

## Equality Impact Assessment Template – Policy, Function or Strategy

This document should be completed when a new policy, function or strategy is introduced or when a substantive change to an existing policy, function or strategy is recommended. This will ensure equality considerations are taken into account before a decision is made and the policy, function or strategy can be altered, if required.

<b>1. Policy, function or strategy</b>						
a.	Name/description of the policy, function or strategy <sup>1</sup>	Following the suspension of a face-to-face service at the Customer Service Centre (CSC) during the Coronavirus pandemic and the resulting health and safety concerns for staff, together with reduced employee numbers, the CSC will re-open to provide a face-to-face service on an appointment only basis, with reduced opening hours in the short-medium term.				
b.	Responsible organisation(s)/Lead Service	Finance Services				
c.	Lead Officer	Anne Marie Locke, Customer Services and Registration Services Team Leader				
d.	Date of Impact Assessment	8 July 2020				
e.	Partners/other Services involved in the development of the policy, function or strategy	Education Services; Revenues and Benefits Team; River Clyde Homes (RCH); the Scottish Government; National Records of Scotland				
f.	Is the policy, function or strategy?	<table border="1"> <tr> <td></td> <td>New</td> </tr> <tr> <td>X</td> <td>Reviewed/Revised</td> </tr> </table>		New	X	Reviewed/Revised
	New					
X	Reviewed/Revised					
g.	What is the purpose of the policy, function or strategy (include details of any new legislation which prompted the introduction of the policy, function or strategy or the substantive change to the policy, function or strategy)?	To re-open the CSC to provide a face-to-face service on an appointment only basis to members of the public				

<sup>1</sup> Please attach details of the policy, function or strategy to this Template

h.	What are the intended outcomes of the policy, function or strategy?	To ensure that all Inverclyde customers still receive an effective service and a service that is still accessible to all despite the social distancing measures put into place as a result of COVID 19.	
i.	Geographical area (Inverclyde-wide or a specific location)	Inverclyde-wide	
j.	Which parts of the Equality Duty will the policy, function or strategy impact on?	X	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by The Equality Act 2010
		X	Advance equality of opportunity between people of different groups
			Foster good relations between people from different groups
k.	Will those who may be directly or indirectly affected by the policy, function or strategy be involved in its development?	Yes, consultation has taken place with RCH regarding the cash collection Service Level Agreement.	

2. Does the policy, function of strategy impact on:		
	Yes	No
a. Protected Characteristics under The Equality Act 2010: Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion and Belief; Sex; Sexual Orientation <b>(see Section 3)</b>	X	
b. Reducing inequalities of outcome caused by socio-economic disadvantage – Fairer Scotland Duty <sup>2</sup> <b>(see Section 6)</b>	X	

<sup>2</sup> [Fairer Scotland Duty: interim guidance for public bodies](#)

c. Local Outcomes Improvement Plan (LOIP) 2017/22 <sup>3</sup> (see Section 7)	X	
d. Corporate Plan 2018/22 <sup>4</sup> (see Section 8)	X	
<b>3. If 'Yes' is selected for any part of Section 2, please populate the other relevant Sections of this Template.</b>		
<b>4. If 'No' is selected for <u>every part</u> of Section 2, please state the reasons for this.</b>		
<b>Please sign below and email a copy of this Template to Karen Barclay, Corporate Policy Officer: <a href="mailto:karen.barclay@inverclyde.gov.uk">karen.barclay@inverclyde.gov.uk</a>.</b>		
Signature:	Date:	

<sup>3</sup> [Local Outcomes Improvement Plan 2017/22](#)

<sup>4</sup> [Corporate Plan 2018/22](#) (agenda item 5)

### 3. Impact – Protected Characteristics

Which of the Protected Characteristics will the policy, function or strategy have an impact upon?

Protected Characteristic	Impact					Reasons/Comments
	Positive High	Positive Low	Neutral	Negative High	Negative Low	
Age		X				Some customers, particularly those who previously used face-to-face contact at the CSC, may not have been able to move to self-service during the lockdown restrictions.
Disability	X					Customers with disabilities are more likely to need to contact the CSC. Some of those customers, particularly people who previously used face-to-face contact at the CSC, may not have been able to move to self-service during the lockdown restrictions.
Gender Reassignment			X			
Pregnancy and maternity			X			
Race			X			
Religion and belief			X			
Sex			X			

Sexual orientation			X			
Other groups to consider						

<b>4. Which parts of the Equality Duty will the policy, function or strategy have an impact upon?</b>	
X	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
X	Advance equality of opportunity between people from different groups
<input type="checkbox"/>	Foster good relations between people from different groups

**5. Impact – groups**

From the information you have highlighted above, describe the positive and negative impacts and the groups affected under The Equality Act 2010.

**Positive impacts**

+

*(Describe groups affected.)*

Age; Disability:

Some customers, particularly those who previously used face-to-face contact at the CSC may plan to move, or have already moved, to self-service, other digital methods of contact or the use of telephony. However, the resumption of a face-to-face service at the CSC provides another option for customers to interact with the Council.

Local businesses which have a Pay Point facility; Post Offices

Local businesses which have a Pay Point facility, together with Post Offices, may have seen an increase in footfall as the Council's customers made cash payments at those premises.

**Negative impacts**

-

*(Describe groups affected.)*

Age; Disability:

Some customers, particularly those who previously used face-to-face contact at the CSC may not be able to self-serve, or use other digital methods of contact or telephony.

Customers with disabilities are more likely to need to contact the CSC. Some of those customers, particularly people who previously used face-to-face contact at the CSC, may not have been able to move to self-service during the lockdown restrictions.

## 6. Impact – Fairer Scotland Duty

What impact will this policy, function or strategy have on reducing inequalities of outcome caused by socio-economic disadvantage?

Positive impact +	Neutral impact =	Negative impact -
+		

**Briefly describe how the policy, function or strategy will impact on reducing inequalities of outcome.**

The recent temporary suspension of a face-to-face service at the CSC may have resulted in increased waiting times for telephone calls to be answered, resulting in higher telephone bills for those who are already socio-economic disadvantaged. However, it should be noted that, during the suspension of the face-to-face service, telephone calls have generally been answered in line with usual response rates.

Increased waiting times to see a Customer Services Representative (CSR) face-to-face could result in people with disabilities or those who are socio-economically disadvantaged waiting in long queues to, for example, hand in evidence for a Housing Benefit claim which could affect the date the claim is paid from. However, it should be noted that the Department of Work and Pensions has introduced a *Trust and Protect* approach for the Housing Benefit client base. This allows the local authority to trust the information verbally provided by a customer, who was unable to provide evidence in support of their claim electronically, and advise them that the evidence would be verified when possible to do so. The approach also allows Councils to protect customers by ensuring they do not have to leave their homes to supply supporting documents or evidence.

Persons waiting to speak to a CSR about Council Tax may give up and end up with larger debts and be pursued by the Council's debt partner, incurring more costs.

**7. Impact – LOIP 2017/22**

Which Priority/Priorities from the LOIP 2017/22 will this policy, function or strategy impact on?

X	1. <b>Population:</b> Inverclyde’s population will be stable and sustainable with an appropriate balance of socio - economic groups that is conducive to local economic prosperity and longer term population growth
X	2. <b>Inequalities:</b> There will be low levels of poverty and deprivation and the gap between the richest and poorest members of our communities will be reduced (This may already have been highlighted at Section 6.)
<input type="checkbox"/>	3. <b>Environment, culture and heritage:</b> Inverclyde’s environment, culture and heritage will be protected and enhanced to create a better place for all Inverclyde residents and an attractive place in which to live, work and visit

**Briefly describe how the policy, function or strategy will impact on the LOIP Priority/Priorities.**

Priority 1: Delivery of this Priority could be affected by a positive impact on the Council’s reputation as a result of the partial resumption of the previous level of service.

Priority 2: The partial resumption of the previous level of service could result in assisting to reduce the gap between the least deprived and most deprived members of our communities as those who are least deprived are more likely to use technology and self-serve. The impact on the most deprived customers may be in terms of their wellbeing and financial circumstances.

## 8. Impact – Corporate Plan 2018/22

Which Priority/Priorities from the Corporate Plan 2018/22 will the policy, function or strategy impact on?

<input type="checkbox"/>	1. To promote Inverclyde, to both residents and visitors alike, as a great place to live, work and visit
<input type="checkbox"/>	2. To work collaboratively, to enable strong, connected and empowered communities, particularly in areas of deprivation, so that residents have influence and control over the things that matter to them
<input type="checkbox"/>	3. To grow the local economy in a way that creates opportunities for all our residents, including access to good quality jobs
<input type="checkbox"/>	4. To reduce the prevalence of poverty and, in particular, child poverty in our communities
<input checked="" type="checkbox"/>	5. To safeguard, support and meet the needs of our most vulnerable families and residents
<input type="checkbox"/>	6. To improve the health and wellbeing of residents so that people live well, and for longer
<input type="checkbox"/>	7. To protect and enhance our natural and built environment
<input type="checkbox"/>	8. To preserve, nurture and promote Inverclyde's unique culture and heritage
<input type="checkbox"/>	9. To deliver services that are responsive to community needs and are underpinned by a culture of innovation, continuous improvement and effective management of resources
<input type="checkbox"/>	10. To develop motivated, trained and qualified employees who deliver quality services that meet current and anticipated service needs

### **Briefly describe how the policy, function or strategy will impact on the Corporate Plan Priority/Priorities.**

It is recognised that some of the customers seeking help, particularly on a face-to-face basis in the CSC, may be amongst some of the most vulnerable residents and families in Inverclyde. Although the re-introduction of a face-to-face service will be on a limited basis, every effort will be made to ensure that no client base will be disadvantaged and their needs will be met.

## 9. Evidence

What evidence do you have to help identify any potential impacts of the policy, function or strategy?

Note: Evidence could include information from consultations, surveys, the Citizens' Panel, focus groups, interviews, projects, user feedback, complaints, Officers' knowledge and experience, equalities monitoring data, publications, research, reports, and local and national groups.

Evidence	Details
Consultation/Engagement (including any carried out while developing the policy, function or strategy)	Consultation with RCH indicates that reduction in RCH rent during the period of lockdown is not as a result of the CSC being closed to members of the public but instead is attributable to a range of other factors including, for example, delays in Universal Credit payments.
Research	Other local authorities in the area have adopted a similar approach; appointment based system but encouraging the client base to use other methods of contact: online, telephone and to opt for other methods of payment other than cash.
Officers' knowledge and experience (including feedback from frontline staff)	
Equalities monitoring data	During the period of lockdown, there has been an increase in payments made to the Council by direct debit, via Pay Points located in local businesses and at Post Offices.
User feedback (including complaints)	During the period of lockdown, there has been an increase in telephone payments taken by CSC staff. Feedback from customers was that they did not realise how easy it was to do this as they had always called in to the CSC to make payments in cash.
Stakeholders  Other RCH; the Scottish Government; National Records of Scotland; the	The Council provides a cash payment facility for RCH.

Post Office; local businesses with the Pay Point facility	
Are there information gaps and, if so, what are these?	<p>There are a number of issues which remain to be resolved; for example, the future of cash collection and the impact this has on the service level agreement with RCH, and any longer term expectations regarding the delivery of some of the support the Council has put in place during the COVID emergency such as the humanitarian aid centre calls.</p> <p>We have contacted other Councils to ask about their approaches to re-instating a face-to-face service at their Customer Service Centres (or equivalent) and their responses are awaited.</p>

**10. Consequences of analysis**

What steps will you take in response to the findings of your analysis? Please select at least one of the following and provide a brief explanation.

a.	Continue development with no changes	<input type="checkbox"/>	
b.	Continue development with minor alterations	X	
c.	Continue development with major changes	<input type="checkbox"/>	
d.	Discontinue development and consider alternatives (where relevant)	<input type="checkbox"/>	

How will the effect of the policy, function or strategy be monitored following implementation?

The number of requests for face-to-face appointments will be monitored, together with call volumes and customer feedback.

When is the policy, function or strategy due to be implemented?

With effect from Wednesday, 15 July 2020.

When will the policy, function or strategy be reviewed?

The provisional review date is Wednesday, 12 August 2020.

What resources are available for the implementation of the policy, function or strategy? Have these resources changed?

**11. Please use the space below to detail any other matters arising from the Equality Impact Assessment process, including what action could be taken to mitigate the impact of the policy, function or strategy.**

If the other preferred methods of contact are not suitable for a customer, an exception is made and a face-to-face scheduled appointment is arranged.

Customers who wish to leave items of mail for the Council can deposit them in the mail box that is located in the carriageway.

Because cash handling presents specific risks to employees, cash payments will not be accepted when the CSC reinstates a face-to-face

service. However, alternative ways of making payments are available throughout Inverclyde; for example, telephone payments, direct debits, via Pay Points located in local businesses and at Post Offices.

The Department of Work and Pensions introduced a *Trust and Protect* approach for the Housing Benefit client base. This allows the local authority to trust the information verbally provided by a customer, who was unable to provide evidence in support of their claim electronically, and advise them that the evidence would be verified when it is possible to do so. It also allows Councils to protect customers by ensuring they do not have to leave their homes to supply supporting documents or evidence.

The Council will recommence follow-up action regarding customers who had outstanding debts with the Council late July early August 2020.

**Details of the Person(s) who completed the Assessment:**

Name:	Anne Marie Locke
Position:	Customer Services and Registration Services Team Leader
Date:	8 July 2020

**Authorised by:**

Name:	Alan Puckrin
Position:	Chief Financial Officer
Date:	13 July 2020

Thank you for your assistance with the completion of this task.

Please send a copy of the completed Template to Karen Barclay, Corporate Policy Officer at [karen.barclay@inverclyde.gov.uk](mailto:karen.barclay@inverclyde.gov.uk).