

Equality Impact Assessment (EIA) Tool:

Title of proposal	Enforcement and Debt Collection services
Name of division/service	Revenues & Customer Support / Finance
Name of lead officer completing this assessment	
Date EIA assessment commenced	18 th April 2023
Date EIA assessment completed (<i>prior to decision being taken as the EIA may still be reviewed following a decision to monitor any changes</i>)	7 th June 2023
Decision maker	
Date decision taken	21 June 2023

EIA sign off on completion:	Signature	Date
Lead officer		19 th June 2023
Equalities officer (has been consulted)		19 th June 2023
Divisional director		5 th July 2023

Please ensure the following:

- a) That the document is **understandable to a reader who has not read any other documents** and explains (on its own) how the Public Sector Equality Duty is met. This does not need to be lengthy but must be complete and based in evidence.
- b) That available support information and data is identified and where it can be found. Also be clear about highlighting gaps in existing data or evidence that you hold, and how you have sought to address these knowledge gaps.
- c) That the equality impacts are capable of aggregation with those of other EIAs to identify the cumulative impact of all service changes made by the council on different groups of people.
- d) That the equality impact assessment is started at an early stage in the decision-making process, so that it can be used to inform the consultation, engagement and the decision. It should not be a tick-box exercise. Equality impact assessment is an iterative process that should be revisited throughout the decision-making process. It can be used to assess several different options.
- e) Decision makers must be aware of their duty to pay 'due regard' to the Public Sector Equality Duty (see below) and 'due regard' must be paid before and at the time a decision is taken. Please see the Brown Principles on the equality intranet pages, for information on how to undertake a lawful decision-making process, from an equalities' perspective. Please append the draft EIA and the final EIA to papers for decision makers (including leadership team meetings, lead member briefings, scrutiny meetings and executive meetings) and draw out the key points for their consideration. The Equalities Team provide equalities comments on reports.

1. Setting the context

Describe the proposal, the reasons it is being made, and the intended change or outcome. Will the needs of those who are currently using the service continue to be met?

The council has a duty to collect any debts owed and under council tax and business rates regulations there is also a statutory duty. [The Council Tax \(Administration and Enforcement\) Regulations 1992 \(legislation.gov.uk\)](#), [Local Government Finance Act 1992 \(legislation.gov.uk\)](#),

There is an existing contract with enforcement agents (EA's) which expires in December 2023 and there is a requirement to procure a new contract. Under the existing contract, enforcement agents are used by the council to recover the following debts;

- council tax and business rates

- parking services and bus lane enforcement debts (Under the Road Traffic regulations)
- business service centre also use enforcement agents for a debt collection service for sundry debts. These are any other debts owed to the council such as housing benefits overpayments, commercial rent arrears, repairs/ maintenance costs for council properties etc.

The needs of those currently going through the enforcement process will remain unchanged and will continue to be protected under enforcement regulations and the council's contract and service level agreement.

2. Equality implications/obligations

Which aims of the Public Sector Equality Duty (PSED) are likely be relevant to the proposal? In this question, consider both the current service and the proposed changes.

a. Eliminate unlawful discrimination, harassment, and victimisation

- How does the proposal/service aim to remove barriers or disproportionate impacts for anyone with a particular protected characteristics compared with someone who does not share the same protected characteristics?
- Is this a relevant consideration? What issues could arise?

This relates to the mitigation of formal collection of the debt, or debts if multiple years.

Before debts progress to enforcement agents, several documents are issued under regulations.

Bill – explanatory notes are also sent stating any discounts, exemptions and help available, are issued with all bills. Leaflets are sent with all bills explaining discounts exemptions and help available. The first page of the bill also states “If you are struggling to pay due to the rise in living costs, please **talk to us for** advice. To find out if you are entitled to any extra benefits or support, please go to **leicester.gov.uk/benefits**. Customers can also contact the service and discuss that account by telephone.

In addition

Reminder notices, final notices in certain cases, summons – all documents advise the customer to contact us if they are struggling to pay the bill and to contact the Service to discuss payment. The documents also signpost the customer to the council's "Better Off" pages [Cost of living support \(leicester.gov.uk\)](http://leicester.gov.uk) , where other help and advice is also available.

Notice letter is issued 14 days in advance of referral to enforcement agents - this gives the customer a final opportunity to discuss their arrears.

The authority has introduced a pilot to send out text messages several days before statutory recovery documents are sent. Experience has shown that customers quickly make contact usually by telephone when a text is received rather than a letter. At this point a payment arrangement is usually made. The text will advise that an instalment is due and payable otherwise a reminder will be served within legislative requirements. The new text service which is due to go live imminently from 1st June 2023, also signposts customers to other help and advice available (such as citizens advice), as well as the council's debt recovery teams.

The Revenues and Customer Support Service (R&CS) also provides a service to customers to make contact by telephone, which is important for those who struggle with modern technology and do not, for example, own a Smart phone and for those with poor literacy skills. They can still contact the Council via telephone and therefore will not be disadvantaged as they will still be able to access any support that they need.

R&CS also has a referral process to Citizens Advice whereby any customers needing additional support are referred.

A special payment arrangement based on the customers circumstances is considered at every step of the process. However, if the customer fails to engage or payment arrangements are not maintained then the council has no option but to refer the case to enforcement agents.

All major enforcement companies have robust Welfare Teams due to the nature of the business. Enforcement regulations were also introduced in 2014, which regulate every part of the process e.g. from the engagement that is required before any visit is made, the fees charged, dealing with vulnerable customers etc. [The Taking Control of Goods Regulations 2013 \(legislation.gov.uk\)](http://legislation.gov.uk) (TCOG) and several associated regulations.

After the case has been sent to the enforcement company several non-statutory and statutory letters are issued and other contact (such as by telephone and text), is made. **The aim of the regulations is to prevent a visit.** Therefore, in our contract and service level agreement, we will require, as now, a letter to be issued 14 days before any statutory letter, notifying the customer that

enforcement action is imminent. Overall, the customer will be given as minimum, 40 days grace (longer if the customer engages), before any visit.

Also, within the TCOG regulations, if the customer fails to engage and a visit is necessary, there is a requirement in the regulations for the customer to be given a minimum 14 days to seek help if any concerns are identified by the enforcement agent. The reality is that many such customers do not engage until an enforcement visit is made.

These cases are then referred to the council and to the enforcement company's Welfare Team. In the majority of these situations the case is returned to the council and is closely managed by the council's team to help the customer where possible by e.g., referring to Citizens Advice or another suitable organisation. In certain cases we can also help the customer to claim council tax support, see [Council tax support \(leicester.gov.uk\)](https://www.leicester.gov.uk/council-tax/council-tax-support/) if they haven't already done so and /or council tax discretionary reliefs . See policy at [Council tax discretionary relief policy \(leicester.gov.uk\)](https://www.leicester.gov.uk/council-tax/council-tax-discretionary-relief-policy/)

The Service also has a vulnerability policy which is attached. This is waiting to be published.

The council's debt collection policy can also be found here [debt-policy-2022.pdf \(leicester.gov.uk\)](https://www.leicester.gov.uk/council-tax/debt-policy-2022.pdf)

b. Advance equality of opportunity between different groups

- Does the proposal/service advance equality of opportunity for people?
- Identify inequalities faced by those with specific protected characteristic(s).
- Is this a relevant consideration? What issues could arise?

There are almost 144,000 domestic properties in Leicester and around 12,700 businesses. Communication is only sent to those customers who have not paid their instalments and fail to engage and is not restrictive to any group or those with protected characteristics. Those who continue to default and do not seek help, are then referred to enforcement agents. Unless there is an eligible discount, exemption, council tax or business rates are paid by the liable person(s) for every property.

As mentioned in part A, every effort is made to try to engage with the customer by methods such as texts first, as most customers do now have telephones capable of receiving these, assuming we have their current contact details.

If texts are not successful, or unavailable statutory documents are issued, and the customer is able to contact the Service by telephone. Others may respond by email or letter and the Service will respond to these either by telephone, email, or letter. Some

customers also request help from independent advice agencies, their Councillor or MP and Services prioritise these responses in accordance with the council's procedures.

With the current cost of living issues, we are keener than ever for customers to reach out for help, especially if they are struggling financially. Help is available in the form of council tax support which is means tested and for those in extreme financial difficulty there is also discretionary council tax relief (as mentioned above) available which is at a cost to the council. With every contact we will also assess whether the customer is entitled to any other discount or exemption or relief. The same support is offered to all customers.

There is also a vulnerability indicator on council tax records which can speedily identify any customers we have previously assisted.

c. Foster good relations between different groups

- Does the service contribute to good relations or to broader community cohesion objectives?
- How does it achieve this aim?
- Is this a relevant consideration? What issues could arise?

Council tax and business rates income makes up high percentage of the council's income and this income pays for many essential services. It is therefore important to ensure that collection can be maximised to help all communities, as many households do pay their charges due in full.

Therefore, the statutory process is followed in the collection of these debts in the same way as at every other council. However, we ensure that there are safeguards in place such as giving the customer every opportunity to contact us for help at every stage of the process including when the case has been sent to enforcement agents. These safeguards include as mentioned in Part B the opportunity and help to claim council tax support, council tax discretionary relief, any discounts and exemptions and & signposting to welfare and that advice agencies.

We always review all collection processes on a regular basis and try to make improvements where possible, such as the issue of better text reminders and reviewing policies, for example that for council tax discretionary relief and the vulnerability policy.

3. Who is affected?

Outline who could be affected, and how they could be affected by the proposal/service change. Include people who currently use the service and those who could benefit from, but do not currently access the service. Where possible include data to support this.

Any household/customers in the city who do not pay according to their Council Tax/Business Rates instalments, Parking /bus lane contravention debt or maintain any special arrangement that they have set up with the Council.

This isn't a service change. The regulations are unchanged, and this new procurement is simply to procure a new contract to replace an existing contract for enforcement services

It is difficult to say who is affected in a positive or negative way as this is dependent on the individual. Those with limited literacy skills or those who have difficulties with IT may respond better to shorter text messages or voice recorded messages rather than written and posted documents whereas possibly some elderly customers who are not so in tune with modern technology may find that they would prefer to contact the Council via telephone.

All of the major enforcement companies use the above technology in their contact centres and we will ensure this is a requirement in our contract.

4. Information used to inform the equality impact assessment

- What **data, research, or trend analysis** have you used?
- Describe how you have got your information and what it tells you
- Are there any gaps or limitations in the information you currently hold, and how you have sought to address this? E.g. proxy data, national trends, equality monitoring etc.

The council currently has four enforcement companies collecting debts on its behalf. These are usually hard to collect debts and in the last year alone these companies have collected £4.4million for council tax and business rates alone which is then used to fund much needed council services which benefit all. This information is gathered through management information gathered from the EA companies we use.

In the last 12 months research was done to check if any councils in England do not use EA's and this showed that all councils use EAs as enabled by government legislation.

5. Consultation

Have you undertaken consultation about the proposal with people who use the service or people affected, people who may potentially use the service and other stakeholders? What did they say about:

- What is important to them regarding the current service?
- How does (or could) the service meet their needs? How will they be affected by the proposal? What potential impacts did they identify because of their protected characteristic(s)?
- Did they identify any potential barriers they may face in accessing services/other opportunities that meet their needs?

As this is a statutory requirement no consultation has been carried out. However engagement with internal colleagues and services was recently done by the R&CS in response to the Money Advice Service's "Stop the Knock" report and this report was considered and approved by Senior Council Officers involved in debt collection including the consideration of enforcement agents, income statements and an enhanced vulnerability statement within the council's debt policy. As part of this the following commitment was approved at Director level - The Council is continuing to review local taxation debt collection practices and has adopted four of the six Money Advice Trust's 'Stop the Knock' campaign steps, www.stoptheknock.org . We are committed to reduce our use of enforcement agents over time, will continue our approach to free debt signposting, building upon current informal arrangements with Citizens Advice LeicesterShire and other partners, adopt a Standard Financial Statement to objectively assess affordability and review and adopt a formal vulnerability policy. We do not intend to adopt and sign the Citizens Advice Council Tax Protocol or to exempt council tax support recipients from enforcement agent action, where all previous engagement has failed. There is now a work party to review the council debt, billing, recovery, and enforcement policies and a commitment to review these as circumstances change.

6. Potential Equality Impact

Based on your understanding of the service area, any specific evidence you may have on people who use the service and those who could potentially use the service and the findings of any consultation you have undertaken, use the table below to explain which individuals or community groups are likely to be affected by the proposal because of their protected characteristic(s). Describe what the impact is likely to be, how significant that impact is for individual or group well-being, and what mitigating actions can be taken to reduce or remove negative impacts. This could include indirect impacts, as well as direct impacts.

Looking at potential impacts from a different perspective, this section also asks you to consider whether any other particular groups, especially vulnerable groups, are likely to be affected by the proposal. List the relevant groups that may be affected, along with the likely impact, potential risks and mitigating actions that would reduce or remove any negative impacts. These groups do not have to be defined by their protected characteristic(s).

Protected characteristics

Impact of proposal:

Describe the likely impact of the proposal on people because of their protected characteristic and how they may be affected. Why is this protected characteristic relevant to the proposal? How does the protected characteristic determine/shape the potential impact of the proposal? This may also include **positive impacts** which support the aims of the Public Sector Equality Duty to advance equality of opportunity and foster good relations.

Risk of disproportionate negative impact:

How likely is it that people with this protected characteristic will be disproportionately negatively affected? How great will that impact be on their well-being? What will determine who will be negatively affected?

Mitigating actions:

For disproportionate negative impacts on protected characteristic/s, what mitigating actions can be taken to reduce or remove the impact? You may also wish to include actions which support the positive aims of the Public Sector Equality Duty to advance equality of opportunity and to foster good relations. All actions identified here should also be included in the action plan at the end of this EIA.

a) Age

Indicate which age group/s is/ are most affected, either specify general age group (children, young people, working aged people or older people) or specific age bands.

What is the impact of the proposal on age?

Those who have not paid their charges and are over the age of 18. Both working age and those of pensionable age could be affected.

What is the risk of disproportionate negative impact on age?

No risk as all those who could be affected are able to seek or supported to seek help to pay and those identified at a later stage by either EA's or the Service will be assisted as required.

What are the mitigating actions?

Ensuring that telephony support and any other support such as that by SMS, email or letter continues to be available.

b) Disability

A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. If specific impairments are affected by the proposal, specify which these are. Our standard categories are on our equality monitoring form – physical impairment, sensory impairment, mental health condition, learning disability, long standing illness, or health condition.

What is the impact of the proposal on disability?

Telephone support and online access will be available for all. This means that those who may have impairments or disabilities can contact the service or EA for help.

The service supports those people with sight or hearing impairments to access the service via face-to-face meetings in the customer service centre and there are also large print bills and bills in other formats available on request, that may be more accessible to their needs. We record those bill payers who require a different format and facilitate the appropriate format when bills or correspondence is issued. These details are available to EA's and adopted by them when communicating about the debt recovery.

Our online offer including the charge payer self-service portal which displays details of account balances, payment dates and stages of recovery of debt is accessible to current industry standards. Where it is not the appropriate statement from the company details the missing functionality and provide a date when this will be remedied.

Additional council tax reliefs are also available for those with physical disability meaning their bill would be reduced. Disabled person reduction can be awarded if eligibility criteria is met for a person who uses their wheelchair indoors and/or their home is adapted to meet their disability needs. An exemption or discount can also be considered where a person has a severe mental impairment, depending on the make-up of the household. Furthermore, also depending on the financial circumstances of the household, help to pay council tax can be considered through means tested benefits such as council tax support and/or council tax discretionary relief.

In addition the council is exploring how it can inform EA's of vulnerability indicators such as impacted by Mental health, disabled household, carer etc can be shared with them at the point of referral. Other appropriate demographic details may be able to be shared to inform appropriate recovery and data analysis.

What is the risk of disproportionate negative impact on disability?

None identified. This is a statutory requirement. enforcement companies are also expected to be attuned to the needs of those with any disabilities and we will make this a requirement in our contract.

What are the mitigating actions?

ensuring that those with disabilities are not disadvantaged. this will be in our contract.

c) Gender reassignment

Indicate whether the proposal has potential impact on trans men or trans women, and if so, which group is affected. a trans person is someone who proposes to, starts, or has completed a process to change his or her gender. A person does not need to be under medical supervision to be protected.

What is the impact of the proposal on gender reassignment?

No impact identified based on data currently available

What is the risk of disproportionate negative impact on gender reassignment?

N/A

What are the mitigating actions?

N/A

d) Marriage and civil partnership

Please note that the under the Public Sector Equality Duty this protected characteristic applies o the first general duty of the Act, eliminating unlawful discrimination, only. The focus within this is eliminating discrimination against people that are married or in a civil partnership with regard specifically to employment.

What is the impact of the proposal on marriage and civil partnership?

No impact identified based on data currently available

What is the risk of disproportionate negative impact on marriage and civil partnership?

N/A

What are the mitigating actions?

N/A

e) Pregnancy and maternity

Does the proposal treat someone unfairly because they're pregnant, breastfeeding or because they've recently given birth.

What is the impact of the proposal on pregnancy and maternity?

No impact identified based on data currently available

What is the risk of disproportionate negative impact on pregnancy and maternity?

N/A

What are the mitigating actions?

N/A

f) Race

Race refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. A racial group can be made up of two or more distinct racial groups, for example Black Britons, British Asians, British Sikhs, British Jews, Romany Gypsies and Irish Travellers.

What is the impact of the proposal on race?

Bills in other formats can be sent to customers on request and the council has its own translation service provider should a customer require assistance. As these are managed by dedicated officers they can be issued in a timely manner.

What is the risk of disproportionate negative impact on race?

N/A

What are the mitigating actions?

N/A

g) Religion or belief

Religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief. Generally, a belief should affect your life choices or the way you live for it to be included in the definition. This must be a belief and not just an opinion or viewpoint based on the present state of information available and;

- be about a weighty and substantial aspect of human life and behaviour
- attain a certain level of cogency, seriousness, cohesion, and importance, and
- be worthy of respect in a democratic society, not incompatible with human dignity and not in conflict with fundamental rights of others. For example, Holocaust denial, or the belief in racial superiority are not protected.

Are your services sensitive to different religious requirements e.g., times a customer may want to access a service, religious days and festivals and dietary requirements

What is the impact of the proposal on religion or belief?

EA's are also required to ensure religious days festivals etc are recognised sympathetically. For example shoes will be removed when entering homes generally, visits will not be made on certain religious or festival days etc.

What is the risk of disproportionate negative impact on religion or belief?

N/A

What are the mitigating actions?

N/A

7. Summary of protected characteristics

a. Summarise why the protected characteristics you have commented on, are relevant to the proposal?

We are trying to collect overdue charges from anyone aged over 18 owing monies to the council. These are often customers who will not engage in any other way. Our SMS pilot has emoji and Avatar functionality which is more engaging with under 30's and has been shown in other collection pilots to be effective as prompts to pay.

b. Summarise why the protected characteristics you have not commented on, are not relevant to the proposal?

This applies to all service users who have not paid their charges. Enforcement companies will be required to submit their own Equality Assessments, and these will be evaluated when deciding on the award of a contract

8. Armed Forces Covenant Duty

The Covenant Duty is a legal obligation on certain public bodies to 'have due regard' to the principles of the Covenant and requires decisions about the development and delivery of certain services to be made with conscious consideration of the needs of the Armed Forces community.

When Leicester City Council exercises a relevant function, within the fields of healthcare, education, and housing services it must have due regard to the aims set out below:

a. The unique obligations of, and sacrifices made by, the Armed Forces

These include danger; geographical mobility; separation; Service law and rights; unfamiliarity with civilian life; hours of work; and stress.

b. The principle that it is desirable to remove disadvantages arising for Service people from membership, or former membership, of the Armed Forces

A disadvantage is when the level of access a member of the Armed Forces Community has to goods and services, or the support they receive, is comparatively lower than that of someone in a similar position who is not a member of the Armed Forces Community, and this difference arises from one (or more) of the unique obligations and sacrifices of Service life.

c. The principle that special provision for Service people may be justified by the effects on such people of membership, or former membership, of the Armed Forces

Special provision is the taking of actions that go beyond the support provided to reduce or remove disadvantage. Special provision may be justified by the effects of the unique obligations and sacrifices of Service life, especially for those that have sacrificed the most, such as the bereaved and the injured (whether that injury is physical or mental).

Does the service/issue under consideration fall within the scope of a function covered by the Duty (healthcare, education, housing)? Which aims of the Duty are likely to be relevant to the proposal? In this question, consider both the current service and the proposed changes. Are members of the Armed Forces specifically disadvantaged or further disadvantaged by the proposal/service? Identify any mitigations including where appropriate possible special provision.

Compliance to the Armed Forces Covenant is a requirement in our day-to-day processes and where any additional discount can be considered this is assessed as soon as it is known that the customer is a member of or an ex-member of the Armed Forces. This is in line with the statutory discounts that can be offered to such payers. These discounts consider whether the officer lives away from their main home, whether other family members remain resident or if their property in Leicester remains unoccupied. For ex-personnel we would also look at any disability reliefs that would apply detailed under point (b) above and whether any further financial assistance is required such as council tax support and/or council tax discretionary relief.

9. Other groups

Other groups

Impact of proposal:

Describe the likely impact of the proposal on children in poverty or any other people who we may consider to be vulnerable, for example people who misuse substances, care leavers, people living in poverty, care experienced young people, carers, those who are digitally excluded. List any vulnerable groups likely to be affected. Will their needs continue to be met? What issues will affect their take up of services/other opportunities that meet their needs/address inequalities they face?

Risk of disproportionate negative impact:

How likely is it that this group of people will be negatively affected? How great will that impact be on their well-being? What will determine who will be negatively affected?

Mitigating actions:

For negative impacts, what mitigating actions can be taken to reduce or remove this impact for this vulnerable group of people? These should be included in the action plan at the end of this EIA. You may also wish to use this section to identify opportunities for positive impacts.

a. Children in poverty

What is the impact of the proposal on children in poverty?

Means tested discounts and exemptions are offered at every stage for council tax which is the most common debt referred to enforcement agents. In most cases this will either eliminate or reduce the charges due.

What is the risk of negative impact on children in poverty?

Charges due will be eliminated or reduced once the household circumstances are known.

What are the mitigating actions?

We will also be using the standard financial statement which provides affordable limits for household incomes, which informs decision making when agreeing payment arrangements. This is all already used by other service areas in the council. Enforcement companies will also be required to make affordable arrangements in the same way

b. Other vulnerable groups

What is the impact of the proposal on other vulnerable groups?

no other groups identified

What is the risk of negative impact on other vulnerable groups?

N/A

What are the mitigating actions?

N/A

c. Other (describe)

What is the impact of the proposal on any other groups?

N/A

What is the risk of negative impact on any other groups?

N/A

What are the mitigating actions?

N/A

10. Other sources of potential negative impacts

Are there any other potential negative impacts external to the service that could further disadvantage service users over the next three years that should be considered? For example, these could include:

- other proposed changes to council services that would affect the same group of service users.
- Government policies or proposed changes to current provision by public agencies (such as new benefit arrangements) that would negatively affect residents.
- external economic impacts such as an economic downturn.

None have been identified. We are not aware of any government policies or regulation changes that would impact this proposal. we are also looking at extra ways of contacting customers before their arrears build up and this would be advantageous.

11. Human rights implications

Are there any human rights implications which need to be considered and addressed (please see the list at the end of the template), if so, please outline the implications and how they will be addressed below:

No impact identified based on data currently available [Click or tap here to enter text.](#)

12. Monitoring impact

You will need to ensure that monitoring systems are established to check for impact on the protected characteristics and human rights after the decision has been implemented. Describe the systems which are set up to:

- monitor impact (positive and negative, intended, and unintended) for different groups
- monitor barriers for different groups
- enable open feedback and suggestions from different communities
- ensure that the EIA action plan (below) is delivered.

If you want to undertake equality monitoring, please refer to our [equality monitoring guidance and templates](#).

The successful bidders will provide management information monthly which can be analysed within the service to ensure there are no negative impacts on the residents and businesses they are collecting from. This analysis will inform and be discussed at contract management meetings which are held every two months. Action will be taken, where appropriate, to address any negative impacts.

The Service area will also continue to monitor its own performance indicators, protected characteristics and demographic elements, against arrears outstanding and those collected, as part of our ongoing system of improvement.

13. EIA action plan

Please list all the equality objectives, actions and targets that result from this assessment (continue on separate sheets as necessary). These now need to be included in the relevant service plan for mainstreaming and performance management purposes.

Equality Outcome	Action	Officer Responsible	Completion date
Improved Communication Strategy with advice organisations and stakeholders	Ensure all communication is regularly reviewed and improved so that customers owing monies can easily contact individual service areas to discuss payments before an account reaches enforcement. This includes referral to stakeholders such as Citizen advice		1st November 2023 (ongoing however before the end of the existing contract in December 2023)
Improve methods of communication ahead of statutory notices	Improve methods of communication ahead of statutory notices A project has started to trial new forms of SMS messaging, which is more interactive than the existing system. Experience has shown that customers will very quickly contact the service for help as most customers these days do have smart phones where they can access and respond to such messages		31/7/2023 – A trial on this type of messaging is imminent

Equality Outcome	Action	Officer Responsible	Completion date
Implement the standard financial statement in revenues and customer support	Implement the standard financial statement in revenues and customer support This is already used in the business service centre to collect sundry debts. This will complement the payment arrangement guidelines already used		31/7/2023
Revised vulnerability policy publication	Amendment to debt collection policy post feedback from relevant within services		31/08/23
Prevent financial hardship, when collecting other income	Utilise the spending guidelines so that payment plans are affordable and reasonable. Avoiding enforcement.		ongoing
Non-residential care costs are affordable.	Apply the means test ensuring the minimum income guarantee rates are used in social care financial assessments for non-residential care. Avoiding enforcement of non-payment of care costs.		ongoing
Offer the deferred payment scheme for residential care costs where appropriate.	Allowing local people to use the value of their homes to help pay residential care costs. Avoiding enforcement of non-payment of care costs.		ongoing

Equality Outcome	Action	Officer Responsible	Completion date
Affordability for major works.	Permitting leaseholds to have a statutory loan avoiding enforcement of works & service charge costs.		ongoing

Human rights articles:

Part 1: The convention rights and freedoms

Article 2: Right to Life

Article 3: Right not to be tortured or treated in an inhuman or degrading way

Article 4: Right not to be subjected to slavery/forced labour

Article 5: Right to liberty and security

Article 6: Right to a fair trial

Article 7: No punishment without law

Article 8: Right to respect for private and family life

Article 9: Right to freedom of thought, conscience, and religion

Article 10: Right to freedom of expression

Article 11: Right to freedom of assembly and association

Article 12: Right to marry

Article 14: Right not to be discriminated against

Part 2: First protocol

Article 1: Protection of property/peaceful enjoyment

Article 2: Right to education

Article 3: Right to free elections