

Equality Impact and Outcome Assessment (EIA)

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

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)**

Title of EIA	Corporate Debt Policy	ID No.FR13	
Team/Department	Corporate Debt Team. Welfare Revenues & Benefits Support		
Focus of EIA	<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.</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 2025 Policy, particularly in relation to protected characteristics groups defined in the Equalities Act 2010 and other relevant groups.</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 Framework', a network of internal and voluntary sector services that combine to provide a comprehensive range of support.

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.

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.

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.

1. 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"> • 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, and the system is aligned with digital MyAccount programme. Currently in test. • 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 coordinated so that where there is financial or other vulnerability citizens are referred to support options. • Increased collaboration with community voluntary sector debt advice organisations • Cross government collaboration with HMRC and DWP to enable ethical and proportionate debt collection. To be Business As Usual in 2024/25 • 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 <p>Result</p>	<ul style="list-style-type: none"> • The Household Support Fund (which is vital to welfare support function) is currently extended to 31 March 2026. If this is withdrawn or, more likely, the funding model is changed considerably, then this EIA will need revisiting. • Front line staff have and will continue to be provided with Mental health awareness and suicide awareness training. Ensure this training is continued • To be aware of advice documents in debt management published ad hoc by central government, advice sector and other professional bodies • Promote adoption of Standard Financial Statement (SFS) across all debt hubs in council to support ethical and sustainable repayment arrangements for citizens in debt. Add to EIA if successful • Monitor pilot of Economic Abuse Evidence Form project from Money Advice Plus and Surviving Economic Abuse.. Training for this is on 09/08/24 after that a panel made up of reps from all debt hubs will meet every time we get a new submission. Add to EIA if successful • Monitor Special Value from the contracts of the External Enforcement Agents into the Fairness Fund.

<u>Further Actions taken from last EIA 2021</u>		
Complete the roll out of Breathing space regulations -inclusive of Mental health elements	Completed	
Ensure adoption of Standard Financial Statement (SFS) across all debt hubs in council to support ethical and sustainable repayment arrangements for citizens in debt	Added to Further Actions	
The Welfare Rights 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	Funding to March 26. Added to Further Actions	
The Welfare rights team will continue to offer advocacy for people with mental health needs in terms of housing rights, adult social care and with the DWP.	Funding to March 26. Added to Further Actions	
Front line staff have and will continue to be provided with Mental health awareness and suicide awareness training	Added to Further Actions	
Housing Income Advisors to continue to provide support and advice to vulnerable housing tenants who need additional help to engage.	HIMT continue to work on a case by case basis to support vulnerable tenants in debt	
Apply for Alternative Payment Arrangements (APA) with the DWP where vulnerable housing tenants are on Universal Credit.	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.	
We will maintain a face to face service, including home visits, to support people with DHP applications where appropriate	DHP applications are dealt with over the phone currently.	
Provide interpretation service for people in debt	Council continues to offer interpretation service to	

where necessary	support people where English is not their first language, so they understand the options they have if they are in debt to the council and how to get support.	
Work with traveller liaison team to understand if their clients are affected.	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.	

2. Review of information, equality analysis and potential actions

Protected characteristics groups from the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Age	<ul style="list-style-type: none"> • Brighton & Hove has an unusual population compared to the South East and England. Brighton & Hove has a much higher proportion of people aged 19–38 years (33%, 90,100 people) compared to only 24% in the South East and 26% in England. • The difference is most pronounced between the ages 19 to 28 years old. Nearly a fifth of Brighton & Hove's total population (18%, 49,600 people) is aged 19 to 28 compared to only 11% in the South East and 12% in England. There are also fewer people across all ages from the age of 60 years. In Brighton & Hove less than a fifth of the total population (19%, 53,000 people) is aged 60 years or older compared to 25% in the South East and 24% in England. • Brighton & Hove has a relatively large proportion of older people living alone and a higher percentage of older people who are income deprived. 	<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. • 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 	<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 	<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. • The following mitigations are applied in addition: • Continue to develop and encourage digital inclusion among all age groups • 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
Age..cont'd				

	<ul style="list-style-type: none">• Over a third of elderly persons live alone, aged 66+. 13,875 people• One in five over the age of 60, 9,900 people live in income deprivation, higher than the national average• Above Info from Brighton & Hove JSNA summary March 2024 Population		their total income.	with the DWP where vulnerable housing tenants are on Universal Credit.
Protected characteristics groups from the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none">• advance equality of opportunity,• eliminate discrimination, and• foster good relations

<p>Disabilities</p>	<ul style="list-style-type: none"> • The percentage of people living with long-term health conditions increases exponentially with age In 20-24 year olds 74% have no long-term conditions and up to the age of 50 years the majority of people in Brighton & Hove still have no long-term conditions. At 50-54 years, 22% have multiple long-term conditions, rising to 48% of those aged 65-69 years and 81% of those aged 85-89 years • There are 10,735 known households (in receipt of HB or CTR) with at least one member of the household receiving Disability Living Allowance, PIP or Attendance Allowance. • A further 1,656 Households are known to be in receipt of Employment and Support Allowance ESA. 6,963 households in total with one member in receipt of ESA. 	<ul style="list-style-type: none"> • Disabled people are more likely to have council tax arrears • The majority of people who claim disability benefits are on legacy benefits rather than Universal Credit. • 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. 	<ul style="list-style-type: none"> • Disabled people are likely to experience financial difficulties potentially leading to them falling into debt • 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. • Households with disabled children under the age of 5 will have caring commitments preventing them from work. • People with a Learning Disability may face more barriers in seeking advice, in budgeting, understanding Welfare Reforms and managing debt, People with learning 	<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 households address their budgeting pressures. • The following mitigations are applied in addition: • We will attempt to maintain a face to face service, including home visits, 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.
<p>Disabilities..cont'd</p>	<ul style="list-style-type: none"> • The percentage of GP registered patients with a long-standing health condition is 52% in Brighton & Hove • Over 17,000 working age adults have a physical disability. • There are 50,900 adults aged 20 years or over in Brighton & Hove recorded as having multiple long- 			

<p>Disabilities..cont'd</p>	<p>term health conditions (two or more) June 2023, just under a quarter of the population (22%) . Just over 19,000 people have both mental and physical health long-term conditions (8%) June 2023.</p> <ul style="list-style-type: none"> • Brighton & Hove has above average levels of mental health issues and higher rates of suicide deaths. 12.9% adults (35,700 people) are on GP Practice Depression register and 4,300 people with severe mental illness (1.3%) 2020/21 • Nearly one in five residents (18.7%, 51,797 people) are disabled • Source Census 2021 and B&H MLTC JSNA 2018 Exec Summary FINAL 		<p>disability often have a representative to help them manage their financial affairs eg; an appointee for benefits</p> <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. • The move from legacy benefits to UC may cause 	<ul style="list-style-type: none"> • We will look to identifying those in receipt of DLA who are also eligible for Adult Social Care services and link with care management • Apply for Alternative Payment Arrangements with the DWP where vulnerable housing tenants are on Universal Credit. • The Welfare Rights and Welfare Reform 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. • The Welfare Rights 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 rights team will continue to offer advocacy for people with mental health needs in terms of housing rights, adult social care and with the DWP. • Breathing space legislation
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			several issues and possible reduction to income.	<p>to support people who have mental health conditions will be supported and adhered to</p> <ul style="list-style-type: none">• Front line staff have and will continue to be provided with Mental Health awareness and suicide awareness training•
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Protected characteristics groups from the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Gender reassignment	<ul style="list-style-type: none"> • At least one in a hundred residents aged 16+ (1.0%, 2,341 people) identify as Trans (England 0.5%) from 2021 Census 	<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 likely to be unemployed, in poverty and homeless. • Issues of debt, benefits and access to appropriate housing, employment, advice and financial products are proportionately higher amongst this diversity group. 	<ul style="list-style-type: none"> • Trans people face significant barriers to employment and housing and may face discrimination in the workplace. They are more likely to be on lower incomes and be reliant on benefits. • This may mean they are less able to meet shortfalls between benefit and rent or other debt. 	<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. • The following mitigations are applied in addition: • 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.

Protected characteristics groups from the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Pregnancy and maternity	<ul style="list-style-type: none"> • There were 2,099 live births in 2021 Source ONS • 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. 	<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. 	<ul style="list-style-type: none"> • 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. 	<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. • 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.

Protected characteristics groups from the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Race/ethnicity Including migrants, refugees and asylum seekers	<ul style="list-style-type: none"> • % in brackets are for England. • From 2021 census; 26% of people are Black or racially minoritised* (27%): • 4.8% Asian or Asian British (10%) • 2.0% Black or Black British (4%) • 4.8% Mixed or multiple ethnic group (3%) • 1.1% Arab (0.6%) • 11.5% White Irish or White other (8%) • Between 2016 and 2019, while white British households had an average income of £518 per week; Black African, British and Caribbean had an average of £408; Bangladeshi households had an average of £365 and Pakistani households had an average of £334. • Over a two-year period between 2016 and 2018, ONS reported that while White British people had an average household wealth (including property, savings and pension) of £590,400 and Indians had £493,800, Black Caribbean people had £379,200; Pakistani 	<ul style="list-style-type: none"> • 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"> • 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. * • For 9.1% of people, English is not their main language (9%) • 1.0% do not speak English well (1.6%) Source 2021 census • 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. Different types of debt and size of debt affect behaviour 	<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 • • The following mitigations are applied in addition: • • 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.

Race/ethnicity..cont'd	<p>people had £302,100; Black African people had £147,300 and Bangladeshi people had £141,100.</p> <ul style="list-style-type: none">• Source Institute Race Relations• Black, Asian and minority ethnic communities have significantly lower levels of savings or assets than White British communities. For every £1 of White British wealth, Pakistani households have around 50p, Black Caribbean around 20p, and Black African and Bangladeshi around 10p• Source Fair4All Finance• In particular, between 2019/20 and 2021/22, around half of people in Pakistani (51%) and Bangladeshi (53%) households lived in poverty, with even higher poverty levels for children in those households (61% and 62%). In comparison, 25% of children in households headed by someone of white ethnicity were in poverty• Source Joseph Rowntree Foundation https://www.jrf.org.uk/uk-poverty-2024-the-essential-guide-to-understanding-poverty-in-the-uk			
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Protected characteristics groups from the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Religion or belief	<ul style="list-style-type: none"> • 55.2% of people have no religion or belief (37%): • 30.9% Christian (46%) • 3.1% Muslim (6.7%) • 0.9% Jewish (0.5%) • 0.9% Buddhist (0.5%) • 0.8% Hindu (1.8%) • 0.1% Sikh (0.9%) • 1.0% Other religion (0.6%) • England figures in brackets. Source census 2021 	<ul style="list-style-type: none"> • 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. 	<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 and businesses address their budgeting pressures.

Protected characteristics groups from the Equality Act 2010	What do you know? <ul style="list-style-type: none"> Summary of data about your service-users and/or staff 	What do people tell you? <ul style="list-style-type: none"> Summary of service-user and/or staff feedback 	What does this mean? <ul style="list-style-type: none"> Impacts identified from data and feedback (actual and potential) 	What can you do? <p>All potential actions to:</p> <ul style="list-style-type: none"> advance equality of opportunity, eliminate discrimination, and foster good relations
Sex/Gender	<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% 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. Tenants who identified as female were responsible for 64% of the total amount of rent arrears outstanding. The gender pay gap has been declining slowly over time. Over the last decade it has fallen by approximately a quarter among both full-time employees and all employees. 	<ul style="list-style-type: none"> Information gathered by the welfare reform team indicate that there several welfare reform changes that have potentially had a significant impact on single parent households Feedback from council tax teams suggest single women with young children are more likely to be in debt for council tax 	<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. High cost of childcare in the city poses a disproportionate barrier to a lone parent seeking work. 	<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. The following mitigation is applied in addition: 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

<p>Sex/Gender..<i>cont'd</i></p>	<ul style="list-style-type: none"> • In 2023, the gap among full-time employees increased to 7.7%, up from 7.6% in 2022. This is still below the gap of 9.0% before the coronavirus (COVID-19) pandemic in 2019. Among all employees, the gender pay gap decreased to 14.3% in 2023, from 14.4% in 2022, and is still below the levels seen in 2019 (17.4%). Source ONS 			
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Sexual orientation	<ul style="list-style-type: none"> • Brighton & Hove has the highest proportion of residents identifying as lesbian, gay, or bisexual (LGB+) in England. More than one in ten residents aged 16 or over (10.6%, 25,375 people) identify with an LGB+ sexual orientation. This is three times the percentage found in both the South East (3.1%) and England (3.1%) and the highest seen in any upper tier local authority in England • Census infographic 2021 	<ul style="list-style-type: none"> • Count Me In Too Housing Report states that 22% of LGBT respondents had experienced homelessness at some point in their lives. • Count Me In Too ended 2008 but this stat may still be relevant. 	<ul style="list-style-type: none"> • LGBTQ people experience worse outcomes than the general population in most, if not all, areas of health and care. The reasons for this are multiple: lack of provision of appropriate services, difficulty and resistance to accessing, and discrimination within, services, and lack of knowledge and understanding of the specific health needs of and risks for LGBTQ people. There are significant evidence gaps due to a lack in data collection and research, but where evidence exists it paints a stark picture of LGBTQ people's unmet needs. • Above from National LGB&T Partnership 2018 	<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 address their budgeting pressures. <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

Sexual orientation cont'd			<ul style="list-style-type: none"> • LGBTQ people still too often face hostility and are inappropriately treated because of their gender identity, trans status and/or sexual orientation. Additional barriers in secondary care include single sex accommodation, where trans and gender non-conforming LGB patients may be made to feel uncomfortable and discriminated against by staff and other service users. • Findings from Pride in Practice and Out Loud - Written submission from the National LGB&T Partnership (HSC0033) to Parliament 	
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Marriage and civil partnership	<ul style="list-style-type: none"> • There are no known factors in debt and income collection that particularly relate to the marital status of a household • 33% of people aged 16+ are married or in a civil partnership (45%) • 52.2% Never married/civil partnership (38%) • 2.0% Separated (2%) • 8.8% divorced/civil partnership dissolved (9%) • 4.2% widowed / surviving civil partnership partner (6%) • UK average in brackets. Census 2021 	<ul style="list-style-type: none"> • There can be issues relating to joint and several liability if a relationship ends • In council tax for example partners are sometimes not recorded for liability 	<ul style="list-style-type: none"> • 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. 	<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.

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
Other relevant groups Households	<ul style="list-style-type: none"> • Brighton & Hove has 121,401 households with at least one resident. The average household size in Brighton & Hove is still smaller than seen in both the South East (2.39) and England (2.37) and is the smallest among all upper tier local authorities in the South East. • More than a third of households (35%, 42,101 homes) in Brighton & Hove are single person households, higher than seen in the South East (28%) and England (30%). A third of single person households (13,875 homes) and one in ten of all households (11%) are households with a single person aged 66 or older living there, this is also higher than seen in the South East (13%) and England (13%).). 	<ul style="list-style-type: none"> • Households with children with low income often face complex financial situations balancing benefit entitlement, work and childcare. 	<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. 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 therefore mitigate the main impacts of the welfare reforms or have capacity to respond to debt. 	<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.

<p>Other relevant groups Households..cont'd</p>	<ul style="list-style-type: none"> Nearly a quarter of households (24%, 28,687 homes) contains a dependent child aged under 16, lower than seen in the South East (29%) and England (28%). However, we have a similar proportion on lone parent households (6%, 7,229 homes) as the South East (6%) and England (7%). Compared to the 2011 Census, the number of lone parent families has fallen by 16% (1,408 homes). Census 2021. UK figure in brackets) Over one-quarter (27%) of households reported that they did not have enough savings to cover a 25% fall in household employment income The households that were most likely to report this, and therefore the least financially resilient, were lone parents with dependent children (55%), renters (48%), households with a Black, African, Caribbean, or Black British head (53%), households where the head had a routine or semi-routine occupation (46%), and households where the head had a limiting disability or longstanding illness (34%) 		<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 The B&H Child Poverty Needs Assessment 2010 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 Mental Health teams report that parents of children struggling with financial difficulties will inevitably see an impact on their mental health and their parenting. 	
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<p>Other relevant groups Households..<i>cont'd</i></p>	<ul style="list-style-type: none"> • Around 4 in 10 (40%) adults reported that affording their rent or mortgage payments were very or somewhat difficult; groups more likely to report this included Asian or Asian British adults (56%), Black, African, Caribbean or Black British adults (51%), and lone adults living in a household with at least one dependent child (61%) • Around 3 in 10 of adults (29%) reported an inability to afford an unexpected expense of £850; this proportion was 40% among disabled adults and 53% among renters, and increased to 66% among disabled adults who were renting • Around 1 in 20 (5%) adults reported running out of food and not being able to afford more; this proportion was 8% among parents living with a dependent child and 13% among renters, and increased to 21% among renters who were parents living with a dependent child • • ONS Dec 2023 General Survey UK; 			
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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: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Carers	<ul style="list-style-type: none"> • 1 in 6 (16%) unpaid carers are in debt as a result of their caring role and their financial situation, increasing to 2 in 5 (40%) for unpaid carers in receipt of Carer's Allowance. • The proportion of carers unable to afford their utility bills has more than doubled since last year – from 6% in 2021 to 14% in 2022. • Those in receipt of Carer's Allowance are also more likely to be cutting back on food and heating (35%) compared to all carers (25%). Nearly 8% of unpaid carers in receipt of Carer's Allowance are using food banks to cope with the cost of living crisis, compared to 5% of all unpaid carers. 	<ul style="list-style-type: none"> • Caring for someone can often be both emotionally and physically tiring. 	<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. • 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 LHA rules which may place them into debt. • Carers affected by the Benefit Cap may be less able to find work that fits in with their caring role. If they cannot work, they cannot self-mitigate this impact. • The cumulative impacts of Welfare Reform have had a disproportionately larger impact on disabled people (and carers) than others. 	<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. • The Care Act 2014 recognises the equal importance of supporting carers and the people they care for. • The Care Act gives carers the right to receive support from their local authority if they have eligible needs. You can get this support through a carer's assessment. • If you care for someone, you have a legal right to have your caring needs assessed.

<p>Carers...cont'd</p>	<ul style="list-style-type: none"> • Carers who care for longer and provide more hours of care per week are more likely to be struggling financially. The proportion of people caring for over 5 years are almost twice as likely to be struggling to afford the cost of food (20%) and be in debt (19%) compared to people caring for less than 5 years (11% and 9% respectively) • From Carers UK Oct 2022 		<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • A carer's assessment should look at all your needs. This includes the things you would like to be able to do in your daily life. Your needs should be written down in a support plan. • You can get a personal budget and direct payments from the local authority to pay for services.
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Protected characteristics groups from the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
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<p>Domestic violence</p>	<ul style="list-style-type: none"> • We have no consistent data on this diversity group within the city's CTR or HB caseload. 		<ul style="list-style-type: none"> • 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 support to make applications for benefits/crisis support. or address debt. • 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. 	<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. • 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 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. • 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.
<p>Domestic</p>				

violence...cont'd

Domestic

- 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 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 suffered.
- Debts may escalate because the behaviour of the customer is effectively treated as avoidance in the absence of any information.

<p>violence...cont'd</p>			<ul style="list-style-type: none"> • Debt problems may be difficult to address without compromising confidentiality • 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. 	
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Protected characteristics groups from the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts identified from data and feedback (actual and potential)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Cumulative impact	<ul style="list-style-type: none"> • From JSNA estimated number of residents in Brighton & Hove is 278,000 • Census 2021- 121,401 homes • Communal establishments One in 33 Brighton & Hove residents (3.1%, 8,505 people) live in a communal establishment • More than a third of households (35%, 42,101 homes) in the city are single person households • Housing tenure: nearly a third of households (33%, 39,684 households) in the city rent privately • Accommodation type: A fifth of households (20%, 23,803 households) live in a flat or bedsit in a converted or shared house • The city's international migrant population has increased by 27% or 11,500 people since the 2011 Census • Ethnicity: the number of Black and Racially Minoritised residents has increased by 35% or 18,921 people since the 2011 Census 	<ul style="list-style-type: none"> • The welfare reforms and austerity of past 14 years have had a detrimental effect on the least wealthy households.. 	<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 takes a longer period to address an individual debt and this may reflect in short term performance indicators. 	<ul style="list-style-type: none"> • 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.
Cumulative				

	<ul style="list-style-type: none">• Private rents rose to an average of £1,723 in March 2024, an annual increase of 9.0% from £1,581 in March 2023. This was higher than the rise in the South East (8.2%) over the year.• 12.3% of the population was income-deprived in 2019.			
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3. List detailed data and/or community feedback that informed your EIA

2024/25 sources used for research	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)
Adults with long term conditions in Brighton and Hove full report 2018.pdf	2018	None	n/a
Brighton & Hove JSNA 2017 executive summary VFINAL 15 08 17.pdf	2017	None	n/a
JSNA Executive Summary May 2023.pdf	2023	None	n/a
Adults with multiple complex needs in Brighton & Hove 2020.pdf	2020	None	n/a
Brighton & Hove JSNA summary December 2021- Population	2021	None	n/a
https://fair4allfinance.org.uk/financial-inclusion-of-black-asian-and-minority-ethnic-communities-in-the-uk/	2021	None	n/a

https://irr.org.uk/research/statistics/poverty/	2023	None	n/a
https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/bulletins/genderpaygapintheuk/2023	2023	None	n/a
Impact of increased cost of living on adults across Great Britain: July to October 2023 ONS	2023	None	n/a
Written submission from the National LGB&T Partnership (HSC0033) to Parliament	2018	None	n/a
https://www.carersuk.org/news-and-campaigns/our-campaigns/cost-of-living-crisis/	2022	None	n/a
Brighton & Hove JSNA summary March 2024	2024	None	n/a
Financial Inclusion Strategy EIA: http://www.brighton-hove.gov.uk/downloads/bhcc/equalities/Financial_Inclusion_Strategy_EIA_Final.doc	2013	None	n/a
Cost of Living in Brighton. Apr 2024. Prices in Brighton (numbeo.com)	2024	None	n/a
Your Data - Nomis - Official Census and Labour Market Statistics (nomisweb.co.uk)	2024	None	n/a

B&H MLTC JSNA 2018 Exec Summary FINAL	2018	None	n/a
Joseph Rowntree Foundation https://www.jrf.org.uk/uk-poverty-2024-the-essential-guide-to-understanding-poverty-in-the-uk	2024	None	n/a

4. 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 found complaint relating to inequality in the collection of debt on behalf of the council	Continuous
All groups	Ensure the Corporate Debt Board implements a strategy through the welfare framework that provides a holistic support network to citizens in financial hardship		Remedy, support or advice for every customer approaching the council with welfare reform related debt issues	Continuous
All groups	Ensure that further actions are listed above are reviewed fully	Progress against further actions listed above is reviewed in next EIA	Number of actions delivered	Continuous

EIA sign-off: (for the EIA to be final an email must sent from the relevant people agreeing it or this section must be signed)

Staff member completing Equality Impact Assessment: Graham Bourne

Date:

Directorate Management Team rep or Head of Service/Commissioning: Nigel Manvell

Date:

CCG or BHCC Equality lead: Sarah Tighe-Ford

Date:

Guidance end-notes

The following principles, drawn from case law, explain what we must do to fulfil our duties under the Equality Act:

- **Knowledge:** everyone working for the council must be aware of our equality duties and apply them appropriately in their work.
- **Timeliness:** the duty applies at the time of considering policy options and/or before a final decision is taken – not afterwards.
- **Real Consideration:** the duty must be an integral and rigorous part of your decision-making and influence the process.
- **Sufficient Information:** you must assess what information you have and what is needed to give proper consideration.

No delegation: the council is responsible for ensuring that any contracted services which provide services on our behalf can comply with the duty, are required in contracts to comply with it, and do comply in practice. It is a duty that cannot be delegated.

- **Review:** the equality duty is a continuing duty. It applies when a policy is developed/agreed, and when it is implemented/reviewed.
- **Proper Record Keeping:** to show that we have fulfilled our duties we must keep records of the process and the impacts identified.

NB: Filling out this EIA in itself does not meet the requirements of the equality duty. All the requirements above must be fulfilled or the EIA (and any decision based on it) may be open to challenge. Properly used, an EIA can be a tool to help us comply with our equality duty and as a record that to demonstrate that we have done so.

Our duties in the Equality Act 2010

As a public sector organisation, we have a legal duty (under the Equality Act 2010) to show that we have identified and considered the impact and potential impact of our activities on all people with 'protected characteristics' (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage and civil partnership).

This applies to policies, services (including commissioned services), and our employees. The level of detail of this consideration will depend on what you are assessing, who it might affect, those groups' vulnerability, and how serious any potential impacts might be. We use this EIA template to complete this process and evidence our consideration.

The following are the duties in the Act. You must give 'due regard' (pay conscious attention) to the need to:

- **avoid, reduce or minimise negative impact** (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).
- **promote equality of opportunity.** This means the need to:
 - Remove or minimise disadvantages suffered by equality groups
 - Take steps to meet the needs of equality groups
 - Encourage equality groups to participate in public life or any other activity where participation is disproportionately low
 - Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary
- **foster good relations between people who share a protected characteristic and those who do not.** This means:
 - Tackle prejudice
 - Promote understanding

EIAs are always 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

The greater the potential adverse impact of the proposed policy on a protected group (e.g. disabled people), the more vulnerable the group in the context being considered, the more thorough and demanding the process required by the Act will be.

When to complete an EIA:

- 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 (eg: a change in population), or at a national level (eg: a change of legislation)

Assessment of equality impact can be evidenced as part of the process of reviewing or needs assessment or strategy development or consultation or planning. It does not have to be on this template, but must be documented. Wherever possible, build the EIA into your usual planning/review processes.

Do you need to complete an EIA? Consider:

- 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 EIA it is usually sensible to document why.

Title of EIA: This should clearly explain what service / policy / strategy / change you are assessing

ID no: The unique reference for this EIA. If in doubt contact your CCG or BHCC equality lead (see page 1)

Team/Department: Main team responsible for the policy, practice, service or function being assessed

Focus of EIA: A member of the public should have a good understanding of the policy or service and any proposals after reading this section. Please use plain English and write any acronyms in full first time - eg: 'Equality Impact Assessment (EIA)'

This section should explain what you are assessing:

- What are the main aims or purpose of the policy, practice, service or function?
- Who implements, carries out or delivers the policy, practice, service or function? Please state where this is more than one person/team/body and where other organisations deliver under procurement or partnership arrangements.
- How does it fit with other services?
- Who is affected by the policy, practice, service or function, or by how it is delivered? Who are the external and internal service- users, groups, or communities?
- What outcomes do you want to achieve, why and for whom? Eg: what do you want to provide, what changes or improvements, and what should the benefits be?
- What do existing or previous inspections of the policy, practice, service or function tell you?
- What is the reason for the proposal or change (financial, service, legal etc)? The Act requires us to make these clear.

Previous actions: If there is no previous EIA or this assessment is of a new service, then simply write 'not applicable'.

Data: Make sure you have enough data to inform your EIA.

- What data relevant to the impact on protected groups of the policy/decision/service is available?¹⁰
- What further evidence is needed and how can you get it? (Eg: further research or engagement with the affected groups).

- What do you already know about needs, access and outcomes? Focus on each of the protected characteristics in turn. Eg: who uses the service? Who doesn't and why? Are there differences in outcomes? Why?
- Have there been any important demographic changes or trends locally? What might they mean for the service or function?
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any groups?
- Do any equality objectives already exist? What is current performance like against them?
- Is the service having a positive or negative effect on particular people in the community, or particular groups or communities?
- Use local sources of data (eg: JSNA: <http://www.bhconnected.org.uk/content/needs-assessments> and Community Insight: <http://brighton-hove.communityinsight.org/#>) and national ones where they are relevant.

Engagement: You must 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:
 - (a) consult when proposals are still at a formative stage;
 - (b) explain what is proposed and why, to allow intelligent consideration and response;
 - (c) allow enough time for consultation;
 - (d) 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.

Your EIA must get to grips fully and properly with actual and potential impacts.

- The equality duty does not stop decisions or changes, but means we must conscientiously and deliberately confront the anticipated impacts on people.
- Be realistic: don't exaggerate speculative risks and negative impacts.
- Be detailed and specific so decision-makers have a concrete sense of potential effects. Instead of "the policy is likely to disadvantage older women", say how many or what percentage are likely to be affected, how, and to what extent.
- Questions to ask when assessing impacts depend on the context. Examples:
 - 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 differential impact, how can you minimise that while taking into account your overall aims
- Do the effects amount to unlawful discrimination? If so the plan must be modified.
- Does the proposal advance equality of opportunity and/or foster good relations? If not, could it?

Consider all three aims of the Act: removing barriers, and also 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.
- An EIA which has attempted to airbrush the facts is an EIA that is vulnerable to challenge.

Age: 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

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 means people whose intention is to stay in the UK for at least twelve 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

Marriage and Civil Partnership: Only in relation to due regard to the need to eliminate discrimination.

Community Cohesion: What must happen in all communities to enable different groups of people to get on well together.

Other relevant groups: eg: Carers, people experiencing domestic and/or sexual violence, substance misusers, homeless people, looked after children, ex-armed forces personnel, people on the Autistic spectrum etc

Cumulative Impact: This is an impact that appears when you consider services or activities together. A change or activity in one area may create an impact somewhere else

Assessment of overall impacts and any further recommendations

Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Explain what positive impacts will result from the actions and how you can make the most of these.

Countervailing considerations: These may include the reasons behind the formulation of the policy, the benefits it is expected to deliver, budget reductions, the need to avert a graver crisis by introducing a policy now and not later, and so on. The weight of these factors in favour of implementing the policy must then be measured against the weight of any evidence as to the potential negative equality impacts of the policy.

Are there any further recommendations? Is further engagement needed? Is more research or monitoring needed? Does there need to be a change in the proposal itself?

Action Planning: The Equality Duty is an ongoing duty: 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 assessment and consultation are needed.

