

Huntingdonshire District Council Equality Impact Assessment (EIA)



Service area	Customer Services
Date of assessment	December 2013
Name of strategy/policy/function/service to be assessed	Cambridgeshire County Wide Fraud-Hub Data-Sharing Agreement
Is this a new or existing strategy/policy/function/service?	New
Name of manager responsible for strategy/policy/function/service	
Names of people conducting the assessment	
Step 1 – Description of strategy/policy/function/service	
Describe the aims; objectives and purpose of the strategy/policy/function/ service (include how it fits in to wider aims or strategic objectives).	<p>The purpose of the Cambridgeshire County Wide Fraud-Hub Data-Sharing Agreement is to share data and data matching for the purpose of the prevention, detection, investigation and where appropriate the prosecution of fraud, the recovery of debts and other related matters between Huntingdonshire District Council, Fenland District Council, Peterborough City Council, Cambridge City Council, South Cambridgeshire District Council, East Cambridgeshire District Council The data sharing agreement has been drawn up under the umbrella of the Cambridgeshire Information Sharing Framework, which sets out the core information sharing principles.</p> <p>The agreement will enable information to be shared between organisations to create a 'Fraud Hub' across Cambridgeshire</p>



based at Huntingdonshire District Council using the Council's existing technology and 'data-warehousing' facilities.

A Privacy Impact Assessment (PIA) has been completed and distributed to all parties for their sign-off. The purpose of the PIA was to identify the privacy impact(s) of the information sharing agreement and to gain an understanding of the acceptability of the project and its features by the organisations and people that will be affected by it;

Privacy Law and Data Protection Act compliance checks were also completed as part of the PIA. The Data Protection Act at s.2 identifies a number of categories of 'sensitive personal data' that require special care, including racial and ethnic origin, political opinions, religious beliefs, trade union membership, health conditions, sexual life, offences and court proceedings. The PIA confirmed that, principally data sharing will only take place for the identification of fraud, error and the recovery of debts, this will include sharing data relating to name, date of birth, address, National Insurance number, although there is potential for identity theft; measures are in place to prevent this include encryption, password protection, limited users, audit trail (who is searching and what for) and DBS checks on employees.

The [Cambridgeshire Information Sharing Framework](#) fulfils the requirements of the Data Protection Act, the Human Rights Act, Freedom of Information Act, Crime & Disorder Act, Civil Contingencies Act, Local Government Act, Equality Act and Localism Act.

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	<p>The PIA identified only one risk and this was around the potential loss of data, due to human error or fraud, however technology is in place to keep this risk to a minimum.</p>
<p>The Equality Act 2010 requires the Council to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations, the Council also needs to demonstrate its compliance with the Equality Duty. The Council therefore needs to understand how its decisions and activities impact on different people, specifically employees and how they are affected by policies and practices. An Equality Impact Assessment is the current method by which the Council can assess and keep a record of the impact of new or amended strategies, policies, functions or services.</p> <p>The council retains these duties even when outsourcing services or providing shared services.</p> <p><i>Definition of Adverse Impact - occurs when a decision, practice, or policy has a disproportionately negative effect on a protected group.</i> <i>Adverse Impact may be unintentional</i></p> <p>Adverse impact can be measured statistically:</p>	
<p>Are there any (existing) equality objectives of the strategy/policy or function/service</p>	<p>No</p>
<p>Who is intended to benefit from the strategy/policy/function/service and in what way?</p>	<p>Local residents are likely to welcome work that protects public money as the Council may be able to recover over-payments incorrectly claimed. Additionally, those in temporary accommodation may be able to have permanent accommodation if properties unlawfully used are recovered.</p>
<p>What are the intended outcomes of this strategy/policy/function/service?</p>	<p>The overall objective is to share data and data matching for the purpose of the identification of housing fraud, the recovery of debts</p>



	<p>between different signatories and other related matters ultimately to ensure that public funds are protected and can be directed to those in genuine need.</p>
<p>Step 2 – Data</p>	
<p>What baseline quantitative data (statistics) do you have about the strategy/policy/function/service relating to equalities groups (e.g. monitoring data on proportions of service users compared to proportions in the population), relevant to this policy?</p>	<p>Forms collect data about age, gender and disability for the calculation of benefit but it is not recorded in such a way as to allow the analysis of the makeup of those who claim benefit, except in the broadest sense of working age/ pensioners. The form has been updated to collect data in relation to race and sexual orientation</p> <p>Records are kept of cases that result in some sort of penalty/sanction/prosecution in terms of age/gender/ethnicity</p> <p>Census records for HDC in 2011 show that from a population of 171k residents:</p> <ul style="list-style-type: none"> • 49% are male and 51% female. • 18% are aged up to 16, 62% are working age, 20% are pensioners. • Of the adult population 77% are working age and 23% pension age. • 46% pensioners are male & 54% female. • 95% of the population are white and 5% non-white. • 15% of the population reported some 'disability' with 6% reporting a serious disability and 9% a less serious one. <p>There are 70,000 domestic properties within the district, of which 17k</p>



	<p>(24%) claim a single person discount. There are 10k (14%) properties where HB and/or CTS is paid</p> <p>HDC Housing Benefit Department keep statistics on the number of working age and nonworking age groups, the gender and ethnicity makeup of the their claimant based on people who complete the information at point of application.</p> <ul style="list-style-type: none"> • Working Age = 64%, Pension Age= 36% • Male =36%, Female= 64% • White= 97%, non-white= 3% <p>6% of the total population in Huntingdonshire claim a benefit, of this 6%, 43% of them are disabled (DWP)</p>
<p>What qualitative data (opinions etc) do you have on different groups (e.g. comments from previous consumer satisfaction surveys/consultation, feedback exercises, or evidence from other authorities undertaking similar work), relevant to this strategy/policy/function/service?</p>	<p>None available</p>
<p>Are there concerns that the strategy/policy/function/service could have a differential impact on different racial groups; this refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. Gypsy/Travellers are distinct group within this category.</p> <p>What evidence do you have for your answer?</p>	<p>Unknown – data not collected</p>
<p>Are there concerns that the strategy/policy/function/service could have a differential impact on younger or older people?</p>	<p>Date of birth data is not available from every source, and data matching does not target any specific age group. The data-matching</p>



<p>For some services this should include consideration of impact in terms of safeguarding young people.</p> <p>What evidence do you have for your answer?</p>	<p>is aimed at identifying discrepancies whether through fraud or genuine error.</p> <p>The type of fraud/error identified depends on the type of service being investigated.</p> <p>In the example of housing benefit, for HDC, current caseloads are split 33% pensioners, 67% working age.</p> <p>For cases of proved HB fraud, resulting in some penalty, at HDC, between 2011 and 2013 the split was 10% pensioners and 90% working age.</p> <p>The lower percentage of pensioners can be explained as their circumstances are less likely to change that the working age group so we would expect to see a discrepancy in this example.</p>
<p>Are there concerns that the strategy/policy/function/service could have a differential impact on gender, including transgender people?</p> <p>What evidence do you have for your answer?</p>	<p>The data-matching conducted will be identifying fraud and error for that type of service. The type of fraud/error identified depends on the type of service being investigated.</p> <p>In the example of housing benefit, for HDC, current caseloads are split 63% female and 37% male.</p> <p>For people receiving a single person discount for their council tax liability the split is very similar 62% female. 32% male.</p> <p>For cases of proved HB fraud, at HDC, between 2011 and 2013 the split was 58% female and 42% male.</p> <p>It is likely that where data-matching take place in these areas that the number of cases involving females will be higher due to the higher number of females in the data-sets.</p> <p>For cases of proved fraud, resulting in some penalty, at HDC, between 2011 and 2013 the split was 52% female and 48% male.</p>

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<p>Are there concerns that the strategy/policy/function/service could have a differential impact on part time/full time employees? What evidence do you have for your answer?</p>	<p>Not applicable</p>
<p>Are there concerns that the strategy/policy/function/service could have a differential impact on disabled people? What evidence do you have for your answer?</p>	<p>The data-matching conducted will be identifying fraud and error for that type of service. The type of fraud/error identified depends on the type of service being investigated. Analyses of cases where people received a penalty or were prosecuted for benefit fraud between 2011 and 2012, within HDC boundaries; show that 11% of cases involved a person receiving some sort of disablement benefit. As the type of cases subject to investigations are those receiving benefits this is likely to be higher than in the general population. The Census, HDC and DWP statistics show that people receiving benefits are much more likely to be disabled and therefore the numbers of disabled people being investigated will be higher as well.</p>
<p>Are there concerns that the strategy/policy/function/service could have a differential impact in terms of marriage and civil partnership</p>	<p>Unknown - data not collected.</p>
<p>Are there concerns that the strategy/policy/function/service could have a differential impact in terms of pregnancy and maternity (e.g. pregnant or breast feeding women)</p>	<p>Not applicable</p>
<p>Are there concerns that the strategy/policy/function/service could have a differential impact on lesbian, gay man, bisexual or heterosexual (straight) people? What evidence do you have for your answer?</p>	<p>Unknown - data not collected.</p>
<p>Are there concerns that the strategy/policy/function/service could</p>	<p>Unknown - data not collected.</p>



<p>have a differential impact on grounds of religion or belief? What evidence do you have for your answer?</p>	
<p>Are there concerns that the strategy/policy/function/service could have a differential impact in terms of specific characteristics of Huntingdonshire e.g. Rural isolation</p>	<p>Not applicable</p>

Findings

This EIA focuses on the Data Sharing Agreement itself rather than the internal processes that may be in place within each partner organisation however, councils that have signed up to the Fraud-Hub Data-Sharing Agreement are all committed to tackling inequality, and the Agreement could impact positively on the most vulnerable groups, by ensuring that funds are diverted to the most vulnerable. Data relating to some of the protected characteristics is not routinely collected. A fair and consistent approach to how fraud is investigated within each partner organisation is implicit to the Data Sharing Agreement and, it is expected that each partner would monitor their own internal processes and outcomes to identify the potential for adverse impact.

Recommendations

- To further promote equality of opportunity organisations should publicise the existence of the Fraud-Hub Data-Sharing Agreement to raise fraud awareness and to remind residents about the actions that will be taken in all cases where fraudulent activity is found.