

Equality Impact Assessment

Before completing this EIA please ensure you have read the EIA guidance notes and other resources, available on the [intranet](#)



Version	1	Date Completed	25th November 2025
Description of what is being impact assessed			
The Income Management including Debt Collection Policy is being reviewed for any changes to legislation and procedures.			
Evidence			
What data/information have you used to assess how this policy/service might impact on protected groups?			
<p>East Devon District Council's Equality Policy and Objectives 2021–2025 Equality Act 2010 Care Act 2014 Office for National Statistics FCA The 2021 Census of Population for England and Wales – data shows that 10.3% of East Devon residents are in social rented accommodation. An FCA report from 2022 shows that consumers who were female, younger, unemployed, working in the gig economy, renters, or in an ethnic minority group, were more likely in May 2022 to have low financial resilience or be in financial difficulty. East Devon population census 2021 shows us that:</p> <ul style="list-style-type: none"> • 26,527 children aged between 0 and 16, equating to circa 17% of the population • 79,068 people aged between 18 and 64, equating to circa 52% of the population • 45,226 people aged 65 and over, reflecting around 30% of the population • 51.8% are female • 10.3% live in social rented accommodation • 2.6% of all households in East Devon contain ethnic minority groups. 			

- 1.9% are unemployed

Therefore, 52% of East Devon customers are more likely to suffer from long-term debt and 51.8% of these will be female with 10.3% of this number living in social rented properties. Only 2.6% of these households in the East Devon area contain ethnic minority groups and 1.9% are unemployed and will therefore be in the largest financial difficulty according to the FCA.

The rural nature of much of East Devon provides it's own unique challenges for customers needing to access our services and the support we can offer.

Who have you consulted with to assess possible impact on protected groups and what have they told you? If you have not consulted other people, please explain why?

Frontline Housing staff and safeguarding leads
Consultation with tenant representatives and working groups

Analysis of impact on protected groups				
<p>The Public Sector Equality Duty requires us to eliminate discrimination, advance equality of opportunity and foster good relations with protected groups. The Council also has a legal duty to have due regard to armed forces personnel when carrying out healthcare, housing and education functions. Consider how this policy/service will achieve these aims. In the table below, using the evidence outlined above and your own understanding, detail what considerations and potential impacts against each of the three aims of the Public Sector Equality Duty. Based on this information, assess the likely outcome, before you have implemented any mitigation.</p>				
Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
Age	<p>Debt can affect people of all ages but national data from the ONS shows that households aged between 35-44 are more likely to suffer from long-term debt.</p> <p>An FCA report from 2022 shows that consumers who were younger were more likely in May 2022 to have low financial resilience or be in financial difficulty.</p> <p>East Devon population census 2021 shows us that:</p> <ul style="list-style-type: none"> 17,089.81 people aged between 35 -44, equating to 10.8% of the population <p>Therefore, 10.8% of East Devon customers are more likely to suffer from low financial resilience or be in financial difficulty.</p> <p>37.5% of East Devon residents are also over the age of 60 and therefore may have other barriers to support such as, digital inclusion, access to online services due to lack of devices, internet connectivity, or digital literacy.</p>	□	⊗	□
Disability	<p>The number of East Devon residents classed as disabled under the Equality Act is 19.5%</p> <p>It is accepted that customers with disabilities may face additional barriers to accessing support, such as communication challenges,</p>	□	⊗	□

	physical accessibility, or dependency on others and therefore may struggle to find a convenient way to pay their rent or get help with additional financial support.			
Gender reassignment	The policy doesn't discriminate against genders, and all customers are treated with respect on a case-by-case basis.	□	□	☒
Marriage and civil partnership	<p>The policy is inclusive of all customers, no matter what their marital status may be.</p> <p>It acknowledges that debt can occur within any relationship, including those legally recognised through marriage or civil partnership, and does not make assumptions about the nature or dynamics of these relationships.</p> <p>The policy promotes equal access to services, regardless of relationship status, and ensures that customers are not deterred from seeking help. Staff are trained to provide help and advice to all customers in any kind of relationships, recognising the potential complexities such as shared housing, finances, or children.</p>	□	□	☒

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
Pregnancy and maternity	It is accepted that pregnancy and maternity can increase financial stress with a possible decrease in working hours, wages, or maternity pay. The policy supports offering financial help to all our customers and would not discriminate against those either pregnant or on maternity leave.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Race and ethnicity	An FCA report from 2022 shows that consumers who were in an ethnic minority group, were more likely in May 2022 to have low financial resilience or be in financial difficulty. 2.6% of these households in the East Devon area contain ethnic minority groups. We recognise that race and ethnicity may create unique barriers to accessing support, such as cultural beliefs and language barriers. The policy supports offering financial help to all our customers and would not racially discriminate against anyone.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Religion or belief	Debt is not linked to any particular religion or belief, however, it is recognised that there may be a cross-over with those customers with a particular race or ethnicity and supported in the same way.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sex	An FCA report from 2022 shows that consumers who were female, were more likely in May 2022 to have low financial resilience or be in financial difficulty. 51.8% of East Devon residents are female. This policy promotes equal access to services, ensuring that both male and female customers are treated equally, ensuring that services are inclusive and non-discriminatory.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
Sexual orientation	<p>The policy recognises debt affects individuals of all sexual orientations, including lesbian, gay, bisexual, and queer survivors.</p> <p>We acknowledge that customers within this protected group might have their own barriers to accessing support, such as lack of specialist services, however, this policy promotes equal access to services, ensuring that all customers are treated equally, ensuring that services are inclusive and non-discriminatory.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Armed Forces (including serving personnel, families and veterans)	<p>The Council acknowledges the unique challenges faced by armed forces personnel, veterans, and their families, particularly around housing, mobility, and access to support services.</p> <p>It aligns with the Council's legal duty to have due regard to armed forces communities when carrying out housing functions, ensuring that customers from these groups are not disadvantaged.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other, e.g. carers, care leavers, low income, rurality/isolation, etc.	<p>The policy recognises that individuals in these groups may face additional barriers with financial hardship, lack of transport, digital exclusion, or limited local services.</p> <p>EDDC offers early help and outreach, home visits by officers, including pop-up events and community engagement, which are particularly beneficial for those in rural or isolated areas.</p> <p>The policy supports digital inclusion initiatives, helping low-income residents and digitally excluded individuals access online services and information safely.</p> <p>Customers who are carers or care leavers may have complex needs, and the policy's trauma-informed approach ensures that support is tailored to their circumstances.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
	<p>The Council works with local VCSE networks and partners to ensure that support is available in communities where formal services may be limited.</p> <p>By prioritising accessibility and flexibility, the policy helps ensure that no one is excluded from receiving help due to their socioeconomic or geographic situation.</p>			
Negative outcomes action plan Where you have ascertained that there will potentially be negative outcomes, you are required to mitigate the impact of these. Please detail below the actions that you intend to take.				
Action taken/to be taken	Date	Person responsible	How will it be monitored?	Action complete
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>
If negative impacts remain, please provide an explanation below.				

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
<p><u>Age</u></p> <p>Although this policy doesn't exclude customers of any age some customers in this group may still struggle to access services due to lack of digital literacy, accessibility issues, lack of family/friends to support. EDDC has a range of help including outreach and pop-up events help to help mitigate this. Visiting Officers to help with accessibility and signposting to other support services.</p> <p><u>Disability</u></p> <p>It is accepted that customers with disabilities may face additional barriers to accessing support, such as communication challenges, physical accessibility, or dependency on others and therefore may struggle to find a convenient way to pay their rent or get help with additional financial support. EDDC offers numerous payment options and financial help and support is offered to all, regardless of their ability/disabilities. Home visits or telephone appointments can help with accessibility issues.</p> <p><u>Pregnancy and Maternity</u></p> <p>It is accepted that pregnancy and maternity can increase financial stress with a possible decrease in working hours, wages, or maternity pay. EDDC has a range of financial support options that we signpost customers to and financial resilience team to help with numerous funding stream options.</p> <p><u>Race and Ethnicity</u></p> <p>Customers whose first language is not English may face difficulties understanding available services or communicating their needs. While translation services are available, they may not always be funded, timely or comprehensive. EDDC offer financial support and advice to all our customers and work together with our Resettlement Team to communicate with those from different cultural backgrounds.</p> <p><u>Others, e.g: . carers, care leavers, low income, rurality/isolation</u></p> <p>Digital Exclusion for Low-Income or Rural Residents</p> <p>Despite efforts to promote digital inclusion, some customers may still struggle to access online services due to lack of devices, internet connectivity, or digital literacy. While outreach and pop-up events help mitigate this, full digital access remains a challenge for some groups. EDDC offer financial signposting and support to all our customers through our Financial Resilience Team and external partnerships.</p>				

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
	<p><u>Armed Forces Families</u></p> <p>Due to stigma or fear of reputational damage, customers from armed forces communities may be less likely to disclose financial difficulties. This can limit access to support and requires ongoing awareness-raising and trust-building.</p> <p>The policy promotes early help and intervention, which is beneficial for families experiencing debt, especially where frequent relocations or isolation may be factors.</p> <p>Staff are trained to respond appropriately and signpost to specialist services, including those tailored to armed forces communities. The Council works in partnership with local and national organisations to ensure that armed forces customers have access to appropriate housing, safeguarding, and financial support.</p> <p>The Rental section will tailor its service to meet the diverse needs of individuals. They will foster good relations with people when providing their services to eliminate discrimination and promote equality of opportunity.</p>			

Completed by:	Andi Loosemore – Rental Manager
Date:	
Approved by:	Andy King (AD for Housing (Regulatory Services))
Date:	10.12.2025
To be reviewed by:	
Review date:	

Ensure that a final copy of this impact assessment is sent to HR as per the equality impact assessment guidance.