

Equality Impact Assessment – Initial Screening

<p>Policy:</p>	<p>Corporate Debt Collection & Recovery Policy</p>
<p>Lead Executive Director:</p>	<p>Executive Director of Finance & Resources</p>
<p>Summary of Policy:</p>	<p>The Corporate Debt Collection & Recovery Policy (CDCRP) details the council’s approach to income collection and recovery including how it prioritises debt outstanding. The emphasis is on sharing data and information across collection teams and to adopt a financial inclusion approach in helping debtors who get into difficulty to manage their debts effectively, particularly where they have multiple debts owing to the council.</p>
<p>Summary of impacts:</p>	<p>An overly robust approach to collection and recovery applied across all debt with no account taken of differing circumstances may not only impact adversely on specific groups but would also be likely to increase their financial exclusion and hardship. The proposed approach aims to minimise the impact of collection and recovery activity in this respect but will need to be monitored, piloted and reviewed on an ongoing basis to fully understand impacts across all groups.</p>
<p>Key actions to reduce negative impacts:</p>	<p>Collection Teams do not work in isolation from their respective service areas and are cognisant of the general characteristics of the client groups that they are dealing with and the associated equalities considerations. However, this policy is about working across teams, which may introduce new challenges and considerations. It is also about strengthening the approach and links with the Financial Inclusion Strategy. As stated above, this will need to be tested on an ongoing basis and appropriate data and information collected to enable a full Equality Impact Assessment to be developed.</p>

Details of potential impacts on specific equality groups to be considered in the full Equality Impact Assessment:

Equality Group	Possible impact on group/s? Yes/No	Potential impact	Actions Planned
Age (people of all ages)	Yes	Older People, particularly frail people receiving care services, can find financial transactions and communications confusing and may not act on them appropriately, causing potential financial difficulties for them. The EIA for the Financial Inclusion Strategy also identified that financial exclusion increases with age, therefore impacting on ability to manage financial affairs.	<p>A Full EIA will need to be completed taking into account relevant actions already identified in the Financial Inclusion Strategy, Council Tax Reduction Scheme, and other relevant EIAs.</p> <p>Wherever possible, good and innovative policy and practice will be identified through consulting relevant groups, joint working across teams, and reviewing equality responses by other providers and authorities. Expert advisers, Toynbee Hall, may also be able to assist with</p>
Disability (a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on ability to carry out normal day-to-day activities)	Yes	Many disability groups may be disproportionately affected by financial exclusion making it harder for them to manage their money effectively. Similarly, some disabilities may lead to general difficulties in managing financial affairs and/or in understanding financial transactions and communications. Those with hearing or visual impairments may also have other requirements.	
Ethnicity/Race (this includes ethnic or national origins, colour or nationality, including refugees and migrants; and Gypsies and Travellers)	Yes	Technical financial terms and language can cause difficulties and may be difficult to interpret into other languages. There is also significant evidence that some groups face higher unemployment, poverty and financial exclusion which all impact on ability to manage financial affairs and debt.	
Gender (both women and men are covered under the Act)	Yes	There may be issues related to women living alone and lone parents (predominantly women) that need to be considered by recovery services, e.g. Bailiff Services. Lone parents are also disproportionately	

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		<p>impacted on by poverty and financial exclusion, affecting their ability to manage money and/or debts.</p> <p>Domestic abuse can extend to control over finances by a partner or spouse and collection units may need to be aware of this potential and liaise with other services if this is apparent.</p> <p>During pregnancy and statutory maternity leave, women may have specific protections.</p>	<p>this aspect of the EIA.</p> <p>A piloting approach to debt recovery will be adopted, identifying specific groups or debts to focus on, ensuring effective monitoring of outcomes and using the learning and feedback to inform corporate policy and practice and the EIA.</p>
<p>Gender reassignment (a transsexual person is someone who proposes to, starts or has completed a process to change his or her gender. A person does not need to be under medical supervision to be protected)</p>	<p>Yes</p>	<p>Trans people face significant barriers to employment and discrimination in the work place and as a result may be more likely to be on lower incomes and be reliant on benefits and therefore also experience financial exclusion, and problems related to debts and benefits.</p>	<p>The EIA will link to other related workstreams, for example, Welfare Reform and Digital Exclusion.</p>
<p>Religion or Belief (religion includes any religion with a clear structure and belief system. Belief means any religious or philosophical belief. The Act also covers lack of religion or belief.)</p>	<p>Yes</p>	<p>There may be cultural issues in terms of some groups' willingness to seek financial help and/or advice from charities or local authorities rather than from their community or religious leaders.</p>	
<p>Sexual Orientation (the Act protects bisexual, gay, heterosexual and lesbian people)</p>	<p>Yes</p>	<p>The Financial Inclusion Strategy identified that single LGB people under the age of 35 are more likely to be particularly affected by the change to housing benefit entitlement as many choose to live alone due to family breakdown or discrimination or harassment. This may impact on financial inclusion.</p>	

Equality Group	Possible impact on group/s? Yes/No	Potential impact	Actions Planned
<p>Other groups relevant to this policy:</p> <ul style="list-style-type: none"> Non-working families Social housing tenants Homeless people Substance misusers Those on low pay or insecure income ('working poor') Those on benefits Those families affected by child poverty Those living in costly private sector housing Digitally excluded people or groups 	Yes	<p>The groups listed will have a greater propensity to financial exclusion and consequently find it more difficult to manage their financial affairs and may have problems with debt and/or welfare rights.</p>	