Equality Impact Assessment [version 2.9]



Title: Enforcement Agent Services	
☐ Policy ☐ Strategy ☐ Function ☐ Service	□ New
☑ Other [please state] Procurement	☑ Already exists / review ☐ Changing
Directorate: All (excluding Housing and Landlord	Lead Officer name: Kevin Smith
Services)	
Service Area: Revenues	Lead Officer role: Revenues Operations Manager
Step 1: What do we want to do?	
	t decision makers in understanding the impact of proposals ed guidance to support completion can be found here
This assessment should be started at the beginning of the proposal and service area, and sufficient influence over the completing the equality impact assessment. Please contains feedback.	he proposal. It is good practice to take a team approach to
1.1 What are the aims and objectives/purpose	e of this proposal?
outcomes. Where known also summarise the key actions	needed. Describe who it is aimed at and the intended aims / you plan to undertake. Please use <u>plain English</u> , avoiding iewed by a wide range of people including decision-makers
of Enforcement Agents (who also act as collection Agen	recovery of unpaid sums and sometimes uses the services ts and High Court Enforcement Officers) to carry out this is so. They are also used for process serving and execution is characteristics on behalf of the Council.
1.2 Who will the proposal have the potential	to affect?
☐ Bristol City Council workforce ☐ Service □	users
☐ Commissioned services ☐ City part	tners / Stakeholder organisations
Additional comments:	
1.3 Will the proposal have an equality impact	?
Could the proposal affect access levels of representation	or participation in a service, or does it have the potential to

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

⊠ Yes	\square No	[please select]
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This procurement exercise has the potential to impact on health and standard of living due to the effect of the collection activity being undertaken to recover unpaid sums owed to the Council.

Step 2: What information do we have?

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

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: https://www.bristol.gov.uk/people-communities/measuring-equalities-success.

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here <u>Data, statistics</u> and intelligence (sharepoint.com). See also: <u>Bristol Open Data (Quality of Life, Census etc.)</u>; <u>Joint Strategic Needs</u> Assessment (JSNA); Ward Statistical Profiles.

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as <u>HR Analytics: Power BI Reports (sharepoint.com)</u> which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the <u>Employee</u> Staff Survey Report and Stress Risk Assessment Form

Data / Evidence Source [Include a reference where known]	Summary of what this tells us	
Indices of deprivation	Level of deprivation	
Quality of Life in Bristol 2020-2021: % who find it difficult to manage	Citizens in more deprived areas are more likely to be financially disadvantaged so are potentially more at risk of enforcement action.	
financially	The implementation of the corporate debt policy aims to reduce the number of cases being sent to enforcement agents for collection activity wherever possible. It is acknowledged that a failure to engage by citizens may lead to increased enforcement action so there is a focus on local outreach activity in an attempt to engage and make appropriate arrangements. There will however always be those citizens who will not engage and will unfortunately receive a visit from an enforcement agent which may result in goods being seized.	
Quality of Life 2020-21 —	Quality of Life Indicator	% who find it difficult to manage financially
Open Data Bristol	Characteristic	% Percentage
	16 to 24 years	13.8
	50 years and older	5.5
	65 years and older	3.7
	Female	7.6
	Male	5.9

Disabled	16.0
Black Asian & Minority Ethnic	12.3
White Minority Ethnic	7.5
White British	6.0
Asian/Asian British	8.3
Black/Black British	23.7
Mixed Ethnicity	9.8
White	6.2
Lesbian Gay or Bisexual	11.5
No Religion or Faith	6.3
Christian Religion	5.7
Other Religions	23.3
Carer	8.9
Full Time Carer	16.9
Part Time Carer	6.3
Single Parent	22.7
Two Parent	5.8
Parent (all)	7.8
No Qualifications	10.3
Non-Degree Qualified	9.9
Degree Qualified	5.1
Rented (Council)	20.4
Rented (HA)	19.6
Rented (Private)	11.5
Owner Occupier	3.4
Most Deprived 10%	15.8
Bristol Average	6.8

(Bristol City Council, 2021)

2017 Runnymede Report "Bristol - a city divided?"

Impact of COVID-19 on BAME Led Businesses, Organisations & Communities' by the Black South West Network There is evidence of economic disparity for Black, Asian and minority ethnic led business in Bristol which have been exacerbated due to COVID-19 restrictions

- Black and minority ethnic people are over-represented in lowincome self-employment including taxis and takeaway restaurants which have been heavily impacted by COVD-19.
- 90% amongst all Black and minority ethnic business owners who
 responded to the survey indicated that they have already lost a
 significant amount of income.
- 67% have had to close their businesses due to COVID-19 direct impact.
- 90% of all businesses responding to survey have requested financial support.
- Almost 50% have stated they need support to apply to financial schemes.
- A little over 30% have stated they need better access to information

- Access to grants limited by payable business rates many entrepreneurs rent shared spaces.
- Communication barriers Use of post to receive letters where businesses are closed, language and IT skills.
- There have been significant losses of income on top of the impact of austerity cash-flow and liquidity are major challenges.
- 64% of social enterprises are unable to deliver products and/or services to their recipients, who are high need in physical and mental health
- Fundraising events being cancelled is having a huge impact on finances
- 92% of Black and minority ethnic led voluntary and community organisations have responded to the survey that they expect the community needs they serve to increase due to COVID-19.

2.2 Do you currently monitor relevant activity by the following protected characteristics?

⊠ Age	□ Disability	□ Gender Reassignment
	□ Pregnancy/Maternity	⊠ Race
⊠ Religion or Belief	⊠ Sex	

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

Whilst we do collect diversity monitoring for some service areas e.g. benefits, there are gaps in the available data e.g. for businesses, and also where this had not historically been required by statutory reporting.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See https://www.bristol.gov.uk/people-communities/equalities-groups.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to <u>Managing change or restructure</u> (<u>sharepoint.com</u>) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

No external engagement has been undertaken however internal stakeholders have been engaged to ensure this procurement exercise creates a joined up approach in an effort to minimise the possibility of separate visits from two or more enforcement agents on the same day for different debts.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

Engagement with internal stakeholders continues with socialisation relevant EDM's and with *relevant* Cabinet members .

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. Equality Impact Assessments (EqIA) (sharepoint.com)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)

Acknowledging that not all debts will be owed by citizens of Bristol there is the potential for a wider impact nationally which is it is difficult to detail but the aim will be to appoint professional Enforcement Agents with a history of low complaints, good customer service, engagement with the third sector and who have specialised teams to deal with vulnerable customers.

As part of any agreement we will ensure that where temporary or permanent vulnerability is identified that recovery action is suspended for an agreed period or terminated with the case being returned to the Council for further investigation. This may include local outreach work or home visits depending upon the nature of the vulnerability and the location of the citizen.

The procurement is indiscriminate and will affect all citizens equally although we acknowledge that some protected characteristic groups may be more susceptible to financial vulnerability or deprivation.

The provider will be required to demonstrate through procurement and ongoing quality assurance that they will operate in accordance with the Equality Act 2010 and the s.149 Public Sector Equality Duty including as an employer that equality of opportunity integral to vacancy advertising, recruitment, retention, promotion, training and grievances; and that services will be regularly tailored and regularly reviewed to meet the needs of Bristol's diverse populations.

PROTECTED CHARACTERISTICS		
Age: Young People	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No $oxtimes$	
Potential impacts:	Young people aged under 25 are more likely to find it difficult to manage financially than average (Quality of Life in Bristol Survey)	
Mitigations:	Implementation of a Corporate Debt Management Policy and ethical approach to debt recovery will hopefully reduce the number of cases needing to be sent to enforcement agents but also allow for increased engagement prior to referral, including local outreach work to encourage financial awareness, ensuring that welfare benefit take up	

	is maximised thereby maximising income. In addition, collaborative working across
Acc. Older Decale	service areas should reduce the number of individual contacts for any one citizen.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes ⊠ No □
Potential impacts:	Age UK sets out the realities of living on a low fixed income in retirement; the coping strategies that older people have developed in order to manage; and the intense difficulties they face in trying to meet the additional, unavoidable costs of ageing which present big, daily challenges for them yet are often overlooked by policymakers (Age UK, 2019).
Mitigations:	Implementation of a Corporate Debt Management Policy and ethical approach to debt recovery will hopefully reduce the number of cases needing to be sent to enforcement agents but also allow for increased engagement prior to referral, including local outreach work to encourage financial awareness, ensuring that welfare benefit take up is maximised thereby maximising income. In addition, collaborative working across service areas should reduce the number of individual contacts for any one citizen.
Disability	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No $oxtimes$
Potential impacts:	Disabled people are more likely to find it difficult to manage financially than average (Quality of Life in Bristol Survey)
	Disabled people are likely to need information indifferent formats to ensure they receive a service of a similar standard to other people. People with neurological differences including Dyspraxia, Dyslexia, ADHD, Dyscalculia, Autism, or Tourette Syndrome etc. may require adjustments such as making sure that communication is clear, concise and unambiguous; setting out timescales to give sufficient advance notice; or managing any known issues around anxiety or sensory sensitivities for face-to-face meetings.
Mitigations:	We will ensure that all communication is in Plain English including advice on how to request information in different format / translations.
	Implementation of a Corporate Debt Management Policy and ethical approach to debt recovery will hopefully reduce the number of cases needing to be sent to enforcement agents but also allow for increased engagement prior to referral, including local outreach work to encourage financial awareness, ensuring that welfare benefit take up is maximised thereby maximising income. In addition, collaborative working across service areas should reduce the number of individual contacts for any one citizen.
	The appointed enforcement agents will provide a choice of alternative payment methods which should be convenient for the customer including debit or credit card transaction (allowing payments to be made 24 hours a day, 7 days a week using the automated telephone line or internet facilities), standing order, cheque and cash.
Sex	Does your analysis indicate a disproportionate impact? Yes ⊠ No □
Potential impacts:	Single parents are more likely to have lost hours and to have lost income in recent months. They are more likely both to have been furloughed, and to have lost their jobs — with a risk that the single parent employment gap has widened as a result of the pandemic. Given the greater impact on their employment, single parents are also more likely to be struggling financially and to be concerned about their future finances (Dromey, Dewar, & Finnegan, 2021).
Mitigations:	Implementation of a Corporate Debt Management Policy and ethical approach to debt recovery will hopefully reduce the number of cases needing to be sent to enforcement agents but also allow for increased engagement prior to referral, including local outreach work to encourage financial awareness, ensuring that welfare benefit take up is maximised thereby maximising income. In addition, collaborative working across service areas should reduce the number of individual contacts for any one citizen.
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes \square No \boxtimes

Potential impacts:	
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No $oxtimes$
Potential impacts:	The move onto statutory maternity pay can reduce income levels significantly thereby increasing financial vulnerability and / or distress.
Mitigations:	Implementation of a Corporate Debt Management Policy and ethical approach to debt recovery will hopefully reduce the number of cases needing to be sent to enforcement agents but also allow for increased engagement prior to referral, including local outreach work to encourage financial awareness, ensuring that welfare benefit take up is maximised thereby maximising income. In addition, collaborative working across service areas should reduce the number of individual contacts for any one citizen.
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No $oxtimes$
Potential impacts:	See above: There is evidence of economic disparity for Black, Asian and minority ethnic led business in Bristol which have been exacerbated due to COVID-19 restrictions
Mitigations:	Implementation of a Corporate Debt Management Policy and ethical approach to debt recovery will hopefully reduce the number of cases needing to be sent to enforcement agents but also allow for increased engagement prior to referral, including local outreach work to encourage financial awareness, ensuring that welfare benefit take up is maximised thereby maximising income. In addition, collaborative working across service areas should reduce the number of individual contacts for any one citizen.
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No $oxtimes$
Potential impacts:	See above: There is evidence of economic disparity for Black, Asian and minority ethnic led business in Bristol which have been exacerbated due to COVID-19 restrictions
Mitigations:	Implementation of a Corporate Debt Management Policy and ethical approach to debt recovery will hopefully reduce the number of cases needing to be sent to enforcement agents but also allow for increased engagement prior to referral, including local outreach work to encourage financial awareness, ensuring that welfare benefit take up is maximised thereby maximising income. In addition, collaborative working across service areas should reduce the number of individual contacts for any one citizen.
Mitigations: Marriage &	recovery will hopefully reduce the number of cases needing to be sent to enforcement agents but also allow for increased engagement prior to referral, including local outreach work to encourage financial awareness, ensuring that welfare benefit take up
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Marriage & civil partnership Potential impacts: Mitigations:	recovery will hopefully reduce the number of cases needing to be sent to enforcement agents but also allow for increased engagement prior to referral, including local outreach work to encourage financial awareness, ensuring that welfare benefit take up is maximised thereby maximising income. In addition, collaborative working across service areas should reduce the number of individual contacts for any one citizen. Does your analysis indicate a disproportionate impact? Yes No
Marriage & civil partnership Potential impacts:	recovery will hopefully reduce the number of cases needing to be sent to enforcement agents but also allow for increased engagement prior to referral, including local outreach work to encourage financial awareness, ensuring that welfare benefit take up is maximised thereby maximising income. In addition, collaborative working across service areas should reduce the number of individual contacts for any one citizen. Does your analysis indicate a disproportionate impact? Yes No
Marriage & civil partnership Potential impacts: Mitigations:	recovery will hopefully reduce the number of cases needing to be sent to enforcement agents but also allow for increased engagement prior to referral, including local outreach work to encourage financial awareness, ensuring that welfare benefit take up is maximised thereby maximising income. In addition, collaborative working across service areas should reduce the number of individual contacts for any one citizen. Does your analysis indicate a disproportionate impact? Yes No
Marriage & civil partnership Potential impacts: Mitigations: OTHER RELEVANT CHARA Socio-Economic	recovery will hopefully reduce the number of cases needing to be sent to enforcement agents but also allow for increased engagement prior to referral, including local outreach work to encourage financial awareness, ensuring that welfare benefit take up is maximised thereby maximising income. In addition, collaborative working across service areas should reduce the number of individual contacts for any one citizen. Does your analysis indicate a disproportionate impact? Yes No NO

	agents but also allow for increased engagement prior to referral, including local
	outreach work to encourage financial awareness, ensuring that welfare benefit take up
	is maximised thereby maximising income. In addition, collaborative working across
	service areas should reduce the number of individual contacts for any one citizen.
Carers	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No $oxtimes$
Potential impacts:	Full time carers are more likely to find it difficult to manage financially than average
	(Quality of Life in Bristol Survey)
Mitigations:	Implementation of a Corporate Debt Management Policy and ethical approach to debt
	recovery will hopefully reduce the number of cases needing to be sent to enforcement
	agents but also allow for increased engagement prior to referral, including local
	outreach work to encourage financial awareness, ensuring that welfare benefit take up
	is maximised thereby maximising income. In addition, collaborative working across
	service areas should reduce the number of individual contacts for any one citizen.
Other groups [Please add	d additional rows below to detail the impact for other relevant groups as appropriate e.g.
Asylums and Refugees; L	ooked after Children / Care Leavers; Homelessness]
Potential impacts:	Asylum seekers cannot work whilst awaiting a decision leave to remain and receive
	limited financial support (HM Government, 2021) and may not have English as a first
	language and have limited understanding of rules and regulations.
	Refugees whilst able to work may not have English as a first language and have limited
	understanding of rules and regulations leading to financial vulnerability.
	Care leavers are a particularly vulnerable group and due to poor financial education and
	support prior to and on leaving care, care leavers often find themselves in debt
	(Become Charity, 2021)
Mitigations:	Care leavers can apply for a discount on their council tax which will last until their 25 th
	birthday.
	The Council has a refugees and asylum seeker inclusion strategy (Bristol City Council,
	2019).
	Implementation of a Corporate Debt Management Policy and ethical approach to debt
	recovery will hopefully reduce the number of cases needing to be sent to enforcement
	agents but also allow for increased engagement prior to referral, including local
	outreach work to encourage financial awareness, ensuring that welfare benefit take up
	is maximised thereby maximising income. In addition, collaborative working across
	service areas should reduce the number of individual contacts for any one citizen.

agents but also allow for increased angagement prior to referral including less!

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our <u>Public Sector Equality Duty</u> to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

The proposed procurement activity will deliver benefits across all sections of the wider Bristol community as it will bring together and co-ordinate the recovery of monies owed to the Council. There is no direct link to the provision of benefits to any one particular group based on one or more protected characteristic, but it is quite possible that citizens with protected characteristics may form a higher percentage of those who are affected by this procurement exercise. It is also quite possible that the local outreach work undertaken by the Council or the enforcement agents may improve the financial position who find themselves subject to recovery action.

Step 4: Impact

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

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified: Negative impacts are mitigated by the continued implementation of both ethical debt collection activity and the proposed corporate debt management policy. Summary of positive impacts / opportunities to promote the Public Sector Equality Duty: n/a

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale

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

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

- Successful procurement exercise within budget and to deadline
- The number of complaints received from citizens regarding enforcement agents

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the <u>Equality and Inclusion Team</u> before requesting sign off from your Director¹.

Equality and Inclusion Team Review: Reviewed by Equality and Inclusion Team	Director Sign-Off: Denise Murray
Date: 20/10/2021	Date: 16 Nov 2021

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.

References

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- Become Charity. (2021). Living independently requires a care leaver to manage their money, pay their bills on time and live on a budget. Retrieved from Become: https://www.becomecharity.org.uk/care-the-facts/the-big-issues/finance/
- Bristol City Council. (2019). Refugee and Asylum Seeker Inclusion Strategy 2019. Bristol:
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