

INTEGRATED IMPACT ASSESSMENT SUMMARY REPORT TEMPLATE FOR EMERGENCY DECISIONS

1. **Title of proposal:** Restart suspended debt recovery activity (D18) in line with principles of Corporate Debt Policy (D121)

2. **What will change as a result of this proposal?**

Council suspended debt recovery action for all major income streams from April to June 2020. Recovery action will recommence offering longer repayment options to take account of individual's specific financial circumstances. This activity will be supported by appropriate communication, assistance and support for citizens and businesses.

Key activities include

- Bills and reminders to highlight the importance of early engagement on arrears will be issued.
- Recommence our SMS / text reminder service.
- Targeted signposting for appropriate schemes such as Council Tax Reduction Scheme and the Scottish Welfare Fund (which has seen an 80% increase in applications).
- Coordinated engagement with debt advice bodies, such as Citizens Advice.
- Social media campaign to support activities, with early intervention.
- Encouraging account holders to proactively reinstate payment plans.

3. **Briefly describe public involvement in this proposal to date and planned**

Due to the fast moving nature of the pandemic and the need for early action direct public involvement has been limited to assessing initial concerns raised by the public around immediate financial hardship. These plans take account of this feedback and wider national and local government initiatives to mitigate financial hardship.

4. **Date of IIA: June 2020**

5. **Who was involved in carrying out the IIA?**

Cheryl Hynd, Customer Manager, Customer & Digital Services
Neil Jamieson Senior Customer Services Manager, Customer & Digital Services
Nicola Harvey, Head of Service

6. **Evidence available at the time of the IIA**

Evidence	Available – detail source	Comments: what does the evidence tell you about different groups who may be affected?
Data on populations in need	Council Tax and Payment Database	Database identified historical debt trends and recognition that lockdown restrictions may exacerbate individuals ability to pay historical debt and new debts arising as household income is impacted.
Data on service uptake/access	Payment Database	Recognition that temporary closure of local offices may impact on individuals ability to make payment. Range of alternative payments publicised, and recovery action suspended to alleviate initial

Evidence	Available – detail source	Comments: what does the evidence tell you about different groups who may be affected?
		pressure. Recovery action will now be tailored around account holders' specific financial circumstances.
Data on socio-economic disadvantage e.g. low income, material/area-based deprivation.	Council Tax and Payment Database	As above, Database identified historical debt trends and recognition that lockdown restrictions may exacerbate individuals ability to pay historical debt and new debts arising as household income is impacted.
Data on equality outcomes	Strategy & Insight	Emergency decision due to the timelines of lockdown. Data would indicate negative impact if recovery was not suspended. Recognition that where possible early engagement with Debtor would enable recovery schedules to best fit individual circumstance.
Research/literature evidence	National Govt / multi agency reports – Covid specific reports	Data indicated negative financial impact if recovery is not suspended, however, this needs to be balanced against the Council's requirement to collect essential funds and meet its obligations under law.
Public/patient/client experience information	N/a	N/a
Insight from public / service user engagement	Correspondence from accountholders	Direct public involvement has been limited to assessing initial concerns raised by the public around immediate financial hardship and need for greater flexibility. This has been addressed via options for longer repayment schedules.
Evidence of unmet need	Various sources/multi agency reports – Covid-19 specific reports	Emergency decision due to the timelines of lockdown. Data would indicate negative impact
Good practice guidelines	N/A	N/A
Carbon emissions generated/reduced	N/A	N/A
Environmental data	N/A	N/A
Risk from cumulative impacts	Various sources/multi agency reports – Covid-19 specific reports	Financial hardship resulting from debt recovery activities at a time when household income potentially under pressure. Council's failure to collect would create additional financial pressure and therefore jeopardise critical service delivery.
Other (please specify)	N/A	N/A
Additional evidence required?	No	The decision taken to suspend recovery for Revenue streams for 3 months (April to June 2020) was an emergency decision due to the timelines of

Evidence	Available – detail source	Comments: what does the evidence tell you about different groups who may be affected?
		lockdown. At the time it was proposed that recovery would be extended and this is now being discharged in line with a consistent approach across Scottish councils.

7. In summary, what impacts were identified and which groups will they affect?

Equality, Health and Wellbeing and Human Rights	Affected populations
<p>Positive Extended repayment schedules designed to mitigate immediate financial hardship associated with Covid19. This is likely to mitigate associated negative health and wellbeing impact.</p> <p>Negative Financial hardship results in range of negative impacts. Mitigation designed to address e.g. early engagement and longer repayment strategies, suspended advanced recovery etc.</p>	<p>Potentially all citizens residents with Council accounts (Council Tax, Rates, service accounts)</p>

Environment and Sustainability including climate change emissions and impacts	Affected populations
<p>Positive No direct impacts</p> <p>Negative No direct impacts</p>	<p>Potentially all citizens residents with Council accounts (Council Tax, Rates, service accounts)</p>

Economic including socio-economic disadvantage	Affected populations
<p>Positive Measures designed to mitigate immediate financial hardship associated with Covid19. Repayment schedules will be extended to enable more sustainable household financial planning.</p> <p>Negative Financial hardship results in range of negative impacts. Mitigation designed to address e.g. early engagement and longer repayment strategies, suspended advanced recovery etc.</p>	<p>Potentially all citizens residents with Council accounts (Council Tax, Rates, service accounts)</p>

8. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human right, including socio-economic disadvantage, environmental and sustainability issues be addressed?

No.

9. Describe how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language?

Using Existing communication strategies – no change required.

- Bills and reminders to highlight the importance of early engagement on arrears will be issued.
- Recommence our SMS / text reminder service.
- Targeted signposting for appropriate schemes such as Council Tax Reduction Scheme and the Scottish Welfare Fund (which has seen an 80% increase in applications).
- Coordinated engagement with debt advice bodies, such as Citizens Advice.
- Social media campaign to support activities, with early intervention.
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10. Is the policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a Strategic Environmental Assessment (SEA) will be required and the impacts identified in the IIA should be included in this.

No

11. What, if any, actions are recommended in response to the impacts identified above? This can include keeping the proposal under review, gathering more data, or specific actions to mitigate identified impacts.

Specific actions (as a result of the IIA which may include responding to financial implications, mitigating negative impacts, action to manage the risk of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Continue with scheduled media and social media awareness campaigns, including CEC website.	David Ure (Media Team) Katy Alison (Media Team) Neil Jamieson (Snr Manager Customer) Cheryl Hynd (Customer Manager)	In progress from 23/3/20	Ongoing

Specific actions (as a result of the IIA which may include responding to financial implications, mitigating negative impacts, action to manage the risk of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Continue with scheduled elected members briefings to enable them to assist citizens. Members updated on plan 22 June through Member briefing.	Neil Jamieson (Snr Manager Customer) Cheryl Hynd (Customer Manager)	In progress from 23/3/20	Ongoing

12. Are there any negative impacts in section 7 for which there are no identified mitigating actions?

No

13. How will you monitor how this proposal affects different groups, including people with protected characteristics?

Ongoing monitoring of correspondence and communication directed to the Council.
Ongoing assessment of collection figures.

14. Sign off by Head of Service

Name: Nicola Harvey

Date: June 2020

15. Publication

Completed and signed IIAs should be sent to strategyandbusinessplanning@edinburgh.gov.uk to be published on the IIA directory on the Council website www.edinburgh.gov.uk/impactassessments