

Tameside Metropolitan Borough Council Equality Impact Assessment Form



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| Subject / Title | Enforcement Agent Contract |
| Project Lead Officer (Name and Job Title) | Christopher Stuart, Head of Service |
| Assistant Director / Director | Julie Smethurst |
| Department | Revenues and Benefits |
| Directorate | Finance |

| | |
|-----------------------|----------------------------|
| EIA Start Date | EIA Completion Date |
| June 2025 | Expected August 2025 |

This Equality Impact Assessment template contains collapsible advice and instructions. **Whenever you see a triangle pictured here, ► click on it to reveal or collapse advice and instructions.**

PURPOSE OF THE EQUALITY IMPACT ASSESSMENT

An Equality Impact Assessment (EIA) aims to examine whether a proposal will contribute to or alleviate inequalities in Tameside through assessing the potential impacts the proposal may have on people with ‘protected characteristics’. (A ‘proposal’ here includes any strategy, policy, service change, or project).

‘Protected characteristics’ are attributes that people have or experiences that people may go through which can result in marginalisation or disadvantage. Under the Equality Act 2010, there are nine legally mandated protected characteristics to consider:

- Age
- Sex
- Race (including colour, nationality, and ethnicity)
- Religion or belief
- Disability
- Sexual orientation
- Gender identity¹

¹ We have rearticulated ‘gender reassignment’ under the Equality Act 2010 as ‘gender identity’. An explanation for this is given in the definitions of protected characteristics in STEP FIVE.

Tameside Metropolitan Borough Council Equality Impact Assessment Form

- Pregnancy and maternity
- Being married or in a civil partnership

Tameside Council has classified further characteristics as protected, referred to as 'extra protected characteristics'. These are below:

- Carers
- Cared for Children and Care Leavers
- Ill Mental Health
- Neurodivergence
- Socio-Economic Disadvantage

Conducting an Equality Impact Assessment based on these protected characteristics will aid compliance with the Public Sector Equality Duty (Equality Act 2010, section 149), which requires that all public bodies pay 'due regard' to the three general aims of the Public Sector Equality Duty:

- Page 14
- 1. Eliminate unlawful discrimination, harassment, and victimisation
 - 2. Advance equality of opportunity between people who share a protected characteristic and those who do not
 - 3. Foster good relations between people who share a protected characteristic and those who do not

Having 'due regard' involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low

EQUALITY IMPACT ASSESSMENT CORPORATE STANDARDS

Due to the important ethical and legal aims of the Equality Impact Assessment (EIA), there are several corporately agreed criteria which should be fulfilled when completing EIAs:

- An EIA is required for all formal decisions that involve changes to service delivery. For all other proposals, an EIA must be considered.
- The decision as to whether an EIA is undertaken rests with the Project Lead Officer in consultation with the appropriate Assistant Director / Director where necessary. Where an EIA is not completed, the reason(s) for this must be detailed within the appropriate report.

- EIAs must be timely and completed alongside the development of any proposal. The findings of any potential detrimental or inequitable impact that may occur through the implementation of the proposal on residents, service users, or staff must be brought to the attention of the decision maker in the accompanying report. Appropriate mitigations must be integrated into the development of the proposal.
- EIAs should be carried out by at least two people. Guidance from case law indicates that judgements arrived at in isolation are not consistent with showing 'due regard' to the necessary equality duties.

INITIAL SCREENING

Step 1: Summarise the proposal

Page 145

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| Purpose: | <p>Exchequer Services and Parking Services are completing a combined procurement exercise to contract with three Enforcement Agent Companies to collect unpaid debts for the Council. The Council is currently in contract with three enforcement agencies for the collection of council tax, business rates, sundry debts, commercial rent arrears, adult social care and housing benefit overpayments. This contract has been in place since June 2018.</p> <p>Parking Services have been in contract with one enforcement agent since 15 February 2024 and both contracts expire in June 2025. The new contract will be awarded for a term of four years beginning on 04 August 2025 and ending on 29 June 2029, with the option to extend for three years.</p> <p>The collection of council tax, business rates, parking and bus lane fines is a statutory responsibility of Tameside Council. The collection of housing benefit overpayments, sundry debts, adult social care and commercial rent arrears, whilst not a statutory responsibility, are imperative to maintaining and maximising the Council's revenue stream.</p> |
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Tameside Metropolitan Borough Council Equality Impact Assessment Form



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| 1a. | Proposal Title: | Enforcement Agent Contract |
| 1b. | Proposal Aims: | To inform the procurement process for enforcement agency services, to ensure Tameside’s commitment to promoting equality, diversity and inclusion is met. |
| 1c. | Context: | Enforcement agencies act as representatives of the Council in sensitive scenarios; therefore, it is crucial to ensure that their practices align with the principles of fairness and non-discrimination. |
| Page 146 | Stakeholders: | Residents, businesses and debtors; equality and diversity lead; local advice and support organisations; procurement and legal teams; enforcement agents and service providers; internal staff; safeguarding teams and social care organisations. |

Step 2: Impact Analysis – identify the impacts

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| Purpose: | This assessment considers the potential impacts of procurement decisions on different groups protected under the Equality Act 2010, and aims to identify any barriers, risks or opportunities to promote equality in service delivery and outcomes. |
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SEE INSTRUCTION:

Each potential impact can be classified as ‘direct’ or ‘indirect’.

A **direct impact** occurs when the proposal is targeted at a particular group. For example, if libraries closed down children’s areas, this would directly impact children under ‘Age’.

Tameside Metropolitan Borough Council Equality Impact Assessment Form



An **indirect impact** occurs when the proposal is more general or universal, but it has a knock-on effect on people with particular protected characteristics. For example, if a pelican crossing is removed due to construction or highway changes, this would indirectly impact people with disabilities ('Disability'), the elderly ('Age'), people with children or who are pregnant ('Pregnancy/Maternity').

If a detrimental direct or indirect impact is identified, an appropriate **mitigating action** should be integrated into the development of the proposal. A mitigating action is an adjustment to the proposal that will reduce or minimise the impact. This is covered in STEP SIX of the EIA Process.

The Impact Analysis is separated between two steps: STEP TWO (here) and STEP FIVE (below). In this step:

- State whether any direct or indirect impacts have been identified under each protected characteristic.
- List the impacts identified under each protected characteristic.
- Identify whether a mitigation action is required.

There is **no requirement** at this stage to provide the detailed evidence about each impact or identify specific mitigating actions.

When identifying impacts, think about:

Page 147

- Information and intelligence you have access to (e.g. data that is publicly available)
- Experiences and knowledge of residents and service users
- Experiences and knowledge of colleagues, including frontline staff
- Experiences in other local boroughs, particularly Greater Manchester and statistical neighbours
- Research reports from think tanks, academia, government organisations, and charities
- **'Multiple marginalisation'** – how the proposal may impact people with combinations of protected characteristics (e.g. Age and Race/Ethnicity) rather than consider each protected characteristic singularly. A proposal may impact people with one combination of protected characteristics more than another combination of protected characteristics. For example, moving a service from physical to digital provision may detrimentally affect elderly people of Bangladeshi backgrounds more than elderly people of a White British background.

| Protected Characteristic | Direct Impact | Indirect Impact | Mitigation Required |
|---|---------------|-----------------|---------------------|
| <i>Select yes or no from the drop-down list in each box to identify whether any direct or indirect have been identified under each protected characteristic and also select yes or no to determine whether a mitigating action is required. Subsequently, list these impacts in the grey box under each protected characteristic.</i> | | | |
| Age | Yes | Yes | Yes |

Tameside Metropolitan Borough Council Equality Impact Assessment Form

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| | Older adults may experience greater distress during enforcement visits, and young people (including care leavers) may have limited support or understanding of the process. | | |
| Sex | Yes | Yes | Yes |
| | Single mothers and those fleeing domestic abuse may be particularly vulnerable when facing enforcement action. | | |
| Race (including colour, nationality, and ethnicity) | Yes | Yes | Yes |
| | Language barriers or cultural differences could result in miscommunication or perceptions of discriminatory treatment. | | |
| Religion or Belief | No | No | No |
| Disability | Yes | Yes | Yes |
| | Individuals with physical, sensory, or mental health conditions may be disproportionately affected by enforcement processes, particularly if reasonable adjustments aren't made. The enforcement activity will not take place against vulnerable and disabled residents where identified by the Council. | | |
| Sexual Orientation | No | Yes | Yes |
| | LGBTQ+ individuals may have experienced prior discrimination, making enforcement visits particularly distressing. | | |
| Gender Identity | No | Yes | No |
| | individuals may have experienced prior discrimination, making enforcement visits particularly distressing. | | |
| Pregnancy/Maternity | Yes | Yes | Yes |
| | Pregnant individuals or new parents may be adversely affected if enforcement action adds physical or emotional stress. The enforcement activity will not take place against pregnant residents where identified by the Council. | | |
| Marriage/Civil Partnership | No | No | No |
| | Generally low risk, but individuals going through separation or divorce may experience added emotional and financial vulnerability. | | |
| Carers | No | Yes | Yes |
| | Carers may be disproportionately burdened by the financial and time pressures of enforcement action; especially if it disrupts caring responsibilities. | | |
| Cared for Children and Care Leavers | Yes | Yes | Yes |
| | The Council provides assistance to Care Leavers through Council Tax LGFA 1992 S13A1C and will not accrue Council Tax debt whilst classed as a care leaver up to the age of 25. Care leavers often face limited financial resilience and support networks, making them particularly vulnerable to enforcement. | | |
| Ill Mental Health | Yes | No | Yes |
| | Individuals with mental ill health may not fully understand enforcement processes, leading to distress or disengagement. The Council will review all cases before enforcement agent action is undertaken. Where vulnerability is identified the Council will not take action, | | |

Tameside Metropolitan Borough Council Equality Impact Assessment Form



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| | however if a resident has ill mental health but working and managing finances payment of Council Tax should continue. The enforcement agents have teams that deal with vulnerability and take precautions. | | |
| Neurodivergence | Yes | No | No |
| | Neurodivergent people may struggle with face-to-face visits, unexpected contact, or inflexible communication styles. The Council will review all cases before enforcement agent action is undertaken. Where neurodivergence is identified and the resident is working and managing finances payment of Council Tax should continue. | | |
| Socio-Economic Disadvantage | Yes | Yes | Yes |
| | Those on low incomes or in insecure housing may face repeated or intensified enforcement activity. The individual circumstances may result in enforcement activity not being used such as low income. | | |
| Multiple Marginalisation | Yes | Yes | Yes |
| | People who fall into several of the above categories may face compound discrimination or barriers, often overlooked by “single characteristic” assessments. | | |

Step 3: Initial Screening Sign Off

Page 149

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| Purpose: | To determine whether a proposal should proceed from the Initial Screening to the Full Equality Impact Assessment. |
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SEE INSTRUCTION:

A full Equality Impact Assessment should be undertaken when:

- There is a formal decision relating to changes in service delivery
- A detrimental impact against a protected group has been identified, irrespective of whether the impact is direct or indirect
- There are substantial, important gaps in knowledge that prevent proper consideration of the proposal’s potential impacts



Sign off is only required if the Initial Screening does not proceed to the Full Equality Impact Assessment.

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| 1e. | Does the proposal require a full EIA? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
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Tameside Metropolitan Borough Council Equality Impact Assessment Form



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| 1f. | If you are not undertaking a full EIA, please provide justification as to why not. | |
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| This initial screening has been completed by the EIA Lead Officer: Page 150 | Name: | Christopher Stuart |
| | Signature: |  |
| | Department: | Revenues and Benefits |
| | Date: | 05 June 2025 |
| This Initial Screening has been checked by the Assistant Director / Director: | Name: | Julie Smethurst |
| | Signature: |  |
| | Department: | Revenues and Benefits |
| | Date: | 12 June 2025 |

FULL EQUALITY IMPACT ASSESSMENT

Step 4: Issues to Consider

SEE INSTRUCTION:

Data and Intelligence

The following types of data can potentially be accessed:

- Publicly available national data (e.g. from the Local Authority Interactive Tool, ONS, NOMIS, NHS Digital, relevant government departments)
- Local data
- Service user information

It is also worth considering how this data can be used, for example:

- Benchmarking data for Tameside against other local authorities, e.g. local authorities in Greater Manchester, statistical neighbours
- Whether national or regional data can be applied to Tameside
- Whether data at a smaller geographical scale than Tameside is required, e.g. by ward, by MSOA/LSOA

Further intelligence can be gathered from the following:

- Research reports from think tanks, academia, government organisations, and charities
- Policy briefings
- Academic papers (which can be found through search engines, e.g. Google Scholar)

Data and Intelligence

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| 4a. | Demographic profiles; Revenues and Benefits service key databases and recovery records; housing data; adult social care and safeguarding data; children’s services data; enforcement agent monitoring and complaints; external sources for local area deprivation, socio-economic indicators, and health/disability prevalence. Debt advice sector reports, vo sector evidence. |
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Tameside Metropolitan Borough Council Equality Impact Assessment Form



SEE INSTRUCTION:

Consultation and Engagement

It is expected that you will engage with potential impacted groups on this proposal when undertaking the Equality Impact Assessment to better understand potential impacts on people with protected characteristics.

Engagement can occur through:

- A general consultation/engagement exercise on the proposal (e.g. a survey), where space is provided to discuss impacts on people with protected characteristics
- Regular channels of engagement or feedback e.g. a service user panel that you already operate
- Input from colleagues (particularly frontline staff) and partners (e.g. the VCSE sector)

Alternatively, insights can be retrieved from engagement or consultation exercises that have previously occurred.

| Consultation and Engagement | | | |
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| Page 152 | 4b. | Has any consultation or engagement been conducted that is relevant to this Equality Impact Assessment? | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |
| | | | If YES, answer 4c-4e. If NO, answer 4f. |
| | 4c. | Engagement Undertaken: | |
| | 4d. | Who has been engaged with? | |

Tameside Metropolitan Borough Council Equality Impact Assessment Form



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| 4e. | Outcomes of Engagement: | |
| 4f. | If engagement has not been undertaken, please explain why. | |

SEE INSTRUCTION:

Legislative Drivers

It is worth considering any legislative drivers that may influence the Equality Impact Assessment:

- Legal duties that services have to abide by, including the Public Sector Equality Duty
- Case law and judicial review, particularly instances where similar services have been provided and challenged, and as a result, have needed to change

| Legislative Drivers | |
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| 4g. | The Council must collect debts owed relating to Council Tax and Business rates in accordance with the LGFA 1992, Sundry Debt in accordance with Council Policy, Parking Fines in accordance with Traffic Management Act 2004, Adult Social Care in accordance with the Care Act 2014 and Enforcement adheres to the Taking Control of Goods Regulation 2013 |

SEE INSTRUCTION:

Financial Considerations

Page 1 of 3

Tameside Metropolitan Borough Council Equality Impact Assessment Form



It is worth considering any financial considerations that may influence the Equality Impact Assessment, e.g. budgeting, available resources, etc.

This is particularly in relation to mitigating actions that are identified in STEP SIX, which are needed to reduce potential impacts of the proposal at hand.

It may be worth thinking about how mitigating actions can serve as opportunities for innovation.

| Financial Considerations | |
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| 4g. | Enforcement Actions raise fees in accordance with the Taking Control of Goods Regulations 2013 and keep any fees collected. The contract is of no cost to the Council. |

Page 1 of 4

Step 5: Impact Analysis – evidence the impacts

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| Purpose: | To provide evidence of the potential impacts identified under each protected characteristic. |
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FOR DEFINITIONS OF PROTECTED CHARACTERISTICS, EXPAND THE INSTRUCTION BELOW. SEE INSTRUCTION:

This step constitutes the second part of the Impact Analysis. In this step, under each protected characteristic, each potential impact should be listed and categorised (e.g. Direct or Indirect), and the evidence for each potential impacts should be provided. The potential impacts that have been identified will likely be the same as those that have been identified in STEP TWO. However, these may have changed or new impacts may be identified, due to the gathering of further evidence.

Evidence can be quantitative (numerical) or qualitative (non-numerical), addressing the ‘what’, ‘who’, ‘how’, and ‘why’ of potential impacts. Refer to the guidance on Data/Intelligence and Consultation/Engagement identified in Step 4 to assist with the evidence that can be included in the Impact Analysis.

When listing the impacts, it will help to number each impact. This will help navigate the form when identifying mitigating actions under STEP SIX.

Do not feel constrained by the space provided in the table. To add a new row, right click on the bottom row, then select ‘Insert Item After’ or click the + button. Also, each box will expand downward as the information is entered. However, when entering data tables, copy and paste as pictures; if entered as tables, it will alter the layout of the Impact Analysis form.

Tameside Metropolitan Borough Council Equality Impact Assessment Form

The definitions of protected characteristics are below:

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| Age | A person's specific age or age group. An age group can be numerical (e.g. 18-30) or descriptive (e.g. 'the elderly', 'teenagers', etc.). |
| Sex | A person's biological sex, whether a person is male, female, or those who are differently sexed (e.g. intersex). This does not include sexual orientation and gender identity, which are analysed separately. |
| Race (including colour, ethnicity, and nationality) | How people identify themselves or are identified in society according to their skin colour, physical features, and national/cultural identity. This can cover: <ul style="list-style-type: none"> • Racial identities (e.g. White, Black, Asian) • Ethnic identities (e.g. Jamaican, Arab, Persian, Jewish, Irish, Gypsy/Roma) • Nationalities • Languages spoken – whether English is the first or additional language • Refugee and asylum status |
| Religion or Belief | Any religion or belief that a person follows or subscribes to. It includes the commonly recognised religions (such as Christianity, Islam, Hinduism, Judaism, Buddhism, and Sikhism) and the different groups within each religion (e.g. in Christianity, it can cover Catholicism, Protestantism, etc.; in Islam, it can cover Sunni Islam, Shia Islam, Sufism, etc.). It also applies to religions that are not necessarily well known (e.g. Jainism, Baha'i Faith) as well as people who do not have any religious belief (e.g. those ascribing to Humanism and Atheism). |
| Disability | Physical or mental conditions that have substantial and long-term adverse effects on people's abilities to carry out day-to-day activities. This covers a wide range of disabilities: <ul style="list-style-type: none"> • Physical and mobility impairments • Sensory impairments (e.g. sight, hearing) • Learning disabilities • Progressive conditions (e.g. neurodegenerative disorders, muscular dystrophies, dementia) • Fluctuating and recurring conditions (e.g. rheumatoid arthritis, epilepsy, myalgic encephalitis) • Organ-specific disorders (e.g. respiratory conditions, cardiovascular diseases) • Auto-immune conditions |
| Sexual Orientation | The orientation that a person has toward another person of any sex or gender. Common orientations are towards people of the opposite sex/gender (e.g. heterosexual/ straight), towards people of the same sex/gender (e.g. a gay man or lesbian), or towards multiple sexes/genders (e.g. bisexual or pansexual). There are other orientations that should be considered (e.g. asexual – a person who does not experience sexual attraction). A person's orientation can be sexual, romantic, or emotional. |
| Gender Identity | The gender that a person identifies with. People most commonly identify with the gender that matches their sex assigned at birth – i.e. as a man or woman. People who are trans identify with a gender that is different to their sex assigned at birth. Included amongst people with trans identities are people "proposing to undergo, undergoing, or having undergone a process to reassign sex". This is the legal definition for 'gender |

Page 155

Tameside Metropolitan Borough Council Equality Impact Assessment Form

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| | reassignment' under the Equality Act 2010. However, this legal definition does not include trans people who do not choose to undertake the medical transitioning process and people with other gender identities (e.g. those who identify as non-binary, gender fluid, etc.). |
| Pregnancy/Maternity | <p>'Pregnancy' refers to when a person is pregnant and expecting a baby. Any person who can become pregnant should be considered – e.g. women, trans men, and people with different gender identities. This should also cover all aspects of the pregnancy journey, including those who have been affected by miscarriage.</p> <p>'Maternity' refers to the period following the birth of the child. In employment, this is related to parental leave. In the non-work context, this is related to unfavourable treatment relating to being a mother or parent. Legally, for the latter, protection is applied for 26 weeks. An important aspect of maternal/parental discrimination is <i>breastfeeding</i>.</p> |
| Marriage/Civil Partnership | A person's marital status in law, whether a person is married or in a civil partnership to another person of the opposite sex or same sex. |
| Carers | Any person who provides unpaid care for a partner, family member, or friend due to illness, disability, frailty, a mental health problem, or an addiction. The person being provided care cannot cope or finds it difficult to cope without that person's care and support. A carer can have varying caring responsibilities, such as supporting people with everyday tasks (e.g. getting out of bed, bathing, etc.) or providing emotional support. This covers people who may not see themselves as 'carers', whom do not separate their caring responsibilities from the relationship that they have with the person for whom they provide care. Importantly, this covers young carers who provide care for their parents or other relatives. |
| Cared for Children/ Care Leavers | 'Cared for Children' (sometimes known as 'looked after children') are children and young people in the care of the local authority due to their parents being unable to take care of them in a temporary or permanent capacity. 'Care Leavers' are any adult who have previously spent time in the care of the local authority. |
| Ill Mental Health | <p>A person with a condition related to their psychological or emotional wellbeing. This includes a wide variety of conditions:</p> <ul style="list-style-type: none"> • Common mental health problems, such as depression or anxiety disorders • Trauma (e.g. Post Traumatic Stress Disorder) • Severe mental illness (e.g. Psychosis/Schizophrenia or Bipolar Disorder) • Phobias (e.g. Agoraphobia) |
| Neurodivergence | A person whose mind works differently to neurocognitive styles that society regards as 'normal'. This includes a wide range of conditions and experiences: Autism, ADHD, Dyslexia, Dyscalculia, Dyspraxia, Dysgraphia, Epilepsy, Tourette's, Aphantasia/Synaesthesia, etc. |
| Socio-Economic Disadvantage | A wide range of experiences accruing from having a disadvantaged socio-economic status: having low or no income; living in absolute or relative poverty; unemployment or underemployment; living in substandard housing; being homeless or threatened with homelessness; food insecurity and poverty; fuel poverty; digital exclusion; etc. |
| Multiple Marginalisation | A wide variety of combinations of different protected characteristics that uniquely influence a person's experiences. Any combination of protected characteristics can be two or above (e.g. RACE/ETHNICITY and GENDER IDENTITY; CARE LEAVER, CARER, and SOCIO-ECONOMIC DISADVANTAGE). |

Page 1 of 6

Tameside Metropolitan Borough Council Equality Impact Assessment Form

| Impact No. | Protected Characteristic <i>Select a protected characteristic from the drop-down list</i> | Impact <i>Identify the potential impact of the proposal</i> | Impact Type (Direct/Indirect) <i>Select 'direct' or 'indirect' from the drop-down list</i> | Evidence <i>Provide evidence regarding the proposal's potential impact (e.g. data/intelligence, findings from consultation/engagement, research reports, etc.).</i> |
|------------|--|--|---|--|
| 1 | Age | Older adults may experience greater distress during enforcement visits, and young people may have limited support or understanding of the process. | Direct | The population of Tameside is estimated at 231,071 based on the latest Census population statistics from the Office for National Statistics (ONS). Of the population 144,600 (62.94%) were of working age (16-64); 45,900 were aged between 0-15 years (19.85%); and 40,470 were aged 65 or over (17.561%). |
| Page 157 | Sex | Single mothers and those fleeing domestic abuse may be particularly vulnerable when facing enforcement action. | Direct | The Government's population estimates as of 2021 show that the total population of Tameside is now made up of 51% female and 49% male with less than 0.05% non-binary. Data from May 2024 shows that 85% of single parent families in the UK were lone-mother families. |
| 3 | Race (including colour, ethnicity, and nationality) | Language barriers or cultural differences could result in miscommunication or perceptions of discriminatory treatment. | Direct | In Tameside, the most recent census data from 2021 indicates that 85.5% of residents identify as White, while 9.2% identify as Asian, Asian British, or Asian Welsh. The "Black, Black British, Black Welsh, Caribbean or African" category saw a significant increase, rising from 0.8% in 2011 to 2.3% in 2021, largely driven by an increase in the Black African population. There was also a smaller increase in the "Mixed or Multiple" category, from 1.4% to 2.1%. |
| 4 | Religion or Belief | N/A | N/A | No direct/indirect impact on this characteristic, this is an income based |

Tameside Metropolitan Borough Council Equality Impact Assessment Form

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| | | | | calculation to establish entitlement. |
| 5 | Disability | Individuals with physical, sensory, or mental health conditions may be disproportionately affected by enforcement processes, particularly if reasonable adjustments aren't made. The enforcement activity will not take place against vulnerable and disabled residents where identified by the Council. | Direct | In Tameside, a significant portion of the population experiences disability. Data indicates that around 20% of residents in certain areas are registered as disabled, with a notable number not claiming disability benefits. This "hidden" disability population, those registered but not claiming benefits, highlights a potential disparity in support and access to resources. |
| 7 | Sexual Orientation | LGBTQ+ individuals may have experienced prior discrimination, making enforcement visits particularly distressing. | Indirect | In Tameside, approximately 2% of the population, or around 3,588 people, identify as LGB (Lesbian, Gay, or Bisexual). A more recent estimate indicates that 90.8% of Tameside residents identify as straight or heterosexual, 1.8% as gay or lesbian, and the remaining 7.4% identify as other sexual orientations or declined to answer the question. |
| 7 | Gender Identity | Individuals may have experienced prior discrimination, making enforcement visits particularly distressing. | Indirect | In Tameside, less than 0.05% of the population identify as non-binary. The majority, 94.7%, of residents state that their gender identity is the same as their sex assigned at birth. Additionally, 1.8% of Tameside residents identify as gay or lesbian, while 90.8% identify as straight or heterosexual. |
| 8 | Pregnancy/Maternity | Pregnant individuals or new parents may be adversely affected if enforcement action adds physical or emotional stress. The enforcement activity will not take place against pregnant | Direct | The number of live births in Tameside in 2021 was 2,525.7 The crude birth rate for Tameside (10.9) was higher than the rate for England (10.5), indicating that Tameside has a slightly higher number of births per 1,000 people than the national average. Nationally, perinatal mental illness affects up to 27% of new and expectant mums and covers a wide range of 7 Live births in England and Wales : birth rates down to local authority areas. |

Tameside Metropolitan Borough Council Equality Impact Assessment Form



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| | | residents where identified by the Council. | | |
| 9 | Marriage/Civil Partnership | N/A | N/A | |
| 10 | Carers | Carers may be disproportionately burdened by the financial and time pressures of enforcement action; especially is it disrupts caring responsibilities. | Indirect | In Tameside, approximately one in ten residents were providing unpaid care as of the 2021 census. Additionally, there are 131 approved fostering households, with 86 mainstream and 45 connected carers. Tameside also has a significant number of young carers, with nearly three times the England average, |
| 11 | Care Leavers | N/A | N/A | The Council provides assistance to Care Leavers through Council Tax LGFA 1992 S13A1C and they will not accrue Council Tax debt whilst classed as a care leaver up to the age of 25 |
| 12 Page 159 | Ill Health / Mental Health | Individuals with mental ill health may not fully understand enforcement processes, leading to distress or disengagement. The Council will review all cases before enforcement agent action is undertaken. Where vulnerability is identified the Council will not take action, however if a resident has ill mental health but working and managing finances payment of Council Tax should continue. The enforcement agents have teams that deal with vulnerability and take precautions. | Direct | <p>Tameside has a higher rate than both the national average and other areas in the North West. Additionally, emergency hospital admissions for self-harm are significantly higher in Tameside, especially among females and young people. There is also a high prevalence of mental health conditions in children and young people, with a large number experiencing unmet needs.</p> <p>Tameside has historically had a high suicide rate, though it has improved in recent years. In 2020-22, the rate was 8.3 deaths per 100,000, lower than the Greater Manchester, North West, and England averages, according to Tameside Council. However, the rate for men aged 35-64 (2013-17) was the third worst in England.</p> <p>Tameside has higher rates of emergency hospital admissions for intentional self-harm than the England average. Admissions are more prevalent among females and young people.</p> <p>An estimated 4,229 children and young people (5-17 years) in Tameside have a mental health condition, though only a fraction are known to have an identified need.</p> |

Tameside Metropolitan Borough Council Equality Impact Assessment Form



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| | | | | <p>Approximately 12% of the population is registered with depression, with prevalence increasing year on year.</p> <p>Just over 2,100 people in Tameside and Glossop have a serious mental health condition</p> |
| Page 160 | 13 | Neurodivergent | <p>Neurodivergent people may struggle with face-to-face visits, unexpected contact, or inflexible communication styles. The Council will review all cases before enforcement agent action is undertaken. Where neurodivergence is identified and the resident is working and managing finances payment of Council Tax should continue.</p> | <p>Direct</p> <p>In Tameside, approximately 1 in 7 people are neurodivergent, meaning their brains function differently from what is considered typical. This encompasses a range of conditions like autism, ADHD, and dyslexia. While not a specific Tameside statistic, it's estimated that 15% of the UK population, or roughly 1 in 7, are neurodivergent</p> |
| | 14 | Socio- Economic Disadvantage | <p>Those on low incomes or in insecure housing may face repeated or intensified enforcement activity. The individual circumstances may result in enforcement activity not being used such as low income.</p> | <p>Direct</p> <p>Tameside experiences significant levels of deprivation and low income, with 17.5% of the population considered income deprived in 2019. Many areas within Tameside are among the most deprived in England, and 17 out of 19 wards have income deprivation exceeding the national average. Furthermore, a substantial number of children in Tameside are living in low-income families.</p> |
| | 15 | Multiple Marginalisation | <p>People who fall into several of the above categories may face compound discrimination or barriers, often overlooked by “single characteristic” assessments.</p> | <p>Direct</p> <p>There are limited stats on this however Tameside has a diverse population, with a significant proportion of residents from minority ethnic groups, a significant number of disabled residents and a large number experience poverty.</p> |

Tameside Metropolitan Borough Council Equality Impact Assessment Form



Step 6: Plan mitigating actions

Purpose: To identify mitigating actions to minimise potential detrimental impacts of the proposal on people with protected characteristics.

| Impact No. | Impact <i>Identify the impact being addressed</i> | Mitigating Action and Rationale <i>Describe the action required to reduce the detrimental impact identified in the Impact Analysis and explain the rationale underneath and/or intended outcome.</i> | Officer Responsible <i>Identify who is responsible for implementing the mitigating action (name and department).</i> | Timescale <i>Provide the timeframe for when the mitigating action should be implemented.</i> | Completed (Yes/No) <i>Has the mitigating action been implemented?</i> | Update <i>Provide any progress updates below.</i> |
|------------|--|---|---|---|--|---|
| Page 161 | Age | <p>The debt will inevitably have a financial impact on individuals with this protected characteristic, as it would on those without. However, the Council complies with its legal obligations by issuing multiple documents before escalating the matter to Enforcement Agents.</p> <p>Neither Council Tax nor Business Rates are calculated based on age. Under 18's are not liable for Council Tax but may be indirectly affected as part of the household. However, where the only residents are under 18 an exemption can be claimed.</p> | Christopher Stuart, Revenues and Benefits | Contract award | Yes | Action has been in place for three years and will continue on contract award. |

Tameside Metropolitan Borough Council Equality Impact Assessment Form



Page 162

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| | | <p>Care leavers are supported through discretionary discount awarded by the Council under section 13A.</p> <p>While it is possible that individuals with this protected characteristic may find the documents overwhelming, they do provide guidance to third parties and charities that can offer assistance and advice. The documents also include the contact number for Tameside, allowing the customer to speak with a Council Officer by phone.</p> <p>The Contract will require the Enforcement Agents to comply with the Equalities Act and follow the CIVEA Code of Conduct and Good Practice and requirements of The Debt Respite Scheme (Breathing Space Moratorium and Mental Health Crisis Moratorium) (England and Wales) Regulations 2020 (SI2020/1311)</p> <p>All accounts will be screened by staff before being referred to enforcement agents to identify vulnerable residents to prevent any undue stress.</p> | | | | |
| 2 | Sex | The debt will inevitably have a financial impact on individuals with this protected characteristic. However, the Council complies with its legal obligations by issuing multiple documents before | Christopher Stuart, Revenues and Benefits | Contract award | Yes | Action has been in place for three years and will continue on contract award. |

Tameside Metropolitan Borough Council Equality Impact Assessment Form



Page 163

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| | | <p>escalating the matter to Enforcement Agents.</p> <p>The title of the debtor would be passed to the contractor, but details of sex and gender are not held on the records and are not used to calculate the charge. The documents also include the contact number for Tameside, allowing the customer to speak with a Council Officer by phone.</p> <p>The Contract will require the Enforcement Agents to comply with the Equalities Act and follow the CIVEA Code of Conduct and Good Practice and requirements of The Debt Respite Scheme (Breathing Space Moratorium and Mental Health Crisis Moratorium) (England and Wales) Regulations 2020 (SI2020/1311)</p> <p>All accounts will be screened by staff before being referred to enforcement agents to identify vulnerable residents to prevent any undue stress.</p> | | | | |
| 3 | Race (including colour, ethnicity, and nationality) | The debt will inevitably have a financial impact on individuals with this protected characteristic, as it would on those without. However, the Council complies with its legal obligations by issuing multiple documents before escalating the matter to Enforcement Agents. | Christopher Stuart, Revenues and Benefits | Contract award | Yes | Action has been in place for three years and will continue on contract award. |

Tameside Metropolitan Borough Council Equality Impact Assessment Form



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| Page 164 | | <p>None of the collection systems hold ethnicity or race details on its records so this information will not be used to select cases for enforcement agent referral. The contract will require regular awareness training on equality and diversity to ensure that where appropriate staff are skilled to ensure any customers with this protected characteristic are not disadvantaged and are given the necessary support.</p> <p>The documents also include the contact number for Tameside, allowing the customer to speak with a Council Officer by phone.</p> <p>All accounts will be screened by staff before being referred to enforcement agents to identify vulnerable residents to prevent any undue stress.</p> | | | | |
| 5 | Disability | <p>The debt will inevitably have a financial impact on individuals with this protected characteristic, as it would on those without. However, the Council complies with its legal obligations by issuing multiple documents before escalating the matter to Enforcement Agents.</p> <p>Council Tax, Business Rates nor Parking Penalty Charge Notices are calculated based on disability and the records do not show this information unless applications</p> | Christopher Stuart, Revenues and Benefits | Contract award | Yes | Action has been in place for three years and will continue on contract award. |

Tameside Metropolitan Borough Council Equality Impact Assessment Form



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| Page 165 | | <p>for disabled band reductions have been made (for council tax purposes only).</p> <p>Where disability is flagged, notices from the Capita system can be produced in large print and where required, in braille. The Tameside website allows customers to self-serve and incorporates Accessibility tools which enables access to accounts where customers can view their Council Tax and Business Rate Accounts.</p> <p>Under Council Tax regulations, subject to certain criteria, if a property is occupied solely by someone who is deemed Severely Mentally Impaired, a full exemption can be applied so these council taxpayers would not be affected.</p> <p>In addition to the above where the household has other occupiers, in some circumstances a 25% discount can be awarded .In either circumstance regulations require any person who is liable for Council tax and also severely mentally impaired, not to be held as a liable party which means any enforcement action or notices will not be issued to them.</p> <p>All accounts will be screened by staff before being referred to enforcement</p> | | | | |
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Tameside Metropolitan Borough Council Equality Impact Assessment Form

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| | | agents to identify vulnerable residents to prevent any undue stress. | | | | |
| 6 | Sexual Orientation | <p>The debt will inevitably have a financial impact on individuals with this protected characteristic, as it would on those without. However, the Council complies with its legal obligations by issuing multiple documents before escalating the matter to Enforcement Agents.</p> <p>This information is not held so will not be passed to the contractor and is not used to calculate the charge</p> <p>While it is possible that individuals with this protected characteristic may find the documents overwhelming, they do provide guidance to third parties and charities that can offer assistance and advice. The documents also include the contact number for Tameside, allowing the customer to speak with a Council Officer by phone.</p> <p>All accounts will be screened by staff before being referred to enforcement agents to identify vulnerable residents to prevent any undue stress.</p> | Christopher Stuart, Revenues and Benefits | Contract award | Yes | Action has been in place for three years and will continue on contract award. |
| 7 | Gender Identity | The debt will inevitably have a financial impact on individuals with this protected characteristic, as it would on those without. However, the Council complies with its legal obligations by issuing multiple | Christopher Stuart, Revenues and Benefits | Contract award | Yes | Action has been in place for three years and will continue on contract award. |

Tameside Metropolitan Borough Council Equality Impact Assessment Form



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| Page 167 | | <p>documents before escalating the matter to Enforcement Agents.</p> <p>None of these debt types are calculated based on gender or gender identity and information regarding this is not held on any of the collection systems.</p> <p>The contract will require regular awareness training on equality and diversity to ensure that where appropriate staff are skilled to ensure any customers with this protected characteristic are not disadvantaged and are given the necessary support.</p> <p>All accounts will be screened by staff before being referred to enforcement agents to identify vulnerable residents to prevent any undue stress.</p> | | | | |
| 8 | Pregnancy/Maternity | <p>The debt will inevitably have a financial impact on individuals with this protected characteristic, as it would on those without. However, the Council complies with its legal obligations by issuing multiple documents before escalating the matter to Enforcement Agents.</p> <p>While it is possible that individuals with this protected characteristic may find the documents overwhelming, they do provide guidance to third parties and charities that can offer assistance and advice. The</p> | Christopher Stuart, Revenues and Benefits | Contract award | Yes | Action has been in place for three years and will continue on contract award. |

Tameside Metropolitan Borough Council Equality Impact Assessment Form



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| | | <p>documents also include the contact number for Tameside, allowing the customer to speak with a Council Officer by phone.</p> <p>All accounts will be screened by staff before being referred to enforcement agents to identify vulnerable residents to prevent any undue stress.</p> | | | | |
| <p>10</p> <p>Page 168</p> | Carers | <p>The debt will inevitably have a financial impact on individuals with this protected characteristic, as it would on those without. However, the Council complies with its legal obligations by issuing multiple documents before escalating the matter to Enforcement Agents.</p> <p>Carers are supported through a 25% carers discount awarded by the Council to reduce Council Tax charged.</p> <p>While it is possible that individuals with this protected characteristic may find the documents overwhelming, they do provide guidance to third parties and charities that can offer assistance and advice. The documents also include the contact number for Tameside, allowing the customer to speak with a Council Officer by phone.</p> | Christopher Stuart, Revenues and Benefits | Contract award | Yes | Action has been in place for three years and will continue on contract award. |

Tameside Metropolitan Borough Council Equality Impact Assessment Form



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| | | All accounts will be screened by staff before being referred to enforcement agents to identify vulnerable residents to prevent any undue stress. | | | | |
| 12 | Ill Health / Mental Health | <p>The debt will inevitably have a financial impact on individuals with this protected characteristic, as it would on those without. However, the Council complies with its legal obligations by issuing multiple documents before escalating the matter to Enforcement Agents.</p> <p>Under Council Tax regulations, subject to certain criteria, if a property is occupied solely by someone who is deemed Severely Mentally Impaired, a full exemption can be applied so these council taxpayers would not be affected.</p> <p>While it is possible that individuals with this protected characteristic may find the documents overwhelming, they do provide guidance to third parties and charities that can offer assistance and advice. The documents also include the contact number for Tameside, allowing the customer to speak with a Council Officer by phone.</p> <p>All accounts will be screened by staff before being referred to enforcement</p> | Christopher Stuart, Revenues and Benefits | Contract award | Yes | Action has been in place for three years and will continue on contract award. |

Tameside Metropolitan Borough Council Equality Impact Assessment Form

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| | | agents to identify vulnerable residents to prevent any undue stress. | | | | |
| 13 | Neurodivergent | <p>The debt will inevitably have a financial impact on individuals with this protected characteristic, as it would on those without. However, the Council complies with its legal obligations by issuing multiple documents before escalating the matter to Enforcement Agents.</p> <p>While it is possible that individuals with this protected characteristic may find the documents overwhelming, they do provide guidance to third parties and charities that can offer assistance and advice. The documents also include the contact number for Tameside, allowing the customer to speak with a Council Officer by phone.</p> <p>All accounts will be screened by staff before being referred to enforcement agents to identify vulnerable residents to prevent any undue stress.</p> | Christopher Stuart, Revenues and Benefits | Contract award | Yes | Action has been in place for three years and will continue on contract award. |
| 14 | Socio- Economic Disadvantage | <p>The debt will inevitably have a financial impact on individuals with this protected characteristic, as it would on those without. However, the Council complies with its legal obligations by issuing multiple documents before escalating the matter to Enforcement Agents.</p> | Christopher Stuart, Revenues and Benefits | Contract award | Yes | Action has been in place for three years and will continue on contract award. |

Tameside Metropolitan Borough Council Equality Impact Assessment Form



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|----------|--------------------------|---|---|----------------|-----|---|
| Page 171 | | <p>While it is possible that individuals with this protected characteristic may find the documents overwhelming, they do provide guidance to third parties and charities that can offer assistance and advice. The documents also include the contact number for Tameside, allowing the customer to speak with a Council Officer by phone.</p> <p>Propensity to pay checks will be conducted before cases are referred to enforcement agents for collection. Encouragement of Discount and Council Tax Support uptake will be undertaken.</p> <p>All accounts will be screened by staff before being referred to enforcement agents to identify vulnerable residents to prevent any undue stress.</p> | | | | |
| 15 | Multiple Marginalisation | <p>The debt will inevitably have a financial impact on individuals with multiple protected characteristics, as it would on those without. However, the Council complies with its legal obligations by issuing multiple documents before escalating the matter to Enforcement Agents.</p> <p>Propensity to pay checks will be conducted before cases are referred to enforcement agents for collection. Encouragement of</p> | Christopher Stuart, Revenues and Benefits | Contract award | Yes | Action has been in place for three years and will continue on contract award. |



Tameside Metropolitan Borough Council Equality Impact Assessment Form



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| | | Discount and Council Tax Support uptake will be undertaken. | | | | |
| | | All accounts will be screened by staff before being referred to enforcement agents to identify vulnerable residents to prevent any undue stress. | | | | |
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| Purpose: | For the EIA Lead Officer to sign that the EIA is complete, and for the Assistant (Director) to counter-sign that they agree with the content of the EIA and that it is sufficiently robust. |
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| Step 7: Sign-off |
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| This Equality Impact Assessment has been completed by the EIA Lead Officer: | Name: | Christopher Stuart |
| | Signature: |  |
| | Department: | Revenues and Benefits |
| This Equality Impact Assessment has been checked by the Assistant Director / Director, and signs that it is sufficiently robust and rigorous: | Date: | 06/08/2025 |
| | Name: | Julie Smethurst, Assistant Director Revenues and Benefits |
| | Signature: |  |
| | Department: | Finance |
| | Date: | 06/08/2025 |

Page 172

POST-IMPLEMENTATION REVIEW

Step 8: Review EIA after implementation

Purpose:

To update the EIA with any new impacts and to provide a progress update on mitigating actions.

SEE INSTRUCTION:

This step should only be completed if the proposal has passed through the governance process where appropriate and has been implemented. It should be completed at two stages:

- Six months after implementation
- Twelve months after implementation

The evidence in the Impact Analysis should serve as the baseline against which change can be measured.

The Post-Implementation Review can find out whether:

- The proposal has had any positive impacts on people with protected characteristics
- Mitigating actions to minimise detrimental impacts have worked
- There are impacts that were not foreseen in the Impact Analysis that need to be accounted for

Six Months After Implementation

Twelve Months After Implementation

Describe and explain the effects of the proposal on people with protected characteristics, using evidence to compare against the Impact Analysis as a baseline.

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