

## Equality Impact Assessment (EqIA)

Please refer to the [Equality Impact Assessments \(EQIAs\)](#) form for details on how to complete.

The aim of an equality impact assessment is to consider the equality implications of any decision (e.g. new or revised policy, process, project, function, or service) on different groups of people including employees and customers. This document helps to evaluate whether the decision may inadvertently disadvantage groups of people and identify ways to avoid discrimination and proactively advance equality.

### 1. Details of the proposal

<b>Name of the proposal:</b>	Corporate Debt Policy
<b>Version number:</b>	
<b>Does this proposal impact on people?</b>	Choose an item: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>Explain your answer whether 'yes' or 'no'</b>	The policy applies to income owed to the Council from both individuals and businesses
<b>Is this a new or existing policy/project/service?</b>	Choose an item: <input type="checkbox"/> New <input checked="" type="checkbox"/> Existing
<b>Person responsible for the proposal:</b>	Head of Service, Finance
<b>Person responsible for the EqIA (if different to above)</b>	
<b>Proposal start date:</b>	22/07/2026
<b>When will this proposal be implemented?</b>	22/07/2026
<b>Briefly describe the aims and objectives of the proposal</b>	

	To introduce an effective Corporate Debt Management Policy to ensure the Council manages outstanding debts efficiently while meeting legal and ethical obligations with a focus on early intervention to prevent debt building up in the first place, including payment plans, application of discounts and exemptions and signposting customers to services, programmes and activities that support building financial resilience.
<b>What are the anticipated outcomes of the proposal?</b>	That monies owed to the Council are recovered promptly and appropriately and that the policy provides a clear framework to ensure fairness and prevent undue hardship for those facing financial difficulties.
<b>Who is likely to be affected by the proposal?</b>	You can select multiple options: <input type="checkbox"/> Staff <input type="checkbox"/> Service users <input checked="" type="checkbox"/> Wider community
<b>How are they likely to be affected?</b>	The Corporate Debt Policy will provide the framework for how services across the Council collect income in a fair, proportional, consistent and transparent manner
<b>Is this proposal going to be approved by SMB, Executive or Council?</b>	Select: <input checked="" type="checkbox"/> SMB <input checked="" type="checkbox"/> Executive <input checked="" type="checkbox"/> Council
<b>When is the proposal going to SMB, Executive or Council?</b>	22/06/2026

### 3. Consultation & Engagement

You will nearly always need to involve and consult with stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal. This should include the individuals/groups who are affected by your proposal. Any proposal for consultation or engagement must be done via the [Consultation and Engagement Form](#).

<p><b>How are you communicating with the individuals/teams who are affected by your proposal?</b></p> <p>You can select multiple options:</p> <input type="checkbox"/> Social media <input type="checkbox"/> Focus groups <input type="checkbox"/> Website
--

- Mail drop
- Via community group
- Other (please describe):

Consultation with senior staff across the Council who are involved in debt recovery has been undertaken;

- Council Tax
- Business Rates
- Housing Benefits
- Housing
- Commercial Assets
- Legal Services

#### 4. Impacts on People

**How will the proposed change affect people with protected characteristics?** Make sure that you assess the impact based on evidence.

- Who will benefit, who won't, who can access, who can't access, who is at an advantage, who is at a disadvantage?
- What evidence has been used for this assessment? For example, employee diversity data, national statistics, customer survey, feedback etc. [Sources of equality data](#) are available on Sharepoint. (Please don't include any information that risks identifying people such as names, or the diversity data, if less than six people).

**Note:** You can copy and paste more rows underneath each protected characteristic if there is more than one impact

How will this proposal affect people with protected characteristics?	Identify Impact:	Why will it have this effect? Use the evidence collated, any engagement or consultation to inform your thinking and record it here. Have you identified any gaps in evidence, if so, what are the gaps? Does this need to be incorporated in the action plan?
Age	Both positive and negative	All customers treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of age with Persons under 18 (and age 25 for care leavers) specifically covered in the Vulnerability Statement. When a person is recognised to be vulnerable, consideration will be given

<b>How will this proposal affect people with protected characteristics?</b>	<b>Identify Impact:</b>	<b>Why will it have this effect?</b> Use the evidence collated, any engagement or consultation to inform your thinking and record it here. Have you identified any gaps in evidence, if so, what are the gaps? Does this need to be incorporated in the action plan?
		to additional measures that can be taken to support them and the appropriateness of recovery action.
Disability: including sensory, mobility, mental health, neurodiversity, long term ill health	Both positive and negative	All customers treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of disability and are specifically covered in the Vulnerability Statement. People with disabilities are more likely to face unemployment due to limitations imposed by their disability or it may affect their ability to manage their financial affairs. When a person is recognised to be vulnerable, consideration will be given to additional measures that can be taken to support them and the appropriateness of recovery action.
Gender reassignment	Both positive and negative	All customers treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of gender recognition. Debt collection practices should be respectful of an individual's chosen name and gender identify. This includes ensuring all communications reflect their affirmed identity and written in gender neutral language.
Marriage and Civil partnership (work related only)	No Impact	All customers treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of marriage or civil partnership.
Pregnancy & Maternity	Both positive and negative	All customers treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of pregnancy and maternity and are specifically covered in the Vulnerability Statement. When a person is recognised to be vulnerable, consideration will be given to additional measures that can be taken to support them and the appropriateness of recovery action. This may include allowing longer to pay to reflect the unique financial circumstances of expecting parents.
Race: including ethnic origin, nationality/national origin	Both positive and negative	All customers treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of ethnicity. Alternative formats for any debt recovery communications, including translations, will be provided on request.
Religion or Belief	No Impact	All customers treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of religion and belief.

<b>How will this proposal affect people with protected characteristics?</b>	<b>Identify Impact:</b>	<b>Why will it have this effect?</b> Use the evidence collated, any engagement or consultation to inform your thinking and record it here. Have you identified any gaps in evidence, if so, what are the gaps? Does this need to be incorporated in the action plan?
Sex	No Impact	<p>All customers treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of sex.</p> <p>In the vast majority of cases, domestic abuse is experienced by women and perpetrated by men. At least one woman a week is killed by her male partner or former partner in England and Wales (ONS, 2025a). Data supplied from 32 police forces showed that the victim was female in 72.1% of domestic abuse-related crimes recorded by the police in the year ending March 2025, compared with 27.9% of domestic abuse-related crimes where the victim was male (ONS, 2025a). (Women’sAid)</p> <p>A person who is experiencing domestic abuse, coercive control or any form of domestic violence are specifically covered in the Vulnerability Statement. When a person is recognised to be vulnerable, consideration will be given to additional measures that can be taken to support them and the appropriateness of recovery action.</p>
Sexual Orientation	No Impact	All customers treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of sexual orientation.
Intersectionality: Could this proposal have an impact on people who have a combination or intersection of two or more characteristics?	Choose an item.	

## 7. Outcome of Assessment

Select one of the following options:	Tick the relevant box
--------------------------------------	-----------------------

No barriers identified, proceed with proposed change.	<input checked="" type="checkbox"/>
Adjust the proposal/policy to remove barriers identified by the EqIA.	<input type="checkbox"/>
Continue with the proposal/policy despite potential for adverse impacts.	<input type="checkbox"/>
Stop the proposal/policy as there are adverse impacts that cannot be prevented/mitigated or justified.	<input type="checkbox"/>
<p><b>Please explain why the option has been chosen:</b></p> <p>The policy aims to provide a framework for the management of Council debt that is proportional, consistent and transparent with a primary focus on preventative measures to help customers sustain payments, avoid further debt recovery actions, and protecting and supporting vulnerable customers that are experiencing financial difficulties.</p>	

## 8. Action Plan

Considering the impacts, you have identified above, please detail any actions you will need take to remove barriers, eliminate negative impacts or maximise opportunities. (Add more rows if required). If an action is to meet the needs of a particular protected group please specify this. These actions should be included in your Service Plan.

Action(s) to be taken.	Expected Outcomes	Responsible Person	Timescale	Progress	Complete
Corporate Debt Policy to be communicated to all officers involved with the Debt Recovery Process	Raise awareness of available preventative measures, including signposting to the new Crisis and Resilience Fund services to support				

	customers develop financial resilience for the future				

## 9. Monitoring

**How will you monitor the impact of your proposed change once it has been implemented?** Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective and your approach is still appropriate. Include the timescale for review in your action plan above.

Monitoring of collection rates, benefit take-up, number of enforcement notices issued, reasons for write-offs and number of referrals to the Crisis and Resilience Fund services will indicate whether the policy is successful.