COVENTRY CITY COUNCIL - EQUALITY IMPACT ASSESSMENT (EIA) 2025

Title of EIA		**Corporate Debt Recovery Strategy**
EIA Author	Name	**Oluremi Aremu**
	Position	**Head of Legal and Procurement Services**
	Date of completion	**22nd June 2026**
Head of Service	Name	**Barrie Strain**
	Position	**Head of Revenues and Benefits**
Cabinet Member	Name	**Cllr Richard Brown**
	Portfolio	**Cabinet Member for Strategic Finance and Resources**

PLEASE REFER TO EIA GUIDANCE FOR ADVICE ON COMPLETING THIS FORM

SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

☒New policy / strategy
☐New service
☐Review of policy / strategy
☐Review of service
☐Commissioning
☐Other project *(please give details)*

1.2 In summary, what is the background to this EIA?

To introduce an effective Corporate Debt Recovery Strategy to ensure the Council manages outstanding debts efficiently while meeting legal and ethical obligations with a focus on early intervention to prevent debt building up in the first place, including payment plans, application of discounts and exemptions and signposting customers to services, programmes and activities that support building financial resilience.

The Strategy applies to income owed to the Council from both individuals and businesses and will provide the framework for how services across the Council collect income in a fair, proportional, consistent and transparent manner.

The strategy includes commitments to:

- Act proportionately when recovering debt.
- Consider individual circumstances and vulnerability.
- Promote financial inclusion.
- Encourage benefit take-up and income maximisation.
- Offer affordable repayment arrangements where appropriate.
- Work with debt advice agencies and partners.
- Distinguish between those who cannot pay and those who will not pay.

These principles are explicitly set out within the strategy

1.3 List organisations and people who are involved in this area of work

The areas involved in this area of work are as follows:

- Council Tax
- Business Rates
- Housing Benefits
- Housing
- Commercial Assets
- Legal Services

The main stakeholders affected are as follows:

- Residents with debts owed to the Council.
- Businesses and commercial tenants.
- Housing benefit claimants.
- Vulnerable residents and households experiencing financial hardship.
- Advice agencies and voluntary sector partners.

1.4 Who will be responsible for implementing the findings of this EIA?

Coventry City Council Revenues and Benefits Service, Finance Service, Highways Service (for Penalty Charge Notices) and relevant service areas responsible for income collection.

SECTION 2 – Consideration of Impact

Refer to guidance note for more detailed advice on completing this section.

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and those who do not

Data Sources to consider are :

- Previous research - consultation or EIAs carried out
- Customer feedback - including complaints, comments, surveys
- Employee feedback - including surveys, workforce monitoring, trade unions
- Specialist feedback - including focus groups, technical experts, subject specialists
- Feedback from organisations - such as those representing target groups

- National and local statistics –
  - National guidance or legislative requirements
  - Census data
  - Audit information
  - JSNA
  - Public health profiles
  - LG inform
  - Census
  - Office for National Statistics
  - Facts about Coventry
  - Breakdown of Coventry by Protected Characteristic
  - Armed Forces Veteran Data

Where possible, when you are analysing the data please try and break the data down by protected characteristic and additional groups.

2.1 Baseline data and information to include data

Please include a summary of data analysis below, using both your own service level management information. Where possible, compare your data to local data using: Facts about Coventry; Census 2021; JSNA etc

Debt type	Value of debt (£m)	Number of debts
Penalty charge notice	0.2	61,437
Council tax	29.3	49,478
Business rates	19.8	3,036
Housing benefit	6.4	2,853
Sundry debt	15.4	1,803

Evidence Considered

The assessment has been informed by:

- The Corporate Debt Recovery Strategy.
- Equality Act 2010 protected characteristics.
- Public Sector Equality Duty requirements, which require public bodies to consider the impact of policies on protected groups and advance equality of opportunity.
- Knowledge of the relationship between financial hardship, debt and social exclusion.
- As a Marmot city, the Council is committed to reducing health inequalities by strengthening the building blocks of health.

Overall Assessment

The strategy is largely expected to have a positive impact on equality because it incorporates safeguards for vulnerable residents, promotes financial inclusion, supports access to benefits and debt advice, and requires proportionality when undertaking recovery action.

The strategy documents the Council's current approach to debt recovery and will not result in any material changes to the experience of people and organisations who owe money to the Council.

The strategy applies to all Council income streams and debt types and therefore will impact across a diverse range of indebted individuals and organisations.

There is potential for adverse impacts if recovery action is pursued against residents who experience barriers associated with disability, age, language, mental ill-health, caring responsibilities or wider socioeconomic disadvantage. These risks can be mitigated through robust operational procedures and staff training.

2.2 Please highlight which Marmot Principles this EIA supports

1. Give every child the best start in life
2. Enable all children, young people and adults to maximise their capabilities and have control over their lives
3. Ensure a healthy standard of living for all
4. Create fair employment and good work for all
5. Create and develop healthy and sustainable places and communities
6. Strengthen the role and impact of ill health prevention
7. Tackle racism, discrimination and their outcomes
8. Pursue environmental sustainability and health equity

SECTION 3 – Protected Groups and Additional Groups

3.1 Based on section 2, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)

Please include considerations of health and digital inequality as part of your analysis below.

Protected Characteristic	**Impact type** P, N, PN, NI	**Nature of impact and any mitigations required**
Age 0-18	**PN**	People under 18 do not pay Council tax and are legally disregarded as adults for billing purposes. For business rates, an under-18 can technically be liable to pay them if they own or lease a commercial property, but they generally cannot legally hold a commercial lease on their own.

		A person under the age of 18 can be held liable for a Penalty Charge Notice but the enforcement of any debt will be carried out in accordance with the principles of the strategy and this age group will not be disproportionately impacted by the strategy. People between the ages of 0 – 18 may be impacted if they live in households experiencing debt. For those persons who are 18, all customers will be treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of age with vulnerable residents specifically covered in the Strategy. When a person is recognised to be vulnerable, consideration will be given to additional measures that can be taken to support them and the appropriateness of recovery action. **Mitigation** • Individual circumstances considered before escalation. • Clear communications in accessible formats. • Signposting to financial support and debt advice
Age 19-64	**PN**	• All customers will be treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of age with vulnerable residents specifically covered in the Strategy. • When a person is recognised to be vulnerable, consideration will be given to additional measures that can be taken to support them and the appropriateness of recovery action. **Mitigation** • Individual circumstances considered before escalation. • Clear communications in accessible formats. • Signposting to financial support and debt advice
Age 65+	**PN**	• All customers will be treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of age with vulnerable residents specifically covered in the Strategy.

		• When a person is recognised to be vulnerable, consideration will be given to additional measures that can be taken to support them and the appropriateness of recovery action. **Mitigation** • Individual circumstances considered before escalation. • Clear communications in accessible formats. • Signposting to financial support and debt advice
Disability	**PN**	**Potential Positive Impact** • The strategy explicitly recognises vulnerability and financial hardship. • Support can be tailored through affordable repayment plans. • Partnership working with advice agencies may improve outcomes for disabled residents. **Potential Negative Impact** • Residents with learning disabilities, mental health conditions, sensory impairments or cognitive disabilities may find debt processes difficult to understand or engage with. • Enforcement action could have a disproportionate impact on disabled people with limited income. **Mitigation** • Reasonable adjustments and accessible communications. • Identification of vulnerability before enforcement. • Referral to welfare, benefits and debt advice services. • Staff awareness training regarding disabilities and hidden disabilities.
Gender reassignment	**PN**	**Potential Positive Impact** • Strategy applies equally to all customers. All customers treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of gender recognition. **Potential Negative Impact** • Risk of inappropriate handling of personal information if systems are not maintained accurately. **Mitigation** • Compliance with data protection requirements.

		• Debt collection practices should be respectful of an individual's chosen name and gender identify. This includes ensuring all communications reflect their affirmed identity and written in gender neutral language. • Staff awareness and equality training.
Marriage and Civil Partnership	**NI**	All customers treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of marriage or civil partnership.
Pregnancy and maternity	**PN**	**Potential Positive Impact** • Recognition of individual circumstances enables consideration of temporary financial hardship linked to pregnancy or maternity. **Potential Negative Impact** • Recovery action may place additional stress on individuals and their unborn child during pregnancy or maternity leave. **Mitigation** • Consider vulnerability and affordability. • Offer realistic repayment arrangements where appropriate.
Race (Including: colour, nationality, citizenship ethnic or national origins)	**PN**	**Potential Positive Impact** • Use of inclusive language in correspondence promotes accessibility. **Potential Negative Impact** • Some residents may face language barriers and have difficulty understanding debt notices or recovery processes. **Mitigation** • Translation and interpretation services where required. • Accessible customer contact channels. • Engagement through community and advice organisations

Religion and belief	**NI**	All customers treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of religion and belief.
Sex	**NI**	All customers treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of sex.
Sexual orientation	**NI**	All customers treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of sexual orientation.

3.2 Based on section 2, complete the table below to show what the potential impact is for each of the additional groups.

Group	**Impact type** P, N, PN, NI	**Nature of impact and any mitigations required**
Care Experienced	**NI**	Care experienced are not required to pay council tax until the age of 25 which mitigates the potential impact of debt collection on this group.
Armed Forces	**NI**	All customers treated fairly and consistently to ensure that no one receives less favourable treatment due to service in the armed forces.
Socio Economic Groups	**NI**	The strategy recognises that financial vulnerability is a clear consideration for decisions on how debt is pursued and whether it should be written off.

SECTION 4 –Next steps

Planned Action	**Owner**	**Timescale**
Corporate Debt Policy to be communicated to all officers involved with the Debt Recovery Process	Revenues and Benefits	Ongoing

4.2 How will you monitor and evaluate the effect of this work?`

Monitoring of collection rates, benefit take-up, number of enforcement notices issued, reasons for write-offs and number of referrals to other relevant services will indicate whether the policy is successful.

SECTION 5 – Impact on Council Staff

5.1 Will this area of work potentially have an impact on Council staff? No
If yes
Nature of impact and any mitigation required

5.2 Please provide headcounts for the below.
If you think by completing this section's headcounts, employees will become identifiable please email equality@coventry.gov.uk for advice on data protection implications

Impact on Council staff - Sex
Female

Male

Impact on Council staff - Disability
Disabled

Not disabled

Prefer not to state

Unknown

Impact on Council staff - Ethnicity
White

Black, Asian, Minority ethnic

Prefer not to state

Unknown

Impact on Council staff – Sexual orientation

Heterosexual

LQBT+

Prefer not to state

Unknown

Impact on Council staff – Age

16-24

25-34

35-44

45-54

55-64

65+

Impact on Council staff – Religion

Any other

Buddhist

Christian

Hindu

Jewish

Muslim

No religion

Sikh

Prefer not to state

Unknown

SECTION 6 – Completion Statement

As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:

No impact has been identified for one or more protected groups ☒
Positive impact has been identified for one or more protected groups ☐
Negative impact has been identified for one or more protected groups ☐
Both positive and negative impact has been identified for one or more protected groups ☒

Before you submit this form - please save your progress and forward the email you receive with any questions to equality@coventry.gov.uk. The team will review your Equality Impact Assessment and provide you with feedback.

SECTION 7 - Approval

Name of Head of Service: Barrie Strain	**Date approved by Head of Service: 23/06/26**
Name of Director: Barry Hastie	**Date sent to Director:**
Name of Lead Elected Member: Cllr Richard Brown	**Date sent to Councillor:**