

<b>TITLE</b>
<b>Vulnerability and Financial Difficulty Policy</b>
<b>DATE</b>
10 January 2026
<b>LEAD OFFICER.</b>
Karen Powell Head of Income Payments and Corporate Debt Gemma Gilley Head of Benefits and Financial Welfare
<b>1 Summary description of the proposed change</b>
What is the change to policy / service / new project that is being proposed? How does it compare with the current situation?
New policy written to ensure equitable, supportive and consistent treatment of residents who are experiencing <b>vulnerability</b> and /or genuine <b>financial difficulty</b> .  At the same time, the policy supports the fair and ethical recovery of public funds by helping residents reduce arrears through sustainable and supportive solutions in line with the government's Debt Management Vulnerability Toolkit.
<b>2 Summary of evidence used to support this assessment</b>
E.g. Feedback from consultation, performance information, service user. E.g. Comparison of service user profile with Medway Community Profile
The Council has an undated Vulnerable Persons Recovery Policy which is more than 10 years old. We do not have a policy that deals with how we will support residents that are vulnerable and / or in financial difficulty. This will be of benefit to services and residents as follows: <ul style="list-style-type: none"> <li>- To demonstrate fair and equitable treatment of vulnerable residents.</li> <li>- To provide a consistent approach across all services for identifying, supporting, and guiding these residents holistically.</li> <li>- Promote collaborative working between teams to build trust and reputation.</li> <li>- To support the Councils income streams effectively.</li> </ul>

<b>3 What is the likely impact of the proposed change?</b>
Is it likely to: Adversely impact on one or more of the protected characteristic groups Advance equality of opportunity for one or more of the protected characteristic groups Foster good relations between people who share a protected characteristic and those who don't <b>(insert Yes when there is an impact or No when there isn't)</b>

Protected characteristic groups (Equality Act 2010)	Adverse impact	Advance equality	Foster good relations
Age	No	No	Yes

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Protected characteristic groups (Equality Act 2010)	Adverse impact	Advance equality	Foster good relations
<b>Disability</b>	No	No	Yes
<b>Gender reassignment</b>	No	No	No
<b>Marriage/civil partnership</b>	No	No	No
<b>Pregnancy/maternity</b>	No	No	Yes
<b>Race</b>	No	No	Yes
<b>Religion/belief</b>	No	No	No
<b>Sex</b>	No	No	No
<b>Sexual orientation</b>	No	No	No
<b>Care experience</b>	No	No	Yes
<b>Other (e.g. low-income groups)</b>	No	No	Yes

#### 4 Summary of the likely impacts

Who will be affected?

How will they be affected?

Anyone that is in debt with the Council and is vulnerable and or in financial difficulty.

The policy promotes collaborative joint working to holistically support residents when they are challenged with vulnerability and / or financial difficulty.

Examples how teams can work together for the benefit of the residents to improve financial well-being:

Two-way referrals between teams, joint case working and reviews, sharing information, maximising income and welfare assistance, joint assessments, early intervention and a preventative approach.

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**5 What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?**

What alternative ways can the Council provide the service?

Are there alternative providers?

Can demand for services be managed differently?

**There is more likelihood to be an adverse impact if the policy is not implemented:**

Without clear guidance, staff may apply different standards

Vulnerable residents without support are more likely to disengage, resulting in escalating debt and enforcement costs.

Failure to demonstrate due regard for vulnerability and equality could breach statutory duties

Residents in hardship may experience worsening health, housing instability, and reliance on crisis services—creating wider community costs.

**6 Action plan**

Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence

Action	Lead	Deadline or review date
Circulate the policy amongst the teams dealing with Debt and Welfare. Ensure there is an awareness to promote a standard when dealing with residents that come under this new policy.	Karen Powell	30/06/2026

**7 Recommendation**

The recommendation by the lead officer should be stated below. This may be: to proceed with the change, implementing the Action Plan if appropriate, consider alternatives, gather further evidence

If the recommendation is to proceed with the change and there are no actions that can be taken to mitigate likely adverse impact, it is important to state why.

To proceed with a new written policy which will support vulnerable residents who are in financial difficulty.

This policy will set out the council's commitment to supporting residents who are vulnerable and/or experiencing financial difficulty by providing fair and consistent guidance. By intervening early and offering tailored solutions, the policy helps residents maintain financial stability while safeguarding the council's income, reducing arrears, and minimising costly enforcement actions.

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Action	Lead	Deadline or review date
<b>8 Authorisation</b> The authorising officer is consenting that the recommendation can be implemented, sufficient evidence has been obtained, and appropriate mitigation is planned, the Action Plan will be incorporated into the relevant Service Plan and monitored		
<b>Assistant Director</b>		
<b>Date of authorisation</b>		