

Equality Impact Assessment

MaPS UK Financial Wellbeing Strategy

Version 2: July 2020 Review

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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)	UK Strategy for Financial Wellbeing		
Name of person drafting:	James Fearnley		
Department or Team:	Strategy & Insight (Money Policy and Strategy)		
Date:	21 July 2020		
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>The UK Strategy for Financial Wellbeing sets out goals, desired outcomes, delivery methods and performance indicators that specify how MaPS, supported by a cross-sectoral coalition of organisations, aims to support all UK consumers to make the most of their money and pensions during the period running until 2030.</p> <p>The Strategy development process is aligned with a series of Agendas for Change, which specify quantitative goals MaPS will achieve, via a range of collaborative partnerships, by 2030. 11 Challenge Groups are driving the Strategy development process, the majority of which are directly aligned with individual Agendas for Change. Other groups have a cross-cutting function by, for example, seeking to address the needs of particular demographic groups (such as women and people with mental health problems) as these apply across the life cycle in relation to specific areas of financial capability and wellbeing.</p>			
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>The goal of one of our five Agendas for Change, Financial Foundations, is to ensure that 2 million children and young people gain a meaningful financial education by 2030.</p> <p>We have identified and are seeking to address the specific needs of the 16-24 age group relating both to longstanding issues (transition to financial independence) and more immediate ones (impact of the Coronavirus on employment sectors most heavily populated by this age group).</p> <p>Issues relating to this group are also being considered directly by the Mental Health and Wellbeing Challenge Group, both directly and also indirectly (via a consideration of the role of parental support/influence).</p>
Working age people (18- 54)	X			<p>Five of our Challenge Groups (Nation of Savers, Credit Counts (Affordable Credit), Credit Counts (Use of Credit), Better Debt Advice,</p>

				<p>Workplace) are directly concerned with improving the financial capability and resilience of the working age population. The needs of women and people with mental health problems are being addressed as part of the work of the associated cross-cutting Groups.</p> <p>We have identified and are seeking to address the specific needs of the 16-24 age group relating both to longstanding issues (transition to financial independence) and more immediate ones (impact of the Coronavirus on employment sectors most heavily populated by this age group).</p>
Older people (55+)	X			The goal of our Future Focus Challenge Group is to increase by 5 million the number of people empowered to make (financial) decisions for and in retirement. The needs of women and people with mental health problems are being addressed as part of the work of the associated cross-cutting Groups.
2. Because they are disabled?				
Disability	Positive	Negative	None / Negligible	Reasons for your decision (including evidence) / How might it impact?
Visual impairment	X			EIAs are now built into MaPS business cases, which will ensure that service plans and propositions delivered or commissioned by MAPs that flow out of the UK Financial Wellbeing Strategy will take into account the needs of consumers with disabilities

				<p>and of other EA-protected groups.</p> <p>As part of ongoing internal and external discussions, we are taking account of the additional living costs and/or barriers to earned income associated with having a disability or long-term health condition. We will seek to enhance our understanding and take account of the impact of these factors on financial wellbeing and resilience in developing our recommendations.</p>
Hearing loss	X			As above
Physical disability	X			As above
Learning disability	X			As above
Long-term health condition	X			As above, and also taking specific account of the work of the Mental Health and Financial Wellbeing Challenge Group as appropriate/relevant.
Mental health problem	X			<p>Findings from our Listening Phase enabled us to identify the priorities that informed our Strategy framework, including consideration of the specific needs of particular demographic groups.</p> <p>As a result, we created two 'cross-cutting' Challenge Groups to work across all Agendas for Change to develop specific recommendations to support women and people with mental health problems. The Mental Health and Financial Wellbeing Group includes representation from seven specialist mental health advice and support</p>

				organisations, NHS England and Public Health England.
Other disability	X			As above
3. Because of their gender?				
Gender	Positive	Negative	None / Negligible	Reasons for your decision (including evidence) / How might it impact?
Male	X			<p>Men will benefit from the implementation of the Strategy as members of the overall UK population, but no dedicated targets or actions will be applied, as we have no evidence of specific disadvantage relating to this group.</p> <p>Men's role in women's financial wellbeing is being considered as an aspect of financial wellbeing as this related to personal and family relationships.</p> <p>Interventions that benefit women will also tend to have a beneficial effect for all genders and society as a whole (including children and young people). We therefore expect men to benefit from our Gender Challenge Group work, even if the recommendations it generates are most directly related to reducing specific disadvantages experienced by women.</p>
Female	X			See comments on mental health above. The Gender and Financial Wellbeing Challenge Group includes representation from three organisations focused on women's financial wellbeing, and other representatives who have factored gender

				<p>considerations into their business outputs.</p> <p>The Mental Health and Financial Wellbeing Challenge Group is also taking account of the high incidence of women with mental health problems and their associated needs.</p>
4. Because they are transgender?				
Transgender	Positive	Negative	None / Negligible	Reasons for your decision (including evidence) / How might it impact?
Transgender	X			Transgender people will benefit from the implementation of the Strategy as members of the overall UK population, but no dedicated targets or actions will be applied as currently we have no evidence of specific disadvantage relating to this group.
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			No evidence that marriage or civil partnership of themselves create specific barriers or generate specific needs, but any gendered implications of marriage/partnership status would form part of the Gender Challenge Group's remit (e.g., divorced women and pension differentials).
Civil Partnership	X			
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			The Gender Group is taking account of the extent to which pregnancy and maternity contribute to women's poorer outcomes in
Maternity (the period after birth)	X			

				<p>relation to pensions and other aspects of financial wellbeing/resilience.</p> <p>Issues related to prenatal and postnatal depression are relevant here and will require further investigation by the Mental Health and Financial Wellbeing Group, subject to availability of data.</p>
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7. Because of their race?

Race	Positive	Negative	None / Negligible	Reasons for your decision (including evidence) / How might it impact?
Black, Asian and ethnic minority (BAME) individuals and communities	X			C19 has starkly highlighted and exacerbated existing structural inequalities experienced by BAME communities. MaPS is bringing forward planned work in this area to consider the nature of both immediate and longstanding impacts, enhance our understanding of the financial wellbeing needs of BAME consumers and agree actions to meet these.
National Origin e.g. Welsh, English etc.	X			Individual delivery plans will be developed for and by Wales, Scotland and Northern Ireland as part of the UK Strategy.
Asylum Seeker and Refugees	X			As for BAME.
Gypsies and Travelers	X			As for BAME.
Others				None identified.

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			Members of specific religious communities will benefit from the implementation of the Strategy as members of the overall UK population.
Belief e.g. Humanists	X			
Non-belief	X			

				There will be merit in exploring the impact of specific doctrinal attitudes and practices affecting financial matters (e.g., Sharia marriage not recognised in English law and impact on women’s financial entitlements, faith-based perspectives on lending, savings and interest, attitudes related to prize-based savings schemes in Northern Ireland etc.). We will keep this under review.
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9. Because of their sexual orientation?

Sexual Orientation	Positive	Negative	None / Negligible	Reasons for your decision (including evidence) / How might it impact?
Gay men	X			No dedicated targets or actions to be applied as no evidence of specific disadvantage related to sexual orientation.
Lesbians	X			
Bisexuals	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)

The design of our Strategy was based on an inclusive process of consultation with a diverse range of organisations representing different communities and interest groups.

Our overall strategy is predicated on improving the financial wellbeing of the entire UK population and, as indicated above, there are some protected groups whom we feel would benefit by default from this overarching approach, i.e., in cases where no specific potential challenges to financial wellbeing for particular groups have been identified.

The existence of Challenge Groups whose priorities are aligned with the specific needs of UK consumers at different life stages will promote equality of access to remedies appropriate to all age cohorts.

The existence of two cross-cutting groups designed to address the specific needs of women and those with mental health problems will promote access to remedies for these two protected groups.

We have identified other protected groups whose needs have not been directly represented so far in the Strategy development process by means of dedicated Challenge Groups. Our ongoing work to better understand the experiences, challenges and needs of BAME and disabled communities and individuals will help ensure that we embed a specific focus on developing approaches that meet the particular needs of these groups as we take our work forward.

MaPS also has a legal duty under the Financial Guidance & Claims Act to consider and address the needs of people in vulnerable circumstances. While monitoring and reporting on our fulfilment of this specific responsibility is limited to our service provision, the vulnerability requirement forms part of our wider thinking on policy, and therefore also informs our Strategy development approach.

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?

Our analysis has not identified any cases in which our Strategy will lead to discriminatory or otherwise negative outcomes for any protected group(s).

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.

Please refer to our analysis above. In cases where targeted action has not been planned, this is because we are confident that our general approach will cover the needs of all consumers. In all other cases, we have planned or are in the process of developing interventions that will tackle existing disadvantage.

12. Monitoring, evaluating and reviewing

How will you monitor the impact of the strategy, policy or process on people with protected characteristics?

As a result of our ongoing discussions with the many external stakeholders engaged in the Strategy development process, and in response to existing obstacles and challenges that have become more salient as a result of the Coronavirus pandemic, we are engaged in a process of ongoing refinement and recalibration of our objectives to ensure that the needs of consumers subject to specific forms of disadvantage or lack of access are addressed. This will enable us to identify and address any thus-far latent issues relating to individual protected groups that we are not yet aware of.

As we note above, the Coronavirus pandemic has starkly highlighted and exacerbated existing structural inequalities experienced by BAME communities. In particular, the combined impacts of higher rates of unemployment, low pay, job insecurity (worsened by lockdown and its aftermath) and low levels of household assets, situated in the context of an economically-depressed 'Covid transition' environment, have made the financial wellbeing and resilience needs of these communities all the more urgent.

MaPS is therefore bringing forward planned work in this area to consider the nature of both immediate and longstanding impacts, enhance our understanding of the financial wellbeing needs of BAME consumers and agree actions to meet these, and we will be reviewing, refining and developing our activity in this space on an ongoing basis.

The impact assessment will be repeated on a six-monthly basis throughout the lifetime of the Strategy |(until 2030).

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	James Fearnley
Department or Team	Strategy & Insight (Money Policy and Strategy)
Date completed	14 August 2020
Person signing off (Head of Department)	Sarah Porretta
Date signed off	19 August 2020
Proposed review date (if any)	February 2021

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:

Appendix 1 Challenge Group members representing consumers with protected characteristics

Young people

- [UK Youth](#)
- [Young Enterprise NI](#)
- [Young Scot](#)
- [Young Enterprise](#)
- [Youth Leads UK](#)
- [Youth Access](#)

BAME

[UK Asian Business Council](#)

Older people

- [Age UK](#)
- [Commissioner for Older People for Northern Ireland](#)
- [Older People's Commissioner for Wales](#)
- [Age Scotland](#)
- [Centre for Ageing Better](#)

Gender

- [Chwarae Teg](#)
- [Surviving Economic Abuse](#)
- [Black Girl Finance](#)

Disability: mental health

- [Mind](#)
- [Hafal Wales](#)
- [Support in Mind Scotland](#)
- [Mindwise](#)
- [City Mental Health Alliance](#)
- [Rethink Mental Illness/Mental Health UK](#)
- [Money and Mental Health Policy Institute](#)