

EQUALITY IMPACT ASSESSMENT (EIA)



STAGE I: WHAT IS BEING ASSESSED AND BY WHOM?

What is being assessed - including a brief description of aims and objectives?

This EIA considers the 2012/13 Revenue and Capital Budget which builds on our three year Medium Term Financial Plan published in March 2011. This analysis is of our Corporate Support Services Departments Delivery Plan and builds on the Budget EIA published in December 2011.

The following actions were proposed in the Corporate Support Budget Delivery Plan for the 3 year period.

1. Training and Development (Learning and Development – L&D): review the provision of training throughout the department and council.
2. Legal Services: restructure the service and reduce support in non-critical areas
3. Democratic Services: reduce the level of Civic engagement and restructure the democratic support service.
4. Information Computer Technology (ICT): reduce support provided to departments and minimise duplication across the council (will need some ICT investment) / ICT direct costs: reduce licence costs, lease costs, phone rentals, licences etc. Data Quality Project: reduction in duplication across different systems.
5. Procurement: Procure To Pay and Buyer roll out - driving efficiencies out of external purchasing.
7. Customer Services and Revenues and Benefits (R&B): integration of services including Single Point of Contact and increased use of the Council website.
8. Human Resources (HR) - staff restructure (relies on e-transactions, shared services and investment) – including a review of Trade Union (TU) facilities.
9. Corporate Property: management restructure and efficiency savings on Facilities management.

Cross-cutting actions

6. Print and Document Services (PADS): consider options for future service delivery and/or increase productivity as well as challenge the current demand across the council and rationalise future publicity and advertising activity.
10. Administration and Business Support Review: Rationalise across the council.
11. Reduce Senior management Structure by 20% and accelerate implementation of Senior Management restructure.

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Since the last budget was set Corporate Support have completed bespoke EIA's on the following:

- Accommodation moves for R& B.
- Hot Desking Pilot
- Standards and Good Practice Guide for Housing and Council Tax Benefit Administration and Local Taxation Administration
- Introduction of Self Service option for Council Tax Payees; Business Rates Payees and Housing Benefit claimants through the use of eBilling and eNotification via the web and internet access this EIA also incorporated Self Service eForms and mobile working for our Visiting and Fraud officers
- Accommodation strategy and Registry Office.

Since the last budget was set the following actions have been delivered:

- Finance: further refinement of the staff structure.
- Cashiers: revise and refine the councils approach to cash collection.
- Income Generation: increase selling of corporate support services externally and explore potential for advertising on corporate assets.
- Registration Services: challenge the structure and increase fees and charges.
- Debt management: better co-ordination of existing processes, challenge the effective use of legal, bailiffs etc.
- Audit Fee Reduction: negotiate a reduction in external and internal audit scope and associated fees.
- Benefits Subsidy: improvements to Housing Benefits subsidy claim to maximise income from benefit overpayments.
- Performance and Intelligence: rational performance management

Within these EIA's no differential impact has been identified. With regard to accommodation moves and hot desking, we have made sure that display screen equipment health and wellbeing assessments have happened and where relevant reasonable adjustments put in place. We now have "break out" areas which allows for contemplation and associated faith time during the working day in comfortable and safe surroundings. The inclusion of "private rooms" also gives people the space to administer medication and address maternity needs.

The Standards and Good Practice Guide for Housing and Council Tax Benefit Administration and Local Taxation Administration EIA did not identify any differential impact and data protection concerns will be addressed to ensure that confidentiality is maintained. Our EIA on the introduction of Self Service option for Council Tax Payees; Business Rates Payees and Housing Benefit claimants through the use of eBilling and eNotification via the web and internet access also

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considering Self Service eForms and mobile working for our Visiting and Fraud officers found in the main positive impact across all the protected characteristic groups due to the 24/7 availability and that web use is on the increase for everyone. Access to computers may be an issue for some people and this is mitigated by our provision of web access in places like libraries and civic centre.

EIA's about our facilities include ones on our accommodation strategy and moving the Registry Office to new premises. Any negative impacts found have associated mitigating actions and with the latter disabled access will in fact be improved.

Actions that relate to cashless payment systems, integrating our customer services and revenues and benefits, and increasing the use of our self service/website arrangements. This was previously assessed as having a potential to affect older people, some people with disabilities and those who do not speak/use English as their first language. We have already closed cashiers and improved our processes to maximise Housing Benefit subsidy claims with minimal impact.

In delivering the Council's changes to debt management and cashiers systems and income generation we have worked with our partners and advice has been offered to individuals that use these services. We also identified and targeted communications to users in advance of the closure notifying them of viable payment alternatives and offering individual meetings if needed. We lease the Guildhall and Council House on an occasional basis to disability organisations such as Plymouth Area Disability Action Network (PADAN). We also lease the Guildhall on a regular basis to small Black Minority Ethnic (BME) communities such as, Plymouth Kurdish Community, South Asian Society, Betwabu, Congolese Community and Unity Plymouth. We are currently considering our charging policy for these facilities.

We are making progress in streamlining our debt collection which should ensure that debt is controlled and repayment arrangements affordable. We are giving specific consideration to vulnerable groups and utilising our contracts with financial advice service providers to minimise differential impact within each of the protected characteristics such as learning disability and mental health.

There has been no implication identified with Audit Reduction and revised fees have already been negotiated.

Actions 2, 3, 4 and 7 should not bring any differential impact in relation to gender, faith, religion, belief or sexual orientation. This is also the case for the Legal Services action (2) which has been completed. There are likely to be positive benefits for younger people and those that rely on technology due to their disability. In the longer term, backed by other support mechanisms like computers in public places and promotional activities about alternative ways to do business with us, these moves should have positive impacts across all the protected characteristics, reducing costs and increasing accessibility.

Item 3 and the completed action to review the Registration Services charges and fees do have some service implications i.e. democratic support for civic engagement as this is particularly important to our diverse communities. This will be mitigated

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against within our member development strategy to ensure that we reach those communities who wish to maximise their contact with local authority members. As registration fees are set nationally the limited differential impact can be objectively justified as we are governed by the national citizenship process which we are required to implement locally.

Overall, as part of our financial inclusion and health inequality work, we will ensure that older people and those with disabilities take up the benefits to which they are entitled and that this is not made more difficult. We are already planning to meet the impact of proposed national changes to welfare benefits. We have established a new financial inclusion framework and a bespoke EIA is being drafted.

Cross-cutting Budget Actions

Action 11 and those in brackets above are cross cutting themes. Items linked to restructures, corporate property, cashiers, debt management, income generation have needed to consider staffing within them. Where any changes to structures or service delivery arrangements lead to redundancies, we will ensure that staff are not unfairly selected for redundancy e.g. on the basis of them having a particular protected characteristic within the Equality Act 2010. We will also seek to avoid any indirect impact on staff within these groups that we cannot objectively justify.

Action 1 relates to L&D for staff across the council and item 4 is about the ICT support they receive as well as the technology that supports our service delivery. Changes to our training arrangements, human resources, business support, information technology (ICT) and legal services have the potential for differential impact on some staff groups within the protected characteristics. Reasonable adjustments such as specific ICT equipment for staff with disabilities will be provided to mitigate this.

There is also a potential for front line services delivered by other service areas to be affected e.g. prioritisation of legal advice to front line services (action 2) and we will mitigate this by ensuring that critical areas are targeted for support.

Where changes lead to commissioning services in different ways, we will use our strategic procurement procedures, which include specific reference to inequality and local priorities are used in order to deal with any potential differential impact. While reducing costs in relation to printing, publicity and advertising we will continue to be mindful about the provision of accessible information through a range of mediums.

“Differential impact” means that the decision might unfairly have more affect one protected characteristic group or local priority action more than another. Where there is a possibility that this could be the case action to mitigate the impact is included within the EIA.

Responsible Officer

Adam Broome.

STAGE 1: WHAT IS BEING ASSESSED AND BY WHOM?	
Department and Service	Director for Corporate Support.
Date of Assessment	From 27/10/11 to 21/12/11.

STAGE 2: INEQUALITY – Assess the impact against our priorities to reduce inequalities and promote community cohesion		Is there an adverse impact? Yes/No
What impact will there be on our priority to reduce the inequality gap, particularly in health, between communities?	Debt Management – our previous debt collection arrangements were fragmented and inconsistent. We are now moving forward with a more coordinated service. This will enable us to identify the total debt owed by individuals. We can then ensure that debt is controlled and repayment levels are affordable. We will give specific consideration to people who are vulnerable groups and in addition deploy our financial inclusion contracts to make sure they are supported.	No.
	Customer Services and Revenues and Benefits Integration – while our current plans should not impact on this local priority we know that pending national benefit changes are likely to have a significant impact on our residents and the way we deliver our current and additional statutory requirements. We are already planning ahead for this and to ensure that we manage any impact in relation to peoples income and spending. We will aim to deliver the pending changes in a way that does not see poverty levels rise and affect our most vulnerable groups or significantly impact on our Health Inequalities work. We will ensure this does not happen by monitoring the impact of the changes on the time taken to claim process claims particularly in relation to out protected characteristics and vulnerable groups.	No.
	Actions Increased use of Self Service/Website - we have evidence that our most deprived communities are least likely to use the internet to access our information and services. In part this because they are less likely to have broadband access. We already provide free internet access at the Civic Centre and libraries but we will also target information at these communities to ensure they are aware that free access points are available.	Yes.
What impact will there be on our priority of fostering good relations	At present our Corporate Support Budget Delivery Actions should not have an impact in relation to people getting on well. We are mindful that at times of increased poverty	No.

STAGE 2: INEQUALITY – Assess the impact against our priorities to reduce inequalities and promote community cohesion		Is there an adverse impact? Yes/No
between different communities (community cohesion)?	there can be an associated rise in crime which in turn feeds into or comes from worsening community tensions. As noted above we are preparing for the potential consequences of current austerity measures from crime prevention/management and social inclusion perspectives.	

STAGE 3: LEGISLATION – Assess the impact against our legal duties: to eliminate unlawful discrimination, advance equality of opportunity, foster good relations and promote human rights. Is there a differential impact for any of the below?			
	Yes/No		Yes/No
Age	No	Gender Reassignment	No
Disability	No	Race	No
Faith, Religion or Belief	No	Sexual Orientation – including Civil Partnership	No
Gender – including marriage, pregnancy and maternity	No	Human Rights	No

STAGE 4: IMPLICATIONS(S). Considering Equality and Legislation (Stages 2 and 3), state the actions to address any adverse impacts identified and measures to address any gaps in information or data.		
Equality Action(s)	Completion Date	Who is Responsible?
Action - Debt Management – Ensure that debt is controlled and repayment levels are affordable giving specific consideration to people who are vulnerable.	By March 2014.	Malcolm Coe. Assistant Director (AD) for Finance Assets and Efficiencies (FA and E).
Action - Debt Management – Deploy our financial inclusion contracts to make sure that we provide both universal services for those that need it within a framework that also gives support to those most in need.	By March 2014.	Peter Aley. AD for Safer Communities (SC).
Action - Customer Services and Revenues and Benefits Integration Monitor the impact of the changes particularly in relation to those within the protected characteristics and those that are vulnerable.	By March 2013.	JP Sanders. AD for Customer Services and Business Transformation (CS and BT).
Actions: Increased use of Self Service/Website – Target information about where and how to use our free web access points to the individuals and communities who least use these systems.	By March 2013.	JP Sanders. AD for CS and BT.


STAGE 4: IMPLICATIONS(S). Considering Equality and Legislation (Stages 2 and 3), state the actions to address any adverse impacts identified and measures to address any gaps in information or data.

Legislation Action(s)	Completion Date	Who is Responsible?
Action - Debt Management – Profile the breakdown of customers to ensure older people, some people with disabilities and those who do not speak/use English as their first language in particular are not excluded from the new processes.	March 2012.	Malcolm Coe. AD for FA and E.
Action - Debt Management – Undertake promotional activities about alternative ways to do business with us as informed by the customer profile data.	March 2013.	Malcolm Coe. AD for FA and E.
Action - Debt Management – Work with partners, e.g. Plymouth Community Homes, to ensure that there are viable alternatives available in local communities including ‘PayPoint’ access and work with client groups to consider how best to meet the needs of those who do not have bank accounts.	March 2013.	Malcolm Coe. AD for FA and E.
Action - Debt Management, Customer Services and Revenues and Benefits Integration – As part of our financial inclusion and health inequality work, ensure that older people and those with disabilities take up the benefits to which they are entitled and that this is not made more difficult.	By March 2014.	Peter Aley. AD for SC
Action - Debt Management and Action 24. Customer Services and Revenues and Benefits Integration – Give specific consideration to vulnerable groups and utilise our contracts with financial advice service providers to minimise differential impact within each of the protected characteristics such as learning disability and mental health.	By March 2014.	Peter Aley. AD for SC
Action - Income Generation – Develop a fair charging policy (building on other charging policies that have recently been reviewed) in relation to our facilities such as the Guild Hall and Council house.	March 2012.	Malcolm Coe. AD for FA and E.
Actions - Increased use of Self Service/Website – Ensure that older people and those who are less likely to claim the benefits to which they are entitled have accessible options available like points of contact with rooms for people using wheelchairs and hearing loop provision; disabled adjusted computer screen settings; interview rooms for those who need personal support such as those with disabilities and their carers and those with smaller children or babies and also translation services.	March 2013.	Malcolm Coe. AD for FA and E.
Increased use of Self Service/Website – Ensure our web continues to be	March 2012	Richard Longford.

STAGE 4: IMPLICATIONS(S). Considering Equality and Legislation (Stages 2 and 3), state the actions to address any adverse impacts identified and measures to address any gaps in information or data.

Legislation Action(s)	Completion Date	Who is Responsible?
available in easy read format with translation facility and meets the required accessibility standards for local government.		Head of Communications.
Housing Benefit - Monitor our customer profile by age for all types of benefit and extend our customer focus groups to cover older and younger people to assess the barriers they face to accessing the service and the support needs we need to meet.	By March 2013.	JP Sanders. AD for CS and BT.
Housing Benefit - Extend our customer focus groups to cover minority faith communities and older people to assess the barriers they face in accessing web based services.	By March 2013.	JP Sanders. AD for CS and BT.
L&D review – Ensure that equality and diversity training needs are considered and matched to the outcomes of corporate appraisals and other sources of information like inspection outcomes which also highlight staff training priorities.	By March 2012	Mark Grimley. AD for Human Resources and Organisational Development (HR and OD).
ICT changes - Consult our Disabled users support group to ensure we meet the needs of disabled ICT users as reasonably required.	March 2012 and ongoing.	Neville Cannon. AD of Information Communication and Technology (ICT).

STAGE 5: PUBLICATION

Director, Assistant Director, Head of Service approving EIA.		Date	20 December 2011
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