

Section 4 Integrated Impact Assessment

Summary Report Template

Each of the numbered sections below must be completed

Interim report		Final report	x
----------------	--	--------------	---

 (Tick as appropriate)

1. Title of proposal

Amendment to Sundry Debt Policy for charges issued by the Mixed Tenure Improvement Service

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

The Council's Mixed Tenure Improvement Service (MTIS) uses the framework provided by the Tenement (Scotland) Act 2004, the Tenement Management Scheme (TMS) to engage with owners and help them meet their responsibilities to carry out common repairs in mixed tenure blocks.

As part of the Council's Sundry Debt Policy (Corporate Debt Policy, Appendix IV) extended repayment terms can be offered to debtors in relation to legacy Statutory Notice-related debt.

Whilst these extended terms are not generally applicable to all other categories of Sundry Debt, we recognise that the scale of essential mixed tenure repairs and the investment required by private flat owners, to common areas of mixed tenure blocks in the Pilot area is substantial. The potential option to spread the cost of debt over a more manageable period will support owner occupiers in carrying out and paying for repairs and investment in their homes, along with achieving the Council's wider responsibility to preserve the built fabric of the City and meeting Net zero emissions targets. The change therefore proposes to make the following extended repayment terms available to owner occupiers in the Pilot area in relation to Mixed Tenure Improvement Service debt;

A three-month interest-free instalment plan will be offered to all property owners participating in the Mixed Tenure Improvement Service Pilot.

Payment plans in respect of the repairs and maintenance, initially financed by the Council and charged to owner occupiers for essential mixed tenure repair work will be offered to debtors where MTIS debts are outstanding by individual property owner occupiers as follows:

- Owners with total MTIS debts of up to £5,000 will be offered a payment plan of a maximum of four years;

- Owners with total MTIS debts between £5,000 and £10,000 will be offered a payment plan of no longer than seven years; and
- Owners with total MTIS debts of more than £10,000 will be offered a payment plan of a maximum of ten years.

These options will not be available to private landlords.

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

As the proposal relates to the Council's Debt Recovery Policy and does not affect the general Debt Recovery terms laid out therein, no public consultation has taken place. Instead, development has drawn from the implementation of the amended terms for Legacy Statutory Notice Debt, and recognises the difficulties faced by debtors prior to their implementation.

4. Is the proposal considered strategic under the [Fairer Scotland Duty](#)?

No

5. Date of IIA

24 May 2021

6. Who was present at the IIA? Identify facilitator, Lead Officer, report writer and any partnership representative present and main stakeholder (e.g. NHS, Council)

Name	Job Title	Date of IIA training
Jackie Timmons	Shared Repairs Senior Manager (lead officer)	27 Nov 2020
Gohar Khan	Performance and Audit Officer	2018
Morven Coulter	Principal Solicitor Real Estate & Planning	TBC
William Morrison	Information & Control Lead (Facilitator)	5 Feb 2021
Ross McCabe	Information & Control Officer (Report Writer)	1 Dec 2020

7. Evidence available at the time of the IIA

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
Data on populations in need	Yes; Council Debt Management Systems	<p>The Edinburgh Shared Repairs Service (ESRS) and MTIS has data for all properties which have outstanding debt.</p> <p>The ESRS has also identified projects in mixed tenure blocks where repair works were required to be undertaken and has required enforcement of a Statutory Notice, providing information on the requirement for owners to request payment plans with the council.</p>
Data on service uptake/access	No	The Mixed Tenure Service is currently in a pilot stage. Data from the pilot projects will inform future developments.
Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation.	Yes; Property Conservation Records & ESRS records.	<p>Data shows that property owners required debt repayment support during previous enforcement works, enacted under the Property Conservation Service and ESRS.</p> <p>We know that household income levels are 37% lower than the Edinburgh Average. We know that 2 bed house prices are 50% lower than the Edinburgh average.</p> <p>These debt re-payment terms will be important to support owner occupiers in the Mixed Tenure Pilot area.</p>
Data on equality outcomes	No	
Research/literature evidence	No	

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
Public/patient/client experience information	No	
Evidence of inclusive engagement of people who use the service and involvement findings	No	
Evidence of unmet need	Yes; ESRS CRM System Property Conservation Records	Data shows that property owners required debt repayment support during previous enforcement works, enacted under the Property Conservation Service and ESRS. In ESRS to end May 2021 – 1 % of all debt results in payment plans. 27% of all outstanding debt results in payment plans.
Good practice guidelines	No	
Carbon emissions generated/reduced data	N/A	
Environmental data	N/A	
Risk from cumulative impacts	No	
Other (please specify)	N/A	
Additional evidence required	N/A	

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

<p>Equality, Health and Wellbeing and Human Rights</p> <p>Positive</p> <p>There may be a positive impact to equality, health or wellbeing and human rights on particular groups.</p> <p>Groups with particularly high rates of unemployment and low income include young people, certain BAME groups, older people, disabled people, single parent households (mainly headed by women). This may be a potentially important policy for addressing wider inequalities of worklessness and income poverty, by enhancing the ability of people sharing protected characteristics who disproportionately experience worklessness and income poverty to access new opportunities in relation to debt management.</p> <p>Negative</p> <p>There is not expected to be any negative impacts to equality, health or wellbeing and human rights.</p>	<p>Affected populations</p> <p>Groups with particularly high rates of unemployment, low income and who live in properties in Wester Hailes where property prices are lower than the Edinburgh average.</p>
<p>Environment and Sustainability including climate change emissions and impacts</p> <p>Positive</p> <p>There may be positive impacts to the environment or sustainability as a result of this policy to encourage collaboration between private owners and the Council to repair their homes and install insulation to the building fabric resulting in a warmer home due to the opportunity to use the new debt Policy.</p> <p>Negative</p> <p>There are not expected to be any negative impacts to the environment or sustainability.</p>	<p>Affected populations</p> <p>All private property owner occupiers in the MTIS Pilot area.</p>
<p>Economic including socio-economic disadvantage</p> <p>Positive</p>	<p>Affected populations</p>

<p>It is expected that the provision of additional support will allow owners to meet the cost of maintaining their property, and thereby minimise the likelihood that further, more expensive maintenance issues will arise in future.</p> <p>It is also expected that extended repayment terms will minimise the likelihood of severe economic impact on low-income groups, or owner occupiers who are otherwise unable to afford shorter payment terms.</p> <p>This new debt policy should contribute positively with benefits for private owner occupiers, including those on low incomes, and the number of families with children.</p> <p>It should also empower and increase the financial security of private sector owners on lower incomes by improving information and opportunities on debt repayment options.</p> <p>The repairs resulting from the project will contribute to lowering fuel poverty in the pilot area for owner occupiers.</p> <p>Negative</p> <p>There is not expected to be any negative economic or socio-economic impact.</p>	<ul style="list-style-type: none"> • Older people and people in their middle years • Men (including trans men), Women (including trans women) and Non-binary people (Include issues relating to pregnancy and maternity including same sex parents) • Disabled people (includes physical disability, learning disability, sensory impairment, long-term medical conditions, mental health problems) • Minority ethnic people (includes Gypsy/Travellers, migrant workers, non-English speakers) • Refugees and asylum seekers • People with different religions or beliefs (includes people with no religion or belief) • Lesbian, gay, bisexual and heterosexual people • People who are unmarried, married or in a civil partnership • Unemployed • People on benefits • Single parents • Vulnerable families eg young mothers, people experiencing domestic abuse, children at risk of statutory measures • Pensioners • Looked after children and young people
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	<ul style="list-style-type: none"> • Those leaving care settings (including children and young people and those with illness) • Homeless people • Carers (including young carers and carers with protected characteristics) • Those involved in the criminal justice system • Those living in the most deprived communities • People with low literacy/numeracy • People misusing substances • Others e.g. veterans and students
--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children’s rights, environmental and sustainability issues be addressed?

N/A

10. Consider 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? Please provide a summary of the communications plan.

Debt repayment terms are offered by Debt Recovery service in various accessible formats. It is expected that this change will be folded into the existing procedure.

11. 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

12. Additional Information and Evidence Required

If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.

N/A

13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date

14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?

No

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

Business as usual processes will be used to monitor the plan.
Financial data will be assessed to track the take up.

16. Sign off by Head of Service/ NHS Project Lead

Name Peter Watton



Date 21 June 2021

17. 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