



Somerset Equality Impact Assessment

Before completing this EIA please ensure you have read the EIA guidance notes – available from your Equality Officer

Organisation prepared for	Somerset West & Taunton Council		
Version	1.0	Date Completed	6 December 2018

Description of what is being impact assessed

The new Income & Arrears Management Policy (previously called Corporate Debt Policy) “The Policy” is being assessed for Somerset West and Taunton.

It is written in plain language to help officers, councillors and customers understand income collection and arrears management. It aids income collection over the multiple debt streams and the monies collected benefiting all customers, citizens, businesses and communities with the Council by providing a wide variety of key services. The two previous policies have been aligned in the past and the new policy enhances previous versions.

The updated policy sets out the Council’s corporate approach to the management of all income streams Council Tax, Business Rates, Housing Benefit Overpayments, Housing Rents and other Miscellaneous Income owed by external customers. It clearly sets out how the Council will work with its customers to raise and collect monies due based upon the underlying principles of consistency, transparency and proportionality whilst paying due regard to its core values of integrity, fairness, respect and trust.

Through the delivery of this policy the Council will aim to maximise collection to benefit all residents in delivery of front line services whilst minimising both cost and protecting the customer.

Evidence

What data/information have you used to assess how this policy/service might impact on protected groups? Sources such as the [Office of National Statistics](#), [Somerset Intelligence Partnership](#), [Somerset's Joint Strategic Needs Analysis \(JSNA\)](#), Staff and/ or [area profiles](#), should be detailed here

The Policy is not new it has been refreshed to take on board the new ethos around the customer thus only further benefits the customer. It has been discussed and had input from various staff that deal with the various income streams, section 151 officer, Portfolio Holders for both Councils, other Local Authorities and the Strategic Forum.

Who have you consulted with to assess possible impact on protected groups? If you have not consulted other people, please explain why?

No consultation - It is difficult to access the new policies impact as equality data in this area is not readily available. It is not possible to draw firm conclusions on the income & arrears management strategy because it does not involve the taking away of any support or changing processes in any way that is likely to be harmful to any group of residents – however, we need to be mindful of any unintended consequences when the strategy is reviewed in 3 years' time. This could be possibility achieved by involving equality groups prior to any review. Overall the new policy provides **more** protection especially for vulnerable customers, committing the Council to a more joined up approach regarding recovery of arrears and looks to improve Business Intelligence to make more informed decisions. It can be reasonably assumed that these aforementioned steps will all be positive ones for all customers, regardless of the equalities' group into which they may belong.

The impact of the policy is more related to those economically disadvantaged people as it is fiscally based. Amongst this group, disabled people who are faced with the additional costs of living face particular difficulties. Their situation may be added to by the Welfare Reforms.

At every stage of the development of the policy the views of stakeholders have been considered and the policy has been developed and refined to reflect any feedback obtained.

This policy will promote support for customers with arrears who face a genuine hardship "Can't Pays" by guiding them to appropriate help and providing a flexible approach to take into account the needs of disadvantaged groups/individuals and even

write off should this be deemed the most appropriate action. However, this will not preclude the Council from taking a robust approach where there is found to be an ability to pay known as the “Won’t Pays”.

All members of the community will need to have the same access and understanding of the Income & Arrears Management Policy. It can be viewed on the Councils website or a paper copy can be sent on request and officers will be on hand to answer anything not understood.

Analysis of impact on protected groups

The Public Sector Equality Duty requires us to eliminate discrimination, advance equality of opportunity and foster good relations with protected groups. Consider how this policy/service will achieve these aims. In the table below, using the evidence outlined above and your own understanding, detail what considerations and potential impacts against each of the three aims of the Public Sector Equality Duty. Based on this information, make an assessment of the likely outcome, before you have implemented any mitigation.

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
Age	<p>Both young and the elderly have a potential impact.</p> <p>The elderly who have simply forgot to pay needs to be different from other groups who may be more likely to be “won’t pays”. This group is covered in both the policy and the new vulnerability protocol and thorough further Council initiatives with the training of all front line staff in areas such as Dementia awareness will add to staffs increased understanding and help better serve this group.</p> <p>Younger people those aged 16 to 24 and living in social housing often face specific difficulties in managing their finances, which could result in arrears. Young people on benefits often receive less money and are also at a greater risk of financial hardship, a problem which can increase without the skills and confidence necessary to engage with the financial products and services that are available to them. As the Council Transforms closer working between agencies and departments could result in earlier identification of people struggling to</p>	□	□	☒

	<p>pay essential bills such as Rent or Council Tax. This could help provide targeted advice and support before debt problems result in the use of Enforcement Agents (bailiffs). Working closely for example with the new customer and performance areas and build up customer intelligence from data sharing to identify these (and other) potentially vulnerable groups. Flag systems and ensure alternative recovery methods are incorporated into the Policy and new office protocols/procedures. Vulnerable listing exists within old departments but a corporate list would be more beneficial and is being look at for the new Council. The Policy is also written in plain language to help both the young and old understand its content. Suggestive future initiatives around targeting school leavers to give life skills around debt management, personal budgeting and awareness of the help available from the Councils and other agencies would make a difference.</p>			
<p>Disability</p>	<p>Potential impact Findings from the CAB 'Double Disadvantage' report found many disabled people faced additional challenge on top of their debt problems, for example demands being sent to people not accessible for their requirements. Where a debt has been identified and the person is known to be disabled, the Council will immediately classify them as vulnerable and work with them to facilitate repayment in accordance with their needs and financial position. The Customer function has officers to deal with Discretionary Housing Payments/Support and potentially 13a write offs in extreme cases.</p>	<p>□</p>	<p>□</p>	<p>☒</p>
<p>Gender reassignment</p>	<p>Unknown although gender reassignment surgeries are on the increase records would only be held by the NHS regarding state funded surgery to change sex with no record of privately funded operations. The CTS database does not record details around this protected characteristic.</p>	<p>□</p>	<p>☒</p>	<p>□</p>

<p>Marriage and civil partnership</p>	<p>Unknown we do not have any data that pertains to this.</p> <p>The measures in the strategy which relate to improving the accessibility of advice, pro-actively reaching out to Council Tax customers and council staff working in a more joined up way when collecting/writing off arrears are likely to be positive for all equalities' groups.</p> <p>Data is not collected in this area for Council Tax customers who do not qualify for Council Tax Support so we cannot look at the demographics for arrears in this respect.</p> <p>The CTS database does not record details around this protected characteristic.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Pregnancy and maternity</p>	<p>Potential impact identified - the later stages of pregnancy is detailed as a vulnerable category in the new protocol. It should also be noted that income levels could drop whilst on Maternity Pay and income levels fall and going back to work part-time both that may have an affecting on ability to pay and officers are aware to factor this change of circumstance into their decision making.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Race and ethnicity</p>	<p>Potential impact identified – language barriers could potentially present an additional challenge on top of monetary problems for some groups. The Council has use of a language line that covers off this potential problem to accommodate communication with people who do not speak English as a first language.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Religion or belief</p>	<p>Unknown we do not have data which allows us to assess the impact for those residents according to their religious beliefs</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	<p>Data is not collected in this area for Council Tax customers who do not qualify for Council Tax Support so we cannot look at the demographics for customers in this respect.</p> <p>The CTS database does not record details around this protected characteristic.</p>			
<p>Sex</p>	<p>Unknown the breakdown of CTS recipients according to gender is not known however we can estimate the Female to Male ratio is somewhere in the region of 65% to 35% :</p> <p>Women will therefore be more likely to benefit from the extra protection from enforcement (bailiff) action afforded by the strategy.</p> <p>Data is not collected in this area for Council Tax customers who do not qualify for Council Tax Support so we cannot look at the demographics for customers in this respect.</p> <p>The measures in the strategy which relate to improving the accessibility of advice, pro-actively reaching out to Council Tax customers and council staff working in a more joined up way when collecting/writing off arrears are likely to be positive for all equalities' groups.</p>	<p>□</p>	<p>⊗</p>	<p>□</p>
<p>Sexual orientation</p>	<p>Unknown we do not have data which allows us to assess the impact for those residents according to their sexuality.</p> <p>The CTS database does not record details around this protected characteristic.</p> <p>Data is not collected in this area for council tax payers who do not qualify for Council Tax Support so we cannot look at the demographics for debtors in this respect.</p>	<p>□</p>	<p>⊗</p>	<p>□</p>

	The measures in the strategy which relate to improving the accessibility of advice, pro-actively reaching out to council tax debtors and council staff working in a more joined up way when collecting/writing off debt are likely to be positive for all equalities' groups.			
Other, e.g. carers, veterans, homeless, low income, rurality/isolation, etc.	<p>Rurality/Locality - The area of Somerset West and Taunton has some very rural areas and measures will be put in place to offer assistance to anyone that cannot easily access services/information or requires help. Residents will benefit from a new self-service and other Council initiatives. Where difficulties are experienced officers in the community will be on hand to assist the Customer. The new Communications and Engagement function will also look for continual improvements for all customers.</p> <p>Low Income – The CTS and the DHP Schemes help low income individual families and individuals.</p> <p>Carers – have been further identified and added to the list of potential vulnerable customers in the new vulnerability protocol.</p>	□	□	☒

Negative outcomes action plan

Where you have ascertained that there will potentially be negative outcomes, you are required to mitigate the impact of these. Please detail below the actions that you intend to take.

Action taken/to be taken	Date	Person responsible	How will it be monitored?	Action complete
	Select date			□

If negative impacts remain, please provide an explanation below.

Completed by:	Steve Perkins
Date	6 December 2018
Signed off by:	Dean Emery
Date	7 December 2018
Equality Lead/Manager sign off date:	7 December 2018
To be reviewed by: (officer name)	Steve Perkins
Review date:	1 April 2019