The vulnerability of the people affected

The greater the potential adverse impact of the proposed policy on a protected group (e.g. disabled people), the more vulnerable the group in the context being considered, the more thorough and demanding the process required by the Act will be.

⁴ **When to complete an EIA:**

- When planning or developing a new service, policy or strategy
- When reviewing an existing service, policy or strategy
- When ending or substantially changing a service, policy or strategy
- When there is an important change in the service, policy or strategy, or in the city (eg: a change in population), or at a national level (eg: a change of legislation)

Assessment of equality impact can be evidenced as part of the process of reviewing or needs assessment or strategy development or consultation or planning. It does not have to be on this template, but must be documented. Wherever possible, build the EIA into your usual planning/review processes.

Do you need to complete an EIA? Consider:

- Is the policy, decision or service likely to be relevant to any people because of their protected characteristics?
- How many people is it likely to affect?
- How significant are its impacts?
- Does it relate to an area where there are known inequalities?
- How vulnerable are the people (potentially) affected?

If there are potential impacts on people but you decide not to complete an EIA it is usually sensible to document why.

⁵ **Title of EIA:** This should clearly explain what service / policy / strategy / change you are assessing

⁶ **ID no:** The unique reference for this EIA. If in doubt contact your CCG or BHCC equality lead (see page 1)

⁷ **Team/Department:** Main team responsible for the policy, practice, service or function being assessed

⁸ **Focus of EIA:** A member of the public should have a good understanding of the policy or service and any proposals after reading this section. Please use plain English and write any acronyms in full first time - eg: 'Equality Impact Assessment (EIA)'

This section should explain what you are assessing:

- What are the main aims or purpose of the policy, practice, service or function?
- Who implements, carries out or delivers the policy, practice, service or function? Please state where this is more than one person/team/body and where other organisations deliver under procurement or partnership arrangements.
- How does it fit with other services?
- Who is affected by the policy, practice, service or function, or by how it is delivered? Who are the external and internal service-users, groups, or communities?
- What outcomes do you want to achieve, why and for whom? Eg: what do you want to provide, what changes or improvements, and what should the benefits be?
- What do existing or previous inspections of the policy, practice, service or function tell you?
- What is the reason for the proposal or change (financial, service, legal etc)? The Act requires us to make these clear.

⁹ **Previous actions:** If there is no previous EIA or this assessment if of a new service, then simply write 'not applicable'.

¹⁰ **Data:** Make sure you have enough data to inform your EIA.

- What data relevant to the impact on protected groups of the policy/decision/service is available?¹⁰
- What further evidence is needed and how can you get it? (Eg: further research or engagement with the affected groups).
- What do you already know about needs, access and outcomes? Focus on each of the protected characteristics in turn. Eg: who uses the service? Who doesn't and why? Are there differences in outcomes? Why?
- Have there been any important demographic changes or trends locally? What might they mean for the service or function?
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any groups?
- Do any equality objectives already exist? What is current performance like against them?
- Is the service having a positive or negative effect on particular people in the community, or particular groups or communities?
- Use local sources of data (eg: JSNA: <http://www.bhconnected.org.uk/content/needs-assessments> and Community Insight: <http://brighton-hove.communityinsight.org/#>) and national ones where they are relevant.

¹¹ **Engagement:** You must engage appropriately with those likely to be affected to fulfil the equality duty.

- What do people tell you about the services?
- Are there patterns or differences in what people from different groups tell you?
- What information or data will you need from communities?
- How should people be consulted? Consider:
 - (a) consult when proposals are still at a formative stage;
 - (b) explain what is proposed and why, to allow intelligent consideration and response;
 - (c) allow enough time for consultation;
 - (d) make sure what people tell you is properly considered in the final decision.

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- Try to consult in ways that ensure all perspectives can be considered.
 - Identify any gaps in who has been consulted and identify ways to address this.

¹² Your EIA must get to grips fully and properly with actual and potential impacts.

- The equality duty does not stop decisions or changes, but means we must conscientiously and deliberately confront the anticipated impacts on people.
- Be realistic: don't exaggerate speculative risks and negative impacts.
- Be detailed and specific so decision-makers have a concrete sense of potential effects. Instead of "the policy is likely to disadvantage older women", say how many or what percentage are likely to be affected, how, and to what extent.
- Questions to ask when assessing impacts depend on the context. Examples:
 - Are one or more protected groups affected differently and/or disadvantaged? How, and to what extent?
 - Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
 - If there are likely to be different impacts on different groups, is that consistent with the overall objective?
 - If there is negative differential impact, how can you minimise that while taking into account your overall aims
 - Do the effects amount to unlawful discrimination? If so the plan must be modified.
 - Does the proposal advance equality of opportunity and/or foster good relations? If not, could it?

¹³ Consider all three aims of the Act: removing barriers, and also identifying positive actions we can take.

- Where you have identified impacts you must state what actions will be taken to remove, reduce or avoid any negative impacts and maximise any positive impacts or advance equality of opportunity.
- Be specific and detailed and explain how far these actions are expected to improve the negative impacts.
- If mitigating measures are contemplated, explain clearly what the measures are, and the extent to which they can be expected to reduce / remove the adverse effects identified.
- An EIA which has attempted to airbrush the facts is an EIA that is vulnerable to challenge.

¹⁴ **Age:** People of all ages

¹⁵ **Disability:** A person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. The definition includes: sensory impairments, impairments with fluctuating or recurring effects, progressive, organ specific, developmental, learning difficulties, mental health conditions and mental illnesses, produced by injury to the body or brain. Persons with cancer, multiple sclerosis or HIV infection are all now deemed to be disabled persons from the point of diagnosis.

¹⁶ Council Tax Reduction Equality Impact Assessment

¹⁷ **Gender Reassignment:** In the Act a transgender person is someone who proposes to, starts or has completed a process to change his or her gender. A person does not need to be under medical supervision to be protected

¹⁸ **Pregnancy and Maternity:** Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.

¹⁹ **Race/Ethnicity:** This includes ethnic or national origins, colour or nationality, and includes refugees and migrants, and Gypsies and Travellers. Refugees and migrants means people whose intention is to stay in the UK for at least twelve months (excluding visitors, short term students or tourists). This definition includes asylum seekers; voluntary and involuntary migrants; people who are undocumented; and the children of migrants, even if they were born in the UK.

²⁰ **Religion and Belief:** Religion includes any religion with a clear structure and belief system. Belief means any religious or philosophical belief. The Act also covers lack of religion or belief.

²¹ **Sex/Gender:** Both men and women are covered under the Act.

²² Financial Inclusion Strategy EIA

²³ As above

²⁴ **Sexual Orientation:** The Act protects bisexual, gay, heterosexual and lesbian people

²⁵ As above

²⁶ **Marriage and Civil Partnership:** Only in relation to due regard to the need to eliminate discrimination.

²⁷ **Community Cohesion:** What must happen in all communities to enable different groups of people to get on well together.

²⁸ **Other relevant groups:** eg: Carers, people experiencing domestic and/or sexual violence, substance misusers, homeless people, looked after children, ex-armed forces personnel, people on the Autistic spectrum etc

²⁹ Council Tax Reduction EIA

³⁰ **Cumulative Impact:** This is an impact that appears when you consider services or activities together. A change or activity in one area may create an impact somewhere else

³¹ **Assessment of overall impacts and any further recommendations**

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Explain what positive impacts will result from the actions and how you can make the most of these.
- Countervailing considerations: These may include the reasons behind the formulation of the policy, the benefits it is expected to deliver, budget reductions, the need to avert a graver crisis by introducing a policy now and not later, and so on. The weight of these factors in favour of implementing the policy must then be measured against the weight of any evidence as to the potential negative equality impacts of the policy.

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- Are there any further recommendations? Is further engagement needed? Is more research or monitoring needed? Does there need to be a change in the proposal itself?

³² **Action Planning:** The Equality Duty is an ongoing duty: policies must be kept under review, continuing to give 'due regard' to the duty. If an assessment of a broad proposal leads to more specific proposals, then further equality assessment and consultation are needed.

