

Bristol City Council Equality Impact Assessment Form

(Please refer to the Equality Impact Assessment guidance when completing this form)



Name of proposal	Ethical Debt Enforcement
Directorate and Service Area	Revenues
Name of Lead Officer	Martin Smith

Step 1: What is the proposal?

Please explain your proposal in Plain English, avoiding acronyms and jargon. This section should explain how the proposal will impact service users, staff and/or the wider community.

1.1 What is the proposal?

Being in debt is more than just having to pay money back. The financial burden causes a person to delay life plans, creates stress that affects their overall health, and impacts detrimentally on the whole family.

We have been reducing the use of enforcement agents year on year and Members have now challenged us to accelerate that progress. Our aim is to continue an ethical debt collection of council tax while exploring mitigation and prevention activities and further alternatives to enforcement action, to support vulnerable citizens.

Through early intervention, improved processes, and better use of information we envisage multiple benefits for citizens, including avoidance of enforcement agent visits and charges, maintaining tenancies, and improved management of household finances. This will also improve cash flow for the Council and reduce demand on other public services and associated budgets.

Ensuring a citizen centric approach to debt is vital to the success of this pilot. We want to promote an increased take up of available support, including welfare benefits, council tax reduction, discounts and exemptions from council tax, and will increase referrals to third sector advice agencies where citizens would benefit from additional help.

Our Approach

Three work streams have been identified

Work-stream 1: Cross cutting strategy & policy

1a - Create a debt working group to shape and implement debt policy, defining an ethical approach to be adopted across the council.

1b - Explore opportunities to share data across services to create a holistic view of debt and enable future enforcement activities to be better targeted

1c – Measure and analyse the impact and outcomes of the prevention activities of work-stream 2 and the cross-service information sharing in order to create the case for rolling out to other services and for further funding

Work-stream 2: Testing new approaches in Council Tax

2a - Roll out SMS texting - proactive reminders for council tax payers, promoting the services of debt agencies, and collecting data to measure success

2b - Increased use of charging orders rather than enforcement agents, where appropriate for homeowners – securing the debt against a person’s property to be repaid on sale or transfer.

2c – The Contact Centre will begin contacting citizens, to understand situation, share advice, refer to debt agencies etc., with a view to create a specialist outreach team within Revenues to further develop this provision

Work-stream 3: Expansion of approaches to other service areas

Evaluate the impact and success of the prevention activities being piloted in Council Tax, and roll out new approaches to other services within the organisation

Step 2: What information do we have?

Decisions must be evidence-based, and involve people with protected characteristics that could be affected. Please use this section to demonstrate understanding of who could be affected by the proposal.

2.1 What data or evidence is there which tells us who is, or could be affected?

Our primary goal is to reduce the number of cases being sent to Enforcement Agents, which totalled 12,292 in 2016 for Council Tax. We hold personal data on each individual case, although we do not hold data related to protected characteristics. For Council Tax, Business Rates and Business Improvement Districts there only exists accurate data on the geographical location, as the

other data regarding equalities information is not required, nor is there any legal obligation to request this, in order to determine liability. We do, however, know where a Disabled Band Reduction has been applied for.

Although the available data is limited, national statistics (published by the Ministry of Justice) suggest that disabled people and lone-parents (majority of which are women) are more likely to be indebted, which indicates that our prevention activities would benefit people with the protected characteristics of disability and sex.

The Quality of Life in Bristol shows a high proportion of disabled, young, and LGB people in the city say they find it difficult to manage financially. There are also significant differences by Ward with just 3% of respondents in Redland saying they find it difficult to manage financially compared to 26.7% in Hartcliffe and Withywood. The overall ‘deprivation gap’ is 8% higher for those living in the most deprived areas of the city and Bristol average.

Indicator	% who find it difficult to manage financially
Equalities Group	Percentage
16 to 24 years	15.0%
50 years and older	9.0%
65 years and older	3.6%
Female	12.3%
Male	10.4%
BME (Black and Minority Ethnicity)	12.4%
WME (White Minority Ethnicity)	10.4%
Carer	11.7%
Disabled	21.1%
LGB (Lesbian Gay Bisexual)	15.4%
No religion or faith	9.8%
Religion or faith	8.9%
Bristol Average	11.4%

*source: Quality of Life in Bristol survey
2018-19*

The qualitative data available to us is much richer. We have numerous case studies that highlight examples of where language barriers, citizenship concerns, mental health problems, and age have prevented citizens from successfully engaging with the council in the debt recovery process. Early intervention and proactive engagement attempts, such as those outlined in our proposal, have proved very successful at improving understanding and

creating sustainable repayment plans with these individuals. Therefore, the qualitative data available to us indicates that people with the protected characteristics of age, disability, and race would benefit from our proposals.

2.2 Who is missing? Are there any gaps in the data?

The gap that is missing in our data is that we do not hold any information relating to protected characteristics on cases that are referred to Enforcement Agents. For Council Tax, Business Rates and Business Improvement Districts there only exists accurate data on the geographical location, as the other data regarding equalities information is not required, nor is there any legal obligation to request this, in order to determine liability.

Research looking at national statistics suggested that those with disabilities and lone-parents (majority of which are women) are more likely to be indebted. However, conclusive data looking at the relationship with debt and the other protected characteristics is not available. We are not able to establish a conclusive correlation between debt and gender reassignment, marriage and civil partnership, pregnancy and maternity, religion or belief, and sexual orientation.

2.3 How have we involved, or will we involve, communities and groups that could be affected?

High levels of engagement has taken place with debt advice agencies, such as The Money Advice and Pensions Service, Talking Money, and the Citizens Advice Bureau, and we aim to maintain a close working relationship. Further engagement will be reviewed as work progresses.

Step 3: Who might the proposal impact?

Analysis of impacts on people with protected characteristics must be rigorous. Please demonstrate your analysis of any impacts in this section, referring to all of the equalities groups as defined in the Equality Act 2010.

3.1 Does the proposal have any potentially adverse impacts on people with protected characteristics?

At this stage we have not identified any potentially adverse impacts from this proposal. The limited data and qualitative information available to us indicate that people with the protected characteristics of age, disability, sex, and race are more likely to be in debt or struggle to understand and engage in the debt

recovery process, which makes it more likely that their cases will be referred to an Enforcement Agent. However, the prevention activities that are proposed are designed to engage and assist people managing debt at an early stage, so should have beneficial impacts to people with the above characteristics, rather than adverse impacts.

The different prevention activities planned might be disproportionately effective with different groups of protected characteristics, but are varied enough so that the impact should be evened out. For example, sending out pre-emptive SMS text messages is likely to prove to be less effective with the elderly (lower mobile phone ownership) or those where English isn't their 1st language. However, the Outreach Team will be able to take a much more personalised approach, and engage in face to face conversations or use translated materials where appropriate.

The use of Charging Orders could disproportionately concentrate enforcement activity on the rented sector, which contains a higher ratio of people with protected characteristics. In certain situations enforcement action would not be pursued against home owners, as a charging order would be applied once the property is sold.

3.2 Can these impacts be mitigated or justified? If so, how?

We need to ensure that the Outreach Team have the appropriate training and access to resources so that they are able to identify and rectify where other prevention activities are proving less effective with people with protected characteristics.

3.3 Does the proposal create any benefits for people with protected characteristics?

The limited data and qualitative information available to us indicate that some groups are more likely to be in debt or struggle to understand and engage in the debt recovery process, which makes it more likely that their cases will be referred to an Enforcement Agent.

The prevention activities that are proposed are designed to engage and assist people managing debt at an early stage, so should have beneficial impacts to people with the above characteristics.

3.4 Can they be maximised? If so, how?

We will be regularly reviewing, analysing, and adjusting the proactive prevention activities outlined in this proposal in order to maximise the impact

on protected groups.

Step 4: So what?

The Equality Impact Assessment must be able to influence the proposal and decision. This section asks how your understanding of impacts on people with protected characteristics has influenced your proposal, and how the findings of your Equality Impact Assessment can be measured going forward.

4.1 How has the equality impact assessment informed or changed the proposal?

Research into the relationship between debt and protected characteristics has highlighted that some groups are more likely to become indebted or fail to engage successfully with the debt recovery process. These findings have helped validate the proposal to try to reduce the use of Enforcement Agents with proactive prevention activities.

The EQIA has also helped highlight the importance of ensuring that the Outreach Team has the appropriate training and access to required resources (e.g. translated material).

4.2 What actions have been identified going forward?

We need to ensure that the Outreach Team have the appropriate training and access to resources so that they are able to identify and rectify where other prevention activities are proving less effective with particular groups.

4.3 How will the impact of your proposal and actions be measured moving forward?

Throughout the lifecycle of the project, the impact of our prevention activities will be closely measured and analysed against the number of cases being referred to Enforcement Agents.

Service Director Sign-Off:
Martin Smith

Date: 22/08/2019

Equalities Officer Sign Off: Duncan
Fleming

Date: 22/08/2019