EQUALITY IMPACT ASSESSMENT AND ANALYSIS (EqIAA)

Debt Management Policy and Guidance 2026

SECTION 1 – INTRODUCTION

South Gloucestershire Council (SGC) is introducing a comprehensive **Debt Management Policy for External Customers** (2026) alongside an **Internal Debt Management Guidance** for staff to maximise income collection whilst safeguarding vulnerable customers. These documents replace previous debt procedures, aligning the Council's approach with its duties under the **Equality Act 2010**, **Public Sector Equality Duty, and safeguarding obligations**.

The Council has a legal and moral responsibility to collect income owed to fund essential services, yet must do so fairly, proportionately, and without discrimination.

This EqIAA examines potential impacts—positive, negative, or neutral—of the Debt Policy and Guidance on different equality groups and socio-economically disadvantaged residents

Legislative and Policy Context:

SGC's Debt Management Policy is grounded in national legislation and best practice. It explicitly commits to compliance with the **Equality Act 2010**—ensuring **no unlawful discrimination** on the basis of protected characteristics and making reasonable adjustments for accessibility. The Policy also references the **Debt Respite (Breathing Space) Scheme**, safeguarding responsibilities (e.g. protecting children and vulnerable adults), and **Data Protection** (UK GDPR 2018).

The wider context includes an ongoing cost-of-living crisis; nationally, low-income households face disproportionate financial strain, with around **44%** of the poorest UK households reporting being in arrears on bills by **late 2025**, and **55%** cutting back on food or going hungry as they struggle to pay essentials.

In SGC, overall deprivation levels are relatively low compared to other areas (SGC ranks among the **20%** least deprived English local authorities, with only **1%** of local neighbourhoods among England's most deprived fifth). However, pockets of significant inequality and hardship exist in specific communities such as parts of **Staple Hill, Mangotsfield and Patchway (Coniston)**.

Local evidence indicates **10%–20%** of children in SGC live in poverty, and some families experience rising financial hardship due to factors like high living costs and limited incomes. SGC's population of **306,000 (2024)** is increasingly diverse (**8.8%** of residents are from minority ethnic backgrounds, up from **5% in 2011**) and aging (over **54,000** residents **65+ in 2021**, projected to reach **21%** of the population by **2040**). Many of those who fall into arrears, especially with Council payments like Council Tax or Adult Social Care charges, are likely to be among socio-economically disadvantaged and include older people, disabled residents, single parents, or others on low incomes.

The Debt Project and new Policies aim to improve how SGC addresses debt with equity and sensitivity, preventing undue harm to vulnerable residents while ensuring fairness for all taxpayers

SECTION 2 – RESEARCH, ENGAGEMENT AND CONSULTATION

Sources of Evidence: This EqIAA draws on a range of qualitative and quantitative evidence:

SGC Debt Management Policy & Internal Guidance (2026): These documents outline the Council's approach and specific measures relevant to equalities (e.g. identification of vulnerability, flexible repayment arrangements, communication in accessible formats). They serve as the primary evidence base for the policies intentions.

Local Socio-Economic & Equalities Data: Local equality monitoring and needs assessments provide context about South Gloucestershire's diverse population and areas of potential inequality.

This includes **Indices of Deprivation 2025** results for SGC and **Census 2021** data on demographics, disability, ethnicity, etc. **Council insights** (e.g., from the Insights Hub and Joint Strategic Needs Assessments) highlight which groups and areas are likely to be affected by debt policies (such as families in deprived wards, older residents, and people with disabilities). South Gloucestershire's relative affluence (low overall deprivation) contrasts with pockets of entrenched poverty and disadvantage, particularly in certain urban neighbourhoods.

National Research & Best Practice: National evidence on debt management and poverty is considered, including findings from organisations like the **Joseph Rowntree Foundation** and Money and Pensions Service.

Nationally, lower-income households disproportionately struggle with debt; by late 2025 nearly **2.6 million UK households (44% of the poorest fifth) were behind on energy or other essential bills**. The Council has also reviewed best practice debt-recovery policies from other local authorities (e.g., Wigan, Wandsworth, Tameside), which emphasise fairness, early intervention, and support for vulnerable debtors. These external insights have informed SGC's approach (e.g., adopting a more "one-council" view of debt, joining up multiple debts per customer, and focusing on prevention and support).

Stakeholder Experience: Though formal public consultation on the Debt Policy was not statutorily required (as it largely codifies existing practices aligned to legal duties), the development of the "Debt Project" has involved internal stakeholder engagement. Staff from various teams across the Council have contributed insights on the challenges faced by specific groups, such as older service users with care charge debts and residents with limited English proficiency. These insights have helped to shape practical measures in the guidance.

Service Usage Data: Data from SGC's **Welfare and Debt Advice services** (2015–2021) shows that certain groups are more likely to need financial/debt advice, indicating potential disproportionate impacts if support is inadequate.

For instance, **over 60%** of local advice service users were women, and people with disabilities consistently comprised **55–70%** of clients, compared to **16%** of the general population who report a disability. Many users were aged **45–64** or had long-term health conditions or mental health issues. This underscores the importance of a debt policy that is sensitive to the needs of disabled, ill, and older residents, who are often overrepresented among those needing debt assistance. SGC's new policy explicitly addresses these needs through adaptive measures detailed below.

SECTION 3 - IDENTIFICATION AND ANALYSIS OF EQUALITIES ISSUES AND IMPACTS

Vulnerability and Disability: Supporting vulnerable customers is at the heart of the Debt Management Policy. The Council recognises that debt recovery processes can disproportionately affect individuals with disabilities, serious health conditions, or those in crisis, by adding stress, financial hardship, and risk of further exclusion.

The Policy explicitly balances income collection with safeguarding and equality duties, acknowledging that strict enforcement can worsen vulnerability. Disabled people (including those with mental health conditions or learning difficulties) may face challenges in understanding complex correspondence or managing payments; if not handled sensitively, aggressive debt collection could worsen mental health or cause disengagement.

The Policy and Guidance mitigate these risks by requiring early identification of vulnerability and tailored responses. Service area are expected to recognise signs of vulnerability or hardship, and when identified, ensure recovery action is reviewed and adjusted. This may involve pausing enforcement, allowing extra time to pay, offering debt advice referrals, or setting up flexible payment plans according to individual circumstances. For example, if a customer discloses a disability or mental health difficulty affecting their ability to pay, the Council will consider **reasonable adjustments** in communication (like large-print letters or telephone follow-ups), avoid immediate legal enforcement, and signpost the person to appropriate support (such as the Council's Welfare Advice service or independent charities). These steps are intended to ensure disabled and vulnerable residents are not discriminated against and are supported rather than penalized.

Accessibility and Communication Methods: Effective, accessible communication is critical to fair debt management. Some equality groups—such as people with **visual impairments, learning disabilities, or those for whom English is not a first language (often linked with certain ethnic minorities)**—may struggle with standard written notices.

The Policy therefore commits to providing information in alternative languages and formats (e.g., large print, Braille, easy-read, or translated materials) upon request. The Council will ensure all bills, reminders, and notices use clear, plain language and avoid unnecessary jargon.

The Guidance instructs staff to use multiple contact channels (letters, emails, phone calls, or in-person where needed) to engage customers, particularly if initial attempts fail. **Digital exclusion** is a known risk: older residents and some disabled people are less likely to use online services, so reliance on digital-only payment or communication methods could marginalise them.

To mitigate this, the Council offers a range of payment methods (including telephone payments, direct debit and online portals) to suit varying needs. For example, while self-service online payments are encouraged, staff at One Stop Shops and the Contact Centre can assist customers directly with payments or enquiries—particularly benefitting those who are digitally excluded or need in-person support. These measures will positively impact groups like older people and some disabled residents by improving their ability to understand their debt situation and engage with the Council to resolve it.

Repayment Flexibility and Affordability: People on low incomes or experiencing financial difficulty—including many single parents (who are often women), carers, and others facing economic hardship—may struggle to pay debts in full.

The Policy explicitly addresses this by promoting affordable repayment arrangements. Customers who cannot pay in full by the due date are encouraged to contact the Council early to agree a manageable instalment plan. Factors like income, essential living costs, and any benefit entitlements are considered to set sustainable repayment amounts, helping prevent additional hardship. These arrangements are reviewed regularly and can be adjusted if circumstances change. This approach benefits women (especially single mothers) and others with caring responsibilities, who statistically are more likely to experience financial stress.

Additionally, the Policy emphasizes early engagement – sending timely reminders and encouraging customers to get in touch at the first sign of difficulty – which creates opportunities for intervention (e.g., checking benefit eligibility, referring to budgeting support or charitable grants) before debts escalate. By proactively offering solutions like Breathing Space (a legal 60-day hold on enforcement for those in problem debt) or signposting to free debt advice (such as Citizens Advice and Step Change), the Council can help prevent negative outcomes like unmanageable debt spirals or reliance on high-cost credit. These measures should positively impact socio-economically disadvantaged residents by reducing stress and giving them time and support to improve their situation.

Enforcement Approach and Risk of Disproportionate Impacts: A key equality concern is that heavy-handed enforcement (e.g. referral to bailiffs or court action) can disproportionately affect those least able to cope, such as individuals with mental health issues, victims of domestic abuse, or older frail people. The Council's approach is to use **enforcement as a last resort** and in a **proportionate, phased manner**. The Policy requires that **no case will be escalated to legal enforcement (e.g., court action or use of enforcement agents)** without multiple attempts to contact the customer and a review of any known personal circumstances. Staff will continue offering opportunities to engage even during the recovery process, in line with statutory timescales, to avoid unnecessary escalation. This approach is intended to mitigate potential adverse impacts on *vulnerable groups* – for example: **older people** (who may be distressed or confused by legal action or doorstep enforcement), **pregnant women/new parents** (who may be in a temporarily difficult financial period due to maternity leave or childcare costs), and **people with mental health conditions** (who may experience severe anxiety or crisis if threatened with court or bailiffs).

The Guidance explicitly states that **enforcement action must consider known vulnerabilities and individual circumstances and may be paused or modified accordingly**. The Council also follows national standards for ethical enforcement and works only with enforcement agents who adhere to codes of practice protecting debtor welfare.

While the policy overall reduces negative equality impacts, some risks remain – for instance, **if customers do not disclose their circumstances**, the Council might not be aware of a disability or hardship. To mitigate this, communications will encourage customers to share any relevant needs or difficulties so that support can be offered.

Impacts on Protected Groups and Others: The following table summarises the identified impacts **(positive, negative, or neutral)** of the Debt Management Policy and Guidance for each protected characteristic group (as defined by the Equality Act) as well as socio-economic disadvantage (a local priority) and the Armed Forces community.

These are assessed based on current evidence, acknowledging that impacts can be **positive (improving equality outcomes)** or **negative (posing risks of adverse effect)**.

Protected Characteristic / Group	Impact	Explanation of Impact
Age	**Positive & Some Risk**	**Older people (65+):** The policy's supportive approach is *positive* in ensuring older residents can receive communications in accessible formats (e.g. large print, phone calls) and have flexibility in repayment, benefiting those on fixed incomes. The Council's *no "digital-only" approach* ensures older people (more likely to be offline) can use traditional payment methods. However, there remains a *potential risk* if older residents do not seek help or disclose difficulties (e.g. cognitive impairments or memory issues). The policy mitigates this with proactive early contact and liaison with family/carers if appropriate. **Children & young people:** Broadly *neutral* to *positive* impact. Minors do not directly engage with Council debt (except as part of a family unit). Indirectly, the policy's focus on preventing parental debt escalation (e.g. Council Tax arrears) helps reduce stress on families, which

		can benefit children's well-being. There are no adverse impacts on young people identified.
Disability (including long-term health, mental health, & learning disabilities)	**Positive**	The policy and guidance have a **strong positive impact** on people with disabilities. It explicitly commits to **identifying and protecting vulnerable customers**, many of whom are disabled or have long-term health conditions. There is a legal commitment to make *reasonable adjustments* in communications and processes for those with disabilities (e.g. accessible information formats, longer time to respond, personal visits if needed). The requirement to consider individual circumstances means those with disabilities (physical, sensory, mental or cognitive impairments) will not be subject to punitive action without support options offered first. This approach *reduces the risk* of adverse outcomes like stress-related health exacerbation or exclusion for disabled residents and should lead to more equitable treatment in debt processes. Overall impact is assessed as highly positive.
Sex (Gender)	**Neutral**	No direct differential impact on women or men is expected. The policy applies equally to all genders. However, an *indirect positive impact* may be felt by women, as women (especially single mothers) are statistically more likely to experience debt and have caring responsibilities. The emphasis on support, signposting to benefits and financial advice, and flexibility in repayment can benefit single-parent households (majority female-headed) who often juggle childcare and financial constraints. There is no indication of any negative or discriminatory effect on persons of any gender.
Gender Reassignment	**Neutral**	No specific impact (positive or negative) identified. Transgender and non-binary individuals are not expected to be directly or indirectly affected differently by the debt policy. The Council's commitment to equal treatment means all will be treated with respect and without

		discrimination regardless of gender identity. Ongoing equality training for staff will reinforce this. **No adverse issues** have been raised specific to this characteristic in relation to debt management.
Race / Ethnicity	**Positive & Some Risk**	The policy is designed to treat all customers fairly irrespective of ethnicity. **Positive measures** include providing written and verbal communication in other languages. These steps benefit residents whose first language is not English (who in SGC are often from minority ethnic communities or migrant groups) by making sure they fully understand their debt situation and options. Cultural awareness training for staff (as part of general equality training) will support respectful engagement with people from diverse backgrounds. ***Potential risk:*** Some minority ethnic groups statistically have higher rates of low income or unemployment, making them more prone to debt; if not proactively supported, they could be disproportionately affected (e.g. recent migrants might not be aware of support available). The policy mitigates this through inclusive communication, early engagement, and consistent application of **Equality Act duties** so no group is treated less favourably.
Religion or Belief	**Neutral**	No specific impacts related to religion or belief have been identified in relation to debt collection. The policy and guidance do not conflict with any religious practices. If language or cultural norms related to religion affect communication (for example, recent refugees or asylum seekers, who may have specific needs), the existing measures on translation and support cover these. The approach remains flexible to avoid scheduling major enforcement actions on significant religious holidays if this is known, which is a good practice but not formalised. Overall, a neutral impact as the policy is applied equitably to people of all faiths or none, with no discrimination.
Sexual Orientation	**Neutral**	There is no evidence to suggest differential impact on lesbian, gay or bisexual (LGB+)

		residents. The policy is universally applied and does not consider sexual orientation in debt decisions. The Council's equality commitments ensure no bias or discrimination. Issues like debt and financial vulnerability are not directly linked to sexual orientation, so the impact is considered neutral.
Pregnancy & Maternity	**Neutral / Positive**	No specific negative impacts are identified. However, **pregnancy and maternity** can affect a person's finances (e.g. reduced income on maternity leave, increased expenses). The policy's softer approach fundamentally benefits anyone undergoing temporary financial changes (like maternity), by allowing flexibility and avoiding immediate legal action during difficult periods. Staff are trained to be understanding if a customer cites pregnancy or new parenthood as a reason for financial difficulty. They can offer supportive measures (such as short-term payment deferrals or referrals to additional support). This is a *positive potential impact* for new parents, predominantly women, though not an explicit part of the policy.
Marriage & Civil Partnership	**Neutral**	No differential impact. Marital or partnership status does not affect how the debt policy is applied. Couples in a household with debt will be treated in line with the policy (each case assessed on ability to pay). The Council recognises a *household* perspective when multiple debts exist, which could indirectly benefit married/civil-partnered couples by considering joint financial circumstances. This is a generally *neutral* impact with no evidence of bias towards or against people based on marital status.
Socio-Economic Disadvantage (Low-Income / Poverty) *Note: Not a protected characteristic but assessed due to local importance*	Positive	The policy is largely aimed at improving outcomes for those in financial hardship, making the impact on socio-economically disadvantaged residents significantly positive. Key measures (early engagement, payment plans, and support referrals) help prevent low-income residents from falling into deeper debt. The Council's emphasis on holistic support (e.g. checking benefit entitlement, referring to welfare and debt advice,

		adhering to Breathing Space) directly addresses the needs of people experiencing poverty. These interventions can reduce entrenched disadvantage by stopping small debts from snowballing (for example, preventing escalation of Council Tax arrears which can attract court costs). The policy balances the requirement to collect revenue with recognition that overly harsh enforcement can compound poverty. By striving for fairness and offering solutions, the Council's approach will likely reduce inequalities linked to socio-economic status. Overall, the impact on socio-economically disadvantaged groups is positive, with minimal residual risk once mitigation actions (see Action Plan) are implemented.
Armed Forces Community	**Neutral / Positive**	**Neutral impact** anticipated, as members of the armed forces community are not singled out or treated differently by the debt policy. In general, veterans can face specific issues (such as injuries or mental health conditions), but those factors are covered under other characteristics (disability, etc.) which are addressed positively by the policy. The Council's commitment to the national Armed Forces Agreement means that if any ex-service personnel were identified as struggling with debt (perhaps due to service-related injuries or frequent relocations), the supportive measures would apply. Thus, the approach is inclusive, and the overall impact is at least neutral. There could be a modest *positive* impact in that some veterans who are vulnerable (e.g. due to PTSD or other health issues) will be supported under the vulnerability provisions, aligning with the Council's pledge to support the armed forces community. No adverse impacts have been identified.

SECTION 4 - EqIAA OUTCOME

Overall Assessment: The implementation of SGC's Debt Management Policy and Guidance is expected to have an overall positive equality impact. The approach will improve fairness and accessibility in debt collection, benefiting vulnerable and disadvantaged groups by preventing undue hardship and ensuring consistent, equitable treatment.

Positive impacts are anticipated for disability, socio-economic disadvantage, and potentially other groups as detailed above, due to the flexible, supportive measures (e.g., adjusted communications, repayment plans, early engagement, referrals to support). Importantly, the policy helps to eliminate or minimise any negative impacts that traditional debt collection might have on vulnerable populations.

Remaining Risks: The analysis indicates few significant negative impacts if the policy and guidance are implemented fully.

Key risks to manage include:

Non-engagement or unknown needs: If a debtor does not respond to outreach or disclose a vulnerability, the Council might inadvertently proceed to enforcement without being aware of equality-related needs.

Mitigation: persistent, multi-channel attempts to reach non-responders and clear invitations for customers to share any difficulties or support requirements (e.g., via wording in letters encouraging contact for help).

Resource challenges: Ensuring staff have capacity and training to identify and assist vulnerable customers is essential. Under-resourcing could undermine the policy's intentions.

Mitigation: as detailed in the Action Plan (Section 5), the Council will ensure training takes place and consider resource implications to maintain effective early support and avoid defaulting to enforcement due to workload.

Digital exclusion or communication gaps: If staff fail to offer alternative communications or payment methods, some residents may miss critical information.

Mitigation: robust staff guidance and compliance monitoring to ensure consistent practice across departments.

With planned mitigations, no disproportionate or discriminatory effect on any protected characteristic has been found. Instead, the policy offers opportunities to advance equality, particularly in terms of fostering good relations between the Council and all community members by building trust in a fair process.

Careful monitoring, as outlined below, will ensure that any unintended consequences are identified and addressed swiftly.

SECTION 5 - ACTIONS TO BE TAKEN AS A RESULT OF THIS EqIAA

To ensure the positive impacts are realised and any residual risks mitigated, SGC will implement the following actions.

These actions correspond to the issues identified above and align with the new Policy and Guidance. The action plan assigns responsibilities and sets out how progress will be monitored, thereby reinforcing accountability for maintaining an equitable approach to debt management.

Actions

Action	Lead Officer / Team	How this addresses equality / mitigates risk
1. Ensure the Debt Management Policy and Internal Guidance are published online and clearly signposted, whilst promoting awareness to both internal staff and external customers to support consistent understanding and application of the Council's approach. The policies will also be discussed at each of the three Departmental Leadership Team (DLT) Meetings	Communications Team / Project Leads	Ensures that all stakeholders are aware of the Council's approach to debt management, including its commitment to **supporting vulnerable customers and applying policies consistently and fairly**. Promoting visibility and understanding of the policy helps ensure staff follow agreed processes and that customers understand their rights, available support, and how to engage—thereby supporting those who may need additional assistance and reducing the risk of inconsistent practice.
2. Multi-Channel Engagement & Digital Inclusion: Maintain and advertise a range of payment and contact methods (online, phone, direct debit, bank, and in-person at One Stop Shops).	Customer Services and Debt Recovery Teams	Ensures **no group is disadvantaged** by inability or reluctance to engage online. This benefits *older residents and disabled people* with limited internet access by providing them with telephone or face-to-face options. Using multiple channels also helps reach those who may not respond to a single method (e.g., young people more likely to respond via text/email, older via posted letters or calls). This will help capture those at risk of non-engagement, preventing inadvertent escalation to enforcement due to communication barriers.
3. Partnership Working and Support Pathways Customer Services Management Team will maintain strong working relationships with local support agencies and work collaboratively with Communities and customer-focused programmes to ensure appropriate support is	Customer Services Management Team	Supports a **joined-up and consistent approach** to helping vulnerable customers by ensuring various forms of support is available and key staff are aware. Working with established partners and community programmes helps ensure that support is **accessible, relevant, and responsive** to differing customer needs, particularly for those experiencing financial hardship, disability, or other vulnerabilities. This reduces the risk of customers not

available and responsive to customer needs. This includes signposting to agencies such as Citizens Advice, independent debt advice services, and SGC Welfare Advice.		receiving the help they need and promotes fair and inclusive outcomes.
4. Monitor Equality Impacts & Outcome Data: Collect data (where possible) on debt recovery outcomes by protected characteristic and geographic area (e.g., who is entering later enforcement stages, which areas have higher arrears) to identify any patterns. Report annually on any disproportionate impacts and recommend adjustments if needed.	Corporate Performance & Recovery Management	Regular **monitoring** will ensure the policy is effective and equitable in practice. If data were to show, for example, that a certain group (like disabled people or residents of a particular deprived ward) is still more likely to face enforcement action, the Council can investigate causes and refine its approach. Monitoring also helps evaluate whether supportive interventions are reducing recourse to court or bailiffs across all groups, thus continuously improving equality outcomes.
5. Review & Update (Continuous Improvement): Schedule an annual review of the Debt Policy, Guidance and EqIAA to incorporate any new data, feedback, or changes in legislation. Engage with relevant groups or forums to gather feedback from service users about their experience of the debt processes.	Revenues Manager & Corporate Equalities Officer	Regular reviews ensure the policy remains up-to-date and sensitive to emerging issues. Engaging community stakeholders

SECTION 6 - EVIDENCE INFORMING THIS EqIAA

The assessment has been informed by the following key sources of evidence:

1. **South Gloucestershire Council – Debt Management Policy for External Customers (June 2026)**: Council wide policy setting out SGC's approach to debt recovery, including objectives, principles, and commitments (e.g., compliance with Equality Act 2010, safeguarding, support for vulnerable customers).

2. **South Gloucestershire Council – Internal Debt Management Guidance (June 2026)**: Staff guidance detailing how to implement the debt policy consistently, with sections on identifying vulnerability, communication methods, repayment plans, enforcement processes, and equality considerations.
3. **South Gloucestershire Local Insight & Data (SGC Insights Hub 2025)**: Demographic and socio-economic data for SGC, including Census 2021 results and Indices of Deprivation 2025. For example, SGC's population (306,435 mid-2024) growth and composition (8.8% BAME; 10.6% born outside UK), poverty levels (10–20% child poverty) and pockets of multiple deprivation in parts of Staple Hill & Patchway.
4. **Indices of Deprivation 2025 – South Gloucestershire (Office for National Statistics / SGC Analysis, 2026)**: Ranking and domain data showing SGC's overall low deprivation rank but highlighting small clusters of significant deprivation, which correlates with areas of higher financial hardship.
5. **SGC Joint Strategic Needs Assessment & Welfare/Debt Advice Service Data (2015–2021)**: Local data on service users' profiles indicating which groups are more likely to experience debt issues or seek advice (e.g., disability, gender, age), and evidence on how poverty and debt affect specific communities (e.g., 2020–21 Advice Service report, showing disproportionate demand in priority neighbourhoods and high need among disabled people and women).
6. **National Research on Debt & Poverty**: *UK Poverty 2026 – Joseph Rowntree Foundation (2026)* and *Money & Pensions Service / ONS data on financial difficulty (2025)*. These highlight trends such as the **cost-of-living crisis** leading to 44% of the poorest UK households being in arrears on bills and 69% going without essentials by late 2025, underscoring the importance of supportive debt management.
7. **Best Practice Equality & Fair Debt Policies (Various Local Authorities, 2024–25)**: Examples of other councils' debt policies and audits (e.g., Tameside MBC 2024; Wigan MBC "Fair Debt" approach (2022); LGA guidance on inclusive debt collection). These influenced SGC's approach, promoting early intervention, holistic view of debt, and protection for vulnerable residents.

This Equality Impact Assessment and Analysis will be made publicly available. It will be reviewed and updated as necessary (at least annually or when significant changes to the Debt Policy occur) to ensure continuous improvement in addressing equality and diversity considerations in SGC's debt management practices.