
Report to: Clackmannanshire Council

Date of Meeting: 25 June 2026

Subject: Corporate Debt & Write off Policy

Report by: Chief Finance Officer

1.0 Purpose

- 1.1. The purpose of this report is for Council to review and agree the updated Corporate Debt & Write off Policy.

2.0 Recommendations

Council is asked:

- 2.1. To review and approve the updated Corporate Debt & Write off Policy (appendix 1)

3.0 Considerations

- 3.1. The Council approved the Corporate Recovery and Write-Off policy in June 2018. Over the last few months a full review of the policy has been undertaken to ensure it continues to be fit for purpose.
- 3.2. The policy sets out the corporate approach to the collection and recovery of income. The policy also deals with the arrangements for the identification of debts proposed for write off. The annual review of debtors report is presented to Council in June each year and includes all debt proposed for write off. The policy underpins the internal procedures followed in the collection of income.
- 3.3. Effective debt management is crucial to maximise income in order to avoid an increase in costs or decrease in the quality of services provided. It is important therefore that the policy clearly states the approach to debt collection.

The aims of the policy are;

- Promote a consistent, corporate approach to income collection, debt recovery and debt management across all Council services.
- Ensure that income due to the Council is collected efficiently, effectively and in a timely manner through legal and proportionate recovery practices.

- Ensure that employees involved in income collection and debt recovery are appropriately trained, supported and aware of their responsibilities in managing and recovering debt.
- Minimise levels of outstanding debt and reduce the risk of debts becoming uncollectable.
- Treat customers fairly, consistently and with respect, taking account of individual circumstances and providing appropriate support, advice and signposting where required.
- Provide accessible, convenient and cost-effective payment options that encourage prompt payment and support customer choice.
- Support early intervention and engagement with customers to prevent debt from escalating and to maximise opportunities for sustainable repayment arrangements.
- Balance the Council's responsibility to protect public funds with its commitment to supporting vulnerable customers and those experiencing financial hardship.

3.4 The policy applies to all debts owed to the Council including statutory charges, rents, fees, service charges, invoices, overpayments and any other sums due from individuals, businesses, organisations or other bodies.

3.5 The following are the council's principles in our approach to debt collection.

- Our actions will be appropriate
- Our approach will be consistent
- Our actions will be transparent

Write-Offs

3.6 The Council recognises that despite utilising all recovery methods and tools available, there will be a small proportion of income due to the Council which will not always be collectable due to matters outwith our control. This income is classed as irrecoverable.

3.7 The policy outlines how this income is identified and the process for making arrangements for it to be proposed for write off in the annual report. The policy also aims to ensure all write off amounts are kept to a minimum.

The policy is subject to annual review with a formal review being undertaken every 5 years.

4.0 Sustainability Implications

4.1. None

5.0 Resource Implications

The full financial implications of the recommendations are set out in the report. This includes a reference to full life cycle costs where appropriate. Yes

5.1. Finance have been consulted and have agreed the financial implications as set out in the report. Yes

5.2. *Staffing*

6.0 Exempt Reports

6.1. Is this report exempt? Yes (please detail the reasons for exemption below) No

7.0 Declarations

The recommendations contained within this report support or implement our Corporate Priorities and Council Policies.

(1) Our Priorities

Clackmannanshire will be attractive to businesses & people and ensure fair opportunities for all

Our families; children and young people will have the best possible start in life

Women and girls will be confident and aspirational, and achieve their full potential

Our communities will be resilient and empowered so that they can thrive and flourish

(2) Council Policies

Complies with relevant Council Policies

8.0 Impact Assessments

8.1 Have you attached the combined equalities impact assessment to ensure compliance with the public sector equality duty and fairer Scotland duty? (All EFSIAs also require to be published on the Council's website)

Yes

8.2 If an impact assessment has not been undertaken you should explain why:

9.0 Legality

9.1 It has been confirmed that in adopting the recommendations contained in this report, the Council is acting within its legal powers. Yes

10.0 Appendices

10.1 Please list any appendices attached to this report. If there are no appendices, please state "none".

Appendix 1 – Corporate Debt & Write off Policy

Appendix 2 – Corporate Debt & Write off Policy EQIA

11.0 Background Papers

11.1 Have you used other documents to compile your report? (All documents must be kept available by the author for public inspection for four years from the date of meeting at which the report is considered)


Yes (please list the documents below) No

- Corporate Debt & Write off Policy (2018)

Author(s)

| NAME | DESIGNATION | TEL NO / EXTENSION |
|------------|-----------------------------------|--------------------|
| Ben Watson | Team Leader – Revenues & Benefits | 01259 226228 |

Approved by

| NAME | DESIGNATION | SIGNATURE |
|----------------|----------------------------|---|
| Chris Alliston | Head of Corporate Services |  |

Clackmannanshire Council

Corporate Debt & Write off Policy

June 2026

Contents

1. Introduction
2. Policy Aims
3. Policy Scope
4. Responsibilities and Delegated Authorities
5. Recovery Policy
6. Payment Methods
7. Withdrawal of Service
8. Offset of Income Against Council Debt
9. Partnership Working and Stakeholders
10. Write off Policy
11. Performance Monitoring and Reporting
12. Equality, Diversity and Inclusion
13. Confidentiality, Data Protection and Information Sharing
14. Review of the Policy

1. Introduction

- 1.1 Clackmannanshire Council delivers a wide range of services that support residents, communities and businesses across Clackmannanshire. These services are funded through a combination of taxation, government funding, rents, charges and other sources of income.
- 1.2 Those who receive services, occupy Council properties, or are liable for statutory charges, have a responsibility to pay amounts due in accordance with relevant legislation, tenancy agreements, contracts and Council policies. The effective collection of income is essential to protecting public funds and ensuring the continued delivery of high-quality services.
- 1.3 This Policy sets out the principles and framework that the Council will apply in the collections, recovery and, where appropriate, write-off of monies owed to the Council. It aims to ensure that all income due is managed in a consistent, proportionate, fair and efficient manner.
- 1.4 The Council collects income from a range of sources, including:
- Council Tax
 - Non-Domestic Rates
 - Housing Rents
 - Housing Benefit Overpayments
 - Sundry debtor accounts and service charges
- 1.5 The Council is committed to maximising the collection of income while treating all customers fairly, consistently and with respect. We recognise that individuals, households and businesses may experience financial difficulties and changing circumstances that affect their ability to pay
- 1.6 The Council will seek to engage with customers at the earliest opportunity, offering appropriate support, advice and signposting to help them manage their financial commitments. Recovery action will be proportionate to the level of debt and the circumstances of the debtor, while ensuring that public funds are protected.
- 1.7 This Policy establishes the Council's corporate approach to income collection, debt recovery and debt write-off. It provides a consistent framework for managing debt across all Council services and supports the principles of good governance, financial stewardship and accountability.

2. Policy Aims

The aims of this Policy are to:

- 2.1 Promote a consistent, corporate approach to income collection, debt recovery and debt management across all Council services.
- 2.2 Ensure that income due to the Council is collected efficiently, effectively and in a timely manner through legal and proportionate recovery practices.

- 2.3 Ensure that employees involved in income collection and debt recovery are appropriately trained, supported and aware of their responsibilities in managing and recovering debt.
- 2.4 Minimise levels of outstanding debt and reduce the risk of debts becoming uncollectable.
- 2.5 Treat customers fairly, consistently and with respect, taking account of individual circumstances and providing appropriate support, advice and signposting where required.
- 2.6 Provide accessible, convenient and cost-effective payment options that encourage prompt payment and support customer choice.
- 2.7 Support early intervention and engagement with customers to prevent debt from escalating and to maximise opportunities for sustainable repayment arrangements.
- 2.8 Balance the Council's responsibility to protect public funds with its commitment to supporting vulnerable customers and those experiencing financial hardship.

3. Policy Scope

- 3.1 This Policy applies to all debts owed to the Council, including statutory charges, rents, fees, service charges, invoices, overpayments and any other sums due from individuals, businesses, organisations or other bodies.
- 3.2 The Policy covers the collection, recovery and write-off of all income due to the Council, regardless of the service area responsible for administering the debt, unless specific legislative requirements or separate approved procedures apply.
- 3.3 This Policy should be read in conjunction with the Council's Financial Regulations, Charging Policy, Scheme of Delegation and any relevant service-specific procedures. Where there is any conflict between this Policy and statutory requirements, legislation will take precedent.

4. Responsibilities and Delegated Authorities

- 4.1 The Council's Section 95 Officer, appointed under the Local Government (Scotland) Act 1973, has overall responsibility for the proper administration of the Council's financial affairs and for ensuring appropriate arrangements are in place for the management, recovery and accounting of debt.
- 4.2 Operational responsibility for the implementation, monitoring and review of this Policy is delegated to the Team Leader responsible for Revenues and Debt Recovery. The Revenues team will administer the Council's corporate debt recovery processes, including:
 - The progression of recovery action for Council Tax and Non-Domestic Rates arrears;
 - The application for Summary Warrants where appropriate;
 - The referral of debts to Sheriff Officers, legal services or approved external collection agencies in accordance with legislation, Council procedures and contractual arrangements;
 - The secure and lawful sharing of customer information where necessary to support debt recovery activities.

- 4.3 Service areas are responsible for the accurate billing, administration and monitoring of debts arising from their activities and for working with the Revenues Team to maximise collection and recovery. The Revenues Team, in conjunction with relevant service areas, will identify debts that are considered irrecoverable and will prepare reports to Council for approval, recommending write-off in accordance with the Council's Financial Regulations and Scheme of Delegation. Approved write-offs will be reported through the Council's governance and financial reporting arrangements.
- 4.4 Responsibility for decisions relating to recovery action associated with Council housing tenancies, including the approval of eviction proceedings where appropriate, rests with the Director of Pace and Economy or such other officer as authorised under the Council's Scheme of Delegation.
- 4.5 The Council will maintain robust governance arrangements and internal controls for all income collection, debt recovery and write off activities. These arrangements will include:
- Clear segregation of duties;
 - Appropriate authorisation and approval processes;
 - Compliance with relevant legislation, regulations and Council policies;
 - Effective management oversight and performance monitoring; and
 - Documented operational procedures and guidance for employees involved in debt management and recovery.

All decisions relating to debt recovery and write-off will be made by authorised officers in accordance with delegated powers and will be subject to appropriate review and scrutiny.

5. Recovery Policy

- 5.1 The effective management and recovery of debt is essential to safeguarding public funds and maximising the resources available to deliver Council services. While the majority of customers pay amounts due on time, the Council will take appropriate action to recover outstanding debts where payment is not made.
- 5.2 The Council's approach to debt recovery is guided by the following principles:
- Recovery action will be proportionate to the level of debt, the circumstances of the debtor and the costs involved.
 - Recovery processes will be applied consistently across services, while taking account of individual circumstances.
 - Recovery action will be transparent, with customers provided with clear information about amounts due, payment options, recovery processes and available support.
 - The Council will seek to engage with customers at an early stage to prevent debts from escalating.
 - The Council will balance its responsibility to recover public funds with its commitment to supporting customers experiencing financial hardship or vulnerability.

- 5.3 The Council's approach to debt recovery will include:
- Customers are responsible for paying bills, charges, rents, invoices and other amounts due by the required payment date. Outstanding debts will be actively pursued in accordance with relevant legislation and Council procedures.
 - Customers will be treated fairly, respectfully and consistently, with relevant information and individual circumstances considered, where known, before enforcement action is taken.
 - Early intervention and timely contact will be used to encourage payment and prevent debts from increasing.
 - Where appropriate, customers will be offered support, advice and signposting to services that can assist with debt management, welfare benefits, income maximisation and financial wellbeing.
 - Recovery and enforcement action will be proportionate and appropriate to the circumstances of each case.
 - The Council may use legal remedies and enforcement powers available to it where appropriate and where other recovery options have been unsuccessful.
 - Where legislation permits, the Council will seek to recover any costs, fees or charges associated with legal or enforcement action from the debtor.
 - Where lawful and appropriate, and subject to any statutory requirements, debts owed to the Council may be offset against monies payable by the Council to the debtor.
 - Legal action will normally be considered only after reasonable efforts have been made to engage with the customer, establish sustainable repayment arrangements and provide access to appropriate support.

6. Payment Methods

- 6.1 The Council will provide a range of accessible, secure and convenient payment methods to support customers in meeting their financial obligations. The availability of flexible payment options can help reduce the likelihood of debt arising and improve collection rates.
- 6.2 Payment methods will be reviewed periodically to ensure they remain efficient, cost-effective, inclusive and responsive to customer needs. The Council will seek to maximise the use of digital and self-service payment channels while ensuring alternative arrangements remain available for those who require them.

7. Withdrawal of Services

- 7.1 Where permitted by legislation, contract, policy or service conditions, the Council may suspend or withdraw discretionary services where payment is not made.
- 7.2 Any decision to withdraw a service will be considered on a case-by-case basis, taking account of the nature of the service, the circumstances of the customer and any potential impact on vulnerable individuals or households.
- 7.3 Essential statutory services will not be withdrawn where legislation prevents such action.

8. Offset of Income Against Council Debt

- 8.1 Where a customer owes money to the Council and is also due a payment from the Council, the Council may offset one amount against the other where permitted by law and in accordance with Council procedures.
- 8.2 Any remaining balance due to the customer will be paid in the normal manner. Where a debt remains outstanding following offset, the Council will seek to recover the outstanding debt in line with this policy.

9. Partnership Working and Stakeholders

- 9.1 The Council recognises that debt can have a significant impact on individuals, families and businesses and that customers may have financial commitments to multiple creditors.
- 9.2 The Council will work collaboratively with relevant partners, including welfare rights services, money advice agencies, housing services, social work services and third-sector organisations, to support customers experiencing financial difficulties.
- 9.3 Where appropriate and lawful, information may be shared with partner organisations to support debt resolution, income maximisation and customer wellbeing, in accordance with data protection legislation and information-sharing protocols.

10. Write-Off Policy

- 10.1 The Council recognises that, despite appropriate recovery action, a small proportion of debt may ultimately prove irrecoverable. In such circumstances, it may be appropriate to write off the debt in accordance with recognised accounting practices, the Council's Financial Regulations and delegated authority arrangements.
- 10.2 The write-off of a debt is an accounting procedure that removes the debt from the Council's accounts. It does not necessarily extinguish the debt or prevent future recovery action should circumstances change.
- 10.3 A debt may be considered for write-off where one or more of the following circumstances apply:
- The debtor is deceased and there are no assets or estate funds available from which the debt can be recovered.
 - The debtor has left the area or cannot be traced despite reasonable enquiries.
 - The debt is unrecoverable due to insolvency, sequestration, liquidation or other formal debt resolution processes.
 - All reasonable recovery and enforcement options have been exhausted without success.
 - The cost of pursuing recovery is likely to exceed the value of the debt.
 - Exceptional circumstances exist where Council officers have deemed continued recovery action would not be in the public interest or would present a significant risk to the wellbeing of a vulnerable individual.
 - The debt is legally unenforceable, or recovery is otherwise prevented by legislation.

- 10.4 All proposed write-offs will be assessed individually and supported by evidence demonstrating that appropriate recovery action has been undertaken and that the debt meets the relevant write-off criteria.
- 10.5 Authority to approve debt write-offs will be exercised in accordance with the Council's Scheme of Delegation and Financial Regulations. Records of all approved write-offs will be maintained and reported through the Council's governance arrangements.
- 10.6 The Council will undertake periodic reviews of outstanding debt to identify amounts that may be considered irrecoverable and to ensure that write-offs are minimised wherever possible.

11. Performance Monitoring and Reporting

- 11.1 The Council recognises that effective debt management relies on timely recovery action, robust monitoring and continuous improvement.
- 11.2 The Council will:
- Monitor the level, age and profile of outstanding debt across all service areas.
 - Maintain documented procedures and guidance for debt collection and recovery activities.
 - Review recovery methods and practices regularly to ensure they remain effective, proportionate and compliant with legislation and best practice.
 - Monitor levels of irrecoverable debt and debt proposed for write-off.
 - Develop and maintain appropriate performance measures and key performance indicators to assess the effectiveness of debt recovery activities.
 - Report performance information, debt recovery outcomes and details of proposed or approved write-offs through the Council's established governance and financial reporting arrangements.

12. Equality, Diversity and Inclusion

- 12.1 The Council is committed to ensuring that this Policy is applied fairly and consistently and that services are accessible to all members of the community.
- 12.2 In implementing this Policy, the Council will comply with the Equality Act 2010 and its Public Sector Equality Duty, ensuring that no individual is disadvantaged or discriminated against on the basis of a protected characteristic or socio-economic circumstance.
- 12.3 The Council will:
- Take account of equality, diversity and inclusion considerations when developing and implementing debt recovery procedures.
 - Provide appropriate training and guidance to employees involved in debt recovery activities.
 - Communicate with customers in clear and accessible language.
 - Provide information in alternative formats, languages or communication methods where reasonably required.
 - Consider the needs of vulnerable customers and make reasonable adjustments where appropriate.

13. Confidentiality, Data Protection and Information Sharing

- 13.1 The Council will ensure that all personal and financial information is processed lawfully, fairly and securely in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Human Rights Act 1998 and any other relevant legislation.
- 13.2 Information will only be accessed, used, shared and retained where there is a lawful basis to do so and where it is necessary for the administration, collection, recovery or management of debt.
- 13.3 Appropriate technical and organisational measures will be maintained to protect customer information and ensure confidentiality.

14. Review of the Policy

- 14.1 This Policy will be reviewed periodically to ensure that it remains effective, compliant with legislation and aligned with Council priorities and best practice.
- 14.2 A formal review will normally be undertaken at least every five years, or sooner where required due to legislative changes, regulatory developments, audit recommendations, service improvements or changes in operational practice.
- 14.3 Any amendments to this Policy will be approved in accordance with the Council's governance arrangements.



Equality and Fairer Scotland Impact Assessment (EFSIA) Summary of Assessment

Title: Corporate Debt and Write-Off Policy

Key findings from this assessment (or reason why an EFSIA is not required):

The assessment identified that while the Corporate Debt and Write-Off Policy is not expected to result in adverse impacts, it is relevant across several equality groups, particularly those experiencing financial vulnerability, including younger households, disabled individuals, women (especially single parents), and those experiencing poverty.

The Policy has the potential to positively impact these groups through a person-centred, flexible and trauma-informed approach to debt recovery, supported by improved communication and access to repayment options and support services.

Summary of actions taken because of this assessment:

As a result of the assessment and stakeholder engagement, the Policy has been strengthened to embed a more person-centred and trauma-informed approach. This includes enhancing communication methods as well as improving accessibility and clarity of information.

Ongoing actions beyond implementation of the proposal include:

Ongoing actions include promoting awareness of the Policy, ensuring accessibility and understanding among residents and partners, and continuing to apply a person-centred approach in practice.

The impact on equality groups will be monitored through operational delivery, with continued collaboration across Council services and partners, and the EFSIA will be reviewed alongside the Policy to ensure it remains responsive and effective.

Lead person(s) for this assessment: Ben Watson

Senior officer approval of assessment: ?

DATE: 02/06/2026

Equality and Fairer Scotland Impact Assessment (EFSIA)

An Equality and Fairer Scotland Impact Assessment (EFSIA) must be completed in relation to any decisions, activities, policies, strategies or proposals of the Council (referred to as 'proposal' in this document). The first stage of the assessment process will determine the level of impact assessment required.

This form should be completed using the guidance contained in the document: ['NAME']. Please read the guidance before completing this form.

The aim of this assessment is to allow you to critically assess:

- the impact of the proposal on those with protected characteristics and, where relevant, affected by socio-economic disadvantage (referred to as 'equality groups' in this document);
- whether the Council is meeting its legal requirements in terms of Public Sector Equality Duty and the Fairer Scotland Duty;
- whether any measures need to be put in place to ensure any negative impacts are eliminated or minimised.

The Fairer Scotland Duty requires public authorities to pay 'due regard' to how they can reduce inequalities of outcome caused by socio-economic disadvantage, when making **strategic decisions**. Strategic decisions are key, high-level decisions such as decisions about setting priorities, allocating resources, delivery or implementation and commissioning services and all decisions that go to Council or committee for approval.

Step A – Confirm the details of your proposal

1. Describe the aims, objectives and purpose of the proposal.

Clackmannanshire Council's Corporate Debt and Write-Off Policy sets out the Council's corporate approach to the collection and recovery of income owed to the Council, together with the arrangements for identifying and managing debt that may require to be written off. The Policy applies across all relevant service areas and establishes a consistent framework for income collection and debt recovery activities.

The Policy covers all income due to the Council from a range of sources, including:

- Council Tax;
- Rental income for Council properties;
- Sundry debt and service charges;
- Non-domestic rates;
- Housing benefit overpayments; and
- Other miscellaneous income streams.

The Policy was last reviewed in 2018, and this update aims to ensure that the Council maintains a modern, consistent and effective approach to debt management. The updated Policy seeks to:

- Establish a consistent Council-wide approach to debt collection and recovery;
- Ensure a professional, timely and proportionate approach to income collection and recovery action;
- Reduce overall levels of outstanding debt and minimise the requirement for debt write-off;
- Equip staff with the necessary knowledge and skills to effectively manage and recover debt;
- Promote a person-centred and trauma-informed approach, taking account of individual circumstances;
- Increase and improve methods of communication between the Council and customers.

2. Why is the proposal required?

The Corporate Debt and Write-Off Policy is required to ensure that Clackmannanshire Council has a streamlined, consistent and proportionate framework for the collection and recovery of income owed to the Council. It provides a clear structure for how debt is managed across services, ensuring fairness, transparency and consistency in approach.

Effective income collection is essential to maximise the level of income recovered by the Council, supporting its financial sustainability and its ability to deliver essential services. These services are funded through Council Tax and a range of statutory and non-statutory charges, and it is therefore important that all reasonable steps are taken to recover monies due while minimising the level of debt that requires to be written off.

It is also important that the Policy is regularly reviewed and updated to ensure that it remains fit for purpose, compliant with relevant legislation and statutory guidance, and responsive to changing circumstances. This includes recognising the needs of residents and businesses, particularly those who may be experiencing financial hardship, and ensuring that the Council's approach to debt collection remains proportionate and sensitive to individual circumstances.

3. Who is affected by the proposal?

The Policy has the potential to affect any individual, household or business that is liable to make payments to Clackmannanshire Council. This includes payments relating to Council Tax, rent, non-domestic rates, and a range of other statutory and non-statutory service charges.

In particular, the Policy will most directly affect residents of Clackmannanshire who are responsible for paying monies to the Council, especially those who may have outstanding debts subject to recovery action. The impacts of the Policy may be more significant for individuals and households who are financially vulnerable or experiencing socio-economic disadvantage. This may include, but is not limited to:

- Individuals on low incomes or in financial hardship;
- Single-parent households;
- Children and families within low-income households; and
- Individuals with disabilities or additional support needs.

The Policy therefore recognises the importance of adopting a person-centred approach to debt recovery, ensuring that support and appropriate engagement mechanisms are available to those who may be disproportionately affected.

4. What other Council policies or activities may be related to this proposal? The EFSIAs for related policies might help you understand potential impacts.

The Corporate Debt and Write-Off Policy aligns with and supports a number of key Council policies and strategic activities, including the General Services Revenue and Capital Budget setting activities as well as the Local Outcomes Improvement Plan.

5. Is the proposal a strategic decision? If so, please complete the steps below in relation to socio-economic disadvantage. If not, please state why it is not a strategic decision:

While the Policy is likely to have implications for individuals experiencing socio-economic disadvantage, it is not considered to be a strategic decision in itself. The Policy does not set strategic priorities or directly allocate resources; rather, it provides an overarching framework that governs how the Council approaches the collection and recovery of debt.

The Policy establishes principles and processes for managing income and debt consistently across services, including how the Council seeks to maximise income and address outstanding debt. As such, it supports and informs wider strategic activity but does not, in isolation, determine policy direction or resource allocation.

Nevertheless, the Policy is expected to link closely with related strategic work and may help to inform future policy development and service delivery approaches, particularly in relation to financial inclusion, debt management and support for vulnerable households.

Step B – Consider the level of EFSIA required

You should consider the available evidence and data relevant to your proposal. You should gather information in order to:

- help you to understand the importance of your proposal for those from equality groups,
- inform the depth of EFSIA you need to do (this should be proportionate to the potential impact), and
- provide justification for the outcome, including where it is agreed an EFSIA is not required.

6. What information is available about the experience of those with protected characteristics in relation to this proposal? Does the proposal relate to an area where there are already known inequalities? Refer to the guidance for sources of evidence and complete the table below.

| Equality Group | Evidence source (e.g. online resources, report, survey, consultation exercise already carried out) | What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C). |
|-------------------|--|---|
| Age | Scottish Census 2022 Poverty and Income Inequality in Scotland 2017-2019 People Community Wellbeing Plan 2025-26 Scottish Household Survey 2019 National Records of Scotland | <p>According to the 2022 Census, Clackmannanshire has a population of 51,778. The age profile is relatively evenly distributed, with 20.8% aged 65 and over, 22.57% aged 45-59, 17.87% aged 30-44, 14.86% aged 16-29, and approximately 28% aged 16 and under.</p> <p>Evidence from the People and Community Wellbeing Plan 2025–26 and wider national data indicates clear links between age and socio-economic disadvantage. Younger households, particularly those where the household head is aged 16–24, are significantly more likely to experience relative poverty. Between 2021 and 2024, 37% of individuals in this group were living in relative poverty after housing costs.</p> <p>Furthermore, DWP figures for 2022/23 show that 2,855 children in Clackmannanshire are living in relative low-income households, which indicates an increase of 36.3% since 2016/17. Of these, 65% live in lone-parent households.</p> <p>As a result, households with children and young people are more likely to experience increased cost-of-living pressures and may be more susceptible to accruing debt, including Council Tax arrears or housing-related debt. The Corporate Debt and Write-Off Policy is therefore likely to have a direct impact on these households, particularly those experiencing poverty.</p> <p>It is important that the Policy reflects these pressures by ensuring a flexible, person-centred and supportive approach to debt recovery, recognising the financial challenges faced by younger households and families.</p> |
| Disability | Scottish Census 2022 Scottish House Condition Survey 2017-2019 Poverty and Income Inequality in Scotland 2017-20 | <p>The 2022 Scottish Census highlights that 22.3% of Clackmannanshire’s population report living with a long-term illness or condition, and 12.4% report a mental health condition. In addition, the Scottish House Condition Survey estimates that approximately 36% of households in the area include at least one person who is long-term sick or disabled.</p> <p>National evidence demonstrates that households containing a disabled person are more likely to experience poverty, with</p> |

| Equality Group | Evidence source (e.g. online resources, report, survey, consultation exercise already carried out) | What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C). |
|-----------------------|--|--|
| | | <p>27% of such households affected compared to 17% of households without a disabled member. This indicates a clear link between disability and increased financial vulnerability.</p> <p>Given this evidence, it is reasonable to assume that households with disabled members may be more susceptible to financial hardship and debt, including arrears owed to the Council. The Corporate Debt and Write-Off Policy is therefore likely to have an impact on this group.</p> <p>It is important that the Policy takes account of the needs and lived experiences of disabled individuals, ensuring that debt collection practices are fair, proportionate and responsive. This includes adopting a person-centred approach that recognises additional barriers and supports individuals in managing and resolving debt wherever possible.</p> |
| Race | Scottish Census 2022 Poverty and Income Inequality in Scotland 2017-20 | <p>Clackmannanshire's population is predominantly White, with 94.5% of individuals identifying as White in the 2022 Scottish Census. Minority ethnic groups make up a small proportion of the population, with 2.1% identifying as Asian and 1.1% as African.</p> <p>National data indicates that individuals from minority ethnic groups are more likely to experience relative poverty after housing costs, with around 43% affected. This suggests an increased likelihood of financial hardship among these groups at a national level.</p> <p>However, given the relatively small minority ethnic population within Clackmannanshire, it is unlikely that the Corporate Debt and Write-Off Policy will have a disproportionate impact on these groups at a local level. Despite this, it remains important that the Policy is inclusive and responsive to all individuals, regardless of ethnicity.</p> <p>The Policy should therefore continue to promote a flexible and person-centred approach to debt collection, ensuring that services are accessible, fair and sensitive to the needs of individuals from diverse backgrounds.</p> |
| Sex | Scottish Census 2022 Poverty and Income Inequality in Scotland 2017-20 | <p>The 2022 Census indicates that the population of Clackmannanshire is broadly evenly split, with 49% male and 51% female.</p> <p>National poverty data highlights that women, particularly single women with children, face higher levels of economic disadvantage. Approximately 38% of lone-parent households headed by women are living in relative poverty, compared to</p> |

| Equality Group | Evidence source (e.g. online resources, report, survey, consultation exercise already carried out) | What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C). |
|----------------------------|--|---|
| | People Community Wellbeing Plan 2025-26 | <p>lower rates among other household types. Single pensioners, particularly women, also experience notable levels of poverty. This suggests that women, and especially those heading single-parent households, may be more likely to experience financial pressures and, consequently, debt such as Council Tax arrears or other liabilities.</p> <p>The Policy is therefore likely to have a greater impact on women in these circumstances. It is important that the Council's approach to debt recovery recognises this and provides appropriate flexibility and support to mitigate financial hardship, while continuing to meet statutory duties and service requirements.</p> |
| Gender Reassignment | Scottish Census 2022 Poverty and Income Inequality in Scotland 2017-2019 | <p>The Scottish Census (2022) reports that 0.44% of people aged 16 and over in Scotland identify as transgender, with Clackmannanshire's rate slightly lower at 0.35%, representing approximately 151 individuals.</p> <p>While the available data does not identify specific financial or debt-related impacts for this group at a local level, the absence of evidence does not indicate an absence of need. Transgender individuals may still experience financial pressures or barriers when engaging with services.</p> <p>Given the small size of this population, the Policy is unlikely to have a direct or disproportionate impact. However, it remains important that the Policy promotes equality, dignity and respect, ensuring that all individuals are able to engage with debt recovery processes in a safe and inclusive manner, regardless of gender identity.</p> |
| Sexual orientation | Scottish Census 2022 Poverty and Income Inequality in Scotland 2017-2019 | <p>According to the 2022 Census, approximately 3.12% of individuals aged 16 and over in Clackmannanshire identify as LGB+.</p> <p>There is currently limited local or national data linking sexual orientation with financial hardship or debt. While this limits the ability to draw firm conclusions, it does not mean that individuals within this group do not experience financial pressures.</p> <p>Given the relatively small population size, it is unlikely that the Corporate Debt and Write-Off Policy will have a disproportionate impact on this group. However, the Policy should remain inclusive and ensure that all individuals are treated fairly and without discrimination in the collection and management of debt.</p> |

| Equality Group | Evidence source (e.g. online resources, report, survey, consultation exercise already carried out) | What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C). |
|---|--|--|
| Religion or Belief | Scottish Census 2022 Poverty and Income Inequality in Scotland 2017-2019 | <p>National data from 2015–2020 indicates that Muslim adults are disproportionately affected by relative poverty after housing costs, with 52% living in poverty compared to 18% of adults overall. In contrast, 15% of adults affiliated with the Church of Scotland and 19% of adults reporting no religion were living in relative poverty.</p> <p>Locally, approximately 1.21% of Clackmannanshire’s population identify as Muslim. Given the relatively small size of this group within Clackmannanshire, it is unlikely that the Policy will have a disproportionate impact based on religion or belief. However, it is important that the Policy remains sensitive to cultural and religious considerations.</p> <p>Debt recovery practices should promote dignity, equality and respect, ensuring that individuals’ beliefs are recognised where relevant and that engagement processes are appropriate and inclusive.</p> |
| Pregnancy or maternity | Scottish Census 2022 Poverty and Income Inequality in Scotland 2017-2019 People Community Wellbeing Plan 2025-26 | <p>National data indicates that single mothers and lone-parent households experience some of the highest levels of relative poverty, with around 38% living in poverty after housing costs. There has also been a notable increase in single parents claiming Universal Credit, reflecting growing financial pressures.</p> <p>Given these factors, individuals who are pregnant or in the maternity period – particularly single parents – may be more vulnerable to financial hardship and debt. This increases the likelihood that they may be affected by the Council’s debt recovery processes.</p> <p>The Policy is therefore likely to have an impact on this group, and it is important that appropriate provisions are in place to ensure flexibility and support. A person-centred and trauma-informed approach will help to ensure that debt recovery processes take account of individual circumstances and minimise additional financial or emotional strain.</p> |
| Marriage or civil partnership (only the first aim of the Duty is relevant to this protected characteristic and only in relation to work matters) | | Not applicable, not an employment matter. |
| Socio economic disadvantage (if required) | | Not applicable, not a strategic decision |

7. **Based on the evidence above, is there relevance to some or all of the equality groups? Yes
If yes or unclear, proceed to further steps and complete full EFSIA**

If no, explain why below and then proceed to Step E:

Step C – Stakeholder engagement

This step will help you to address any gaps in evidence identified in Step B. Engagement with people who may be affected by a proposal can help clarify the impact it will have on different equality groups. Sufficient evidence is required for you to show 'due regard' to the likely or actual impact of your proposal on equality groups.

- 8. Based on the outcome of your assessment of the evidence under Step B, please detail the groups you intend to engage with or any further research that is required in order to allow you to fully assess the impact of the proposal on these groups. If you decide not to engage with stakeholders, please state why not:**

Ongoing engagement is intended to take place with:

- Relevant internal Council services involved in income collection, welfare support and financial inclusion; and
- Relevant external partner organisations and stakeholders who provide direct support to individuals experiencing poverty, vulnerability or indebtedness.

- 9. Please detail the outcome of any further engagement, consultation and/or research carried out:**

Engagement was undertaken with Aberlour Children's Charity to inform the development of the Corporate Debt and Write-Off Policy. This included discussions on the current Policy framework, as well as consideration of potential areas of focus for the revised Policy.

Aberlour were invited to review the current iteration of the Policy and provide feedback. While discussions were primarily focused on the overall approach and processes set out within the Policy, the feedback provided has helped to inform several key areas of development. In particular, this includes:

- Strengthening the use of inclusive and accessible language;
- Embedding a more person-centred approach to debt collection and recovery and;
- Enhancing communication methods and improving how individuals can engage with the Council.

In addition, the feedback has informed consideration of potential procedural enhancements, including opportunities to strengthen staff awareness and training. This includes developing staff capability to better recognise financial vulnerability and respond appropriately, supporting a more responsive and empathetic approach to individuals experiencing debt.

Step D - Impact on equality groups and steps to address this

10. Consider the impact of the proposal in relation to each protected characteristic under each aim of the general duty:

- Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010? How will this be mitigated?
- Is there potential to advance equality of opportunity between people who share a characteristic and those who do not? How can this be achieved?
- Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not? How can this be achieved?

If relevant, consider socio-economic impact.

| Age | Place 'X' in the relevant box(es) | | | Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes |
|---|-----------------------------------|------------------|-----------|---|
| | Positive impacts | Negative impacts | No impact | |
| risk of discrimination | X | | | <p>The Corporate Debt and Write-Off Policy aims to strengthen the Council's approach to communication and early engagement with individuals, households and businesses who are experiencing financial hardship and debt. The Policy promotes early intervention, encouraging individuals to make contact at the earliest stage of the debt recovery process and providing clear information on repayment responsibilities, available support and advice.</p> <p>A person-centred approach is adopted, recognising that households with children and young people, as well as younger adults, are more likely to experience financial pressures and may be disproportionately affected by debt. Council services will work proactively with individuals to ensure they understand their responsibilities and are supported to engage in a way that reflects their individual circumstances.</p> <p>The Policy provides a range of accessible payment methods and flexible repayment arrangements, including affordable repayment plans tailored to household circumstances. In addition, individuals are signposted or referred to relevant internal services and partner organisations where additional support is required.</p> <p>These measures aim to mitigate the risk of discrimination by ensuring that those who may be more financially vulnerable due various reasons, including due to age, are supported appropriately.</p> |
| potential for developing good relations | | | X | <p>While the Policy is not expected to directly impact relationships between different age groups, it supports the development of positive relationships between the Council and service users through clear communication, transparency and early engagement.</p> <p>By adopting a trauma-informed and person-centred approach, the Policy helps ensure that individuals feel</p> |

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| | | | | supported and understood when engaging with debt recovery processes. This approach promotes trust and confidence in the Council's services, including for younger households and families who may be experiencing financial hardship. |
| potential to advance equality of opportunity | X | | | <p>The Policy helps advance equality of opportunity by ensuring that households with children and young people, who are more likely to experience financial disadvantage, can access appropriate support to manage and repay debt.</p> <p>Through flexible repayment options, improved communication methods and clearer pathways for referrals/signposting to support services, individuals will be better able to engage with the Council and manage their financial circumstances.</p> <p>The focus on affordability and sustainability of repayment plans helps to reduce financial hardship and supports more equitable outcomes.</p> <p>Overall, the Policy supports younger households to manage debt effectively and reduces barriers to engagement, helping to ensure that they are not disadvantaged in accessing Council services.</p> |

| Disability | Place 'X' in the relevant box(es) | | | Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes |
|------------------------|-----------------------------------|------------------|-----------|---|
| | Positive impacts | Negative impacts | No impact | |
| risk of discrimination | X | | | <p>The Corporate Debt and Write-Off Policy aims to adopt a person-centred and inclusive approach to debt recovery, recognising that individuals with disabilities or long-term health conditions may face additional barriers in managing debt and engaging with services.</p> <p>The Policy strengthens communication with customers by offering a range of accessible methods of contact and engagement. It also provides flexible repayment options, including tailored repayment plans that take account of individual circumstances, health conditions and wider household needs.</p> <p>Council officers will work proactively with individuals to understand their circumstances and ensure that appropriate support is in place. This includes signposting and referral to internal services and external partner organisations where required. Staff training is also emphasised to ensure that officers can recognise financial vulnerability and adopt a trauma-informed approach.</p> <p>These measures aim to help prevent disabled individuals from being disproportionately affected by debt recovery processes and reduce the risk of discrimination.</p> |

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| potential for developing good relations | | | X | While the Policy is not expected to directly impact relationships between different groups, the Policy supports the development of positive relationships between the Council and disabled individuals through clear communication, early engagement and a supportive, person-centred approach. |
| potential to advance equality of opportunity | X | | | <p>The Policy aims to advance equality of opportunity by ensuring that disabled individuals can access the support required to manage and repay debt in a way that reflects their needs.</p> <p>Flexible communication methods, tailored repayment arrangements and clear referral pathways help to remove barriers to engagement and support individuals in achieving sustainable financial outcomes. The focus on individual circumstances ensures that disabled individuals are not disadvantaged in the debt recovery process.</p> <p>Overall, the Policy aims to support fair access to services and helps promote financial stability and wellbeing for disabled households.</p> |

| Race | Place 'X' in the relevant box(es) | | | Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes |
|--|-----------------------------------|------------------|-----------|--|
| | Positive impacts | Negative impacts | No impact | |
| risk of discrimination | X | | | <p>While Clackmannanshire has a relatively small minority ethnic population, the Policy includes measures to ensure that all individuals are treated fairly and consistently in the collection and recovery of debt.</p> <p>The Policy enhances communication methods, offering accessible ways for individuals to engage with the Council. It also provides flexible repayment options and clear information on available support, with decisions based on individual circumstances rather than background.</p> <p>Where appropriate, individuals are signposted or referred to relevant support services to assist with financial hardship. These measures help mitigate any potential risk of discrimination and ensure a consistent and equitable approach to debt recovery.</p> |
| potential for developing good relations | | | X | While the Policy is not expected to directly impact relationships between different ethnic groups, it supports the development of positive relationships between the Council and service users through clear communication, transparency and early engagement |
| potential to advance equality of opportunity | X | | | The Policy supports equality of opportunity by ensuring that all individuals, including those from minority ethnic backgrounds, are able to access appropriate support to manage debt. |

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| | | | | Through improved communication, flexible repayment arrangements and access to support services, individuals are better able to engage with the Council and address financial challenges. This helps reduce barriers and supports more equitable outcomes for those experiencing financial hardship. |
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| Sex | Place 'X' in the relevant box(es) | | | Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes |
|--|-----------------------------------|------------------|-----------|---|
| | Positive impacts | Negative impacts | No impact | |
| risk of discrimination | X | | | <p>The revised Corporate Debt and Write-Off Policy aims to strengthen the Council's approach to communication and early engagement with individuals, households and businesses experiencing financial hardship and debt.</p> <p>The Policy promotes early intervention, encouraging individuals to engage at the earliest stage of the debt recovery process and providing clear information on repayment responsibilities, support and advice.</p> <p>A person-centred approach is adopted, recognising that certain groups, including single-parent households – most commonly headed by women – are more likely to experience financial hardship and may be disproportionately affected by debt. Council officers will aim to work proactively with individuals to ensure that their circumstances are understood and that appropriate support is provided.</p> <p>The Policy aims to offer a range of accessible payment methods and flexible repayment arrangements, including affordable repayment plans tailored to household circumstances. Individuals are also signposted or referred to relevant internal services and partner organisations where additional support is required. Staff training further supports officers to recognise financial vulnerability and deliver trauma-informed services.</p> <p>These measures help mitigate the risk of sex-based discrimination by ensuring that women, particularly those in financially vulnerable households, are supported appropriately in managing debt.</p> |
| potential for developing good relations | | | X | <p>While the Policy is not expected to directly impact relationships between men and women, it promotes positive engagement through clear communication, transparency and a person-centred approach.</p> |
| potential to advance equality of opportunity | X | | | <p>The Policy helps advance equality of opportunity by ensuring that individuals, particularly women in low-income or single-parent households, can access appropriate support to manage and repay debt.</p> <p>Through flexible repayment options, improved communication methods and clear referral pathways, individuals are better able to engage with the Council and address financial challenges. The focus on affordability and sustainability of repayment plans helps reduce financial hardship and supports more equitable outcomes.</p> |

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| | | | | Overall, the Policy aims to support women experiencing financial vulnerability to manage debt effectively and reduces barriers to accessing Council services. |
|--|--|--|--|---|

| Gender Reassignment | Place 'X' in the relevant box(es) | | | Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes |
|--|-----------------------------------|------------------|-----------|--|
| | Positive impacts | Negative impacts | No impact | |
| risk of discrimination | | | X | Given the demographic profile of Clackmannanshire, it is unlikely that the Corporate Debt and Write-Off Policy will have a direct or indirect impact on this protected characteristic. |
| potential for developing good relations | | | X | Given the demographic profile of Clackmannanshire, it is unlikely that the Corporate Debt and Write-Off Policy will have a direct or indirect impact on this protected characteristic. |
| potential to advance equality of opportunity | | | X | Given the demographic profile of Clackmannanshire, it is unlikely that the Corporate Debt and Write-Off Policy will have a direct or indirect impact on this protected characteristic. |

| Sexual Orientation | Place 'X' in the relevant box(es) | | | Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes |
|--|-----------------------------------|------------------|-----------|--|
| | Positive impacts | Negative impacts | No impact | |
| risk of discrimination | | | X | Given the demographic profile of Clackmannanshire, it is unlikely that the Corporate Debt and Write-Off Policy will have a direct or indirect impact on this protected characteristic. |
| potential for developing good relations | | | X | Given the demographic profile of Clackmannanshire, it is unlikely that the Corporate Debt and Write-Off Policy will have a direct or indirect impact on this protected characteristic. |
| potential to advance equality of opportunity | | | X | Given the demographic profile of Clackmannanshire, it is unlikely that the Corporate Debt and Write-Off Policy will have a direct or indirect impact on this protected characteristic. |

| Religion or Belief | Place 'X' in the relevant box(es) | | | Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes |
|--|-----------------------------------|------------------|-----------|--|
| | Positive impacts | Negative impacts | No impact | |
| risk of discrimination | | | X | Given the demographic profile of Clackmannanshire, it is unlikely that the Corporate Debt and Write-Off Policy will have a direct or indirect impact on this protected characteristic. |
| potential for developing good relations | | | X | Given the demographic profile of Clackmannanshire, it is unlikely that the Corporate Debt and Write-Off Policy will have a direct or indirect impact on this protected characteristic. |
| potential to advance equality of opportunity | | | X | Given the demographic profile of Clackmannanshire, it is unlikely that the Corporate Debt and Write-Off Policy will have a direct or indirect impact on this protected characteristic. |

| Pregnancy/maternity | Place 'X' in the relevant box(es) | | | Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes |
|--|-----------------------------------|------------------|-----------|---|
| | Positive impacts | Negative impacts | No impact | |
| risk of discrimination | X | | | <p>The Corporate Debt and Write-Off Policy aims to promote a person-centred and flexible approach to debt recovery, recognising that individuals who are pregnant or in the maternity period – particularly single-parent households headed by women – may experience increased financial pressures.</p> <p>The Policy aims to strengthen communication and encourages early engagement, ensuring that individuals are provided with clear information and support at all stages of the debt recovery process.</p> <p>Council officers will work proactively with individuals to understand their circumstances and ensure that appropriate consideration is given to their situation.</p> <p>Flexible repayment methods and tailored repayment plans are available, reflecting the individual and household circumstances of the debtor. In addition, individuals are signposted or referred to relevant support services where additional assistance is required. Staff training ensures that officers are able to recognise financial vulnerability and adopt a trauma-informed approach.</p> <p>These measures aim to help to ensure that individuals who are pregnant or in the maternity period are not disproportionately affected by debt recovery processes.</p> |
| potential for developing good relations | | | X | <p>While the Policy is not expected to directly impact relationships between different groups, it supports the development of positive relationships between the Council and service users through clear communication, transparency and early engagement</p> |
| potential to advance equality of opportunity | X | | | <p>The Policy helps advance equality of opportunity by ensuring that individuals who are pregnant or in the maternity period can access appropriate support to manage debt.</p> <p>Flexible repayment arrangements, improved communication methods and clear referral pathways enable individuals to engage with the Council in a way that reflects their circumstances. This is particularly important for single parents, which are primarily led by women, who are more likely to experience financial hardship.</p> <p>By focusing on individual needs and supporting sustainable repayment options, the Policy helps to reduce financial pressure and supports more equitable outcomes for this group.</p> |

| Marriage/civil partnership | Place 'X' in the relevant box(es) | | | Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes |
|---|-----------------------------------|------------------|-----------|---|
| | Positive impacts | Negative impacts | No impact | |
| risk of discrimination (only the first aim of the Duty is relevant to this protected characteristic and only in relation to work matters) | | | X | Not applicable, not an employment matter. |

| Socio-economic disadvantage | Place 'X' in the relevant box(es) | | | Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes |
|---|-----------------------------------|----|-----------|---|
| | Yes | No | No impact | |
| (If required) Will the proposal reduce inequalities of outcome caused by socio-economic disadvantage? | | | X | Not applicable, not a strategic decision. |

11. Describe how the assessment might affect the proposal or project timeline?

Examples of the items you should consider here include, but are not limited to:

- **Communication plan:** do you need to communicate with people affected by proposal in a specific format (e.g. audio, subtitled video, different languages) or do you need help from other organisations to reach certain groups?
- **Cost:** do you propose any actions because of this assessment which will incur additional cost?
- **Resources:** do the actions you propose require additional or specialist resource to deliver them?
- **Timing:** will you need to build more time into the project plan to undertake research, consult or to complete any actions identified in this assessment?

The assessment is not expected to affect the overall timeline for the development and implementation of the Corporate Debt and Write-Off Policy.

Equality considerations have been embedded at an early stage in the policy review process, ensuring that the needs of individuals across protected characteristics have been taken into account from the outset. This has included drawing on a combination of national and local data, relevant policies and strategic documents, and engagement with internal services and external partners.

12. **Having considered the potential or actual impacts of your proposal, you should now record the outcome of this assessment.** Choose from one of the following:

| Please select (X) | Implications for the proposal |
|-------------------|--|
| X | <p>No major change Your assessment demonstrates that the proposal shows no risk of unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.</p> |
| | <p>Adjust the proposal and/or implement mitigations You have identified ways of modifying the proposal to avoid discrimination or to better advance equality of opportunity or foster good relations. In addition, or alternatively, you will introduce measures to mitigate any negative impacts. Adjustments and mitigations should be recorded in the tables under Step D above and summarised in the summary sheet at the front of the document.</p> |
| | <p>Continue the proposal with adverse impact The proposal will continue despite the potential for adverse impact. Any proposal which results in direct discrimination is likely to be unlawful and should be stopped and advice taken. Any proposal which results in indirect discrimination should be objectively justified and the basis for this set out in the tables under Step D above and summarised in the summary sheet at the front of the document. If objective justification is not possible, the proposal should be stopped whilst advice is taken.</p> |
| | <p>Stop the proposal The proposal will not be implemented due to adverse effects that are not justified and cannot be mitigated.</p> |

Step E - Discuss and review the assessment with decision-makers

13. **You must discuss the findings of this assessment at each stage with senior decision makers during the lifetime of the proposal and before you finalise the assessment. Record details of these discussions and decisions taken below:**

Step F – Post-implementation actions and monitoring impact

It is important to continue to monitor the impact of your proposal on equality groups to ensure that your actual or likely impacts are those you recorded. This will also highlight any unforeseen impacts.

14. Record any post-implementation actions required.

Following implementation, the Revenues Team will aim to take steps to ensure that the Policy is clearly visible, accessible and understood by residents, businesses and relevant partner organisations across Clackmannanshire.

This will include promoting awareness of the Council's approach to debt collection and recovery, ensuring clarity around the Council's remit, and supporting individuals and businesses to understand their responsibilities in relation to payments owed.

15. Note here how you intend to monitor the impact of this proposal on equality groups.

The impact of the Policy on equality groups will be monitored on an ongoing basis through operational practice and service delivery.

Officers responsible for administering the Policy will continue to adopt a person-centred and trauma-informed approach to debt collection. Particular attention will be given to identifying and responding to individuals who may be affected due to protected characteristics or financial vulnerability.

Where vulnerabilities are identified, officers will ensure that appropriate advice, support and signposting is provided, tailored to the individual's circumstances. This will include referral to relevant internal services and external partner organisations where required.

16. Note here when the EFSIA will be reviewed as part of the post-implementation review of the proposal:

The EFSIA will be reviewed concurrently with the scheduled review of the Policy.

Step G – Assessment sign off and approval

Lead person(s) for this assessment: Ben Watson

Signed: 

Date: 02/06/2026

Senior officer approval of assessment:

Signed:

Date:

All full EFSIAs must be published on the Council's website as soon as possible after the decision is made to implement the proposal.

