Equality Impact Assessment [version 2.11]



Title: R22 - Reduction in Debt Collection Funding	
□ Policy □ Strategy □ Function □ Service	🗆 New
☑ Other [please state] Budget Proposal	□ Already exists / review ⊠ Changing
Directorate: Finance	Lead Officer name: Kevin Smith
Service Area: Revenues and Benefits	Lead Officer role: 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 <u>Equality and Inclusion Team</u> 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 <u>plain English</u>, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

Budget context

Every year, the council must agree an annual budget which balances the money we spend with the money we are expecting to receive. Councils across the country are facing financial challenges and based on our current forecasts, we face a funding gap over the next five years (to 2027/28) of up to £87.6 million dependent on the severity of factors such as rising costs of fuel, energy and inflation. This is in addition to the £34.3 million of savings and efficiencies proposals for 2022-2027 outlined in the 2022/23 budget.

The Council has defined statutory responsibilities, but deliver against a far broader agenda, providing universal services benefiting the whole community, and targeted services aimed at individuals, communities with particular needs, and businesses – administered by our workforce, city partners, stakeholder organisations and commissioned services.

To address these challenges we must look again across all of our services to find where we can do things differently to reduce costs, be more efficient in how we do things and, in some cases, stop doing some things entirely.

This Proposal

Reduce the temporary funding by £100,000 in 2023/24 to the debt outreach programme, which works with individuals in debt to the council, and instead improve signposting to specialist providers of debt advice in the city.

1.2 Who will the proposal have the potential to affect?

Bristol City Council workforce	Service users	□ The wider community
Commissioned services	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.

Yes No [please select]

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: <u>How we measure equality and diversity (bristol.gov.uk)</u>

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> <u>and intelligence (sharepoint.com)</u>. See also: <u>Bristol Open Data (Quality of Life, Census etc.)</u>; <u>Joint Strategic Needs</u> <u>Assessment (JSNA)</u>; <u>Ward Statistical Profiles.</u>

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> <u>Staff Survey Report</u> and <u>Stress Risk Assessment Form</u>

Data / Evidence Source	Summary of what this tells	sus
[Include a reference where known]		
Bristol Deprivation Data	• 15% of Bristol's population	on live in the most deprived 10% of
JSNA 2022.23 - Deprivation (bristol.gov.uk)	areas in England in 2019 (16% in 2015)	
	• 17,200 children (21%) and	d 13,600 older people (17%) in
Deprivation (bristol.gov.uk)	Bristol live in income deprived households	
	• At ward level, the greatest levels of deprivation in Bristol are	
		Withywood, Lawrence Hill and
	Hengrove & Whitchurch Pa	
	-	ghbourhoods1 in Bristol are all in the
		f Hartcliffe, Whitchurch Park and
	Knowle West	
Quality of Life in Bristol 2021/2: % who find it		reas are more likely to be financially
difficult to manage financially		on in outreach work, including home
		have a negative impact on both
	citizens.	he mental health and wellbeing of
		% who find it difficult to
	Quality of Life Indicator	manage financially
	16 to 24 years	12.5
	50 years and older	6.7
	65 years and older	3.2
	Female	8.6
	Male	8.5
	Disabled	21.6
	Black Asian & Minority	14.9
	Ethnic	
	White Minority Ethnic	8.4
	White British	7.8
	Asian/Asian British	9.9
	Black/Black British	19.8
	Mixed Ethnicity	16.3
	White	7.9
	Lesbian Gay or Bisexual	12.7
	No Religion or Faith	8.0
	Christian Religion	8.3
	Other Religions	18.2
	All carer	10.7
	Full Time Carer	14.0

	Dent Time Concer	0.7
	Part Time Carer	9.7
	Single Parent	28.6
	Two Parent	9.6
	Parent (all)	12.0
	No Qualifications	10.3
	Non-Degree Qualified	12.9
	Degree Qualified	6.7
	Rented (Council)	20.3
	Rented (HA)	20.6
	Rented (Private)	14.6
	Owner Occupier	4.6
	Most Deprived 10%	18.8
	Bristol Average	8.7
	Distorrage	
Bristol One City: Cost of Living Crisis – Bristol's	The rising cost of living is r	· · · · · · · ·
One City approach to supporting citizens and	0 0	
communities (Oct 2022)		
Cost of Living Risk Index (arcgis.com)	 (Bristol Average 8.7) (Bristol City Council, 2022) The rising cost of living is not impacting on everyone equally. People who are already experiencing inequity and poverty will be disproportionately impacted: People on the lowest incomes - will have less available income but also pay more for the same services. For example, people unable to pay their bills by Direct Debit and those borrowing money are subject to higher costs and interest rates. This is what anti-poverty campaign group Fair by Design has referred to as a Poverty Premium Households with pre-payment energy meters - households with pre-payment meters often pay above-average costs for their fuel. They will face a significant rise in their monthly bills in autumn and winter with increased energy usage as they do not benefit from the "smoothing" effect of Direct Debits, which spread usage costs evenly across the year Parents and young families – parents of young children are more likely to seek credit and alternative support as they are less able, on average, to afford an unexpected expense. Single parents will be disproportionately affected; and one in four single parents find it difficult to manage financially (28.6%). Disabled people – just under half of all people in poverty in the UK are Disabled people nore for their energy bills than an average household Black and Minoritised people – A higher proportion of Black and Minoritised people – A higher proportion of Black and minoritised ethnic groups reported finding it difficult to manage financially (14.9%) in 2021. In 2020 the Social Metrics Commission found that almost half of people living in a family in the UK where the head of the household is Black are in poverty. Age UK report that poverty among older Black and minoritised ethnic groups is twice as high as for white pensioners 	

	 meet rising housing and living cost. Almost three in ten homes in Bristol are privately rented Underserved populations - It is likely that populations that are not typically well represented in data and research are likely to also face increased risk from rising cost of living. For example, refugees and asylum seekers, people experiencing homelessness, and Gypsy/Roma/Traveller groups. Cost of Living Risk Index (October 2022) identified Lawrence Hill, Hartcliffe & Withywood, Filwood, Lockleaze, Ashley, Southmead, Easton, Avonmouth & Lawrence Weston, Hillfields and Eastville as neighbourhoods in Bristol more at risk of the impact of the cost of living crisis.
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🖾 Age	🛛 Disability	🛛 Gender Reassignment
🛛 Marriage and Civil Partnership	Pregnancy/Maternity	🖾 Race
🛛 Religion or Belief	🖾 Sex	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 (for accounts payable debt there is no equalities data available regarding the Council's suppliers and many of these will also be bodies corporate rather than sole traders), 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.

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.

We launched a public consultation on our budget proposals between Friday 11 November and Friday 23 December. This consultation set out all the savings proposals we had identified to produce a balanced budget in the context of reduced available funding and increasing financial pressures.

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.

All responses to the Budget Consultation will be analysed and included in the Council's Budget report that will be published on the Bristol City Council website in early 2023. We will take Budget consultation responses into account when developing this and other final proposals to put to the Cabinet and a meeting of Full Council for approval. The final decision will be taken by Full Council at its budget setting meeting in February / March 2023.

Following the setting of the overall budget envelope there will be extensive engagement, consultation and co-design with affected communities on particular proposals which will inform future decision making prior to implementation. Our approach to public engagement and consultation will proactively target under-represented respondents to increase the participation of people from equality groups and their local representative organisations. This will help to ensure that our services and actions are informed by the views and needs of all our citizens.

Engagement with internal stakeholders continues with input from relevant officers and 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 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 proposal will reduce the level of support to those citizens of Bristol who are financially disadvantaged and / or owe debts to the Council. There will also be a reduction in the support able to be provided in income maximisation with increased reliance on partnerships with third sector advice agencies and the Money and Pensions Service.

The proposed reduction in funding will reduce the available capacity to undertake outreach functions which are a core part of the ethical debt collection initiative and corporate debt management policy.

We will continue to work closely with external partners who offer debt advice and support, and proactively signpost service users to appropriate services wherever possible.

Whilst the proposal is not directly discriminatory because it will apply to all citizens in debt, it is acknowledged that some groups with particular protected characteristics may be more susceptible to financial vulnerability or deprivation. Our resources will be used to target those most in need.

We do not anticipate any significant impact for council employees arising from this proposal as any required workforce changes have already taken place.

Decision makers will have the ability to make changes to the individual spending plans following further engagement as appropriate and detailed evaluation of the impact of specific proposals. Within the proposed

budget envelope there will be financial mitigation put aside for any non-delivery or amendments to proposals which may occur due to future consideration of equalities issues or other factors.

PROTECTED CHARACT	ERISTICS
Age: Young People	Does your analysis indicate a disproportionate impact? Yes \boxtimes No \square
Potential impacts:	 Young people aged under 25 are more likely to find it difficult to manage financially than average (Bristol City Council, 2022) Young adults are most likely to have lost work or seen their income drop because of COVID-19 and the cost of living crisis
Mitigations:	Focus on this area with remaining resources.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No \Box
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:	Focus on this area with remaining resources.
Disability	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No \Box
Potential impacts:	 One in five Disabled adults faces extra costs of over £1,000 a month even after they have received welfare payments designed to meet those costs¹. Disabled people are more likely to find it difficult to manage financially than average (Bristol City Council, 2022). 17% of Bristol's population are disabled. There are more disabled women than men.
	 17% of Bristol's population are disabled. There are more disabled women than men living in Bristol. In 2021, the disability pay gap was 13.8% with disabled employees earning a median of £12.10 per hour and non-disabled employees a median of £14.03 per hour. Disabled people are less likely to be employed in a managerial or professional occupation the national disability employment rate was 52.7% in Q2 2021, compared to 81.0% for non-disabled people. Disabled workers move out of work at nearly twice the rate (8.8%) of non-disabled workers (4.9%). Workless disabled people move into work at nearly one-third of the rate (11.0%) of workless non-disabled people (26.9%) Disability increases with age: 4.1% of all children, for the working age population it increases to 12.3% and for people aged 65 and over it increases to 55.9%. 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:	Focus on this area with remaining resources.
Sex Potential impacts:	 Does your analysis indicate a disproportionate impact? Yes ⊠ No □ The average UK pay gap is 15.4% in favour of men. The South West average is 16.6% with women paid 83p for every £1 earned by male counterparts. Women still bear the majority of caring responsibilities for both children and older relatives. 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 as a result of the COVID pandemic and cost of living crisis – with a risk that the single parent employment gap has widened. 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, 2020)
Mitigations:	Focus on this area with remaining resources.
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No \Box
Potential impacts:	 The Quality of Life Survey data (Bristol City Council, 2022) clearly shows that sexual orientation does have an impact on financial vulnerability.
Mitigations:	Focus on this area with remaining resources.
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No \Box
Potential impacts:	Research shows that pregnancy causes financial strain (International Forum for
	Wellbeing In Pregnancy, Unknown).
Mitigations:	Focus on this area with remaining resources.
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No \Box
Potential impacts:	 Citizens may feel marginalised and therefore could be more financially vulnerable. The Quality of Life survey data (Bristol City Council, 2022) shows that LCBT is citizens are more financially unlnerable.
Mitigatiana	that LGBT+ citizens are more financially vulnerable.
Mitigations:	Focus on this area with remaining resources.
Race	Does your analysis indicate a disproportionate impact? Yes 🛛 No 🗌
Potential impacts:	• There is evidence of growing economic disparity for Black, Asian and minority ethnic led business in Bristol
	 Ethnic minorities in Bristol experience greater disadvantage than in England and Wales as a whole in education and employment and this is particularly so for Black African people².
	• Although the race or ethnicity pay gap has narrowed in recent years there are still wide pay differences between particular ethnic groups and most minority ethnic groups earn less on average than White British people.
	 Bangladeshi, Pakistani, and Black ethnic groups are more likely to live in deprived neighbourhoods; and the same groups and Chinese ethnicities are about twice as likely to live on a low income and experience child poverty compared to White groups
	 Black, Asian and minoritised ethnic households are less likely to own their home and more likely to living in overcrowded housing and intergenerational households. Bangladeshi and Pakistani groups are more likely to live in multi-family households.
	 People from Black African, and Black Caribbean groups have persistently high levels of unemployment and almost all ethnic minority groups in Bristol experience employment inequality when compared to White British people. Black, Asian and other minoritised ethnic groups are more likely to be self-employed than the Bristol average and over-represented in low income self-employment including taxis, takeaway restaurants
	 People who do not speak English as a main language may require information in plain English and community language translations or videos etc.
Mitigations:	Focus on this area with remaining resources.
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No \Box
Potential impacts:	• The data from the Quality of Life survey (Bristol City Council, 2022) indicates that there is some disparity between financial vulnerability depending upon religion or faith.
Mitigations:	Focus on this area with remaining resources.
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No \Box
Potential impacts:	 The Quality of Life survey (Bristol City Council, 2022) does not differentiate between marriage and civil partnership however studies have shown that financial abuse does exist in marriage (Pace, 2021) and it is not unreasonable to believe therefore that it exists in civil partnerships.
Mitigations:	Focus on this area with remaining resources.
OTHER RELEVANT CHA	

Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No \Box	
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, 2022). Citizens in more deprived areas are more likely to be financially disadvantaged so are potentially more at risk of collection and recovery activity. 	
Mitigations:	Focus on this area with remaining resources.	
Carers	Does your analysis indicate a disproportionate impact? Yes 🛛 No 🗌	
Potential impacts:	 Carers are more likely to find it difficult to manage financially than average (Bristol City Council, 2022). 	
Mitigations:	Focus on this area with remaining resources.	
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:	• Those whose English is not their first language, who were previously or are homeless or are care leavers may be more financially vulnerable (Bristol City Council, 2022).	
Mitigations:	Focus on this area with remaining resources.	

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:

- \checkmark 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 scale of the potential gap in our core funding means that there is very limited opportunity to bring genuine additional benefit to equalities groups in the circumstances. However we have considered as far as possible the need to: eliminate discrimination, harassment, victimisation and any other conduct prohibited under the Equality Act 2010; advance equality of opportunity between people from different groups; and foster good relations between people from different groups.

Our budget savings proposals are aligned to our Corporate Strategy and although we have limited resources our future focus will be on achieving those priorities we have identified including tackling poverty and intergenerational inequality.

Although we have not identified any additional benefit, support will be targeted at those who present with financial vulnerabilities. These persons may come from any of the groups with protected or other relevant characteristics identified above.

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:

Resource will be focussed on mitigating negative impacts of the reduction in funding but it must be recognised that a reduction in funding will have a resultant effect on the level of service that can be provided. Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

None

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
Ensure resource is allocated	Kevin Smith, Operations Manager	Following confirmation of reduction in
effectively to minimise any impacts		funding.

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.

Numbers of citizens reporting financial distress as a result of recovery activity undertaken by the Council.

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 Director².

Equality and Inclusion Team Review:	Director Sign-Off:
Reviewed by Equality and Inclusion Team	Denise Murray, Director of
	Finance/S151 Officer
Date: 4/1/2023	Date: 19/1/23

² 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.