

Equality Impact and Outcome Assessment (EIA) Template - 2020

EIAs make services better for everyone and support value for money by getting services right first time.

EIAs enable us to consider all the information about a service, policy or strategy from an equalities perspective and then action plan to get the best outcomes for staff and service-users¹. They analyse how all our work as a council might impact differently on different groups². They help us make good decisions and evidence how we have reached these decisions³.

See end notes for full guidance. Either hover the mouse over the end note link (eg: Age¹³) or use the hyperlinks ('Ctrl' key and left click).

For further support or advice please contact:

- BHCC: Communities, Equality and Third Sector Team on ext 2301**
- CCG: Engagement and Equalities team (Jane Lodge/Meg Lewis)**

1. Equality Impact and Outcomes Assessment (EIA) Template

First, consider whether you need to complete an EIA, or if there is another way to evidence assessment of impacts, or that an EIA is not needed⁴.

Title of EIA⁵	Corporate Debt Policy	ID No.FR13	
Team/Department⁷	Corporate Debt Team		
Focus of EIA⁸	<p>The Corporate Debt Policy defines the council approach to collecting debt. The policy applies to the activities of all the services that have income or debt collecting function. The council has the dual responsibility to collect income to pay for services and to have appropriate regard for every household/business in terms of affordability, sustainability, vulnerability, and hardship. This is particularly important in the context of the impact that welfare reforms have had in this city and in the response to and recovery from the COVID 19 pandemic.</p> <p>This assessment is not a duplication of the EIAs that separately exist in some of the service areas or in relation to some of the mitigations that the council delivers (such as discretionary payments). It concentrates on the specific debt collection activities and considerations stated in the revised 2021 Policy, particularly in relation to protected groups.</p> <p>The Corporate Debt Board meets regularly to bring together representatives from all the relevant service areas to ensure the principles of the policy are effectively maintained. There are escalation routes in the council to access support for households struggling with their debt repayment responsibilities. The main provision of this support sits within the Welfare Support area of Revenues & Benefits, that also networks with internal and voluntary sector services to provide a</p>		

	<p>comprehensive range of support. There are strong links to the Debt Prevention Team in Revenues & Benefits and a similar offer within Housing Services. The emphasis is on mitigating the impacts of the Universal Credit roll out and supporting the COVID 19 response and recovery. Externally, there is direct commissioning of budgeting advice in the third sector both in respect of Welfare support and Housing Services. The overall effectiveness of the combined efforts of the council and voluntary sector is managed through attendance of the Advice Services Network and Advice Partnership meetings.</p> <p>This assessment breaks down debt into two types: Household Debt and Business Debt. This assessment primarily concentrates on the former. Whilst there is less consideration of Business Debt because expenditure is normally considered as something that should be anticipated in a business model, it is recognised that there is a link particularly in relation to small businesses and individual financial hardship.</p> <p>Because households/businesses move out of the area, debts are incurred by households/businesses that are outside the area. Also, some businesses have central offices outside the area. The council conducts a considerable amount of debt collection activity across the country and sometimes beyond. Where this is the case, the debt impacts are less measurable and the mitigations available are limited. However, the principles within the policy, particularly in relation to affordability, still apply.</p>
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2. Update on previous EIA and outcomes of previous actions⁹

What actions did you plan last time? (List them from the previous EIA)	What improved as a result? What outcomes have these actions achieved?	What <u>further</u> actions do you need to take? (add these to the Action plan below)
<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household address their budgeting pressures.</p> <ul style="list-style-type: none"> Focus digital inclusion on people of working age 	<ul style="list-style-type: none"> There has been a reduction in use of Enforcement action through earlier intervention. Improved analysis and segmentation of customer data to inform ethical collection strategies Use of digital technology to enable early intervention and avoid escalation and further costs Proactive outbound contact with customers to discuss sustainable repayment plans Development and introduction of corporate debt database working towards a single view of citizens debt so that sustainable repayments can be agreed. Closer working between council's debt hubs to facilitate a single view of a resident's debt where they have multiple council debts Corporate debt and welfare approaches aligned and more co ordinated so that where there is financial or other vulnerability citizens are referred to support options Increased collaboration with community voluntary sector debt advice organisations Breathing space regulations ready for introduction Cross government collaboration with HMRC and DWP to enable ethical and proportionate debt collection Training approach to debt collection based on principals of fairness for front line teams aligned for debt hubs Introduction of Standard Financial statement which will be developed and used across all council debt hubs Council digital programme has continued to develop the MyAccount single view approach enabling citizens access to council services digitally. 	<ul style="list-style-type: none"> Complete the roll out of Breathing space regulations -inclusive of Mental health elements BHCC Mental health and debt coordinator role embedded into structure Continue to support the Community Hub COVID response work in collaboration with ASC and Revs and Bens Revenues & Benefits will continue to assist with the administration of the COVID Business grant scheme whilst it is in operation. Ensure that the changes to the Carers allowance scheme that have been introduced to mitigate the impact of COVID are communicated to citizens. Continue to support and refer people to the carers Hub network Link in with Faith Council to attend meetings to pass on any key messages Ensure adoption of Standard Financial Statement (SFS) across all debt hubs in council to support ethical and sustainable repayment arrangements for citizens in debt The Welfare support teams will continue to link to the advice services in the city and specifically have provided training to Speak out the advocacy service for people with Learning Difficulties The Welfare support teams will continue to offer advocacy for people with mental health needs in terms of housing rights, adult social care and with the DWP. Front line staff have and will continue to be provided with Mental health awareness and suicide awareness training Notices seeking Possession due to rent arrears have not been issued since the pandemic began and this will remain under review.

<ul style="list-style-type: none"> • Gather information on the age of those referred to MACS through the Housing Financial Inclusion and Universal Credit contracts • Engage with services that support working age people to ensure sure DHP literature is available to them • Engage with services that support young people to ensure DHP literature is available to them • To promote the single apprenticeship pathway to assist young people into work • Ensure services that support and engage with people over pensionable age promote energy efficiency grants. • Housing Income Advisors to continue to provide support and advice to vulnerable housing tenants who need additional help to engage. • Support younger housing tenants through the Better Start Guide. • Apply for Alternative Payment Arrangements (APA) with the DWP where vulnerable housing tenants are on Universal Credit. • People affected by any of these new benefit policies and who also contribute to the cost of social care services, can apply for a reassessment of their charges which may then be reduced • We will maintain a face to face service, 	<p>No data currently available</p> <p>Voluntary sector is aware of discretionary schemes available</p> <p>Voluntary sector is aware of discretionary schemes available</p> <p>Collaboration work continuing with Youth Advice Centre (YAC) to support young people in debt</p> <p>There is energy advice for residents including accessing grants delivered in partnership through the Local Energy Advice Partnership which the council is part of. Public Health also fund the annual Warmth for Wellbeing programme, with CAB and BHESCO delivering support to residents at risk of ill health from cold homes/people living in fuel poverty. Along with other partners we also signpost to the Wenceslas fund from Brighton & Hove Lions club, which has a really strong focus on older residents</p> <p>HIMT continue to work on a case by case basis to support vulnerable tenants in debt</p> <p>Continuing work in Housing service who review, and update website guide every year as necessary.</p> <p>The impact of UC is being mitigated by setting up APA for citizens experiencing financial hardship. 46% of tenants on UC have an APA in place and they make up 68% of the total arrears.</p> <p>Adult social care (ASC) ensure that when peoples financial circumstances change, they reassess the charges for care services. Once notified they will act upon the new financial information and review the financial assessment.</p>	
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<p>including home visits, to support people with DHP applications where appropriate</p> <ul style="list-style-type: none"> • Where possible working with agencies, social services, and NHS to monitor and feedback the impact to disabled people • When council is procuring advice contracts make sure that accessibility issues and outreach issues are included in contract specification. • Reorganisation of NHS services should make it easier for people with common Mental Health issues such as anxiety and depression to receive help • We will look to identifying those in receipt of DLA who are also eligible for Adult Social Care services and link with care management • The Welfare support teams support households with issues of disability and long-term ill health to access appropriate disability benefits, supporting with both the application process and through the appeals process. They will also support households with Non-Dependents in receipt of disability benefits claim Carers Allowance, to exempt them from the Benefit Cap • Where a persons assigned gender differs from their birth gender the Revenue and Benefits service are legally able to reflect this in decisions about housing benefit. • The addition of a child may mean accommodation changes for the household that may conflict with timing of benefit awards. In these circumstances DHP/DCTR is 	<p>DHP applications are dealt with over the phone currently.</p> <p>Welfare Board, once formed, will provide ongoing monitoring of impacts of welfare changes on identified at risk groups and feeds into key internal departments and partner organisations.</p> <p>All contracts follow council procurement equalities guidelines. Money Advice Plus who are providing debt advice for ASC and Housing is a debt advice service based in the local community.</p> <p>Council has employed a Mental Health and Debt coordinator role to support citizens in debt who have mental health conditions.</p> <p>The Welfare support teamwork with Adult social care teams to ensure citizens are provided with support as necessary. Community hub collaboration between ASC and Revenues and Benefits to respond to COVID 19 and support vulnerable citizens.</p> <p>Welfare support team frequently get referrals from Adult social care section and carry out advocacy work to ensure full entitlement of an individual is claimed.</p> <p>Transgender citizens are supported when they apply for benefit.</p> <p>This approach continues to mitigate the risks to ensure families are not financially or otherwise disadvantaged in these circumstances</p>	
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<p>considered to address shortfalls.</p> <ul style="list-style-type: none"> • Provide interpretation service for people in debt where necessary • To improve the monitor and data on this diversity group making applications to DHP • To monitor the ethnicity data on those affected by the Benefit Cap • To provide interpretation services for persons wishing to make an application for DHP who cannot do so using English language forms • Provide interpretation service for people in debt where necessary • Work with traveller liaison team to understand if their clients are affected. • Share DHP/DCTR info with organisations that specifically support people for the LGBT community through the advice services network • To use information on affected families to share, as appropriate and within the law, with Children's Services to ensure that the families most affected are accessing support that is both holistic and appropriate • Feed information into the Stronger Families Stronger Communities project (SFSC) • Continue to work with Housing Options and 	<p>Council continue to offer interpretation service to support people where English is not there first language, so they understand the options they have if they are in debt to the council and how to get support.</p> <p>No data currently available</p> <p>No data currently available</p> <p>Interpretation service is provided on request</p> <p>Interpretation service is provided on request</p> <p>Corporate debt team are working with Travellers liaison team to consider the combined debts to the council in respect of the permanent Traveller site residents and options for collection.</p> <p>Voluntary sector is aware of discretionary schemes available</p> <p>Information is shared to promote free school meals to those eligible and support has been provided for the recent Rashford fund project. Data has been shared with the Stronger Communities work to ensure all welfare options are considered.</p> <p>Joint working continues with Housing through our Special Accommodation, Move on Mentors MOMs, discretionary and Welfare support teams. There are 4 DWP co-location Work Coaches operating throughout Housing, SFSC and Revs and Bens.</p>	
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<p>Children’s Services as part of our Homeless Prevention work</p> <ul style="list-style-type: none"> • Make sure information on DHPs and benefit changes are available in all Children’s Centres through the Family Information Service. • Where appropriate briefings to be sent out to Schools in regard to benefit changes so that teachers can be aware of any financial difficulties a family may be facing and be able to offer them appropriate signposting. • Specialist teams within Revenue and Benefits Services such as the Discretionary Help and Advice Team and the Special Accommodation Team will work closely with refuges in the city and the Council’s own Crisis Intervention Team within Housing Options to ensure that those fleeing domestic violence (DV) and other forms of violence against women and girls (including sexual violence) are given access to all discretionary support available in the most consistent way and with a holistic approach. • Engage with specialist services that support victim/survivors to ensure sure DHP/DCTR literature is available to them • We will continue to use all administrative discretion available to us to protect the security of people affected by DV when making an application for Housing Benefit or DHP or addressing debt issues. • To work with the Violence against Women and Girls Commissioner within relevant partnership structures to ensure the message is communicated as effectively as we can • Monitor application and take up of DHP/DCTR by protected characteristic, keep this under review and amend this assessment, and its mitigations as appropriate. 	<p>Family Information service have details on benefits and discretionary options</p> <p>Family Information service have details on benefits and discretionary options</p> <p>Family Information service have details on benefits and discretionary options</p> <p>The Revenues & Benefits service continues to offer support to people fleeing domestic violence and collaborates with Housing Options as necessary.</p> <p>Voluntary sector and specialist teams are aware of discretionary options available in these scenarios</p> <p>We continue to use the discretion available to protect the security of anyone affected by DV.</p> <p>No update currently</p> <p>No data currently available</p>	
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<ul style="list-style-type: none"> • The Revenues and Benefit and Housing services will continue to signpost customers affected by Housing Benefit shortfalls to appropriate channels of advice. • Where the council has information about a protected characteristic the council will take this into account when making a decision about DHP/DCTR. • The Revenues and Benefits team will continue to publicise and promote the DHP/DCTR scheme • The Revenues & Benefits team will provide training and information to staff from other services who work with service users who may be able to claim DHP/DCTR. This may include staff working for the NHS who have direct or ongoing involvement with families. 	<p>The service continues to offer support and guidance to citizens impacted by reductions to their benefit income ensuring citizens are aware of all their welfare rights.</p> <p>No data currently available</p> <p>Team continue to publicise on website and through other services as well as with community debt advice partners. The service continues to highlight the discretionary assistance available to citizens in financial crisis.</p> <p>The service has delivered training to partners in the advice sector to enable them to give citizens advice about claiming benefits</p>	
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3. Review of information, equality analysis and potential actions

Protected characteristics groups from the Equality Act 2010	What do you know ¹⁰ ? Summary of data about your service-users and/or staff	What do people tell you ¹¹ ? Summary of service-user and/or staff feedback	What does this mean ¹² ? Impacts identified from data and feedback (actual and potential)	What can you do ¹³ ? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Age ¹⁴	<p>Brighton & Hove has an unusual population compared to the South East and England. There are a much higher proportion of people aged 19 – 44 years, with lower proportions of children aged 0 to 15 and older people aged 65 to 84. However, there is the same percentage of people aged 85 years or over in Brighton & Hove as in England.</p> <ul style="list-style-type: none"> • 16 per cent (45,009) were estimated to be aged under 16 in 2011 • 70 per cent (193,632) were estimated to be aged between 16 & 64 • 13 per cent (36,684) were estimated to be aged 65 or more • In terms housing tenants the data for January 2021 indicates that tenants aged 16-24 are at a higher risk of arrears. This group makes up 1% of tenants but accrues 3% of arrears. • 51% of tenants are aged 55 and over but this group collectively make up only 22% of outstanding arrears. 	<ul style="list-style-type: none"> • Staff report that welfare reforms have impacted in terms of debt most significantly on the younger working age population. • Staff report that there has been an increase in requests from working age people to extend council tax repayment plans due to the impact of COVID 19 • Claims for working age CTR in the city has increased from 10772 to 12246 since the pandemic started • The ONS report that young people (aged 16 to 29 years) said that COVID 19 was affecting their work. The most reported impact was a reduction in hours worked (21%). This is reflected in an increase in claims for working age benefits. • 14% of 18-29-year olds have council tax debt compared to 2% of over 50's • 17% of people with children under 5 have council tax arrears 	<ul style="list-style-type: none"> • The COVID 19 impact on top of nearly 10 years of welfare reforms means that a personal debt crisis is emerging: the number of people affected by COVID 19 in severe problem debt has almost doubled since the beginning of the outbreak to 1.2 million people nationally. • The number of people affected who have fallen into arrears or borrowed to make ends meet has increased from 4.6 to 5.6 million nationally. Its estimated that the amount of arrears and borrowing among this group attributable to the impact of coronavirus is now £10.3 billion • Financial difficulty is crystallising into harm: 17% of those who financial situation has been negatively impacted by COVID 19 have experienced one or more forms of hardship since March 2020, including going without meals and rationing basic 	<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household address their budgeting pressures.</p> <p>The following mitigations are applied in addition:</p> <ul style="list-style-type: none"> • Continue to develop and encourage digital inclusion among all age groups • Gather information on the age of those referred to MACS through the Housing Financial Inclusion and Universal Credit contracts • Engage with services that support working age people to ensure sure DHP literature is available to them • Engage with services that support young people to ensure DHP literature is available to them

	<ul style="list-style-type: none"> • 49% of tenants aged 16-54 account for 78% of total arrears. 	<ul style="list-style-type: none"> • COVID 19 has disproportionately some groups who are experiencing difficulty, including young adults who are no longer in education or able to access family support and families with dependent children—particularly single parents—who have been squeezed by falls in income alongside additional costs linked to care for children during the pandemic. • For the older pensioner population, the fear is accessibility, exclusion, and fixed incomes. • For those with children the problem is finding sustainable work and complimentary childcare as a solution to welfare reform impact/ debt, this is being exacerbated by the impact of COVID and particularly on the entertainment, hospitality, and leisure sectors. 	<p>utilities (this compares to 4% among those not affected).</p> <ul style="list-style-type: none"> • Those with financial commitments such as a mortgage who have experienced an income shock due to the pandemic are increasingly struggling: two in five (38%) of those in this group are now worried about paying for essentials. • Tenants of pensionable age have been less affected by the government’s welfare reforms. • However financial exclusion increases with age and older people of working age are more likely to be digitally excluded and be facing issues of debt, food, and fuel poverty • Older people of working age are less likely to be able to find work or increase their hours, which would otherwise exempt them from the impact of welfare reform or address outstanding debt. • Older people over pensionable age tend to be on fixed incomes with very limited capacity to increase their income. 	<ul style="list-style-type: none"> • To promote the single apprenticeship pathway to assist young people into work. • Ensure services that support and engage with people over pensionable age promote energy efficiency grants. • Housing Income Advisors to continue to provide support and advice to vulnerable housing tenants who need additional help to engage. • Support younger housing tenants through the Better Start Guide. • Apply for Alternative Payment Arrangements with the DWP where vulnerable housing tenants are on Universal Credit.
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Protected characteristics groups from the Equality Act 2010	What do you know¹⁰? Summary of data about your service-users and/or staff	What do people tell you¹¹? Summary of service-user and/or staff feedback	What does this mean¹²? Impacts identified from data and feedback (actual and potential)	What can you do¹³? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
			<ul style="list-style-type: none"> • Older people over pensionable age are less capable of adjusting their expenditure on food or heating without compromising their health. • Older people over pensionable age are more likely to have a disability or a long term health problem • Young people are less likely to be able to find work and are less aware of or seek the help of support services or discretions. • Young people are more likely to be over-indebted than older age groups and less likely to seek advice • Single people under 35 affected by the welfare reforms have seen large reductions in their entitlement to housing benefit. • Single people under the age of 25 will be living on the lowest out-of-work income and so will be impacted more adversely than older people as shortfalls in Council Tax and Rent will be proportionately more of their total income. 	
	<ul style="list-style-type: none"> • There are 10,735 	<ul style="list-style-type: none"> • 24% of disabled people report 	<ul style="list-style-type: none"> • Disabled people are likely 	The best practice principles outlined

<p>Disability¹⁵</p>	<p>known households (in receipt of HB or CTR) with at least one member of the household receiving Disability Living Allowance, PIP or Attendance Allowance.</p> <ul style="list-style-type: none"> • A further 1,656 Households are known to be in receipt of ESA. 6,963 households in total with one member in receipt of ESA. • In January 2021 53% of council tenants were recorded as having a disability or long-term health condition. 51% of rent arrears were incurred by tenants with a disability or health problem. • In the same year 49% of the total arrears were attributed to the 47% of tenants with no recorded disability or long-term health condition. 	<p>that their work is being affected by the pandemic</p> <ul style="list-style-type: none"> • 21% of disabled people nationally report that their household finances are being affected by the pandemic. • 62% of disabled people report that their wellbeing is being affected by the pandemic. • Disabled people are more likely to have council tax arrears • 20% of people who had to shield have council tax arrears • The majority of people who claim disability benefits are on legacy benefits rather than Universal Credit. People claiming legacy benefits are excluded from the £20-per-week increase given to people claiming Universal Credit. • Disabled people are more likely than non-disabled people to have experienced difficulty paying household bills as a result of the COVID-19 outbreak (22.1% vs 15.5%) and are more likely to be unable to withstand a sudden, significant emergency bill (43.7% vs 29.7%) • Of people who said their finances had been affected by the pandemic in September 2020, 24.6% of disabled people reported having less money available to spend on food compared with 12.2% of non-disabled people, while 35.6% of disabled people believed their financial position would worsen over the next 12 months compared with 28.8% of non-disabled people • Information gathered by the 	<p>to experience financial difficulties potentially leading to them falling into debt and the COVID 19 pandemic will exacerbate this</p> <ul style="list-style-type: none"> • Higher cost of living for Disabled people and parents of disabled children means that the increased shortfalls created by the Welfare Reforms has seen these families disproportionately impacted. • Some disabled people and parents of disabled children will receive extra premiums in housing benefit which might increase the level of their award. • Physical access issues to some advice services and financial products that would enable them to address debts. • Accessibility issues to online services, such as UC, may create income difficulties. It also inhibits access to lower cost products available via the internet. • In relation to higher likelihood of needing help with housing costs: 28% of disabled people are likely to be low paid (on less than £7/hour), compared with 19% of non-disabled people. • Households with disabled children under the age of 	<p>in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help households address their budgeting pressures.</p> <p>The following mitigations are applied in addition:</p> <ul style="list-style-type: none"> • Where there is arrears Notices of Seeking Possession have not been issued since the pandemic began and this will remain under review. • We will maintain a face to face service, including home visits (when safe to do so), to support people with DHP applications where appropriate. • Where possible working with agencies, social services, and NHS to monitor and feedback the impact to disabled people • When council is procuring advice, contracts make sure that accessibility issues and outreach issues are included in contract specification. • Reorganisation of NHS services should make it easier for people with common Mental Health issues such as anxiety and depression to receive help. • We will look to identifying those in receipt of DLA who are also eligible for Adult Social Care services and link with care management • When people are affected by new benefit entitlement, and who
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		<p>welfare support teams indicated there have been several welfare reform changes that have impacted disabled households.</p> <ul style="list-style-type: none"> • Research suggests that the cumulative impacts of Welfare Reform have had a disproportionately larger impact on disabled people 	<p>5 will have caring commitments preventing them from work, but it is difficult to successfully apply for DLA because of the burden of proof. Therefore, they may be required to job seek and/or not qualify for exemptions from certain Welfare Reforms.</p>	<p>also contribute to the cost of social care services, they can apply for a reassessment of their charges which may then be reduced.</p> <ul style="list-style-type: none"> • Apply for Alternative Payment Arrangements with the DWP where vulnerable housing tenants are on Universal Credit. • The Welfare support teams support households with issues of disability and long-term ill health to access appropriate disability benefits, supporting with both the application process and through the appeals process. They will also support households with Non-Dependents in receipt of disability benefits claim Carers Allowance, to exempt them from the Benefit Cap.
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Protected characteristics groups from the Equality Act 2010	What do you know¹⁰? Summary of data about your service-users and/or staff	What do people tell you¹¹? Summary of service-user and/or staff feedback	What does this mean¹²? Impacts identified from data and feedback (actual and potential)	What can you do¹³? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
		(and carers) and their families than others ¹⁶ . <ul style="list-style-type: none"> • The B&H Child Poverty Needs Assessment identified that families with a child or parent with a disability have a higher risk of living in poverty and less capacity to repay debt • Information suggests people with a learning disability find the most helpful way to communicate is face to face. This isn't always easily accessible, particularly in relation to UC. 	Learning Disabilities: <ul style="list-style-type: none"> • People with learning disabilities are commonly in receipt of low rate DLA care. As there is no low rate under PIP, they could lose their entitlement to disability benefit when they move to PIP, hence reducing their ability to make up their rental shortfall • People with a Learning Disability may face more barriers in seeking advice, in budgeting, understanding Welfare Reforms and managing debt, these could be exacerbated by COVID 19 impact. • People with learning disability often have a representative to help them manage their financial affairs. E.g. An Appointee for benefits this could be more complex due to impact of COVID 19 	<ul style="list-style-type: none"> • The Welfare Support team will continue to link to the advice services in the City and specifically have provided training to Speak out the advocacy service for people with Learning Difficulties. • The Welfare Support team will continue to offer advocacy for people with mental health needs in terms of housing rights, adult social care and with the DWP. • Continue to support the Community Hub COVID response work in collaboration with ASC and Revs and Bens • The council has employed a Mental Health and Debt coordinator • Breathing space legislation to support people who have mental health conditions will be supported and adhered to • Front line staff have and will continue to be provided with Mental health awareness and suicide awareness training

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			<p>Mental Health</p> <ul style="list-style-type: none"> • Being in debt may exacerbate anxiety and stress for some people • Potential increase in demand for (already stretched) Mental Health Services. • National studies suggest that people with mental health issues may face disadvantage in terms of diagnosis by non-specialist staff and in relation to non-compliance with reassessment. In the short term, this can lead to additional financial pressure. • People with mental health issues may face more barriers in seeking advice, in budgeting and managing debt. • Maintaining a claim of both ESA and UC require continued engagement and prompt communication management. Some people with anxiety and mental health issues struggle to read or respond to communication, leaving them more open to sanction or ending of their entitlement. 	

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	<ul style="list-style-type: none"> • An estimated 2,700 city residents identify as transgender (from the 2015 Trans Needs Assessment) • 0.3% of housing tenants identified 	<ul style="list-style-type: none"> • There is limited feedback around transgender issues and debt because of the relatively low numbers. However, evidence from a Trans survey report in the United states in 2015 and the UK Government National LGBT survey in 2019 both showed that transgender people are more 	<p>Trans people face significant barriers to employment and housing and may face discrimination in the workplace. Therefore, they are more likely to be on lower incomes</p>	<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household address their budgeting pressures.</p>

Gender reassignment¹⁷	as transgender	likely to be unemployed, in poverty and homeless. <ul style="list-style-type: none"> Issues of debt, benefits and access to appropriate housing, employment, advice, and financial products are proportionately higher amongst this diversity group. 	and be reliant on benefits. This may mean they are less able to meet shortfalls between benefit and rent or other debt.	The following mitigations are applied in addition: <ul style="list-style-type: none"> Share DHP/DCTR info with organisations that specifically support people for the transgender community through the Advice Services Network Where a persons assigned gender differs from their birth gender the Revenue and Benefits service are legally able to reflect this in decisions about housing benefit.
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Protected characteristics groups from the Equality Act 2010	What do you know¹⁰? Summary of data about your service-users and/or staff	What do people tell you¹¹? Summary of service-user and/or staff feedback	What does this mean¹²? Impacts identified from data and feedback (actual and potential)	What can you do¹³? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Pregnancy and maternity¹⁸	<p>There were 2395 births in Brighton 7 Hove in 2019. A fertility rate of 1.12%, the third lowest in England and Wales. The national rate was 1.65%</p> <p>All 3rd and subsequent children born to households after 6th April 2017 are not eligible for further Child Tax Credit or UC child element payments.</p>	<ul style="list-style-type: none"> • The period around the birth of a child is one of financial pressure as well as emotional pressure and may be accompanied by difficult decisions in relation to accommodation, work and budgets. • Citizens Advice Bureau estimate that 17% of young families with children under 5 have arrears for council tax since COVID 19 started 	<ul style="list-style-type: none"> • COVID 19 has disproportionality impacted young families pushing them into financial hardship • Women who are pregnant and those with very young children will be less able to seek or increase their working hours, reducing their ability to self-mitigate in light of the reduced income caused by Welfare Reform. • With very young children couples adjust their working hours to account for their childcare arrangements. • A baby does not count in terms of family size until it is born. A family with a pregnant person in it who moves to accommodation of a size which takes into account the expected baby will not receive a level of housing benefit which pays for that property until the baby is born leaving a period of occupation where there will be a shortfall. 	<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household address their budgeting pressures.</p> <p>The addition of a child may mean accommodation changes for the household that may conflict with timing of benefit awards. In these circumstances DHP/DCTR is considered to address shortfalls.</p>

Protected characteristics groups from the Equality Act 2010	<ul style="list-style-type: none"> What do you know¹⁰? Summary of data about your service-users and/or staff 	<p>What do people tell you¹¹? Summary of service-user and/or staff feedback</p>	<ul style="list-style-type: none"> What does this mean¹²? Impacts identified from data and feedback (actual and potential) 	<p>What can you do¹³? All potential actions to:</p> <ul style="list-style-type: none"> advance equality of opportunity, eliminate discrimination, and foster good relations
<p>Race/ethnicity¹⁹ Including migrants, refugees and asylum seekers</p>	<p>The below figures are extrapolated from total data for the city compiled in the 2011 Census.</p> <ul style="list-style-type: none"> The 2011 census reveals that one out of five Brighton & Hove residents are from a BME background, whilst one in twelve residents do not consider English to be their first or preferred language. The main languages spoken in Brighton & Hove other than English are Arabic, Polish, Chinese, Spanish and French. In January 2021, housing tenants who identified as Black or Black British made up 3% of the total tenant group but were responsible for 5% of total arrears. Housing tenants who identified as Asian or Asian British made up 3% of the total tenant group. They were responsible for 3% of total arrears indicating that the level of their arrears was average. Housing tenants who identified as mixed ethnicity made up 2% of 	<ul style="list-style-type: none"> Citizens Advice Bureau figures show that since COVID 19 started Black Asian Minority Ethnic (BAME) people are more likely to have council tax arrears, 16% compared to 6% of white people In same period BAME people who are disabled are nearly 4 times more likely to be in council tax arrears than non-disabled white people Customers who do not consider English as their first language have expressed that they find it easier to overcome language barriers when discussing issues face to face. Some groups (particularly Pakistani and Bangladeshi) are less likely to have bank accounts. This will create a barrier to financial inclusion 	<ul style="list-style-type: none"> COVID 19 is pushing Black Asian Minority Ethnic (BAME) citizens into financial hardship Without a bank account a household will not be able to set up direct debits. They may, therefore, be more at risk at not maintaining repayments. * While every attempt is made to produce plain English documents the language around debt can be specialised and difficult to understand particularly if English is not a first language. * In relation to higher likelihood of needing help with housing costs: nearly half of Bangladeshi and Pakistani employees are likely to be low paid (on less than £8.21/hour), compared with 25% 	<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household address their budgeting pressures</p> <p>The following mitigations are applied in addition:</p> <ul style="list-style-type: none"> To improve the data on this diversity group making applications to DHP To monitor the ethnicity data on those affected by the Benefit Cap. To provide interpretation services for persons wishing to make an application for DHP who cannot do so using English language forms Provide interpretation service for people in debt where necessary Work with traveller liaison team to understand if their clients are affected.

	<p>the total tenant group but were responsible for 3% of total arrears.</p>		<p>of White British people (2013 DHP EIA figures extrapolated).</p> <ul style="list-style-type: none">• Gypsies and Travellers may be unable to access financial products and advice services as well as being affected by fuel poverty in light of reduced incomes.• Some different cultures will have different approaches to debt.• Potential for misinformation to be spread within a community.• Employment patterns and earning levels are different for different ethnic groups which would affect the ability of some groups to self-mitigate in light of the reduction in their benefit income or as remedy for debt situations.• The reduction and capping of Local Housing Allowance has impacted disproportionately on black and minority ethnic communities as they are more likely to need larger accommodation due to family size. <p>• Child poverty rates for</p>	
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			<p>black and minority ethnic families in the UK are higher than the national average.</p> <ul style="list-style-type: none">• Increased conditionality for working-age claimants is more likely to impact on black and minority ethnic claimants as they are disproportionately represented among workless households	
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Protected characteristics groups from the Equality Act 2010	What do you know ¹⁰ ? Summary of data about your service-users and/or staff	What do people tell you ¹¹ ? Summary of service-user and/or staff feedback	What does this mean ¹² ? Impacts identified from data and feedback (actual and potential)	What can you do ¹³ ? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Religion or belief²⁰	According to the 2011 census, more than two out of five residents are Christian. Two out of five residents also stated they had no religion. The Muslim community is the largest non-Christian faith group in the city (2.2%).	We have had no specific feedback in relation to religion and belief and recovery of debt.	<ul style="list-style-type: none"> • Some religious groups experience different levels of disadvantage. • Different religious group /cultures have different approaches to debt. • Potential for misinformation to be spread within a religious community. 	<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household and businesses address their budgeting pressures.</p> <p>Link in with Faith Council and attend meetings to pass on any key messages.</p>
Sex/Gender²¹	<ul style="list-style-type: none"> • CTR caseload: Among CTR claimants and their partners, 58% are female and 42% are male, compared with a city profile of residents aged over 16 where 49% are male and 51% are female. • 60% of people of working age living alone are male and 40% female. • 63% of people of pensionable age living alone are female and 37% male. • In January 2021 60% 	<p>Information gathered by the welfare support team indicate that there several welfare reform changes that have potentially had a significant impact on single parent households</p> <p>Feedback from council tax teams suggest single women with young children are more likely to be in debt for council tax</p>	<ul style="list-style-type: none"> • Women are far more likely to be a lone parent (94%) and therefore managing on less income. In such cases they are less likely to be available for work, due to childcare commitments and therefore are limited in their debt remedy options. 	<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the</p>

Protected characteristics groups from the Equality Act 2010	What do you know¹⁰? Summary of data about your service-users and/or staff	What do people tell you¹¹? Summary of service-user and/or staff feedback	What does this mean¹²? Impacts identified from data and feedback (actual and potential)	What can you do¹³? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
	of housing tenants identified as female and 40% as male. These figures include the additional 0.3% of tenants who identified as transgender, depending on their gender identity. <ul style="list-style-type: none"> • Tenants who identified as female were responsible for 64% of the total amount of rent arrears outstanding. 		<ul style="list-style-type: none"> • In relation to higher likelihood of needing help with housing costs: 20% of women are likely to be low paid (on less than £8.21/hour), compared with 10% of men (2013 DHP EIA figures extrapolated). • High cost of childcare in the city poses a disproportionate barrier to women seeking work to avoid the impacts of welfare reform or address debt. • A third of women suffering Domestic Violence have no bank account – transactional / rent²² • Men have a higher risk of homelessness, alcohol and substance misuse and therefore being insecurely housed²³ 	support that can be put into place to help household address their budgeting pressures. The following mitigation is applied in addition: <ul style="list-style-type: none"> • To work with gender specific advice agencies (including through the CVS) and groups through the advice services network to ensure DHP is appropriately promoted to this group and there is access to debt advice.
Sexual orientation²⁴	Brighton & Hove’s State of the City report estimated that at least 14% (38,000 of the 2011 census population) of Brighton & Hove’s adult residents are lesbian, gay, bisexual or transgender.	Count Me In Too Housing Report states that 22% of LGBT respondents had experienced homelessness at some point in their lives.	<ul style="list-style-type: none"> • Stonewall survey of LGBT people show that they are more likely to expect poorer treatment from public services including Social Housing, Criminal Justice and Health Services. • Issues of debt, benefits and access to appropriate housing, employment, advice and financial 	The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household

Protected	What do you	What do people tell	What does this mean¹²? Impacts	What can you do¹³? All potential actions to:
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characteristics groups from the Equality Act 2010	know ¹⁰ ? Summary of data about your service-users and/or staff	you ¹¹ ? Summary of service-user and/or staff feedback	identified from data and feedback (actual and potential)	<ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
			<p>products are proportionately higher amongst sections of this group, particularly lesbians and disabled LGB people</p> <ul style="list-style-type: none"> • Single LGB people under 35 are more likely to be affected by the SRR change as many choose to live alone due to family breakdown or discrimination or harassment.²⁵ Therefore they are likely to have increased debt pressure. 	<p>address their budgeting pressures.</p> <p>The following mitigation is applied in addition:</p> <ul style="list-style-type: none"> • Share DHP/DCTR info with organisations that specifically support people for the LGBT community through the advice services network
Marriage and civil partnership²⁶	There are no known factors in debt and income collection that particularly relate to the marital status of a household	There can be issues relating to joint and several liability if a relationship ends	There are specific legislative requirements, depending on the type of debt, relating to liability or treatment of income and assets. E.g. care costs are individual, benefit assessments are household. However, these do not discriminate between the marital status of the partnership.	The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household address their budgeting pressures.
Community Cohesion²⁷	<p>While debts are an individual household concern the setting of rent levels, council tax levels and business rate levels affect specific communities.</p> <p>COVID 19 has increased benefit take up.</p> <p>COVID 19 has increased council tax debt owed to the</p>	COVID 19 has meant that extra support has been delivered for businesses and households, through national schemes like the furlough and business grants to mitigate the financial impact of the pandemic. This support has reduced the initial impact but in the recovery period businesses and households will need further financial support and a proportionate approach to debt repayment.	<p>The financial impact of COVID 19 crosses over all areas of society. The pandemic is increasing financial hardship in the city.</p> <p>The recovery period will need a joined up supportive approach across government, national and local and the voluntary sector. An ethical and proportionate approach to debt collection should be part of that work.</p> <p>Above inflation rises impact on household/businesses.</p>	<ul style="list-style-type: none"> • The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household address their budgeting pressures. • Revenues & Benefits will continue to administer the COVID Business grant scheme whilst it is in operation. • Housing Services manage the specific relationship with their

	<p>council.</p> <p>Businesses in the city have been supported through the pandemic by a national grant scheme. There is uncertainty about the scheme and support available going forward.</p>	<p>People already think the levels of rent, council tax and business rates are too high, and this affects their ability to repay debt. This will be exacerbated by the impact of COVID 19.</p>		<p>tenants through establish community liaison structures.</p> <ul style="list-style-type: none"> • The budgeting processes that relate to Council Tax levels are fully and openly explained.
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Protected characteristics groups from the Equality Act 2010	What do you know ¹⁰ ? Summary of data about your service-users and/or staff	What do people tell you ¹¹ ? Summary of service-user and/or staff feedback	What does this mean ¹² ? Impacts identified from data and feedback (actual and potential)	What can you do ¹³ ? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
				<ul style="list-style-type: none"> • The national budgeting processes that relate to Business Rate levels are fully and openly explained. • The Economy, Environment and Culture Directorate manage the Council's relationship with the business community through established structures.
Other relevant groups²⁸ Households with children	<p>29,809 households have children in B&H. 24.5% of all households.</p> <p>The child poverty index estimated that 19.6% of children living in B&H live in poverty.</p> <p>A high percentage live in a lone parent household which in turn 88% are headed by women.</p> <p>Most of these are out- of-work families</p>	<p>Households with children with low income often face complex financial situations balancing benefit entitlement, work and childcare.</p>	<ul style="list-style-type: none"> • Single parent households are at a higher risk of poverty. Women make up the majority of those households and often live in social housing. Early evidence suggests that the COVID 19 has hit them harder in the job market – particularly those on low incomes. Moreover, lone parents are likely to lower their working hours with children being at home during lockdowns. A reduction in the household's only income means that more are pushed into financial hardship. • Single parent families are approximately twice as likely as couples to be living on a low income and claiming a benefit. Lone parents in the UK have an employment rate of 59% (compared with 71% for women in two-parent households and 90% for men in two-parent households). • Single parent families with young children are less likely to be able to look for work without support, and 	<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household address their budgeting pressures.</p> <p>The following mitigations are applied in addition:</p> <ul style="list-style-type: none"> • To use information on affected families to share, as appropriate and within the law, with Children's Services to ensure that the families most affected are accessing support that is both holistic and appropriate • Feed information into the Stronger Families Stronger Communities project • Continue to work with Housing Options and Children's Services as part of our Homeless Prevention work

	<p>and women make up 94% of single parent families in B&H.</p>		<p>therefore mitigate the main impacts of the welfare reforms or have capacity to respond to debt.</p> <ul style="list-style-type: none"> • The increasing gap between local Private Sector Rent and LHA may result in families in this tenure choosing to occupy accommodation smaller 	<ul style="list-style-type: none"> • Make sure information on DHPs and benefit changes are available in all Children's Centres through the Family Information Service. • Where appropriate briefings to be sent out to Schools in regard to benefit changes so that teachers can be aware of any financial difficulties a family may be facing and be able to offer them appropriate signposting. • Automatic referral for Stronger Families Stronger Communities families to any Financial Inclusion services agreed as part of the Financial Inclusion Commission
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Protected characteristics groups from the Equality Act 2010	What do you know¹⁰? Summary of data about your service-users and/or staff	What do people tell you¹¹? Summary of service-user and/or staff feedback	What does this mean¹²? Impacts identified from data and feedback (actual and potential)	What can you do¹³? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
			<p>than they require in an attempt to reduce shortfalls in rent / arrears/debt. This will have an impact on the amount of space these children may have to develop, play, study, or on having age or gender appropriate bedroom allocation.</p> <ul style="list-style-type: none"> • Welfare reform has meant shortfalls in income and families have used other benefits to meet their rent and as a result have less money for food, fuel and other essentials and an increase in use of foodbanks. COVID 19 has exacerbated this situation. • The B&H Child Poverty Needs Assessment identified that families with a child or parent with a disability, families with larger numbers of siblings and BME families have a higher risk of living in poverty • Due to the lack of larger family homes in the Social Rented Sector, families with a large number of children may be less able to be suitably accommodated in the social rented sector and therefore, be more likely to have a large shortfall between their rent and the reduced LHA. • Mental Health teams report that parents of children struggling with financial difficulties will inevitably see an impact on their mental health and their parenting. 	<p>.</p>

Protected characteristics groups from the Equality Act 2010	What do you know ¹⁰ ? Summary of data about your service-users and/or staff	What do people tell you ¹¹ ? Summary of service-user and/or staff feedback	What does this mean ¹² ? Impacts identified from data and feedback (actual and potential)	What can you do ¹³ ? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Carers	<p>1,660 households in receipt of Housing Benefit are also in receipt of Carers Allowance.</p> <p>Among all CTR caseload in 2021, approximately 8% of households have a person in receipt of Carer's Allowance.</p> <p>It is estimated by the Carers HUB that there are 23,000 unpaid carers in the city</p>	<p>Caring for someone can often be both emotionally and physically tiring. COVID 19 can bring added worries over not spreading or picking up the virus.</p>	<ul style="list-style-type: none"> • Carers are struggling financially, and significant numbers live in fuel and food poverty as a result of being in debt. These conditions are likely to have been exacerbated by COVID 19 • Young carers are likely to have reduced educational attainment and employment opportunities • Carers are less likely to seek access to advice services and financial products. • Carers of their partners, where there may be a medical or respite need for an additional bedroom, are affected by the SSSC and LHA rules which may place them into debt. • Carers affected by the Benefit Cap may be less 	<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household address their budgeting pressures.</p> <p>The following mitigation is applied in addition:</p> <ul style="list-style-type: none"> • Ensure that the changes to the Carers allowance scheme that have been introduced to mitigate the impact of COVID are communicated to citizens. • To continue to engage with the Carers' Service to appropriately promote DHP. • Continue to support and refer to the carers Hub network

Protected characteristics groups from the Equality Act 2010	What do you know¹⁰? Summary of data about your service-users and/or staff	What do people tell you¹¹? Summary of service-user and/or staff feedback	What does this mean¹²? Impacts identified from data and feedback (actual and potential)	What can you do¹³? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
			<p>able to find work that fits in with their caring role. If they cannot work, they cannot self-mitigate this impact.</p> <ul style="list-style-type: none"> • The cumulative impacts of Welfare Reform have had a disproportionately larger impact on disabled people (and carers) than others²⁹ • A high proportion of carers will also be experiencing some mental health difficulties. This will have an impact upon social care services if care relationships break down under additional stressors such as debt. 	
Domestic violence	We have no consistent data on this diversity group within the city's CTR or HB caseload.	<ul style="list-style-type: none"> • Rise reported that there were 7075 referrals to their service in 2018/19 and from that 3018 clients were support in East Sussex. • Police recorded crime data show an increase in offences flagged as domestic abuse-related during the COVID-19 pandemic, however, there has been a gradual increase in police recorded domestic abuse-related offences over recent years as police have improved their recording of these offences; therefore it cannot be determined whether this increase can be directly attributed to the coronavirus 	<ul style="list-style-type: none"> • COVID 19 has led to an increase in demand for services to support abuse victims. Financial and other forms of coercive control are forms of abuse. • At the point of accessing a domestic violence service, up to a 1/3 of women who are victim/survivors have no bank account • Victim/survivors who flee domestic violence may not have access to ID (because they are unable to take it when they leave, or because the abuser has seized documents), making applications for benefits humiliating and difficult. Due to the circumstances most people in this group will need 	<p>The best practice principles outlined in the Corporate Debt Policy are designed to ensure there is a structure for considering the appropriate actions to take to recover a debt without placing households in hardship. The welfare framework provides specific consideration for the support that can be put into place to help household address their budgeting pressures.</p> <p>The following mitigations are applied in addition:</p> <ul style="list-style-type: none"> • Specialist teams within Revenue and Benefits Services such as the Discretionary Help and Advice Team and the Special Accommodation Team will work closely with refuges in the city and the Council's own Crisis Intervention Team within Housing

		<p>pandemic.</p> <ul style="list-style-type: none"> • There has generally been an increase in demand for domestic abuse victim services during the pandemic, particularly affecting helplines as lockdown measures eased; this does not necessarily indicate an increase in the number of victims, but perhaps an increase in the severity of abuse being experienced, and a lack of available coping mechanisms such as the ability to leave the home to escape the abuse, or attend counselling. • The city completed a Domestic Violence Needs Assessment, undertaking as part of the Intelligent Commissioning Pilot 2010/11. This identified relevant issues, including the links between domestic violence, economic exclusion and work 	<p>support in order to make applications for benefits/crisis support. or address debt.</p> <ul style="list-style-type: none"> • Many victim/survivors will experience financial control and abuse, this can include control over their access to or use of benefits which increase their risk of economic exclusion and limit their ability to prevent debt situations arising or effectively address them. • Universal Credit is paid in full to one member of the household. This could limit a survivor's access to independent financial means that may enable them leaving the relationship. Requesting split payments may further endanger the survivor as this is not possible to do without alerting the partner to the change. • A significant number of those experiencing domestic violence (and other forms of violence against women and girl, including sexual violence) are likely to leave their settled accommodation to escape it. This may create debt situations. • Alternatively, the abuser may leave or may be required to leave, which may reduce the resources available to the household and a possible unaffordable debt legacy. • If victim/survivors leave settled accommodation they may be 'hidden' because they spend time living with friends or relatives or are sleeping rough. • Debts may escalate because they are a low priority in the context of the trauma being 	<p>Options to ensure that those fleeing domestic violence and other forms of violence against women and girls (including sexual violence) are given access to all discretionary support available in the most consistent way and with a holistic approach.</p> <ul style="list-style-type: none"> • Specialist teams have access to appropriate training around the identification and response to domestic violence and other forms of violence against women and girls (including sexual violence) • Engage with specialist services that support victim/survivors to ensure sure DHP/DCTR literature is available to them • We will continue to use all administrative discretion available to us to protect the security of people affected by DV when making an application for Housing Benefit or DHP or addressing debt issues. • To work with the Violence against Women and Girls Commissioner within relevant partnership structures to ensure the message is communicated as effectively as we can
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			<p>suffered.</p> <ul style="list-style-type: none">• Debts may escalate because the behaviour of the customer is effectively treated as avoidance in the absence of any information.• Debt problems may be difficult to address without compromising confidentiality.	
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			<ul style="list-style-type: none"> • Victim/survivors may not access services because they are not aware of what is available, their entitlements or are not able to do so. They may also have additional vulnerabilities (including mental health, substance use or immigration issues) • Victim/survivors may present at services, including those provided by the Council, in crisis or in distress. They may also make disclosures to Council Officers which need to be identified and responded to appropriately. 	

Protected characteristics groups from the Equality Act 2010	What do you know ¹⁰ ? Summary of data about your service-users and/or staff	What do people tell you ¹¹ ? Summary of service-user and/or staff feedback	What does this mean ¹² ? Impacts identified from data and feedback (actual and potential)	What can you do ¹³ ? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Cumulative impact³⁰	<ul style="list-style-type: none"> • There are approx. 131,000 households in the city and 10,000 businesses • According to the Office of National Statistics British household debt is the highest level ever recorded • Nationally the ONS reported that the least wealthy 50% of households held 36% of total household debt in April 2016 to March 2018, but whilst they held less debt their total debt was a relatively large proportion of their total wealth, with less wealthy households being more likely to have financial debt. 	<p>COVID has had an economic impact on the least wealthy households. This is on top of the impact the welfare reforms of last 10 years have had. Households and businesses are contacting the council because they are struggling to pay.</p>	<ul style="list-style-type: none"> • There is likely to be a higher demand for debt advice and welfare support. We are making more long-term payment arrangements to settle arrears. • This may mean it may take a longer period to address an individual debt and this may reflect in short term performance indicators. 	<p>The Corporate Debt Policy specifically promotes an ethical best practice approach that incorporates fairness in actions of debt collection. This fairness approach includes the consideration of all protected characteristics.</p> <ul style="list-style-type: none"> • Monitor application and take up of DHP/DCTR by protected characteristic, keep this under review and amend this assessment, and its mitigations as appropriate • The Revenues and Benefit and Housing services will continue to signpost customers affected by Housing Benefit shortfalls to appropriate channels of advice Where the council has information about a protected characteristic the council will take this into account when making a decision about DHP/DCTR. • The Revenues and Benefits team will continue to publicise and promote the DHP/DCTR scheme • The Revenues & Benefits team will provide training and information to staff from other services who work with service users who may be able to claim DHP/DCTR. This may include staff working for the NHS who have direct or ongoing involvement with • families.

Assessment of overall impacts and any further recommendations³¹

The Corporate Debt Policy specifically promotes an ethical best practice approach that incorporates fairness in actions of debt collection. This fairness approach includes the consideration of all protected characteristics. Collection of income and debt is an essential function to the council's financial health, but the policy provides assurance that we recover money with appropriate sensitivity to individual circumstances.

4. List detailed data and/or community feedback that informed your EIA

Title (of data, research or engagement)	Date	Gaps in data	Actions to fill these gaps: who else do you need to engage with? (add these to the Action Plan below, with a timeframe)
Financial Inclusion Strategy EIA: http://www.brighton-hove.gov.uk/downloads/bhcc/equalities/Financial_Inclusion_Strategy_EIA_Final.doc	2013	None	N/a
Council Tax Reduction Equality Impact Assessment	2018	None	N/a
http://raceequalityfoundation.org.uk/housing/new-research-on-the-impact-of-welfare-reforms/	2018	The EIA and these reports contain data sources from reports 2011 to date	Annually review the EIA with the most recent data available

Discretionary Housing Payment EIA	2013	None	N/a
Housing Income Management EIA	2018	None	N/a
Coronavirus and the social impacts on young people in Great Britain - Office for National Statistics (ons.gov.uk)	2020	None	N/A
StepChange Tackling the Coronavirus personal debt crisis	2020	None	N/A
Women and single parents most impacted by effects of COVID-19 on social housing - UEA	2021	None	N/A
Unavoidable debt - Coronavirus council tax debt Citizens Advice Bureau	2020	None	N/A
Local Moneyworks view on council debt collection approach	2021	None	N/A

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5. Prioritised Action Plan³²

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.				
All groups	Ensured the Corporate Debt Policy is fully applied across the council	Improved ethical collection performance and improved consideration of individual circumstances in designing recovery making suitable recovery arrangements	No incident of found complaint relating to inequality in the collection of debt on behalf of the council	Continuous
All groups	Ensure the Corporate Welfare Board implements a strategy through the welfare framework that provides a holistic support network to citizens in financial hardship and best mitigates the impact of COVID 19 with the resources available		Remedy, support or advice for every customer approaching the council with welfare reform related debt issues	Continuous
All groups	Ensure that the further actions listed above are reviewed fully	Progress against further actions listed above is reviewed in next EIA	Number of actions delivered	Continuous