

Equality (Impact) Assessment



**Money &
Pensions
Service**

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1. BACKGROUND

The Money and Pensions Service was formally launched on 6 April 2019. The Single Financial Guidance Body (its original legal name) was formed on 1 October 2018. On 1 January 2019, it came into operation and took on the responsibilities of:

- Pension Wise
- The Pensions Advisory Service (TPAS)
- The Money Advice Service (MAS)

The Money and Pensions Service is funded from multiple levy budgets across money guidance, debt advice, pensions guidance and pension freedoms; and is sponsored by the Department of Work and Pensions, but also engages with HM Treasury, which is responsible for policy on financial capability.

The vision of the Money and Pensions Service is of a society where everyone makes the most of their money and pensions. The ability to manage money is central to people's health and wellbeing; it impacts their ability to fulfil their potential, and to care for their families. Enabling people to manage money and pensions well is vital for our economy and for society as a whole.

2. MaPS' OBLIGATIONS UNDER EQUALITY LEGISLATION

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity between those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.
- There is also a 'Specific Duty' to publish information about people affected by the policies and practices of the public body.

As an arms-length body of DWP, MaPS is a public body required to have due regard to this Public Sector Equality Duty. We meet this requirement by ensuring that we carry out a vulnerability and equalities impact assessment of any customer facing proposition or service that we deliver or commission to ensure that we meet the needs of consumers in vulnerable circumstances, or consumers with protected characteristics.

In relation to our organisational strategies and business plans, internal policies, processes and practices, we undertake an Equality Impact Assessment to evaluate the impact on people with protected characteristics, and address any area of potential disadvantage.

3. PROTECTED CHARACTERISTICS: DEFINITIONS

Throughout this guidance there is reference to 'protected characteristics'. The following provides more information on each of the nine protected characteristics.

Age: Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 years old) or range of ages (e.g. 18 - 30 years old).

Disability: A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Gender reassignment: The process of transitioning from one gender to another.

Marriage and civil partnership: Marriage is no longer defined as a 'union between a man and a woman' but now includes marriage between same- sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.

Pregnancy and maternity: Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavorably because she is breastfeeding.

Race: Refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Religion and belief: Religion has the meaning usually given to it, but belief includes religious and philosophical beliefs including lack of belief (e.g. atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

Sex: A man or a woman.

Sexual orientation: Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

More detailed definitions of these protected characteristics can be found on the Office of Public Sector Information website.

4. EIA STAGE 1: RELEVANCE ASSESSMENT

Activity and purpose (brief outline)	Equality Impact Assessment (EIA) on the Money and Pensions Service's (MaPS) Debt Commissioning Programme: Lot 3: Business Debt
Name of person drafting:	
Department or Team:	Money & Debt Operations Debt Policy & Strategy
Date:	
<p>1. Please provide a brief description of the strategy, policy or process. For example, what is its overall objective, what are the stated aims (including who the intended beneficiaries are), a broad description of how this will be achieved, what the measure(s) of success will be, and any relevant time frame?</p> <p>The Money & Pension Service initiated the Debt Advice in England Commissioning Programme, which is focused around the delivery of four linked procurement processes named:</p> <ul style="list-style-type: none"> • Lot 1: National Services; • Lot 2: Regional Services; • Lot 3: Business Debt; and, • Lot 4: DRO Administration Hubs. <p>Commissioning will take place in 2021/22 with contract commencement dates for all Lots of 01 April 2022.</p> <p>The objective of the Programme is to transform existing service delivery through newly commissioned debt advice services for individuals and small businesses and also Debt Relief Order (DRO) Administration Hubs in England. Access to the free, high-quality debt advice services will be available to the public in England. This is in line with MaPS statutory duty as laid out in the Financial Guidance and Claims Act 2018 c.10.</p> <p>Given the differing propositions of each Lot, a separate EIA has been completed per Lot. This EIA is specifically in relation to:</p> <p>Lot 3: Business Debt.</p> <p>MaPS' aim is to commission a single supplier to provide support to sole traders and small business owners where personal finances are impacted. The contract will cover England and will initially be three-year funding period.</p> <p>The measures of success as a result of the procurement exercise are:</p> <ol style="list-style-type: none"> 1. Delivery of a compliant procurement exercise which result in a contract being awarded. 2. There is diverse workforce of highly skilled and well-motivated advisers and support staff to meet the needs of sole traders and small businesses. 3. More people receive free high-quality debt advice (contributes to the UK Strategy for Financial Wellbeing goal for Better Debt Advice). 	

4. A longer-term contract can provide an opportunity for service improvements to be rolled-out incrementally, beneficial to addressing identified gaps and/or streamlining services to serve more people efficiently and effectively.

The procurement timelines are:

Lot 3: Business Debt	
PIN Issued	27.04.21
Bidders Information event – Webinar	13.05.21
Issue of ITT to Bidders	16.07.21
Deadline for ITT clarification questions	27.08.21
Return of Tenders	16.09.21
Completion of evaluation of Tenders	22.10.21
Award approval/ Notification of intention to award	15.12.21
Standstill period ends	+10 days
Contract Award	31.12.21
De-commissioning period (where applicable)	01.01.22 – 31.03.22
Contract commencement	01.04.22

2. Impact – Screening process for relevance to diversity and equality issues.
Please X as appropriate.

Does this strategy, policy or process have any relevance to:	Positive	Negative	None / Negligible
Age	x		
Disability	x		
Gender reassignment			x
Marriage and civil partnership	x		
Pregnancy and maternity	x		
Race	x		
Religion or belief			x
Sex	x		
Sexual orientation			x

If you have identified any impacts (other than negligible ones), positive or negative, on any group with protected characteristics, please complete Part 2.

Only if there are no or negligible impacts should you go straight to part 3 and sign off the EA.

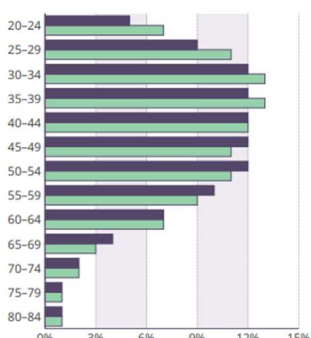
5. EA STAGE 2: FULL EQUALITY ASSESSMENT

IMPACT: Please complete the next sections to show how this strategy, policy or process could have an impact (positive or negative) on the protected groups under the Equality Act 2010.

Lack of evidence is not a reason for not progressing to carrying out an EA.

Please highlight any gaps in evidence that you have identified and explain how/if you intend to fill these gaps.

1. Do you think this will have a positive or negative impact on people because of their age?																		
Age	Positive	Negative	None / Negligible	Reasons for your decision (including evidence) / How might it impact?														
Younger people (Children and young people, up to 18)	x			<p>MAS’ Indebted lives: the complexities of life in debt (2013) showed that of the 8.8m people who are over-indebted. Looking at the over-indebted population as a whole, the research revealed the age profile of people struggling with their debt to be:</p> <table><tr><th>Age</th><th>% of Over-Indebted Population</th></tr><tr><td>18-24</td><td>21</td></tr><tr><td>25-34</td><td>22</td></tr><tr><td>35-44</td><td>32</td></tr><tr><td>45-54</td><td>21</td></tr><tr><td>55-64</td><td>3</td></tr><tr><td>65+</td><td>1</td></tr></table> <p>Of the working age population those in middle age are over-represented in our service users suggesting that continuing service provision will have a positive impact on this group.</p> <p>MaPS’ Levels of Over-Indebtedness report (2018) showed that 5.3m adults in the UK need debt advice. Around half of those that need debt advice are younger (just 26% of the UK population is aged 18–34, but 48% of the 5.3m are within that age group).</p> <p>MaPS’ Levels of Over-Indebtedness report (2018) identified variables suggesting an increased likelihood of over-indebtedness, on those aged 25-39 who had three or more children as home.</p>	Age	% of Over-Indebted Population	18-24	21	25-34	22	35-44	32	45-54	21	55-64	3	65+	1
Age	% of Over-Indebted Population																	
18-24	21																	
25-34	22																	
35-44	32																	
45-54	21																	
55-64	3																	
65+	1																	
Working age people (18- 54)	x																	
Older people (55+)	x																	

				<p>Citizens Advice's Delivering debt advice during a pandemic – Debt Advice impact report 2020/21 confirms the spread of customers accessing their debt advice services reflects the same spread as those age groups found within the over-indebted population (2013).</p> <p>Age of clients accessing our advice</p>  <p>According to ONS, 20% of self-employed people are aged 16-34 compared with 37% employed people. 10% of self-employed people are over 65 compared with 3% of employed people.</p> <p>MaPS' commissioned services will ensure services are accessible universally and will not turn people away.</p>
2. Because they are disabled?				
Disability	Positive	Negative	None / Negligible	Reasons for your decision (including evidence) / How might it impact?
Visual impairment	X			MaPS' funding will ensure commissioned services contribute to fulfilment of the Public Sector Equality Duty under the Equality Act 2010. Services delivered under contract must provide equality of access to customers with additional needs including, but not limited to, this group.
Hearing loss	X			MaPS' funding will ensure commissioned services contribute to fulfilment of the Public Sector Equality Duty under the Equality Act 2010.

				Services delivered under contract must provide equality of access to customers with additional needs including, but not limited to, this group.
Physical disability	X			MaPS' funding will ensure commissioned services contribute to fulfilment of the Public Sector Equality Duty under the Equality Act 2010. Services delivered under contract must provide equality of access to customers with additional needs including, but not limited to, this group.
Learning disability	X			MaPS' funding will ensure commissioned services contribute to fulfilment of the Public Sector Equality Duty under the Equality Act 2010. Services delivered under contract must provide equality of access to customers with additional needs including, but not limited to, this group.
Long-term health condition	X			<p>People living with an illness or on long-term health condition can experience adverse impact on their financial situation due to increased essential living costs to manage their illness or limit earning potential which could potentially lead to debt – see https://www.stepchange.org/debt-info/debt-long-term-sickness.aspx</p> <p>MaPS' funding will ensure commissioned services contribute to fulfilment of the Public Sector Equality Duty under the Equality Act 2010. Services delivered under contract must provide equality of access to customers with additional needs including, but not limited to, this group.</p>
Mental health problem	x			MaPS' Levels of Over-Indebtedness report (2018) showed that 5.3m adults in the UK need debt advice. A proportion are more likely to be struggling with their mental health, with 51% saying they have had mental

				<p>health problems within the last 3 years (21% in the whole population).</p> <p>Nearly half of those in problem debt have a mental health problem. But symptoms of common mental health problems, such as difficulties communicating, impaired clarity of thought and reduced concentration or problem-solving skills, can make it difficult to engage with debt advice. With growing recognition of the importance of debt advice being accessible to all those who need it, there are opportunities to better serve customers with mental health problems (Help Along the Way, Money & Mental Health (July 2020)).</p> <p>MaPS funding will contribute to delivering the UK Strategy for Financial Wellbeing, this includes the cross cutting lens on mental health.</p>
Other disability	X			<p>MaPS' funding will ensure commissioned services contribute to fulfilment of the Public Sector Equality Duty under the Equality Act 2010. Services delivered under contract must provide equality of access to customers with additional needs including, but not limited to, this group.</p>
3. Because of their sex?				
Sex	Positive	Negative	None / Negligible	Reasons for your decision (including evidence) / How might it impact?
Male	X			Two thirds of the self-employed population in England are male (ONS).
Female	x			<p>MAS' Indebted lives: the complexities of life in debt (2013) showed that of the 8.8m people who are over-indebted. Looking at the over-indebted population as a whole, the research revealed women (64%) are over-represented than men (35%).</p> <p>The Insolvency Service's Individual Insolvencies by Location, Age and</p>

				<p>Gender, England and Wales (2019) report revealed the insolvency rates for females was higher than the male rate for the sixth successive year, and the gap has continued to widen. Insolvency rates were highest in the 25 to 34 age group for females and 35 to 44 for males.</p> <p>MaPS funding will contribute to delivering the UK Strategy for Financial Wellbeing, this includes the cross cutting lens on gender, closing the gap.</p>
4. Because of their gender reassignment?				
Gender reassignment	Positive	Negative	None / Negligible	Reasons for your decision (including evidence) / How might it impact?
Gender reassignment			x	No evidence to suggest positive or negative effect.
5. Because of their marriage or civil partnership?				
Marriage and Civil Partnership	Positive	Negative	None / Negligible	Reasons for your decision (including evidence) / How might it impact?
Marriage	x			Marriage and civil partnership are often high-cost events with the potential to lead to debt.
Civil Partnership	x			
				Conversely separation may also lead to financial difficulty. Many advice services engage this group, e.g. How to deal with problem debt after separation - Money Advice Service
				MaPS funding will ensure commissioned Services provide a holistic service to people to ensure their debt problem and root problem are on the journey to be resolved.
6. Because of their pregnancy or maternity?				
Pregnancy and Maternity	Positive	Negative	None / Negligible	Reasons for your decision (including evidence) / How might it impact?
Pregnancy	x			Pregnancy/Maternity is likely to or may trigger additional and/or anticipatory expenditure as well as potential for fluctuation in household income which may trigger a need for debt advice. Many advice services
Maternity (the period after birth)	x			

				engage this group, e.g. Maternity, Preparing For a Child And Debt. StepChange.
7. Because of their race?				
Race	Positive	Negative	None / Negligible	Reasons for your decision (including evidence) / How might it impact?
Black, Asian or other minority groups	x			<p>Research conducted by the Finance Conduct Authority, Insight show:</p> <p>Covid-19 and the UK's BAME communities – an economic perspective</p> <p>– show BAME consumers have seen a higher fall on average in earnings since February . Looking at the use and behaviour around specific financial products we see BAME consumers have been more likely to use credit or rent deferral, to cash in savings and reduce pension contributions – which may be significant in terms of longer term financial security.</p> <p>Ethnicity, personal finances and Coronavirus - show before Coronavirus, a higher proportion of BAME consumers were over-indebted – 22% compared with 13% of White consumers. BAME consumers were also more likely to class domestic bills or credit commitments as a heavy burden – 17% compared with White consumers – 9%. In October 15% of White consumers were over-indebted compared with a quarter (26%) of BAME consumers. However, when we control for gender, age, and income, our initial modelling shows that there is no significant relationship between ethnicity and being over-indebted. The most influential factor was age. A higher proportion of BAME consumers report that their financial situation has worsened in any way in the period since the epidemic began – 42% compared with 36%. However, a higher proportion</p>

				<p>of BAME consumers are also reporting their financial situation has improved – 6% compared with 3% of White consumers.</p> <p>According to ONS, people in Pakistani (25%) and Bangladeshi (19%) ethnic groups more likely to be self-employed than those who identify as being White (15%).</p> <p>Numerous research reports have shown the need of debt advice services to support this group even more so. MaPS funding will ensure commissioned Services accommodate access into debt advice for this group.</p>
National Origin e.g. Welsh, English etc.			x	No evidence to suggest positive or negative effect.
Gypsies and Travelers			x	No evidence to suggest positive or negative effect.
Others	x			<p>All those for whom their first language is not English. MaPS funding will ensure commissioned Services accommodate access into debt advice for this group e.g. access to interpreting services.</p> <p>MaPS' funding will ensure commissioned services contribute to fulfilment of the Public Sector Equality Duty under the Equality Act 2010. Services delivered under contract must provide equality of access to customers with additional needs including, but not limited to, this group.</p>
8. Because of their religion and belief or non-belief?				
Religion and belief or non-belief	Positive	Negative	None / Negligible	Reasons for your decision (including evidence) / How might it impact?
Different religious groups including Muslims, Jews, Christians, Sikhs, Buddhists, Hindus or others			x	No evidence to suggest positive or negative effect.
Belief e.g. Humanists			x	

Non-belief			x	
9. Because of their sexual orientation?				
Sexual Orientation	Positive	Negative	None / Negligible	Reasons for your decision (including evidence) / How might it impact?
Same sex			x	No evidence to suggest positive or negative effect.
Opposite sex			x	
Either sex attraction			x	
10. Building on the evidence you gathered and considered in Part 1, please consider the following:				
How could, or does, the strategy, policy or process help advance / promote equality of opportunity? (For example, positive measures designed to address disadvantage and reach different communities or protected groups)				

MaPS undertakes an annual survey to look at the need for debt advice (MaPS 2020 Need Survey) – the I&E team have completed work (as yet unpublished) to better understand the severity of need. This work breaks down those that need advice into three groups based on the characteristics driving their situation (such as the number of priority bills customers are behind on, the severity of the action being taken against them etc). It shows that within the 6.7m that need debt advice there are significant numbers with complex debt situations that may need casework and advocacy to help them resolve their debt problems. As well as supporting work to encourage earlier intervention, services commissioned need to make sure that they are meeting the needs of these cohorts of customers who may require more intensive support. MaPS is best placed to achieve this.

The outcome of the procurement exercise will support people in crisis debt with managing their debt through the offer of free, high-quality debt advice. The impact to customers, including those with protected characteristics, will help them achieve positive outcomes and in turn live better lives both financial and mentally.

The design of the procurement exercise will ensure equality of opportunity is addressed both within operational service delivery and reaching/serving customers.

- Tenderers will need to demonstrate how they will utilise funding to serve those in need across England. For example, we would expect Bidders to state they have established working relationships (national, regional or local) either directly or through a third-party intermediary to ensure that the debt advice provision offer is extended to all communities including those with protected characteristics.
- Tenderers must hold an Equality, Diversity and Inclusion Policy.
- Successful Suppliers will be contractually obliged to deliver the Statement of Requirements (SOR). When developing the SOR, consideration was given to ensure debt advice is made available to those most in need of it, bearing in mind the particular need of people in vulnerable circumstances and our ambition to exceed our statutory obligations under the Public Sector Equality Duty.
- Specifically, Suppliers will be mandated to ensure:
 - the Business Debt Advice Service has the capabilities and staff to deliver the service in line with the Public Sector Equality Duty and MaPS' regard for vulnerable customers.
 - PSED requirements and MaPS regard for the most vulnerable are considered in the design and delivery of all aspects of Service(s)
 - Access to the service is equal to all, regardless of vulnerability or other circumstance.
 - All aspects of the Service must reflect the diverse needs and preferences of business debt advice customers. Particular care should be taken to ensure that the service is accessible to, and meet the needs and preferences of, those groups who are over-represented in the self-employed population but under-represented in terms of debt advice seeking behaviour when compared to the overall UK population.
 - Customer journeys remain equally accessible to all customers, even where those journeys necessarily continue through another Delivery Party.
 - Customer feedback informs ongoing Service design and development activity.
 - Services availability meets the needs and preferences of the self-employed population (who will make up the majority of customers), regardless of delivery channel selected.

11. Addressing any negative impacts	
If the strategy, policy or process is likely to have a negative effect ('adverse impact') on any of the protected groups what are the reasons for this? What practical changes/actions will be taken to reduce or remove any negative impacts identified?	
N/A	
If no action is to be taken to remove or mitigate negative / adverse impact, please justify why. (Please remember that if you have identified unlawful discrimination (immediate or potential) as a result of the new activity, it must be changed or revised.	
N/A	
12. Monitoring, evaluating and reviewing	
How will you monitor the impact of the strategy, policy or process on people with protected characteristics?	
<p>MaPS has taken due consideration on customer data to be collected from MaPS funded services and has prescribed a list of appropriate data fields (please refer to the Statement of Requirement). Services will be required to undertake monitoring on protected characteristics and vulnerability indicators. As part of the Performance Reporting and Responsibilities of the contract, Services will be required to monitor and analyse the data collected and report on insights, with the intention to address identified gaps to ensure no communities or protected groups are disadvantaged.</p> <p>The Operational Delivery Team will influence continuous improvements by conducting checks that the contractual requirements are satisfactorily being met during the lifetime of the contract. This will be done through general performance reporting and or open visits to service premises.</p> <p>The Operation Delivery Team will continue to engage MaPS' wider business PSED and Vulnerability experts to ensure the team is kept up-to-date with best practice approaches to ensure the team is continuously striving to meet its MAPS' statutory obligations, but most importantly the customer groups are not disadvantaged as a result of our funding.</p>	
The results of all impact assessments where the impact is significant will be published on the MaPS website, together with any planned or implemented remedial action where impact is negative	

6. EA STAGE 3: REVIEW AND APPROVAL

Declaration

We have reviewed the impact of the strategy, policy or process and ensured that it will not disadvantage anyone because they have a protected characteristic

Person completing the EIA	
Department or Team	Money & Debt Operations Debt Policy & Strategy
Date completed	
Person signing off (Head of Department)	
Date signed off	
Proposed review date (if any)	January 2022 (Post evaluation of Tenders), and

	annually thereafter.
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8. GOVERNANCE

Policy and process EAs: To be approved by Business Head / Head of Department.

Strategies: To be approved by ELT and, where necessary, MaPS Board. Whether an EA needs to be approved by MaPS Board will be decided by ELT.

9. STORING YOUR EIA

This EIA is stored within the following directory:

