

Equality Impact Assessment [version 2.9]



Title: Corporate Debt Management Policy	
<input checked="" type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Finance (and All)	Lead Officer name: Kevin Smith
Service Area: Revenues	Lead Officer role: Revenues Operations Manager

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

This Policy aims to standardise debt collection activity throughout the Council whilst also implementing or further rolling out early engagement initiatives to engage with citizens and minimise the impact of debt. Collaborative working across service areas will reduce the number of individual contacts by the Council and allow a citizen centric and holistic approach to be employed when dealing with debt.

Signposting and engaging with third sector advice agencies will improve citizens financial position and hopefully break the circle of debt leading to improved outcomes

1.2 Who will the proposal have the potential to affect?

<input type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input type="checkbox"/> City partners / 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 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.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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The Policy will hopefully improve both the quality of life and standard of living of those who are in debt through the implementation and adoption of a Council wide joined up and collaborative approach to debt recovery.

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 [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs 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 [HR Analytics: Power BI Reports \(sharepoint.com\)](#) 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 [Employee 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 financially	<p>Citizens in more deprived areas are more likely to be financially disadvantaged so implementation of this policy, along with the associated outreach work, and home visits for those in need, will have a positive impact on both income maximisation and the mental health and wellbeing of citizens. Sustainable, affordable, payment plans, based on a citizen centric holistic approach will assist citizens in breaking the circle of debt.</p> <p>The Council will also benefit from those sustainable and affordable arrangements to pay as this will generate income which can be used to fund frontline services to support citizens in general but especially the most vulnerable in society.</p>																
Quality of Life 2020-21 — Open Data Bristol	<table border="1"> <thead> <tr> <th>Quality of Life Indicator</th> <th>% who find it difficult to manage financially</th> </tr> <tr> <th>Characteristic</th> <th>% Percentage</th> </tr> </thead> <tbody> <tr> <td>16 to 24 years</td> <td>13.8</td> </tr> <tr> <td>50 years and older</td> <td>5.5</td> </tr> <tr> <td>65 years and older</td> <td>3.7</td> </tr> <tr> <td>Female</td> <td>7.6</td> </tr> <tr> <td>Male</td> <td>5.9</td> </tr> <tr> <td>Disabled</td> <td>16.0</td> </tr> </tbody> </table>	Quality of Life Indicator	% who find it difficult to manage financially	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
Quality of Life Indicator	% who find it difficult to manage financially																
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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?"⁸

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 low income self-employment including taxis, takeaway restaurants which has been heavily impacted by COVID-19.
- 90% amongst all Black and minority ethnic business owners who responded to 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 for 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.

	<ul style="list-style-type: none"> • 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.
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2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input checked="" type="checkbox"/> Gender Reassignment
<input checked="" type="checkbox"/> Marriage and Civil Partnership	<input checked="" type="checkbox"/> Pregnancy/Maternity	<input checked="" type="checkbox"/> Race
<input checked="" type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input checked="" type="checkbox"/> Sexual Orientation

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 [Managing change or restructure \(sharepoint.com\)](#) 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 an internal corporate debt working group has met several times to discuss indebtedness and explore ways in which service areas can work together to have a positive effect on those citizens who are suffering financial distress or are financially vulnerable.

The Revenues service already has a good working relationship with both local and national third sector advice agencies and are a pilot authority for the PaCE initiative (Money & Pensions Service, 2019) run by the Money and Pensions Service (MaPS). This initiative allows for 'warm' hand offs from council officers to specially trained MaPS staff who are then able to provide immediate support to customers. This improves the provision of debt and

money advice to not only our financially disadvantaged and vulnerable customers but also encourages those who may be considering debt and / or money advice to take up the offer of immediate assistance.

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 input from all current debt type owners, EDM's, CLB, lead Cabinet Members, Audit Committee and Resources Scrutiny Commission.

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)

The proposed policy will deliver benefits across all sections of the wider Bristol community as it will bring together and co-ordinate the holistic recovery of monies owed to the Council.

Acknowledging that not all debts will be owed by citizens of Bristol there are also wider national benefits for those individuals who owe debts to the Council and who will be dealt with in line with the proposed policy.

The policy is indiscriminate and affects all citizens equally although I acknowledge that some groups with protected characteristics may be more susceptible to financial vulnerability or deprivation. However this policy is designed to give greater consideration and scope to engage with all citizens who may be impacted.

PROTECTED CHARACTERISTICS

Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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) Positive impact: Increased engagement including 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:	N/A
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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).

	<p>Positive impact: Increased engagement including 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.</p>
Mitigations:	
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<p>Positive impact: Increased engagement including 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.</p> <p>Disabled people are more likely to find it difficult to manage financially than average (Quality of Life in Bristol Survey)</p> <p>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.</p>
Mitigations:	<p>We will ensure that all communication is in Plain English including advice on how to request information in different format / translations.</p> <p>The policy is to provide a choice of alternative payment methods which should be convenient for the customer. There are a range of payment options including Direct Debit, 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 at PayPoint or Post Office. Further payment options including text payments are being investigated and may be introduced as cost effective alternatives.</p>
Sex	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<p>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).</p> <p>Positive impact: Increased engagement including 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.</p>
Mitigations:	
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<p>Positive impact: Increased engagement including 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.</p>
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Potential impacts:	Positive impact: Increased engagement including 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:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Positive impact: Increased engagement including 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:	
Race	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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 Positive impact: Increased engagement including 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:	
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Positive impact: Increased engagement including 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 & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Positive impact: Increased engagement including 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:	
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	People in Council rented (and other rented) accommodation and living in the most deprived areas of the city are more likely to find it difficult to manage financially than average (Bristol City Council, 2021). Positive impact: Increased engagement including 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:	Outreach work will take place in local locations, such as libraries, as well as home visits for those more vulnerable citizens.
Carers	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Full time carers are more likely to find it difficult to manage financially than average (Quality of Life in Bristol Survey) Positive impact: Increased engagement including 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:	Outreach work will take place in local locations, such as libraries, as well as home visits for those more vulnerable citizens.
Other groups [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Looked after Children / Care Leavers; Homelessness]	
Potential impacts:	Positive impact: Increased engagement including 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:	Outreach work will take place in local locations, such as libraries, as well as home visits for those more vulnerable citizens.

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 Public Sector Equality Duty 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

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 new policy.

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:
N/A
Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:
Increased engagement including 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.

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
External comms to third sector advice agencies	Kevin Smith	Once policy in place
Internal comms to service areas highlighting new policy	Kevin Smith	Once policy in place

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.

- Reduced numbers of citizens reporting financial distress as a result of recovery activity undertaken by the Council.
- Increased collection performance
- Reduced bad debt provision

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 Equality and Inclusion Team before requesting sign off from your Director¹.

Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i>	Director Sign-Off: Denise Murray
Date: 20/10/2021	Date:

References

Age UK. (2019). *Struggling on - Experiences of financial hardship in later life*. London: Age UK.

Bristol City Council. (2021). *Quality of Life in Bristol 2020-21*. Bristol City Council.

Dromey, J., Dewar, L., & Finnegan, J. (2021). *Tackling single parent poverty after coronavirus*. Learning and Work Institute.

Money & Pensions Service. (2019). *What is the PACE debt advice pilot?* Retrieved from Money & Pension Service: <https://moneyandpensionservice.org.uk/our-debt-work/pace/?cn-reloaded=1>

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.