

# Equality, Diversity, Cohesion and Integration Impact Assessment



As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality, diversity, cohesion and integration. In all appropriate instances we will need to carry out an equality, diversity, cohesion and integration impact assessment.

This form:

- can be used to prompt discussion when carrying out your impact assessment
- should be completed either during the assessment process or following completion of the assessment
- should include a brief explanation where a section is not applicable

<b>Directorate: Resources</b>	<b>Service area: Revenues &amp; Benefits</b>
<b>Lead person: Steve Blighton</b>	<b>Contact number: 0113 395 0543</b>
<b>Date of the equality, diversity, cohesion and integration impact assessment: 21<sup>st</sup> January 2011</b>	

<b>1. Title: Revenues and Benefit Service Restructure</b>		
Is this a:		
<input type="checkbox"/> Strategy	<input type="checkbox"/> Policy	<input checked="" type="checkbox"/> Service
<input type="checkbox"/> Function	<input type="checkbox"/> Other	
Is this:		
<input type="checkbox"/> New/ proposed	<input checked="" type="checkbox"/> Already exists and is being reviewed	<input type="checkbox"/> Is changing
(Please tick one of the above)		

## 2. Members of the assessment team:

<b>Name</b>	<b>Organisation</b>	<b>Role on assessment team e.g. service user, manager of service, specialist</b>
Steve Carey	LRBS	Chief Officer
Steve Blighton	LRBS	Technical & Compliance Manager

**3. Summary of strategy, policy, service or function that was assessed:**

The Revenues and Benefit Service is responsible for the assessing entitlement to housing benefit, council tax benefit, second adult rebate, free school meals, school clothing allowance and student loans and grants. It is also responsible for assessing the contribution of individuals to personal care packages, the collection of council tax, non domestic rates, sundry income accounts and housing benefit overpayments. .

**4. Scope of the equality, diversity, cohesion and integration impact assessment**  
 (complete - 4a. if you are assessing a strategy, policy or plan and 4b. if you are assessing a service, function or event)

**4a. Strategy, policy or plan**  
 (please tick the appropriate box below)

The vision and themes, objectives or outcomes	<input type="checkbox"/>
The vision and themes, objectives or outcomes and the supporting guidance	<input type="checkbox"/>
A specific section within the strategy, policy or plan	<input type="checkbox"/>
<b>Please provide detail:</b>	

**4b. Service, function, event**  
 please tick the appropriate box below

The whole service (including service provision and employment)	<input type="checkbox"/>
A specific part of the service (including service provision or employment or a specific section of the service)	<input checked="" type="checkbox"/>
Procuring of a service (by contract or grant) (please see equality assurance in procurement)	<input type="checkbox"/>
<b>Please provide detail:</b>	
The Revenues and Benefits restructure proposes the following changes:	

- the Student Finance function is removed as a result of Central Government decision to transfer responsibility for this work from Local Authorities to the Student Loans Company;
- the number of Home Visitors is reduced to reflect, in the main, a substantial reduction in the number of interventions visits undertaken since 2006/7. These are visits undertaken to identify unreported changes in circumstances;
- the number of Fraud Investigators is reduced to reflect budgetary pressures and will result in a focus on more high value fraud with allegations of low value fraud being dealt with as changes in circumstances;
- the Technical and Compliance Team is largely removed. The Team mainly coordinates performance data, complaints, FOI requests etc but also has responsibility for monitoring progress against Equality and Diversity plans and developing the annual Service Plan;
- an increase in the number of funded assessment officer posts. This is required to ensure that the Service can continue to provide timely and efficient assessment of new claims and changes.

## 5. Fact finding – what do we already know

The Benefit caseload is made up as follows:

- 57.75% are working age;
- 42.25% are older age of which 7.06% are over 85 years of age.
- 16.78% are lone parents,
- 24.01% are families with children.

Data is collected on the ethnicity of Benefit claimants. 82.24% of claimants have provided ethnicity data and the 82.24% is made up as follows:

- 70.77% are white British,
- 0.69% are white Irish,
- 0.54% are white other,
- 0.54% are Asian of Indian origin,
- 1.62% are Asian of Pakistani origin,
- 0.44% are Asian of Bangladeshi origin,
- 1.3% are Asian of other origin,
- 1.33% are black of Caribbean origin,
- 2.02% are black of African origin,
- 0.28% are black of other origin,
- 0.26% are Chinese,
- 0.8% are eastern European,
- 0.97% are of mixed origin and
- 0.68% are from other origins.

**Implications of proposals to reduce the number of home visits:**

Since 2006/7 the number of interventions carried out by Home Visit has reduced from in excess of 16,000 to a little over 3,000. This reflects the gradual change in stance by the Department for Work and Pensions (DWP) who no longer require Local Authorities to carry out interventions by home visit. Intervention visits are sometimes seen as intrusive by customers and are not always welcomed. At one time the visits used to be unannounced but this approach was changed a number of years ago.

Postal interventions are also undertaken whereby customers are required to confirm their circumstances and these have increased over time.

There is a risk that some people may not respond to a postal intervention and may lose benefit as a result of this. However, vulnerable tenants are unlikely to be adversely affected by the growth in postal interventions:

- Cases are usually chosen for intervention using a 'high risk' list provided by the DWP. This is an analysis carried out by DWP of the caseload with characteristics such as age, tenure type, history of changes, income types etc taken into account to produce cases that have a higher incidence of having had a change in their circumstances. The focus is more on the working age claimants and more on claimants with incomes and circumstances that are more likely to change. Older people, people on long-term disability benefits and people living in supported accommodation are less likely to be chosen for an intervention;
- Improvements in access to DWP data on benefits means that more cases can be checked online without the need to contact the customer and more work is being carried out to identify cases where a change is predicted e.g. due to a time-limited benefit or other information provided by the customer;
- Some capacity is being retained to carry out interventions by home visit in support of postal interventions. This capacity will be used to support those vulnerable customers who may struggle with the postal process;
- The Interventions process will also be reviewed to introduce a telephone check before taking action over the non-return of a postal intervention.

In general Home Visitors are able to sign-post service users to other services they may be entitled to and the overall trend away from home visiting reduces the scope to signpost customers to other services. However, given that the majority of customers having their circumstances checked by home visit were working age customers with high risk criteria such as being single, private tenant or in work, this change will not have a significant impact on vulnerable and older tenants.

Other than the Interventions Visits, the restructure proposals provide the capacity for the same volume of home visits as in previous years to be carried out in relation to Fairer Charging assessments and home visits to help people claim benefits.

**Fraud:**

It is proposed to reduce the number of fraud investigators and to continue to provide an effective counter fraud service, in conjunction with Jobcentre Plus, by focusing more on higher value fraud and increasing productivity. It is not expected that this will have any adverse implications for vulnerable claimants.

The Leeds Team works jointly with the Jobcentre Plus fraud team and this has already identified some efficiencies and identified options for improving performance outcomes. The Leeds Team is larger in comparison than other Core Cities and the reduction in staffing brings the size of the team to a similar level to many Core City authorities.

Authority	Caseload	Current no. of Investigators	Investigators per 1,000 cases	LCC with 5 fewer investigators
Birmingham	148,482	19.65	0.13	
Bristol	49,218	5.5	0.11	
<b>Leeds</b>	<b>82,112</b>	<b>15.5</b>	<b>0.19</b>	<b>0.13</b>
Liverpool	80,429	10.4	0.13	
Manchester	75,455	9.6	0.13	
Newcastle	37,597	9.0	0.24	
Nottingham	42,542	5.0	0.13	
Sheffield	62,462	10.4	0.17	

Fraud identification is based upon the quality of the referral or information gained as a result of a pro-active counter-fraud initiative, the evidence collected by the investigator and the potential value of the loss to the administrative body. Whether a referral is investigated is based only upon these factors and the ethnicity, sex, age, faith etc of the customer is not relevant. This approach will remain following the restructure and there are therefore no equality implications arising from the proposals affecting fraud investigation.

The change is likely to mean that fewer customers will receive sanctions for low level fraud. Typically, those receiving a sanction for low level fraud would be tenants with small changes in their circumstances or people such as pensioners where it may not be in the public interest to prosecute. These customers will nevertheless have their benefit corrected and be expected to repay any overpaid benefit.

### **Transfer of Equality activity**

The restructure proposals include the transfer of equality activity from a separate Equality Officer within the technical and Compliance Unit to the Assessment Unit. This change means that equality activity in Benefits mirrors the approach taken in Revenues.

There are no adverse implications arising from this change. The Assessment Unit already plays a significant role in improving access to benefits for vulnerable customers and holds regular liaison meetings with specialist accommodation providers dealing with some of the most vulnerable tenants. The change will see the Assessment Unit take over responsibility for monitoring completion of actions against Equality and Diversity action plans with many of these actions falling on the Assessment Unit in the first place.

### **Transfer of Student Finance activity.**

The Government is removing the student finance function from local councils with effect from 31<sup>st</sup> March 2011. This completes a 3-year transition process that has seen the Student Loans Company take responsibility for assessing applications for financial assistance from more and more students. No new applications have been taken by local councils since 2009/10 and the majority of students that are currently with local councils are in their last year of study.

Over this time the applications process has moved, with considerable success, from being a paper based process to an online process. However, where students still need to make

a paper-based application, then this option will continue to be provided by the Student Loans Company along with the majority of facilities currently provided by local councils. The exception to this is the provision of face-to-face counter services. This will not be an option following the transition to the Student Loans Company.

The growth in online claims, increased telephone capacity within the Student Loans Company and increased modernisation of the service is expected to be sufficient support students in making and querying claims for financial assistance.

### **Staffing implications**

The restructure also sees a reduction in employees in Technical and Compliance, Visiting Service, Investigation Service, Student Finance and Business Continuity Team. Revenues and Benefits service has a diverse workforce and the implications arising from the restructure do not affect any group more than another.

All staff affected by the proposals have been offered the opportunity to consider Voluntary Early Retirement or Voluntary Severance. Where this is not appropriate staff will be considered for remaining posts in accordance with Appendix 1 of the Recruitment and Selection Code of Practice & Appendix 12 Procedure for the Appointment of Staff Following Restructure Schemes.

### **Are there any gaps in equality and diversity information Please provide detail:**

No

### **Action required:**

None

### **6. Wider involvement – have you involved groups of people who are most likely to be affected or interested**

Yes

No

### **Please provide detail:**

Full consultation has been undertaken with all staff within the service and also with the Unions.

Consultation has also taken place with Jobcentre Plus Fraud Investigation Service and with Adult Social Care in relation to proposals to reduce the number of visitors.

### **Action required:**

None required

**7. Who may be affected by this activity?**

please tick all relevant and significant equality characteristics, stakeholders and barriers that apply to your strategy, policy, service or function

**Equality characteristics**

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> Age                  | <input checked="" type="checkbox"/> Carers             | <input checked="" type="checkbox"/> Disability         |
| <input checked="" type="checkbox"/> Gender reassignment  | <input checked="" type="checkbox"/> Race               | <input checked="" type="checkbox"/> Religion or Belief |
| <input checked="" type="checkbox"/> Sex (male or female) | <input checked="" type="checkbox"/> Sexual orientation |  |
| <input checked="" type="checkbox"/> Other                |  |  |

(for example – marriage and civil partnership, pregnancy and maternity, social class, income, unemployment, residential location or family background, education or skills level)

**Please specify:**

Service information suggests that Benefit recipients come from all backgrounds and are likely to cover all the equality characteristics. There is no information to suggest that people from one or more equality characteristics are more or less likely to have unreported changes in circumstances or to be investigated for potential benefit fraud.

**Stakeholders**

- |  |   |  |
|--|---|--|
| <input checked="" type="checkbox"/> Services users                         | <input checked="" type="checkbox"/> Employees | <input checked="" type="checkbox"/> Trade Unions |
| <input checked="" type="checkbox"/> Partners<br>(JCP with regard to fraud) | <input type="checkbox"/> Members              | <input type="checkbox"/> Suppliers               |
| <input type="checkbox"/> Other please specify                              |   |  |

**Potential barriers.**

- |  |  |
|--|--|
| <input type="checkbox"/> Built environment             | <input type="checkbox"/> Location of premises and services |
| <input type="checkbox"/> Information and communication | <input type="checkbox"/> Customer care                     |
| <input type="checkbox"/> Timing                        | <input type="checkbox"/> Stereotypes and assumptions       |
| <input type="checkbox"/> Cost                          | <input type="checkbox"/> Consultation and involvement      |

**specific barriers to the strategy, policy, services or function**

**Please specify**

### **8. Positive and negative impact**

Think about what you are assessing (scope), the fact finding information, the potential positive and negative impact on equality characteristics, stakeholders and the effect of the barriers

#### **8a. Positive impact:**

There are positive implications arising from the restructure proposals. Firstly the restructure provides additional assessment officers to help provide an effective benefit service that can deal with claims and changes in a speedy and timely manner.

The reduction in Home visits to carry out interventions will be seen by some as being less intrusive than previously and enables the Revenues and Benefits Service to maintain a visiting service to support the most vulnerable tenants who need help to claim benefits. Those customers receiving personal care packages will continue to receive home visits and have an assessment undertaken to ensure that they are receiving all services that are available to them and all benefits to which they are entitled.

#### **Action required:**

None required.

#### **8b. Negative impact:**

The continuing reduction in home visits to check for unreported changes in circumstances also reduces the opportunity to signpost people to other services they may be entitled to.

#### **Action required:**

Undertaking more campaigns with our partners and stakeholders.

### **9. Will this activity promote strong and positive relationships between the groups/communities identified?**

**Yes**

**No**

#### **Please provide detail:**

It has no impact.

#### **Action required:**

None required

<b>10. Does this activity bring groups/communities into increased contact with each other (e.g. in schools, neighbourhood, workplace)?</b>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Please provide detail:</b> It has no impact in this area
<b>Action required:</b> None required

<b>11. Could this activity be perceived as benefiting one group at the expense of another?</b>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Please provide detail:</b>
<b>Action required:</b> None required

**12. Equality, diversity, cohesion and integration action plan**

(insert all your actions from your assessment here, set timescales, measures and identify a lead person for each action)

<b>Action</b>	<b>Timescale</b>	<b>Measure</b>	<b>Lead person</b>
Review Interventions process to incorporate telephone check before cancelling benefit entitlement	April 2011	No of interventions cancelled as a result of non-response to postal check	Jennifer Ellis
Ensure regular targeting to people with potential entitlement to: - Pension Credit - Tax Credits - Income Support	In place and needs to continue		Jennifer Ellis
Set targets for Counter Fraud activity that focuses on higher value frauds	April 2011	Value of fraud identified	Jobcentre Plus Manager

**13. Governance, ownership and approval**

State here who has approved the actions and outcomes from the equality, diversity, cohesion and integration impact assessment

Name	Job Title	Date
Steve Carey	Chief Officer (Revenues and Benefits)	

**14. Monitoring progress for equality, diversity, cohesion and integration actions** (please tick)

As part of Service Planning performance monitoring

As part of Project monitoring

Update report will be agreed and provided to the appropriate board  
Please specify which board

Other (please specify)

**15. Publishing**

<b>Date sent to Equality Team</b>	<b>15<sup>th</sup> February 2011</b>
<b>Date published</b>	<b>16<sup>th</sup> February 2011</b>