

Template for Impact Assessment Level 1: Initial screening assessment

Subject of assessment:	Corporate Debt Write Off Policy			
Coverage:	Cross cutting			
This is a decision relating to:	<input checked="" type="checkbox"/> Strategy	<input checked="" type="checkbox"/> Policy	<input checked="" type="checkbox"/> Service	<input checked="" type="checkbox"/> Function
	<input checked="" type="checkbox"/> Process/procedure	<input checked="" type="checkbox"/> Programme	<input type="checkbox"/> Project	<input checked="" type="checkbox"/> Review
	<input checked="" type="checkbox"/> Organisational change	<input type="checkbox"/> Other (please state)		
It is a:	New approach:	<input type="checkbox"/>	Revision of an existing approach:	<input checked="" type="checkbox"/>
It is driven by:	Legislation:	<input checked="" type="checkbox"/>	Local or corporate requirements:	<input checked="" type="checkbox"/>
Description:	<ul style="list-style-type: none"> ○ Key aims, objectives and activities ○ The policy sets out how the Council will consider write off of debt where it fits the various criteria for write off, and facilitates a fair and consistent approach to the write off of debt across all Council services. In order to maximise all debt and income for the provision of services, Middlesbrough Council will collect all debt owing to it promptly, effectively and efficiently, while ensuring fair treatment to all debtors. ○ Statutory drivers (set out exact reference) ○ Implementation of the Policy will reinforce the Council's plans to meet its legal duty under the Local Government Finance Act 1992 to manage the Council's financial affairs. It will also enable the Council to meet other statutory duties detailed in the legislation covering the recovery of unpaid Council Tax, Non Domestic Rates, Adult Social Care debt, Car Parking fines, etc., whilst taking into account new legislation such as the Debt Respite Scheme Regulations 2020. ○ Differences from any previous approach ○ The policy has been put in place to try and provide a coordinated and consistent approach to debt write off across the council, improve speed and efficiency of collection, whilst being mindful of and providing support to vulnerable groups and their ability to pay. ○ Key stakeholders and intended beneficiaries (internal and external as appropriate) ○ The key stakeholders include customers of council services, businesses, staff, local partners and national government. ○ Intended outcomes. ○ To set out general principles for debt write off across all services provided by Middlesbrough Council. 			
Live date:	October 2021			
Lifespan:	3 years. This is the first iteration of the policy. It will be reviewed quarterly during the first year, and then annually thereafter.			
Date of next review:	January 2022			

Screening questions	Response			Evidence
	No	Yes	Uncertain	
<p>Human Rights</p> <p>Could the decision impact negatively on individual Human Rights as enshrined in UK legislation?*</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>This proposed policy is designed to ensure that the Council operates a more consistent and joined approach to debt write off, and considers the whole view of a customer’s debt and financial situation / personal circumstances before considering write off. A policy will result in a more prompt and efficient process of write off, increased signposting and support for those who are having difficulties repaying their debt, and also links in with the Council’s debt management policy, vulnerability policy and the Stop the Knock approach. There are no concerns that the policy could infringe qualified or absolute human rights.</p> <p>Evidence used to inform this assessment includes analysis of the various debt write off processes across the council, and engagement to date with senior officers who have been involved in the development of the policy and supporting detailed delivery plans.</p>

* Consult the Impact Assessment further guidance appendix for details on the issues covered by each of these broad questions prior to completion.

Screening questions	Response			Evidence
<p>Equality</p> <p>Could the decision result in adverse differential impacts on groups or individuals with characteristics protected in UK equality law? Could the decision impact differently on other commonly disadvantaged groups?*</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The Public Sector Equality Duty (PSED) requires that when exercising its functions the Council must have due regard to the need to:-</p> <ul style="list-style-type: none"> eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act; advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it. <p>In having due regard to the need to advance equality of opportunity, the Council must consider, as part of a single equality duty:</p> <ul style="list-style-type: none"> removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of people who do not share it; and encouraging people who share a protected characteristic to participate in public life or in any other activity in which participation is low. <p>The proposed policy looks to provide consistency and efficiency in the council’s approach, whilst being mindful of a debtor / service user’s ability to pay and their vulnerability (if applicable). Supporting systems are in place to help where this is identified such as Stop the Knock, and payments which can be made from various council support funds. It also links directly to the Council’s Corporate Debt Management policy which supports Social Inclusion and a customer’s ability to pay.</p> <p>The policy joins up with recent Government legislation (Breathing Space / Debt Respite) where a person is in debt and requires a breathing space moratorium or a mental health crisis moratorium</p> <p>It is potentially relevant to all the protected characteristics. The aim of the policy is to address inequalities in outcomes experienced by people / service users / debtors of the council when they owe a debt to the council for a charge or a service.</p> <p>This method of working is designed to understand the individual needs of debtors / service users and address those needs in a joined up and holistic way. This will result in a more tailored service response, improving outcomes and the better identification of equality and fairness issues that may need to be addressed. There are no concerns that the policy could have a disproportionate adverse impact on individuals or groups because they hold one or more protected characteristics. The application of a case by case approach to vulnerability will support work to provide nuanced approaches.</p> <p>Evidence used to inform this assessment includes analysis of the various debt write off processes currently in place across the council and engagement to date with senior officers who have been involved in the development of the policy and supporting detailed delivery plans. It also links to the plan to combine all debt recovery and charging services across the council under one Service Head - Business and Residents Services.</p>

Screening questions	Response	Evidence			
<p>Community cohesion</p> <p>Could the decision impact negatively on relationships between different groups, communities of interest or neighbourhoods within the town?*</p>	<table border="1"> <tr> <td style="background-color: #90EE90; text-align: center;"><input checked="" type="checkbox"/></td> <td style="background-color: #FFD700; text-align: center;"><input type="checkbox"/></td> <td style="background-color: #FFD700; text-align: center;"><input type="checkbox"/></td> </tr> </table>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The proposed policy should provide a coordinated , joined up and consistent approach to write off, including a single view of debt for each and every person to whom it interacts with, whilst taking into consideration any vulnerabilities and ability to pay.</p> <p>Where there may be any different needs because of a protected characteristic or geography, this joined up approach will help to develop follow up actions focussed on addressing those unequal impacts. There are no concerns that the policy could have an adverse impact on community cohesion.</p> <p>Evidence used to inform this assessment includes analysis of the various debt write off processes currently in place across the council and engagement to date with senior officers who have been involved in the development of the policy and supporting detailed delivery plans.</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
<p>Next steps:</p> <ul style="list-style-type: none"> ➡ If the answer to all of the above screening questions is No then the process is completed. ➡ If the answer of any of the questions is Yes or Uncertain, then a Level 2 Full Impact Assessment must be completed. 					

Assessment completed by:	Mark Symmonds	Head of Service:	Janette Savage
Date:	07/09/2021	Date:	07/09/2021