

## Equality Impact Assessment

### Our duties in the Equality Act 2010

As a local authority, the council must demonstrate due regard to the public sector [Equality Duty](#) as part of the [Equality Act \(2010\)](#). There are three general equality duties across our functions; these apply to our policies, services (including commissioned services), and our employees:

- eliminate discrimination, harassment, and victimisation and other conduct prohibited by the act
- advance equality of opportunity between people who share a protected characteristic<sup>1</sup> and those who do not
- foster good relations between people who share a protected characteristic and those who do not.

Failure to have 'due regard' in relation to the Equality Act could mean:

- a judicial review of decision making
- incurring unnecessary costs to the council
- reputational damage
- unconscious discrimination against a part of the city community
- developing services that do not meet the needs of our communities.

### What is covered in this equality impact assessment?

1. [Identifying details](#)
2. [Summary of what is being assessed](#)
3. ~~[Update on previous equality impact assessment and outcomes of previous actions](#)~~ **No previous EIA has been carried out.**
4. [Review of evidence and data](#)
5. [Impact analysis and actions](#)
6. [Conclusion](#)
7. [Action plan to address and monitor adverse impacts](#)
8. [Sign off](#)
9. [Appendix1: Guidance](#)

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<sup>1</sup> The Equality Act prohibits discrimination on the grounds of: **age, disability, gender (formerly sex), gender reassignment, marriage & civil partnership, pregnancy & maternity, race, religion & belief, sexual orientation.**

## Equality Impact Assessment

### Section 1: Identifying details

<b>Title of equality impact assessment</b>	Non-commercial debt policy	<b>Date</b>	February 2020
<b>Team / Department</b>	Strategy and transformation		
<b>Head of service / Director</b>	Anton Bull	<b>Role</b>	Director of resources
<b>Officer completing</b>	Nicki Bristow	<b>Role</b>	Financial inclusion liaison officer

### Section 2: Summary of what is being assessed

<b>Status</b>	Change of existing policy
<b>What are the main aims or purpose of the policy, practice, service or function?</b>  At a high level, the policy sets out Norwich City Council's approach to: <ul style="list-style-type: none"> <li>- setting fees and charges</li> <li>- income: an holistic approach to managing multiple debts owed to the council</li> <li>- debt management: applying best practice to debt collection</li> </ul> The purpose of the policy is to: <ul style="list-style-type: none"> <li>- provide clear guidance to council officers on the recovery of all non-commercial debt in a timely, effective and fair manner, while ensuring fair treatment of all debtors</li> <li>- ensure that the council maximises the collection of debts and income by using a co-ordinated approach and having due regard to the customer's ability to pay.</li> </ul>	

It also aims to:

- ensure a consistent approach to the management of debts across the authority
- recognise the varying causes of debt and adjust recovery procedures accordingly
- reduce the likelihood of financial hardship for customers by ensuring individuals financial circumstances are considered on a case by case basis
- enable the signposting of debtors to debt advice as appropriate

Link to [Cabinet report September 2020](#)

### **Who implements, carries out or delivers the policy, practice, service or function (person/team/body and other organisations who deliver under procurement or partnership arrangements)?**

The policy has been developed by the council's Strategy and transformation team in collaboration with the Housing income team, Revenues and benefits team and Sundry income team.

The Financial Consortium have reviewed the policy and Norfolk Community Law Service have contributed to a number of amendments.

The council teams implementing the policy are:

- Revenues and benefits
- Housing income
- Sundry income
- Customer contact

### **How does it fit with other services and policies, and how does it support [corporate objectives](#)?**

The policy will help to ensure:

- **People live well** with Norwich continuing to be a city which supports wellbeing, and one in which people enjoy living and working.
- In partnership with others, we continue to develop Norwich as a strong, vibrant and **inclusive economy** in which the benefits of economic activity are shared by all.

The council recognises that in many cases, people's financial circumstances have been adversely affected as a result of Covid-19. The policy ensures that these circumstances will be considered when considering a customer's ability to pay. The council's [blueprint for recovery](#) provides more information on plans and actions to be taken in response to the Covid-19 pandemic.

**Who is affected by the policy, practice, service or function, or by how it is delivered (customers, employees, the wider community or groups of people)?**

The policy will affect all customers who hold some form of non-commercial debt with Norwich City Council.

**What outcomes do you want to achieve, why and for who (what do you want to provide, what changes or improvements and what should the benefits be)?**

The key outcomes the policy seeks to achieve are:

- improved debt collection rates for the council and reduce the cost of collection
- a reduction in the likelihood of financial hardship for customers in debt
- a more holistic approach to customers with multiple council debt
- a consistent approach to the financial assessment for use with customers
- an improved relationship with our debtors and local advice agencies.

**What do existing or previous reviews/assessments of the policy, practice, service or function tell you?**

There are several factors that have led to the review of the existing policy including:

- concerns around individual debts to the council being dealt with separately
- no specific reference to the need for fair treatment of vulnerable customers
- the council becoming a member organisation of Standard Financial Statement in 2018
- the Debt Respite Scheme (60 day breathing space) due to become law next year

The revised policy forms part of the corporate customer debt and income collection project.

**What is the reason for the proposal or change (financial, legal etc)? The Equality Act requires us to make this clear.**

Norwich City Council has a responsibility to collect monies from both individuals and business for a range of different reasons. The council has a legal duty to collect all sums due in the most efficient and effective manner. The monies may be for statutory and non-statutory charges. There is no current corporate approach to debt; we have a number of competing policies all of which are due for review.

## Section 4: Review of evidence and data

## Disability



### Physical Disability 18-64 year olds

Moderate    Serious

Norwich    6.8%    1.9%

England    7.8%    2.3%

### Day to day activity limited due to disability (all ages)



A little    A lot    Total

Norwich    9.8%    8.6%    18.4%

Norfolk    11.0%    9.3%    20.3%

England    9.3%    8.3%    17.6%

The policy and its implementation will be tested with communities of interest as part of the wider council customer debt and income collection project.

However, the average total indebtedness in Norwich is approximately 23,600 adults (20%) which will include a proportion of residents from communities of interest. (CACI Over-Indebtedness by Local Authority (Lower Tier) data 2018

<https://www.moneyadvice.service.org.uk/en/corporate/a-picture-of-over-indebtedness-in-the-uk>

### Impacts of Covid-19 on financial wellbeing

Concern over financial wellbeing and personal finances is high and those impacted financially also have lower general wellbeing.

<https://moneyandpensions.service.org.uk/wp-content/uploads/2020/06/Covid19-impact-on-financial-wellbeing-in-the-UK.pdf>

## Gender reassignment



No reliable data is available but it is estimated that around 1% of the UK population is to be gender variant.

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## Race/ethnicity (including migrants, refugees and asylum seekers)



	Norwich	Norfolk	England
<b>Total White</b>	<b>90.8%</b>	<b>96.4%</b>	<b>86.0%</b>
White non-British	6.1%	4.0%	5.5%
<b>Total Black, Asian or minority ethnic group</b>	<b>9.2%</b>	<b>3.5%</b>	<b>14.0%</b>
Asian/Asian British	4.4%	1.6%	7.5%
Black/African/Caribbean/Black British	1.6%	0.6%	3.3%
Mixed heritage	2.3%	1.1%	2.2%
Other ethnic group	0.8%	0.2%	1.0%

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### **Impacts of Covid-19 on financial wellbeing**

Ethnic minorities are more economically vulnerable and more likely to be impacted.

<https://moneyandpensionservice.org.uk/wp-content/uploads/2020/06/Covid19-impact-on-financial-wellbeing-in-the-UK.pdf>

## Religion or belief





	Norwich	Norfolk	England
<b>Christian</b>	44.9%	61.0%	59.4%
<b>Buddhist</b>	0.7%	0.3%	0.5%
<b>Hindu</b>	0.8%	0.3%	1.5%
<b>Jewish</b>	0.2%	0.1%	0.5%
<b>Muslim</b>	2.0%	0.6%	5.0%
<b>Sikh</b>	0.1%	0.1%	0.8%
<b>Other</b>	0.7%	0.5%	0.4%
<b>No religion</b>	42.5%	29.6%	24.7%
<b>Not stated</b>	8.2%	7.6%	7.2%

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## Sex/gender



**Female** 50.40%  
**Male** 49.60%

## Claimants



Claimant count by gender (October 2019)			
	Norwich	East of England	Great Britain
<b>All people</b>	3.1%	2.2%	2.9%
<b>Males</b>	3.8%	2.4%	3.3%
<b>Females</b>	2.5%	2.0%	2.4%

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## Impacts of Covid-19 on financial wellbeing

	<p>Women may be at greater risk because they are over-represented in the sectors most affected by social distancing restrictions.</p> <p><a href="https://moneyandpensionservice.org.uk/wp-content/uploads/2020/06/Covid19-impact-on-financial-wellbeing-in-the-UK.pdf">https://moneyandpensionservice.org.uk/wp-content/uploads/2020/06/Covid19-impact-on-financial-wellbeing-in-the-UK.pdf</a></p>
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## Sexual orientation



At least 2/5 respondents to the national LGBT survey 2018 had experienced verbal harassment or physical violence due to their sexual orientation in last 12 months. More than 9/10 of the most serious incidents went unreported as they felt, "it happens all the time".

	East	England	UK
<b>Heterosexual or straight</b>	95.3%	92.7%	93.2%
<b>Gay or lesbian</b>	0.8%	1.3%	1.3%
<b>Bisexual</b>	0.7%	0.8%	0.7%
<b>Other</b>	1.0%	0.6%	0.6%
<b>Don't know or refuse</b>	2.3%	4.5%	4.1%

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## Other relevant groups

<b>Carers</b>			<p>The policy and its implementation will be tested with communities of interest as part of the wider council customer debt and income collection project.</p>
		<b>Norwich</b>	<b>England</b>
	<b>1-19 hours of unpaid care</b>		
		5.7%	6.5%
	<b>20-49 hours of unpaid care</b>		
		1.1%	1.4%
	<b>50+ hours of unpaid care</b>		



## Socio-Economic Classification (NS-SEC)



Socio-Economic Classification (2011)									
	1	2	3	4	5	6	7	8	L15
Norwich	9.3%	18.4%	10.9%	6.8%	6.5%	15.3%	12.6%	5.4%	14.8%
Norfolk	8.3%	19.7%	12.5%	11.2%	8.0%	17.1%	12.4%	3.9%	6.8%
England	10.4%	20.9%	12.8%	9.4%	6.9%	14.0%	11.0%	5.6%	9.0%

Socio-Economic Classification Key	
1.	Higher managerial and professional occupations (e.g. directors, clergy and medical practitioners)
2.	Lower managerial and professional occupations (e.g. teachers, nurses and journalists)
3.	Intermediate occupations (e.g. travel agents, medical secretaries and police officers)
4.	Small employers and own account workers (e.g. taxi-cab drivers, product designers)
5.	Lower supervisory and technical occupations (e.g. electricians, train drivers, bakers)
6.	Semi-routine occupations (e.g. traffic wardens, dental workers and scaffolders)
7.	Routine occupations (e.g. cleaners, waiters/waitresses)
8.	Never worked and long-term unemployed
L15.	Full-time students

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## Impacts of Covid-19 on financial wellbeing

- Concern over financial wellbeing and personal finances is high and those impacted financially also have lower general wellbeing.
- Anxiety and low wellbeing have increased since the outbreak, and around a fifth of people report concerns around their mental health because of Covid-19. People who have been financially impacted report lower mental wellbeing
- Low income households are at greater risk. They are more likely to work in shut-down sectors, less able to work from home, and because they spend a higher proportion of income on essentials, they have less capacity to absorb an income shock.
- Parents with dependent children are under greater financial pressure, particularly single parents and parents with young children.

<https://moneyandpensions.service.org.uk/wp-content/uploads/2020/06/Covid19-impact-on-financial-wellbeing-in-the-UK.pdf>

## Section 5: Impact analysis and actions

<a href="#">Groups to consider</a>	<b>What does this mean?</b> What are the actual and potential <a href="#">impacts</a> based on the evidence in section 4 and are they <i>positive, neutral or adverse</i> ?	<b>Extent of impact</b>	<b>What can we do?</b> Identify potential <a href="#">actions</a> , gaps in data, further engagement and consultation, reasonable adjustments.
<b>Positive</b>			
For all those with a protected characteristic, from a community of interest or other relevant groups there will be a fairer and more consistent approach to supporting those in debt including an industry recognised financial assessment tool ( <a href="#">Standard Financial Statement</a> ) and the introduction of the Debt Respite Scheme (60 days breathing space for the debtor).		High	<p>We will monitor:</p> <ul style="list-style-type: none"><li>- types of debt</li><li>- number of debts</li><li>- value of debts</li><li>- reasons for debt</li><li>- age of debt</li><li>- collection of debt</li></ul> <p>We will:</p> <ul style="list-style-type: none"><li>- create a single view of customer non- commercial debt</li><li>- interrogate further data when it becomes available, the new and extensive data from the Norwich Vulnerability Hub</li><li>- investigate targeted messaging and support to those households/areas identified via the data working in close collaboration with the financial inclusion consortium</li><li>- test the policy with communities of interest as part of the wider council customer debt and income collection project.</li></ul> <p>We will continue to:</p> <ul style="list-style-type: none"><li>- provide bills in a variety of formats: braille, large print etc</li><li>- use INTRAN services to assist those who are non-English speaking, deaf or hard of hearing</li></ul>

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		<ul style="list-style-type: none"> <li>- promote support services offered by the Financial Inclusion Consortium (Equal Lives, AgeUK, Citizen's Advice, MAP, Shelter, Norfolk Community Law Service)</li> <li>- offer multi-agency support to customers by making a referral to Norfolk Community Advice Network (NCAN) via their referral system.</li> </ul>
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## Equality Impact Assessment

### Section 6: Conclusion

<b>Does the analysis in section 5 indicate any MEDIUM or HIGH ADVERSE impacts on one or more equality group?</b>							
No		If <b>YES</b> , use the action plan in section 7 to detail and prioritise what needs to be done to mitigate these adverse impacts.					
<b>Does the policy or decision need to be changed?</b>							
Change to policy/decision	No	Adjustment needed to policy/decision	No	Continue with policy/decision	Yes	If high adverse impact – rethink policy/decision	N/A

### Section 7: [Action plan](#) to address and monitor adverse impacts (based on section 5)

There are no adverse impacts identified at this stage. Following Cabinet approval of the policy, a delivery programme will be implemented, along with periodic review of the policy for quality assurance, test of relevance purposes and any further equality impacts.

### Section 8: Sign off (for the assessment to be final, the relevant people agreeing it must sign this section or send an email)

<b>Officer completing equality impact assessment</b>	Nicki Bristow	<b>Date</b>	3 September 2020
<b>Head of service or Director</b>	Helen Chamberlin on behalf of Anton Bull	<b>Date</b>	3 September 2020
<b>Equality lead (strategy team)</b>	Emma Smith	<b>Date</b>	3 September 2020

## Equality Impact Assessment

### Appendix 1: Guidance

#### Why have equality impact assessments?

Equality impact assessments are about service improvement, and should be used as a tool to test and analyse the nature and impact of either what we do or are planning to do in the future. They should also identify where further consultation, engagement and data is required. When used properly they can help us to comply with our public sector equality duty. They should be proportionate to:

- the size of the service or scope of the policy/strategy
- the resources involved
- the numbers of people affected
- the size of the likely impact
- the vulnerability of the people affected

#### When to complete an equality impact assessment?

- When planning or developing a new service, [policy](#) or strategy
- When reviewing an existing service, [policy](#) or strategy
- When ending or substantially changing a service, [policy](#) or strategy
- When there is an important change in the service, [policy](#) or strategy, or in the city or at a national level.

The assessment of equality impact should be carried out in a timely manner, as part of the planning, development, consultation or review process, and/or before a final decision is taken. *If there is evidence of assessment of impacts captured elsewhere, then a separate equality impact assessment is not needed.*

#### Do you need to complete an equality impact assessment?

Things to consider before completing an equality impact assessment include:

- Is the policy, decision or service likely to be relevant to any people **because** of their protected characteristics?
- How many people is it likely to affect?
- How significant are its impacts?
- Does it relate to an area where there are known inequalities?
- How vulnerable are the people (potentially) affected?

If there are potential impacts on people but you decide **not** to complete an equality impact assessment, you should document the reasons why.

## Equality Impact Assessment

### Policy

The word 'policy' for the purpose of the equality impact assessment refers to a decision, plan or set of procedures that determines, directs or influences the way business is carried out internally and externally. It can relate to projects and services, changes in funding to contracts and property closures. Strategies, guides, procurements, manuals and common practices are all policies that relate to customers (including staff) and/or communities.

### Data

It's important to have enough data to inform the equality impact assessment.

- What data is relevant to the impact on protected groups of the policy/decision/service is available?
- What further evidence is needed and how can you get it? (further research or engagement with affected groups)
- What do you already know about needs, access and outcomes? Focus on each of the protected characteristics in turn (who uses the service, who doesn't and why?) Have there been any demographic changes or trends locally? What might this mean for the service?
- Does the data show that any policies or practices create particular problems or difficulties for any groups?
- Review current equality objectives and what current performance is like against them
- Is the service having a positive or negative effect on particular people in the community, or particular groups in the community?
- Data sources:
  - [Equalities reports](#)
  - [Economic barometer](#)
  - [Customer insight](#)
  - [Norfolk Insight](#) (includes Joint Strategic Needs Assessment and Census 2011 data)
  - [Office for National Statistics](#)

### Engagement

It is important to engage appropriately with those likely to be affected to fulfil the equality duty.

- What do people tell you about the services?
- Are there patterns or differences in what people from different groups tell you?
- What information or data will you need from communities?
- How should people be consulted? Consider:
  - Consult when proposals are still at a formative stage
  - Explain what is proposed and why
  - Allow enough time for consultation



## Equality Impact Assessment

- Make sure what people tell you is properly considered in the final decision.
- Try to consult in ways that ensure all perspectives can be considered
- Identify any gaps in who has been consulted and identify ways to address this.

### Impacts

It is important to identify *actual* and *potential* impacts.

- The equality duty does not stop decisions or changes being made, but means we must conscientiously and deliberately confront the anticipated impacts on people.
- Be realistic when assessing risks and impacts
- Be detailed and specific so decision makers have a clear sense of potential impacts – how many, what percentage, to what extent will a group of people likely to be affected.
- Questions to consider when assessing impacts could be:
  - Are one or more protected groups affected differently and/or disadvantaged? How, and to what extent?
  - Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
  - If there are likely to be different impacts on different groups, is that consistent with the overall objective?
  - If there is negative impact, how can you minimise that while taking into account your overall aims?
  - Do the effects amount to unlawful discrimination? If so the policy *must* be modified.
  - Does the proposal advance equality of opportunity, and/or foster good relations? If not, could it?

### Actions

When deciding what mitigating actions to take, consider all three [aims](#) of the act: removing barriers, and identifying positive actions we can take.

- Where you have identified impacts you must state what actions will be taken to remove, reduce or avoid any negative impacts and maximise any positive impacts or advance equality of opportunity.
- Be specific and detailed and explain how far these actions are expected to improve the negative impacts.
- If mitigating measures are contemplated, explain clearly what the measures are, and the extent to which they can be expected to reduce / remove the adverse effects identified.
- The equality impact assessment will be subject to challenge so it is important to be clear about the facts, what decisions are made, and why.

### Protected characteristics

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- **Age** – this applies to people of all ages
- **Disability** – a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day to day activities. The definition includes sensory impairments, impairments with fluctuating or recurring effects, progressive, organ specific, developmental, learning difficulties, mental health conditions and mental illnesses, produced by injury to the body or brain. Persons with cancer, multiple sclerosis or HIV infection are all now deemed to be disabled persons from the point of diagnosis.
- **Gender reassignment** – in the Act a transgender 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.
- **Marriage and civil partnership** – this is only in relation to the need to eliminate discrimination.
- **Pregnancy and maternity** – protection is during pregnancy and any statutory maternity leave to which the woman is entitled.
- **Race/ethnicity** – this includes ethnic or national origins, colour or nationality, and includes refugees and migrants, and Gypsies and Travellers. Refugees and migrants mean people whose intention is to stay in the UK for at least 12 months (excluding visitors, short term students or tourists). This definition includes asylum seekers, voluntary and involuntary migrants, people who are undocumented and the children of migrants, even if they were born in the UK.
- **Religion and 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.
- **Sex/gender** – both men and women are covered under the Act.
- **Sexual orientation** – the Act protects bisexual, gay, heterosexual, and lesbian people.
- **Other relevant groups** – this includes carers, people experiencing domestic abuse and/or sexual violence, substance misusers, homeless people, looked after children, ex-armed forces personnel, people on the autistic spectrum etc.

### Action planning

The Equalities Duty is an ongoing duty, therefore [policies](#) must be kept under review, continuing to give 'due regard' to the duty. If an assessment of a broad proposal leads to more specific proposals, then further equality assessments and consultation are needed.