

SSA EQUALITY IMPACT AND NEEDS ANALYSIS

Directorate	Resources
Service Area	Revenues
Service/policy/function being assessed	Debt Management Policy
Which borough (s) does the service/policy apply to	Richmond
Staff involved in developing this EINA	Alix Wilson
Date approved by Directorate Equality Group (if applicable)	
Date approved by Policy and Review Manager All EINAs must be signed off by the Policy and Review Manager	
Date submitted to Directors' Board	

1. Summary

Debt Management Policy

Councils have a duty to recover outstanding debts and in doing so, ensure that its processes are fair to everyone, particularly in the current economic climate. With this in mind, the existing debt policies have been reviewed and an overarching Debt Management Policy has been created to formulate cohesive expected behaviors for Council services collection activities.

The Policy reflects current custom and practice, drawing on the robust procedures and good practice operating across Council services that help to ensure that the Council minimises debt and maximises rates of collection. The Policy helps to ensure that we are consistent in our approach but also recognises the importance of testing out new approaches and taking learning forward to improve the way we collect income and manage our debt. The policy also acknowledges that there is a difference between those that can and won't pay to those that can't pay and need additional support from the Council.

The policy provides the overarching corporate framework under which the operational income collection and debt recovery procedures for each debt type are maintained. The corporate policy sets the tone as a fair and compassionate borough, establishing general principles of governance supported by individual operational policies used at a local level by council officers.

A Debt Fairness Charter has been developed and forms part of the Debt Management Policy. This is aligned with Central Government Debt Management Function's own Debt Fairness Charter. The Charter demonstrates the Council's ongoing commitment to treat individuals and businesses in the borough fairly, providing guidance and support to those who have difficulty in repaying their debts.

This EINA looks at the impact of the Debt management policy on protected characteristics groups

The key findings from the EINA are:

- The council's debt management policy has, and will continue to have, a positive impact on residents with protected characteristics aimed at residents in debt and providing structured

support and tailored financial advice. While the policy is available to any resident with council debt, the debt management policy and Debt Fairness Charter will help groups with protected characteristics achieve greater financial stability and reduce stress, particularly groups more at risk of debt including low-income groups, single parent families and those with disabilities.

- There is little local debt data on protected characteristics

The following actions are proposed to mitigate the impact of the debt management policy

- The policy brings together current practice with no changes that will negatively impact debtors. There are some actions however in terms of how we ensure that we communicate and share the policy, particularly the Debt Fairness Charter including via key voluntary sector providers.

2. Evidence gathering and engagement

a. What evidence has been used for this assessment? For example, national data, local data via DataRich or DataWand

Evidence	Source
National data on Debt	Research Briefing - House of Commons Library - Debt (May 2024)
National Citizens Advice Data on Debt	Citizens Advice Data on Debt
Low income family Debt data	Low Income Family Tracker (LIFT) Dashboard
Age, Disability, Sex, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Religion and Belief, Sexual Orientation, and socio-economic characteristic groups.	ONS Census
Deprivation	English Indices of Deprivation 2019
Carers	Carers UK
Deprivation	Health Foundation

b. Who have you engaged and consulted with as part of your assessment?

Individuals/Groups	Consultation/Engagement results	Date	What changed as a result of the consultation

3. Analysis of need

Potential impact on this group of residents and actions taken to mitigate impact and advance equality, diversity and inclusion

Protected group	Findings																												
Age	<p>The most up to date national data from the House of Commons Library states that those aged 25-44 are most likely to hold consumer credit, with 80% of 25-34 year olds doing so, compared with only 18% of those aged 75 and over. High income households are most likely to hold debt, particularly property debt, because taking out large loans like mortgages requires a high income and savings. However, low-income households are more likely to be overindebted.</p> <p>National Citizens Advice data on debt as of September 2024 suggests that of the people they help, people aged 24 to 64 are more likely to be in negative budget and have debts than any other age group and over 65s least likely.</p> <table><tr><th>Age</th><th>proportion of people helped by CA who are likely to be in debt (by age band)</th></tr><tr><td>65+</td><td>32</td></tr><tr><td>45-64</td><td>53</td></tr><tr><td>30-44</td><td>49</td></tr><tr><td>18-29</td><td>46</td></tr></table> <p>Richmond's Population</p> <table><tr><th>Age</th><th>% of population</th></tr><tr><td>75+</td><td>7.3%</td></tr><tr><td>65-74</td><td>8.9%</td></tr><tr><td>55-64</td><td>12.4%</td></tr><tr><td>45-54</td><td>16.1%</td></tr><tr><td>35-44</td><td>15.9%</td></tr><tr><td>25-34</td><td>11.3%</td></tr><tr><td>15-24</td><td>10%</td></tr><tr><td>Under 14</td><td>19%</td></tr></table> <p>Richmond has a higher than London average of young people between 0-14 and old people aged 65. The borough has a significantly lower percentage of people aged between 14 and 65 compared to the rest of London.</p>	Age	proportion of people helped by CA who are likely to be in debt (by age band)	65+	32	45-64	53	30-44	49	18-29	46	Age	% of population	75+	7.3%	65-74	8.9%	55-64	12.4%	45-54	16.1%	35-44	15.9%	25-34	11.3%	15-24	10%	Under 14	19%
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Disability	<p>Citizens Advice data on debt as of September 2024 suggests that within their client group, households without a disability are more likely to be in a negative budget</p>																												

	<p>situation and be susceptible to debt. Many low-income households with a disability however, have higher costs including energy bills and this may impact on levels of debt.</p> <table><tr><th>Disability</th><th>% of CA client group who are likely to be in debt</th></tr><tr><td>Disabled</td><td>47</td></tr><tr><td>Long term health issue</td><td>47</td></tr><tr><td>None</td><td>50</td></tr></table> <p>Approximately 12% of Richmond’s population have a disability. Of these 4.5% of the population have disabilities which means activities are limited a lot and 7.6% have activities limited a little.</p> <table><tr><th>Age</th><th>%</th></tr><tr><td>65+</td><td>16.1</td></tr><tr><td>50-64</td><td>20.1</td></tr><tr><td>35-49</td><td>24</td></tr><tr><td>25-34</td><td>11.3</td></tr><tr><td>16-24</td><td>8.2</td></tr><tr><td>0-15</td><td>20.2</td></tr></table> <p>Of those in the borough with a disability the majority are between the ages of 35-49. Those with the lowest numbers of disability are those 16-24.</p>	Disability	% of CA client group who are likely to be in debt	Disabled	47	Long term health issue	47	None	50	Age	%	65+	16.1	50-64	20.1	35-49	24	25-34	11.3	16-24	8.2	0-15	20.2
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Pregnancy and maternity	<p>The 2021 Census recorded that in Richmond there were 19.2 births per 1,000 females (15-44).</p> <p>Data on pregnancy/maternity of debtors is not currently recorded.</p>																						
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Across groups i.e older LGBT service users or Black, Asian & Minority Ethnic young men.	<p>Data across groups of Debtors is not currently recorded. DataRich – Population Explorer has some demographic data across characteristics (e.g. sex by ethnicity, age, disability etc.) – can be found by Ward.</p> <p>The average IDACI and IDAOPI scores indicate that 7% of children (0-15) and 9% of older people (60+) in the borough are affected by income deprivation.</p> <p>By providing debt management services this policy aims to maximise positive impacts on all groups and minimise negative impacts. Therefore, those individuals who are included in more than one protected characteristic group should be impacted positively by policy. For example, low-income, single parent families and those with disabilities.</p>																									
Socio-economic status (to be treated as a protected characteristic under Section 1 of the Equality Act 2010) Include the following groups: Deprivation (measured by the 2019 English Indices of Deprivation) <ul style="list-style-type: none">• Low-income groups & employment• Carers• Care experienced people• Single parents• Health inequalities• Refugee status	<p>Deprivation</p> <table><tr><th>Income Level (by decile)</th><th>Percentage of working-age people (age 16–64) in households that are experiencing problem debt</th></tr><tr><td>1 (lowest)</td><td>17.3</td></tr><tr><td>2</td><td>10.2</td></tr><tr><td>3</td><td>7.2</td></tr><tr><td>4</td><td>4.5</td></tr><tr><td>5</td><td>4.2</td></tr><tr><td>6</td><td>3</td></tr><tr><td>7</td><td>3.1</td></tr><tr><td>8</td><td>1.6</td></tr><tr><td>9</td><td>1.8</td></tr><tr><td>10 (highest)</td><td>1</td></tr></table> <p>In Great Britain, those on the lowest income deciles are significantly more likely to have problem debt.</p> <p>Richmond is a relatively affluent borough with low levels of deprivation. Only 0.9% of the population are in Decile 2 and 2.6% in Decile 3. Most residents are in Deciles 9 and 10 (36.5%).</p> <p>Low-income Groups and employment There were 8,394 households on Universal Credit in May 2024</p> <p>Citizens Advice data on debt as of September 2024 suggests that self-employed people are the most likely to have an income deficit and be in debt:</p> <table><tr><th>Employment Status</th><th>% of people who are likely to be in debt</th></tr></table>		Income Level (by decile)	Percentage of working-age people (age 16–64) in households that are experiencing problem debt	1 (lowest)	17.3	2	10.2	3	7.2	4	4.5	5	4.2	6	3	7	3.1	8	1.6	9	1.8	10 (highest)	1	Employment Status	% of people who are likely to be in debt
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	<p>LIFT data shows that of the 1681 Richmond households in debt, 47% of these are in work.</p> <p>Carers 13,146 residents reported providing unpaid care, which is the 5th lowest proportion in London.</p> <p>In England and Richmond, females reported providing more unpaid care than males, with majority aged 50-59 years.</p> <p>14% of carers nationally are in debt because of caring</p> <p>Care Experienced People At the end of March 2019, 115 children and young people were looked after by the authority, of 25 per 10,000 of the populations.</p> <p>Single Parents Richmond has 7,078 Lone Parent families in the borough. – see above re household status. Citizens advice data on debt suggest that single parents with debt are the most likely to have negative budgets and be in debt than any other household type.</p> <p>Health Inequalities Richmond borough has generally better health than London and England averages. With life expectancy higher than the national average.</p> <p>Refugee Status Refugee status - There are 842 people with refugee status outside of the Hong Kong BNO scheme currently living in Richmond (04/2024).</p>												
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	Unaccompanied Asylum-Seeking Children	26
	Hong Kong BNO scheme	No exact data available, but proxy data shows 497 School Applications from Hong Kong and 985 people indicated they were born in Hong Kong in the 2021 Census

Data gaps

Data gap(s)	How will this be addressed?
Sex, Gender Reassignment, Marriage/Civil Partnership, Pregnancy and Maternity, Race/Ethnicity, Religion, Sexual Orientation, Refugee Status	The information is not collated although may be in part for some debt types. We do not currently have single view of debt but could look at how we capture this data as part of this project as this progresses.

4. Impact

Protected group	Positive	Negative
Age	<p>Those working aged are more likely to be impacted by debt and are therefore more likely than other age groups to see the positive benefits of the councils' debt management policy. However, this policy is available to anyone in debt regardless of age. The Debt Fairness Charter provides positive support to anyone who owes debt to the council, not just households with protected characteristics.</p> <p>Provision is built into current operational debt management policies about dealing with older vulnerable people who are known to Adult Social Care. This is reflected in the Policy and Debt Fairness Charter.</p>	The Debt Management Policy is a new policy based on current council practice and does not have any negative impact on this group.
Disability	As those with disabilities are more likely to be in debt, this policy may have a bigger positive impact on this protected characteristic than those without disabilities. However, the	None identified

	policy is applicable to anyone regardless of disability.	
Sex	Since debt likelihood does not vary significantly by gender, this policy is expected to have a similar impact on both men and women in the borough.	None identified
Gender reassignment	While we do not collect data on debt and gender re-assignment and there is limited national data, this policy is applicable to anyone regardless of gender reassignment.	None identified
Marriage and civil partnership	As above	None identified
Pregnancy and maternity	As Above	None identified
Race/ethnicity	As those Asian/Asian British are more likely to be in debt, this policy may have a bigger positive impact on this group. However, the policy is applicable to anyone regardless of race/ethnicity.	None identified
Religion and belief, including non belief	While we do not collect data on debt and religion and there is limited national data, this policy is applicable to anyone regardless of religion or belief.	None identified
Sexual orientation	As Above	None identified
Socio-economic status (to be treated as a protected characteristic under Section 1 of the Equality Act 2010) Include the following groups: <ul style="list-style-type: none"> • Deprivation (measured by the 2019 English Indices of Deprivation) • Low-income groups & employment • Carers • Care experienced people • Single parents • Health inequalities • Refugee status 	Deprivation & low-income groups and employment As those in debt are more likely to be from lower-income groups they are therefore more likely to benefit from the council's debt management policies than other income groups. The debt management policy and Debt Fairness Charter aims to support those who have difficulty in repaying their debts. Carers Although we do not gather specific data on carers and debt, unpaid carers are generally at risk of financial difficulties. This policy will support unpaid carers who may be more vulnerable to debt. Care experienced people	Refugee status:

	<p>As above</p> <p>Single parents Given that single parent families are more prone to debt, this policy will offer substantial support to them.</p> <p>Refugee status People with No Recourse to Public Funds are unlikely to be paying for services from the Council and have any Council debts. However, for specific groups, and if in any exceptional circumstance they do require debt management services, this policy can be applied to them.</p>	
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5. Actions to advance equality, diversity and inclusion

Action	Lead Officer	Deadline
Advertise Debt Fairness Charter to residents via Council web page, Council Newsletter, local press and twitter	Alix Wilson	
Briefing sessions to Front line and back-office staff regarding the Debt Management Policy and Debt Fairness Charter to be able to better advise residents on support.	Alix Wilson	
Share the Debt Fairness Charter with key voluntary sector partners including Citizens Advice.	Alix Wilson	
To review data collected for each debt type as part of the single view of debt project.	Alix Wilson	

6. Further Consultation (optional section – complete as appropriate)

Consultation planned	Date of consultation