

Equality Impact Assessment Template – Policy, Function or Strategy

This document should be completed when a new policy, function or strategy is introduced or when a substantive change to an existing policy, function or strategy is recommended. This will ensure equality considerations are taken into account before a decision is made and the policy, function or strategy can be altered, if required.

1. Policy, function or strategy		
a.	Name/description of the policy, function or strategy ¹	Inverclyde Council Corporate Debt Recovery Policy 2023
b.	Responsible organisation(s)/Lead Service	Finance Services
c.	Lead Officer	Tracy Bunton, Revenues and Benefits Manager
d.	Date of Impact Assessment	17th January 2023
e.	Partners/other Services involved in the development of the policy, function or strategy	Sheriff Officer; Inverclyde Health and Social Care Partnership (HSCP) Advice Services; Legal and Democratic Services, Inverclyde Council; Education Services, Inverclyde Council; Department for Work and Pensions; Scottish Government.
f.	Is the policy, function or strategy?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Reviewed/Revised
g.	What is the purpose of the policy, function or strategy (include details of any new legislation which prompted the introduction of the policy, function or strategy or the substantive change to the policy, function or strategy)?	The Council has both a legal duty and a responsibility to its citizens to collect income due promptly. The policy, originally agreed in 2003, has been reviewed and updated reflecting operational best practice which ensures effective recovery of debt while being sensitive to the economic conditions faced by debtors.
h.	What are the intended outcomes of the policy, function or strategy?	Debt recovery is maximised using a consistent and sensitive approach.
i.	Geographical area (Inverclyde-wide or a specific location)	Inverclyde-wide

¹ Please attach details of the policy, function or strategy to this Template

j.	Which parts of the Equality Duty will the policy, function or strategy impact on?	<input type="checkbox"/>	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by The Equality Act 2010
		<input checked="" type="checkbox"/>	Advance equality of opportunity between people of different groups
		<input type="checkbox"/>	Foster good relations between people from different groups
k.	Will those who may be directly or indirectly affected by the policy, function or strategy be involved in its development?	No	

2. Does the policy, function of strategy impact on:		
	Yes	No
a. Protected Characteristics under The Equality Act 2010: Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion and Belief; Sex; Sexual Orientation (see Section 3)	X	
b. Reducing inequalities of outcome caused by socio-economic disadvantage – Fairer Scotland Duty ² (see Section 6)	X	
c. Local Outcomes Improvement Plan (LOIP) 2017/22 ³ (see Section 7)	X	
d. Corporate Plan 2018/22 ⁴ (see Section 8)	X	
If 'Yes' is selected for any part of Section 2, please populate the other relevant Sections of this Template.		

² [Fairer Scotland Duty: guidance for public bodies](#)

³ [Local Outcomes Improvement Plan 2017/22](#)

⁴ [Corporate Plan 2018/22](#) (agenda item 5)

If 'No' is selected for every part of Section 2, please state the reasons for this.

Please sign below and email a copy of this Template to Karen Barclay, Corporate Policy Officer: karen.barclay@inverclyde.gov.uk.

Signature:

Date:

3. Impact – Protected Characteristics

Which of the Protected Characteristics will the policy, function or strategy have an impact upon?

Protected Characteristic	Impact					Reasons/Comments
	Positive High	Positive Low	Neutral	Negative High	Negative Low	
Age		X				Debt can affect all members of society however those with certain protected characteristics are more likely to have lower incomes, higher costs as a proportion of their income and are more susceptible to debt. The majority of older people in Inverclyde experience socio-economic disadvantage.
Disability		X				Those most reliant on unemployment, disability and in-work benefits within Inverclyde include women, families with children and those with disabilities related to physical and mental health. We will provide assistance for people who have sensory communication difficulties.
Gender Reassignment			X			

3. Impact – Protected Characteristics						
Marriage and civil partnership			X			
Pregnancy and maternity		X				Those most reliant on unemployment, disability and in-work benefits within Inverclyde include women, families with children and those with disabilities related to physical and mental health.
Race		X				We will provide assistance for people who have language or communication difficulties.
Religion and belief			X			
Sex			X			
Sexual orientation			X			
Other groups to consider <ul style="list-style-type: none"> Carers 		X				Providing care increases the likelihood of experiencing financial hardship and poverty as carers are less likely to be able to juggle work and care.

4. Which parts of the Equality Duty will the policy, function or strategy have an impact upon?	
<input type="checkbox"/>	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
<input checked="" type="checkbox"/>	Advance equality of opportunity between people from different groups
<input type="checkbox"/>	Foster good relations between people from different groups

5. Impact – groups	
From the information you have highlighted above, describe the positive and negative impacts and the groups affected under The Equality Act 2010.	
Positive impacts + <i>(Describe groups affected.)</i>	Negative impacts - <i>(Describe groups affected.)</i>
<u>Age; Disability; Pregnancy and maternity; Race; Carers:</u> the policy allows for individuals' circumstances to be considered although this relies on engagement with the appropriate Council Service. An example being additional expenditure associated with a disability is taken into consideration when a repayment arrangement is being negotiated.	

6. Impact – Fairer Scotland Duty

What impact will this policy, function or strategy have on reducing inequalities of outcome caused by socio-economic disadvantage?

Positive impact +	Neutral impact =	Negative impact -
+		
<p>Briefly describe how the policy, function or strategy will impact on reducing inequalities of outcome.</p> <p>The policy will ensure those with debt owed to the Council will be treated appropriately; debts will be communicated promptly and accurately; affordable repayment arrangements will be offered; and debt advice will be promoted at all stages of recovery. These actions will ease pressure on household income and consequently health and relationships, recognised as being drivers to improve inequalities of outcome.</p>		

7. Impact – LOIP 2017/22

Which Priority/Priorities from the LOIP 2017/22 will this policy, function or strategy impact on?

X	1. Population: Inverclyde's population will be stable and sustainable with an appropriate balance of socio - economic groups that is conducive to local economic prosperity and longer term population growth
X	2. Inequalities: There will be low levels of poverty and deprivation and the gap between the richest and poorest members of our communities will be reduced (This may already have been highlighted at Section 6.)
<input type="checkbox"/>	3. Environment, culture and heritage: Inverclyde's environment, culture and heritage will be protected and enhanced to create a better place for all Inverclyde residents and an attractive place in which to live, work and visit
X	4. The local economy: Inverclyde has a thriving and diverse local economy, economic activity is increased and skills development enables both those in work and those furthest from the labour market to realise their full potential
<p>Briefly describe how the policy, function or strategy will impact on the LOIP Priority/Priorities.</p>	

Priority 1: Firm but fair administration of debt recovery signals inclusivity, promoting Inverclyde as a good place to live.

Priority 2: The policy ensures that appropriate consideration of individuals' circumstances is given at whichever stage of debt recovery they engage with the service.

Priority 4: Debt recovery actions (bank arrestment, earnings attachment, sequestration etc.) can seriously disturb individuals' finances, reducing disposable income to spend in local businesses. The policy makes clear that these actions will be invoked only when debtors fail to engage or payment arrangements are not maintained.

8. Impact – Corporate Plan 2018/22

Which Priority/Priorities from the Corporate Plan 2018/22 will the policy, function or strategy impact on?

<input type="checkbox"/>	1. To promote Inverclyde, to both residents and visitors alike, as a great place to live, work and visit
<input type="checkbox"/>	2. To work collaboratively, to enable strong, connected and empowered communities, particularly in areas of deprivation, so that residents have influence and control over the things that matter to them
<input type="checkbox"/>	3. To grow the local economy in a way that creates opportunities for all our residents, including access to good quality jobs
<input checked="" type="checkbox"/>	4. To reduce the prevalence of poverty and, in particular, child poverty in our communities
<input checked="" type="checkbox"/>	5. To safeguard, support and meet the needs of our most vulnerable families and residents
<input checked="" type="checkbox"/>	6. To improve the health and wellbeing of residents so that people live well, and for longer
<input type="checkbox"/>	7. To protect and enhance our natural and built environment
<input type="checkbox"/>	8. To preserve, nurture and promote Inverclyde's unique culture and heritage

X	9. To deliver services that are responsive to community needs and are underpinned by a culture of innovation, continuous improvement and effective management of resources
□	10. To develop motivated, trained and qualified employees who deliver quality services that meet current and anticipated service needs

Briefly describe how the policy, function or strategy will impact on the Corporate Plan Priority/Priorities.

Priorities 4, 5, 6, 9: The policy ensures that income due is collected effectively and that debtors are treated appropriately.

9. Evidence

What evidence do you have to help identify any potential impacts of the policy, function or strategy?

Note: Evidence could include information from consultations, surveys, the Citizens' Panel, focus groups, interviews, projects, user feedback, complaints, Officers' knowledge and experience, equalities monitoring data, publications, research, reports, and local and national groups.

Evidence	Details
<p>Consultation/Engagement (including any carried out while developing the policy, function or strategy)</p>	<p>Assurance that appropriate customer service standards and practices are in place was received from the Council's appointed Sheriff Officer.</p> <p>HSCP Advice Services highlighted the increasing financial pressure on most households and the need for a considered and sensitive approach to debt recovery.</p> <p>Education Services provided the Primary School Debt Recovery Procedure which informed the development of the related section of the policy.</p>
<p>Research</p>	<p>StepChange (Scotland) and the Improvement Service, May 2022, <i>Collaborative Council Tax Collection</i> emphasises the importance of early intervention and collaboration with debt advice services.</p> <p>Elements of Scottish Government policy introduced to protect debtors during the pandemic have been extended in recognition of the current economic climate.</p>
<p>Officers' knowledge and experience (including feedback from frontline staff)</p>	<p>Officers have experience of delivering the Council's Debt Recovery service.</p>
<p>Equalities monitoring data</p>	

Evidence	Details
User feedback (including complaints)	Officers have experience of handling customer complaints in relation to income collection and debt recovery.
Stakeholders	Sheriff Officer HSCP Advice Services
Are there information gaps and, if so, what are these?	No

10. Consequences of analysis

What steps will you take in response to the findings of your analysis? Please select at least one of the following and provide a brief explanation.

a.	Continue development with no changes	<input checked="" type="checkbox"/>	Debt support and a sensitive approach to collection were key findings from the analysis. The policy adequately explains the provision which meets these requirements.
b.	Continue development with minor alterations	<input type="checkbox"/>	
c.	Continue development with major changes	<input type="checkbox"/>	
d.	Discontinue development and consider alternatives (where relevant)	<input type="checkbox"/>	

How will the effect of the policy, function or strategy be monitored following implementation?

Collection targets will be set annually and regularly monitored, reported, and performance reviewed against these targets.

Improved Council Tax collection performance and a reduction in the number of enquiries and complaints may give an indication however only minor changes have been made to the previous policy so the impact will be minimal. Furthermore, the wider economic effects of the increasing cost of living will introduce new challenges to be able to disengage the impact of the policy.

When is the policy, function or strategy due to be implemented?

February 2023.

When will the policy, function or strategy be reviewed?

The policy will be reviewed at intervals of no less than 4 years. The policy will also be reviewed in the light of any legislative changes, trends or other factors that impact on the effectiveness of the policy.

What resources are available for the implementation of the policy, function or strategy? Have these resources changed?

Delivery will be carried out by existing resources.

11. Please use the space below to detail any other matters arising from the Equality Impact Assessment process, including what action could be taken to mitigate the impact of the policy, function or strategy.

Details of the Person(s) who completed the Assessment:

Name: Tracy Bunton

Position: Revenues and Benefits Manager

Date: 17th January 2023

Authorised by:

Name: Alan Puckrin

Position: Interim Director, Finance and Corporate Governance

Date: 18th January 2023

Thank you for your assistance with the completion of this task.

Please send a copy of the completed Template to Karen Barclay, Corporate Policy and Performance Officer at karen.barclay@inverclyde.gov.uk.