

City of York Council
Equalities Impact Assessment

Who is submitting the proposal?

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| Directorate: | Customer & Communities | | |
| Service Area: | Customer and Exchequer Services | | |
| Name of the proposal : | Debt Pilot | | |
| Lead officer: | David Walker | | |
| Date assessment completed: | 08 February 24 | | |
| Names of those who contributed to the assessment : | | | |
| Name | Job title | Organisation | Area of expertise |
| Susan Wood | Welfare Benefits & Strategic Partnership Manager | CYC | Welfare Benefits |
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Step 1 – Aims and intended outcomes

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| 1.1 | What is the purpose of the proposal? Please explain your proposal in Plain English avoiding acronyms and jargon. |
| | This EIA relates to a debt pilot undertaken across 2022/23 to better understand residents debt issues and broader problems asking those residents in Council Tax arrears to voluntarily participate in the pilot. The attached paper provides the outcomes and findings of the pilot along with a set of recommendations. |
| 1.2 | Are there any external considerations? (Legislation/government directive/codes of practice etc.) |
| | www.gov.uk/government/publications/council-tax-collection-best-practice-guidance-for-local-authorities/council-tax-collection-best-practice-guidance-for-local-authorities |
| 1.3 | Who are the stakeholders and what are their interests? |
| | All residents in the city who are in council tax arrears, staff, community sector organisations. |
| 1.4 | What results/outcomes do we want to achieve and for whom? This section should explain what outcomes you want to achieve for service users, staff and/or the wider community. Demonstrate how the proposal links to the Council Plan (2019- 2023) and other corporate strategies and plans. |
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| | <p>This work is directly related to the council’s Affordability core commitment. The report includes recommendations to explore ways to best support residents in financially vulnerable households who are struggling to pay their council tax. The outcomes include:</p> <ol style="list-style-type: none"> 1. Trying to reduce debt for residents not just Council Tax but all debts 2. Gain a broader understanding of what debts residents have 3. Understand the added complexities arising from debt e.g. mental health problems 4. Produce an action plan/recommendation to try and address the issues 5. By taking action try to improve resident wellbeing |
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Step 2 – Gathering the information and feedback

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| 2.1 | What sources of data, evidence and consultation feedback do we have to help us understand the impact of the proposal on equality rights and human rights? Please consider a range of sources, including: consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, the views of equality groups, as well your own experience of working in this area etc. | |
| | Source of data/supporting evidence | Reason for using |
| | City of Council Tax Debt Recovery Project Report | Provides evidence of current provision & indicates financial vulnerability |
| | City of York Council: Council Tax Debt Recovery: Snapshot Conversations 2022 – Healthwatch York | Stakeholder feedback from residents affected by council tax arears |
| | City of York Council: Council Tax Debt Recovery - Centre for Housing Policy | Stakeholder feedback including CYC Council Tax and revenues staff, LAC’s, Citizens Advice York |
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Step 3 – Gaps in data and knowledge

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| 3.1 | What are the main gaps in information and understanding of the impact of your proposal? Please indicate how any gaps will be dealt with. | | |
| Gaps in data or knowledge | | Action to deal with this | |
| There are no obvious gaps in the data we hold other than knowing exactly the financial position of individual households | | The proposals look to help people in arrears get individual advice and support on their circumstances. | |
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Step 4 – Analysing the impacts or effects.

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| 4.1 | Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments? Remember the duty is also positive – so please identify where the proposal offers opportunities to promote equality and/or foster good relations. | | |
| Equality Groups and Human Rights. | Key Findings/Impacts | Positive (+) Negative (-) Neutral (0) | High (H) Medium (M) Low (L) |
| Age | Will provide support to people affected by Council Tax arrears | + | H |
| Disability | Will provide support to people affected by Council Tax arrears | + | H |

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| Gender | Will provide support to people affected by Council Tax arrears | + | H |
| Gender Reassignment | Will provide support to people affected by Council Tax arrears | + | H |
| Marriage and civil partnership | Will provide support to people affected by Council Tax arrears | | |
| Pregnancy and maternity | Will provide support to people affected by Council Tax arrears | + | H |
| Race | Will provide support to people affected by Council Tax arrears | + | H |
| Religion and belief | Will provide support to people affected by Council Tax arrears | | |
| Sexual orientation | Will provide support to people affected by Council Tax arrears | | |
| Other Socio-economic groups including : | Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes? | | |
| Carer | Will provide support to people affected by Council Tax arrears | + | H |
| Low income groups | Will provide support to people affected by Council Tax arrears | + | H |
| Veterans, Armed Forces Community | Will provide support to people affected by Council Tax arrears | + | H |
| Other | | | |
| Impact on human rights: | | | |

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| List any human rights impacted. | n/a | | |
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Use the following guidance to inform your responses:

Indicate:

- Where you think that the proposal could have a POSITIVE impact on any of the equality groups like promoting equality and equal opportunities or improving relations within equality groups
- Where you think that the proposal could have a NEGATIVE impact on any of the equality groups, i.e. it could disadvantage them
- Where you think that this proposal has a NEUTRAL effect on any of the equality groups listed below i.e. it has no effect currently on equality groups.

It is important to remember that a proposal may be highly relevant to one aspect of equality and not relevant to another.

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| <p>High impact (The proposal or process is very equality relevant)</p> | <p>There is significant potential for or evidence of adverse impact The proposal is institution wide or public facing The proposal has consequences for or affects significant numbers of people The proposal has the potential to make a significant contribution to promoting equality and the exercise of human rights.</p> |
| <p>Medium impact (The proposal or process is somewhat equality relevant)</p> | <p>There is some evidence to suggest potential for or evidence of adverse impact The proposal is institution wide or cross-Unit, but mainly internal The proposal has consequences for or affects some people The proposal has the potential to make a contribution to promoting equality and the exercise of human rights</p> |
| <p>Low impact (The proposal or process might be equality relevant)</p> | <p>There is little evidence to suggest that the proposal could result in adverse impact The proposal operates in a limited way The proposal has consequences for or affects few people The proposal may have the potential to contribute to promoting equality and the exercise of human rights</p> |

Step 5 - Mitigating adverse impacts and maximising positive impacts

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| 5.1 | Based on your findings, explain ways you plan to mitigate any unlawful prohibited conduct or unwanted adverse impact. Where positive impacts have been identified, what is been done to optimise opportunities to advance equality or foster good relations? |
| There is no unlawful prohibited conduct issues associated with the debt pilot, accompanying report and the recommendations. There are no adverse impacts arising from the pilot or recommendations on any of the groups as all should benefit where they are in arrears. The key groups are those on low income in any of the categories within the EIA. | |

Step 6 – Recommendations and conclusions of the assessment

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| 6.1 | Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take: |
| - No major change to the proposal – the EIA demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality and foster good relations, subject to continuing monitor and review. | |

- **Adjust the proposal** – the EIA identifies potential problems or missed opportunities. This involves taking steps to remove any barriers, to better advance quality or to foster good relations.
- **Continue with the proposal** (despite the potential for adverse impact) – you should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations under the duty
- **Stop and remove the proposal** – if there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the proposal altogether. If a proposal leads to unlawful discrimination it should be removed or changed.

Important: If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column.

| Option selected | Conclusions/justification |
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| Continue with the proposal | The recommendations look to provide support to low income households and those households experiencing financial difficulties across the city. It is open to all residents. |

Step 7 – Summary of agreed actions resulting from the assessment

| 7.1 What action, by whom, will be undertaken as a result of the impact assessment. | | | |
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| Impact/issue | Action to be taken | Person responsible | Timescale |
| N/A | | | |
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Step 8 - Monitor, review and improve

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| 8. 1 | <p>How will the impact of your proposal be monitored and improved upon going forward? Consider how will you identify the impact of activities on protected characteristics and other marginalised groups going forward? How will any learning and enhancements be capitalised on and embedded?</p> |
| | <p>Data is collected on council tax arrears, Council Tax Support and discretionary council tax reduction. We will report back to FISG on progress on the recommendations. We will seek opportunities for feedback from people in Council Tax arrears on their experiences.</p> |