

Equality Impact Assessment (EIA) Template: Service Reviews/Service Changes

Title of spending review/service change/proposal	National Non-Domestic Rates (NNDR) Administration 2022/23
Name of division/service	Finance, Revenues and Customer Support
Name of lead officer completing this assessment	Revenues & Benefits Manager
Date EIA assessment completed	24 th February 2022
Decision maker	Deputy Director of Finance
Date decision taken	February 2022

EIA sign off on completion:	Signature	Date
Lead officer		February 2022
Equalities officer		February 2022
Divisional director		February 2022

Please ensure the following:

- (a) That the document is understandable to a reader who has not read any other documents, and explains (on its own) how the Public Sector Equality Duty is met. This does not need to be lengthy, but must be complete.

- (b) That available support information and data is identified and where it can be found. Also be clear about highlighting gaps in existing data or evidence that you hold, and how you have sought to address these knowledge gaps.
- (c) That the equality impacts are capable of aggregation with those of other EIAs to identify the cumulative impact of all service changes made by the council on different groups of people.

1. Setting the context

Describe the proposal, the reasons it is being made, and the intended change or outcome. Will current service users' needs continue to be met?

Non-domestic rates, or business rates, collected by local authorities are the way that those who occupy non-domestic property contribute towards the cost of local services. Under the business rates retention arrangements introduced from 1 April 2013, authorities keep a proportion of the business rates paid locally. The money, together with revenue from council taxpayers, locally generated income and grants from central government, is used to pay for the services provided by local authorities in your area.

Depending on individual circumstances, a ratepayer may be eligible for a rate relief (i.e. a reduction in your business rates bill). There are a range of available reliefs. These include Nursery Discounts, Charity and community amateur sports club relief, Small Business Rates Relief, Retail, Hospitality & Leisure Business Rates Relief (expanded as a result of the Covid-19 pandemic), and the Local Discount Discretionary Rate Relief scheme, providing assistance mainly to charities.

Enforcement Agents are employed regarding non-payment of Business Rates – although this is primarily targeted at limited companies, sole traders and partnerships with unlimited liability may also be personally liable for debt. Enforcement follows the Council-wide Fair Debt Policy.

2. Equality implications/obligations

Which aims of the Public Sector Equality Duty (PSED) are likely be relevant to the proposal? In this question, consider both the current service and the proposed changes.

	Is this a relevant consideration? What issues could arise?
Eliminate unlawful discrimination, harassment and victimisation How does the proposal/service ensure that there is no barrier or disproportionate impact for anyone with a particular protected characteristic	See Fair Debt Policy.
Advance equality of opportunity between different groups How does the proposal/service ensure that its intended outcomes promote equality of opportunity for users? Identify inequalities faced by those with specific protected characteristic(s).	Access primarily through digital means assisting those with limited mobility, telephone and face-to-face services are also available dependent on need.
Foster good relations between different groups Does the service contribute to good relations or to broader community cohesion objectives? How does it achieve this aim?	Discretionary discounts and rates relief available to offset the negative impact of the Covid-19 pandemic and promote social enterprise, e.g. charity relief.

3. Who is affected?

Outline who could be affected, and how they could be affected by the proposal/service change. Include current service users and those who could benefit from but do not currently access the service.

Business rates are charged on most non-domestic premises, including commercial properties such as shops, offices, pubs, and industrial properties such as warehouses and factories. Discounts are applied for online and in writing.

4. Information used to inform the equality impact assessment

What **data, research, or trend analysis** have you used? Describe how you have got your information and what it tells you. Are there any gaps or limitations in the information you currently hold, and how you have sought to address this, e.g. proxy data, national trends, etc.

National trends and data, debt enforcement reports and analysis, local trends and impact of reliefs/discounts.

5. Consultation

What **consultation** have you undertaken about the proposal with current service users, potential users and other stakeholders? What did they say about:

- What is important to them regarding the current service?
- How does (or could) the service meet their needs?
- How will they be affected by the proposal? What potential impacts did they identify because of their protected characteristic(s)?
- Did they identify any potential barriers they may face in accessing services/other opportunities that meet their needs?

No consultation conducted/required, no significant changes to operations have been adopted.

6. Potential equality Impact

Based on your understanding of the service area, any specific evidence you may have on service users and potential service users, and the findings of any consultation you have undertaken, use the table below to explain which individuals or community groups are likely to be affected by the proposal because of their protected characteristic(s). Describe what the impact is likely to be, how significant that impact is for individual or group well-being, and what mitigating actions can be taken to reduce or remove negative impacts.

Looking at potential impacts from a different perspective, this section also asks you to consider whether any other particular groups, especially vulnerable groups, are likely to be affected by the proposal. List the relevant that may be affected, along with their likely impact, potential risks and mitigating actions that would reduce or remove any negative impacts. These groups do not have to be defined by their protected characteristic(s).

Protected characteristics	Impact of proposal: Describe the likely impact of the proposal on people because of their protected characteristic and how they may be affected. Why is this protected characteristic relevant to the proposal? How does the protected characteristic determine/shape the potential impact of the proposal?	Risk of negative impact: How likely is it that people with this protected characteristic will be negatively affected? How great will that impact be on their well-being? What will determine who will be negatively affected?	Mitigating actions: For negative impacts, what mitigating actions can be taken to reduce or remove this impact? These should be included in the action plan at the end of this EIA.
Age¹	Pension-age customers – may not be digitally able or have the means to access services	Older customers may have some difficulties, particularly those used to sitting down with an officer who would fulfil their transaction on their behalf.	We offer phone line alternatives for those customers who are not digitally able, and there are front of house officers situated within the

¹ Age: Indicate which age group is most affected, either specify general age group - children, young people working age people or older people or specific age bands

			centre to assist those customers who need additional support.
Disability²	Disabled people – may not be digitally able or have the means to access services	Disabled customers may experience some difficulties depending on the nature and severity of their condition – restrictions on face-to-face appointments may particularly disadvantage customers with sight/hearing impairments and mental incapacity issues.	We offer phone line alternatives for those customer are not digitally abled, and there are front of house officers situated within the centre to assist those customers need the additional support. We have also added assisted technology within the centre such as hearing loops and have an accessible layout with wheelchair ramps.
Gender Reassignment³	No disproportionate impact is attributable specifically to this characteristic.	N/A	N/A
Marriage and Civil Partnership	No disproportionate impact is attributable specifically to this characteristic.	N/A	N/A

² Disability: if specific impairments are affected by the proposal, specify which these are. Our standard categories are on our equality monitoring form – physical impairment, sensory impairment, mental health condition, learning disability, long standing illness or health condition.

³ Gender reassignment: indicate whether the proposal has potential impact on trans men or trans women, and if so, which group is affected.

Pregnancy and Maternity	No disproportionate impact is attributable specifically to this characteristic.	N/A	N/A
Race⁴	No disproportionate impact is attributable specifically to this characteristic.	N/A	N/A
Religion or Belief⁵	No disproportionate impact is attributable specifically to this characteristic	N/A	N/A
Sex⁶	No disproportionate impact is attributable specifically to this characteristic	N/A	N/A

⁴ Race: given the city's racial diversity it is useful that we collect information on which racial groups are affected by the proposal. Our equalities monitoring form follows ONS general census categories and uses broad categories in the first instance with the opportunity to identify more specific racial groups such as Gypsies/Travellers. Use the most relevant classification for the proposal.

⁵ Religion or Belief: If specific religious or faith groups are affected by the proposal, our equalities monitoring form sets out categories reflective of the city's population. Given the diversity of the city there is always scope to include any group that is not listed.

⁶ Sex: Indicate whether this has potential impact on either males or females

Sexual Orientation⁷	No disproportionate impact is attributable specifically to this characteristic.	N/A	N/A
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Summarise why the protected characteristics you have commented on, are relevant to the proposal?

As outlined above, the key protected characteristics with relevance to the proposal are age, sex, race, pregnancy and maternity and disability – resulting from the cumulative impact of CTRS costs to be met by an individual household alongside any other financial limitations they may be experiencing (for instance limitations to other benefits).

Summarise why the protected characteristics you have not commented on, are not relevant to the proposal?

As no impacts relating to sexual orientation, religion and belief and gender reassignment have been identified.

Other groups	Impact of proposal: Describe the likely impact of the proposal on children in poverty or any other people who we consider to be vulnerable. List any vulnerable groups likely to be affected. Will their needs continue to be met? What issues will affect their take up of services/other opportunities that meet their	Risk of negative impact: How likely is it that this group of people will be negatively affected? How great will that impact be on their well-being? What will determine who will be negatively affected?	Mitigating actions: For negative impacts, what mitigating actions can be taken to reduce or remove this impact for this vulnerable group of people? These should be included in the action plan at the end of this EIA.
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⁷ Sexual Orientation: It is important to remember when considering the potential impact of the proposal on LGBT communities, that they are each separate communities with differing needs. Lesbian, gay, bisexual and transgender people should be considered separately and not as one group. The gender reassignment category above considers the needs of trans men and trans women.

	needs/address inequalities they face?		
Children in poverty	No disproportionate impact is attributable specifically to this characteristic.	N/A	N/A
Other vulnerable groups	No disproportionate impact is attributable specifically to this characteristic.	N/A	N/A
Other (describe)	Customers without English as a first language	May be less likely to be digitally able and successfully able to navigate our online offers without assistance	Availability of advice services by phone, support in person at the Customer Service Centre and availability of Community Language Services.
<p>7. Other sources of potential negative impacts Are there any other potential negative impacts external to the service that could further disadvantage service users over the next three years that should be considered? For example, these could include: other proposed changes to council services that would affect the same group of service users; Government policies or proposed changes to current provision by public agencies (such as new benefit arrangements) that would negatively affect residents; external economic impacts such as an economic downturn.</p> <p>No impacts identified.</p>			
<p>8. Human Rights Implications Are there any human rights implications which need to be considered (please see the list at the end of the template), if so please complete the Human Rights Template and list the main implications below:</p> <p>No impacts identified.</p>			
<p>9. Monitoring Impact You will need to ensure that monitoring systems are established to check for impact on the protected characteristics and human rights after the decision has been implemented. Describe the systems which are set up to:</p>			

- monitor impact (positive and negative, intended and unintended) for different groups
- monitor barriers for different groups
- enable open feedback and suggestions from different communities
- ensure that the EIA action plan (below) is delivered.

10. EIA action plan

Please list all the equality objectives, actions and targets that result from this Assessment (continue on separate sheets as necessary). These now need to be included in the relevant service plan for mainstreaming and performance management purposes.

Equality Outcome	Action	Officer Responsible	Completion date

Human Rights Articles:

Part 1: The Convention Rights and Freedoms

- Article 2:** Right to Life
- Article 3:** Right not to be tortured or treated in an inhuman or degrading way
- Article 4:** Right not to be subjected to slavery/forced labour
- Article 5:** Right to liberty and security
- Article 6:** Right to a fair trial
- Article 7:** No punishment without law
- Article 8:** Right to respect for private and family life
- Article 9:** Right to freedom of thought, conscience and religion
- Article 10:** Right to freedom of expression
- Article 11:** Right to freedom of assembly and association
- Article 12:** Right to marry
- Article 14:** Right not to be discriminated against

Part 2: First Protocol

- Article 1:** Protection of property/peaceful enjoyment
- Article 2:** Right to education
- Article 3:** Right to free elections