

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Enforcement and Collection Agent Procurement
DEPARTMENT:	Resident Services
TEAM:	Revenue and Debt Recovery
LEAD OFFICER:	Ryan Stephenson
DATE:	17 April 2023

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The procurement of suppliers for enforcement agent and debt collection agency services will assist the Council in meeting its statutory obligations to recover former tenants Housing Rent arrears, Parking, Council Tax, National Non-Domestic Rates, Adult Social Care client contributions, Housing Benefit Overpayments and Sundry debts that are owed to the Council. The Council is under statutory obligation to recover current and historic debt.

2. Who may be affected by this policy or proposal?

Affected parties include residents, organisations or any individual who are in arrears with the Council which remain unpaid following request for payment by issue of demand notices or dialogue with recovery teams.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

There is relevance to equality and public sector equality duty as the nature of enforcement and debt collection services are directed to targeted groups of customers who have debts with the Council, potentially across multiple services. Additional disadvantages may also be experienced due to socio-economic inequalities such as poverty, social or technological isolation and economic deprivation. We have consulted with lead members and intend to publish on the Council's forward plan for Cabinet approval in May 2023.

4. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age	X		
Sex		X	
Race		X	
Disability	X		
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
<p>If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.</p>		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

There is an acknowledgment that not all amounts will be owed by the residents of Brent as there is the potential for a wider impact nationally. However, by using the CCS Framework the Council's objective is to appoint reputable, professional enforcement agents with a proven history of good customer service, customer engagement and relationships with voluntary sector organisations who have specialised teams to deal with customers. There is also a requirement for service providers to comply with the Council's Ethical Debt Recovery Policy.

No external engagement has been undertaken; however internal stakeholders have been engaged with to ensure this procurement exercise creates a joined-up approach to recovery of debts across Council services. Engagement with internal stakeholders will continue on a monthly basis with updates to the relevant Cabinet lead member.

2. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

AGE	
Details of impacts identified	<p>Consideration to exclude individuals or groups from referral to enforcement agents can be derived from records held on financial assessments and revenues systems.</p> <p>The age of customers can be identified through from for example, groups in receipt of pension payments, customers residing in care homes or care leavers. As part of existing contractual arrangements, the Council would not encourage enforcement agent visits to residences where vulnerability may be a factor.</p>
DISABILITY	
Details of impacts identified	<p>The Council will seek to identify any customers who may be disabled from exemption and discount records. Currently, where an exemption is applied from liability due to severe mental impairment, the Council are able to exclude identified groups from enforcement agent referral. Arrangements are in place to provide services relating to sight, hearing and language.</p>
RACE	
Details of impacts identified	N/A

SEX	
Details of impacts identified	N/A
SEXUAL ORIENTATION	
Details of impacts identified	N/A
PREGANCY AND MATERNITY	
Details of impacts identified	N/A
RELIGION OR BELIEF	
Details of impacts identified	N/A
GENDER REASSIGNMENT	
Details of impacts identified	N/A
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	N/A

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

No

5. Please detail any areas identified as requiring further data or detailed analysis.

None

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

N/A

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

Regular meetings with suppliers and internal legal department stakeholders. Commitment to attend community events for engagement with potential or newly identified affected groups.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

The Council will ensure appointed suppliers abide by the public sector equality duty.

The specification requires suppliers to outline their training programmes for staff inclusive of procedures and processes for review of performance and continuous learning.

In reference to any complaints received the appointed supplier is required to address instances of poor standards/behaviours, reporting in regular meetings actions taken to mitigate and avoid recurrence.

Suppliers will be required to carry out duties on behalf of the Council in accordance with the Council's Ethical debt recovery policy

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	X
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	<i>Ryan Stephenson - 17 April 2023</i>
REVIEWING OFFICER:	Angela Chaudhry
HEAD OF SERVICE:	Peter Cosgrove 20 April 2023