Coventry City Council

Agenda

Cabinet Member for Strategic Finance and Resources

Time and Date
11.00 am on Wednesday, 15th July, 2026

Place
Committee Room 3 - Council House

Public Business

1. **Apologies**

2. **Declarations of Interest**

3. **Minutes of Previous Meeting** (Pages 3 - 4)

   (a) To agree the minutes of the meeting held on 12 May 2025

   (b) Matters Arising

4. **Corporate Debt Recovery Strategy** (Pages 5 - 36)

   Report of the Director of Finance and Resources

5. **Any other items of public business which the Cabinet Member decides to take as matters of urgency because of the special circumstances involved.**

Private Business
Nil

Julie Newman, Director of Law, Governance and Safer Communities, Council House, Coventry

Tuesday, 7 July 2026

Note: The person to contact about the agenda and documents for this meeting is Tom Robinson, tom.robinson@coventry.gov.uk

Membership: Councillors R Brown (Cabinet Member) and F Beechey (Shadow Cabinet Member)

Public Access
Any member of the public who would like to attend the meeting in person is encouraged to contact the officer below in advance of the meeting regarding arrangements for public attendance. A guide to attending public meeting can be found here: https://www.coventry.gov.uk/publicAttendanceMeetings

Tom Robinson
Email: tom.robinson@coventry.gov.uk

Coventry City Council
Minutes of the Meeting of Cabinet Member for Strategic Finance and Resources held at 3.00 pm on Monday, 12 May 2025

Present:	Councillor R Brown (Cabinet Member) Councillor P Male (Shadow Cabinet Member)
Employees:	
Law and Governance	S Bennett, A Veness
Peoples Services	M Chouhan LeCras

Public Business

5. **Declarations of Interest**

There were no disclosable pecuniary interests.

6. **Minutes of Previous Meeting**

The minutes of the meeting held on 12th May 2025 were agreed and signed as a true record.

There were no matters arising.

7. **Updated 'Compliments, Comments & Complaints' and 'Unreasonable Complainant Actions' Policies**

The Cabinet Member for Strategic Finance and Resources considered a report of the Director of Peoples Services relating to the updated ‘Compliments, Comments & Complaints’ and ‘Unreasonable Complainant Actions’ policies.

For context the Council is expected to have defined policies and procedures in place for dealing with any complaints received. These policies must be in keeping with the relevant statutory complaints processes and / or the advice and guidance issued by the Local Government and Social Care Ombudsman (LGSCO) under their powers under section 23(12A) of the 1974 Local Government Act.

In February 2024 the LGSCO issued their ‘Complaint Handing Code’ (‘the Code’) to local authorities, setting out their expectations for complaint handling, as well as scrutiny and oversight by senior officers and elected officials. Councils are encouraged to adopt the Code as soon as practicable and the LGSCO will be considering adherence to the Code as part of their complaint investigations from April 2026 onwards. Councils must also demonstrate they have considered the Code when developing complaint handling policies and procedures, and when responding to complaints.

Coventry City Council’s current ‘Compliments, Comments and Complaints’ Policy was written in 2013 and is out-of-date and not fully compliant with the new Code.

The updated 'Compliments, Comments & Complaints' and 'Unreasonable Complainant Actions' policies will address these shortcomings.

The revised version was considered by the Scrutiny Task and Finish Group in August 2024 and Leadership Board in October 2024.

RESOLVED that the Cabinet Member for Strategic Finance and Resources:

1. **Approves the updated 'Compliments, Comments and Complaints' Policy and Process and the 'Unreasonable Complainant Actions' Policy, as appended to this report, together with their publication and implementation.**

8. **Any other items of public business which the Cabinet Member decides to take as matters of urgency because of the special circumstances involved.**

There were no other items of urgent public business.

(Meeting closed at 3.15 pm)

Coventry City Council

Public report
Cabinet Member

Cabinet Member for Strategic Finance and Resources 15 July 2026

Name of Cabinet Member:
Cabinet Member for Strategic Finance and Resources – Councillor R Brown

Director approving submission of the report:
Director of Finance and Resources

Ward(s) affected:
All

Title:
Corporate Debt Recovery Strategy

Is this a key decision?
No

Executive summary:

The report sets out the detail of the Council's proposed Corporate Debt Recovery Strategy and recommends the strategy be adopted. The strategy covers various forms of income due to the council, including local taxation, penalty charge notices and sundry fees and charges.

The strategy formally documents the Council's current approach to debt management and does not propose any material changes to current approaches to the recovery of debt.

The report outlines the four key principles of the Council's approach to debt recovery:

- Robust and proportionate collection
- Efficient administration
- Financial inclusion
- Minimise arrears and bad debt

Overall, the strategy documents the Council's current approach to managing corporate debt – recognising the significance of the various corporate income streams to the Council's financial sustainability whilst balancing the need to maximise collection with the Council's responsibilities to its most vulnerable residents and service users.

Recommendations:

The Cabinet Member for Strategic Finance and Resources is recommended to:

1) Approve the adoption of the Council's Corporate Debt Recovery Strategy as set out in Appendix 1 attached.

List of Appendices included:

Appendix 1 - Corporate Debt Recovery Strategy
Appendix 2 – Equalities Impact Assessment

Background papers:

N/A

Other useful documents

N/A

Has it or will it be considered by Scrutiny?

No

Has it or will it be considered by any other Council Committee, Advisory Panel, or other body?

No

Will this report go to Council?

No

Report Title: Corporate Debt Recovery Strategy

1. Context (or background)

1.1 The Council delivers a wide range of statutory and discretionary services, many of which generate income through fees, charges, and taxation.

1.2 The Council's income is diverse in nature and collects more than £400 million of income from these various income streams which may include:

- Council tax
- Business rates
- Business Improvement District
- Commercial rent
- Housing benefit overpayments
- Sundry fees and charges (adult social care, general services)
- Parking Fines / Penalty charge notices

1.3 This income helps to pay for vital council services – including services to our most vulnerable residents. Reduced Government grants and our increased dependence on income from business rates and trading, along with pressures on tenants and Council Taxpayer's income due to economic challenges means effective debt collection is more important than ever.

1.4 The collection practices for the various types of income and debts due to the Council are long established and subject to relevant legislation. Policies and procedures exist which govern the collection activity relevant to each specific income stream.

1.5 Whilst general policies and procedures exist to guide decision making on debt recovery, decisions on specific cases are often tailored to the circumstances of that specific case. Factors taken into account when considering the recoverability of a debt may include:

- Whether all reasonable efforts to recover the debt have been exhausted.
- The cost of pursuing the debt against the value of the debt and whether associated recovery costs can be recovered.
- The likelihood of recovering the debt.
- The debtor's circumstances.

1.6 In recent years, the Council has faced increasing financial pressures arising from:

- Reduced government funding and continued budget constraints.
- Rising demand for services, particularly within social care.
- Economic challenges affecting residents and businesses, including cost-of-living pressures.

1.7 These factors have contributed to increased levels of debt owed to the Council and have made effective debt recovery more critical to maintaining financial sustainability.

1.8 As a result, it is recognised that, given the increasing reliance on income collection and debt management, it is appropriate for the Council to have a formal, published debt strategy.

1.9 The development of a Corporate Debt Strategy aligns with local government best practice and supports the Council's financial strategy and organisational priorities.

1.10 The strategy captures, at a high level, the Council's approach to managing income collection. The strategy does not propose any significant changes in the Council's current approaches to income collection and debt management but serves as an overarching framework to ensure that the Council's approach is applied more consistently.

1.11 The broad purpose of the strategy, set out on page three of the document, is to:

- Set out the key guiding principles for the Council's approach to the recovery of debt.
- Optimise and increase the collection performance of income.
- Minimise the level of debt held by the Council.
- Minimise the levels of debt written off.
- Promote a robust, proportionate and fair approach in the Council's debt recovery processes.
- Ensure the Council discharges its statutory functions.

1.12 Debt, for the purpose of the strategy, is defined as any amount of revenue that is due to the Council but has not been paid. This includes:

- Council tax
- Business rates
- Business Improvement Districts
- Housing benefit overpayments
- Commercial Rent
- Penalty Charge Notices
- All other sundry fees and charges (including adult social care charges)

1.13 The strategy sets out four key principles guiding debt recovery.

Key principle 1 – Robust and proportionate collection

1.14 This principle focusses on ensuring the Council maximises collection but is responsive to the context of each case and debt type. This is about balancing the need to collect essential public revenue with protecting some of our most vulnerable customers from financial hardship.

1.15 The Council will utilise a range of statutory measures in pursuing debt – which could, in the most extreme examples, result in a person being committed to prison for non payment of council tax – but the Council will always endeavour to be responsive to the circumstances of each case.

Key principle 2 – Efficient Administration

1.16 The Council recognises that robust and efficient debt collection is heavily reliant on the efficacy of billing and invoicing processes. The potential for collecting amounts due is far improved of the underlying invoice is generated in a timely and accurate fashion and captures all relevant information relating to the nature of the charge and customer details.

1.17 Payments for services should, as far as possible, be required in advance and customers should be provided with convenient and sustainable payment options.

Key principle 3 – Financial inclusion

1.18 The Council engages in multi-agency activities to create a culture of financial inclusivity, promoting take-up of available support and maximising income for residents.

1.19 The Council operates a direct referral process to local advice agencies and the national Money and Pension Service for financially vulnerable customers to access independent debt advice.

Key principle 4 – Minimise arrears and bad debt

1.20 The Council will maintain prudent accounting models which provide for bad debt but seek to ensure that the write off of debt is a last resort and subject to relevant scrutiny and governance.

1.21 Reasons for writing off debt may include:

- All reasonable efforts to recover the debt have been exhausted.
- The cost of pursuing the debt exceeds the value of the debt and those costs incurred are unlikely to be recovered.
- The likelihood of recovery is such that the Council determines that no further resource should be allocated to pursuing the debt.
- Pursuing the debt would place the debtor in undue and extreme financial hardship.
- The Council is legally compelled to write off a debt.
- The debtor cannot be traced (the Council will undertake reasonable tracing measures including the use of credit reference agencies as appropriate).
- The debtor’s vulnerability justifies writing off the debt.
- The debt is time barred, where the statute of limitation applies. Generally, this means that if a period of six years has elapsed without notifying the debtor of the amount owing, the debt cannot be enforced by legal action.

2. Options considered and recommended proposal

2.1 The Council has never formally adopted a corporate debt strategy. The management of income and debt collection is largely operational and administered in accordance with legislation relevant to the given debt type.

2.2 In recent years, Councils across the country have seen significant increases in debt across a range of income streams. The COVID pandemic and the subsequent period of high inflation have challenged collection rates in local taxation and across various council income streams.

2.3 Councils are increasingly reliant on these various income streams to fund local services whilst at the same time there is increased scrutiny of local government collection practices. With this increased scrutiny it is important that the Council can demonstrate a balanced approach to management of debt – one which seeks to maximise the collection of public funds for our communities but which also recognises the financial challenges and vulnerabilities of individuals and households.

2.4 Formalising and documenting the Council's approach to debt management at this time, allows the Council to demonstrate its commitments to maximising collection and supporting vulnerable residents.

2.5 Formalising this approach in the form of a strategy ensures that the Council is consistent in its guiding principles across income streams whilst maintaining the flexibilities required to manage debt operationally within relevant legislative frameworks.

2.6 The Council could choose not to formalise a corporate debt strategy or to adopt a radically different approach to the management of debt. However, the Council's current approach – as set out in the draft strategy – provides a flexible, balanced and effective approach to debt management.

3. Results of consultation undertaken

3.1. The proposed strategy merely documents the Council's existing approach to debt recovery and therefore does not need to be the subject of a wider consultation. Operationally, the Council works closely with partners across the advice sector in a collaborative approach to debt management and income maximisation.

4. Timetable for implementing this decision

4.1. If the strategy is approved, it will be formally adopted from Monday 27th July.

5. Comments from Director of Finance and Resources and Director of Law, Governance and Safer Communities

5.1. <u>Financial Implications</u>

Maximising income collection is essential to the delivery of all Council services and the overall financial sustainability of the Council. The Council maintains a prudent approach to accounting for income and providing for bad or doubtful debt.

There are no direct financial implications arising from this report as the strategy documents existing practice.

5.2. Legal Implications

5.2.1 Local authorities are required to collect monies from both residents and business for a variety of reasons such as Council Tax (Local Government Finance Act 1992) and Business Rates (Local Government Finance Act 1988).

5.2.2 Local authorities also have various legal powers to pursue other types of debts. These depend on the nature of the debt involved and are specific to certain services such as off-street parking charges (Road Traffic Regulation Act 1984) and care and support needs (Care Act 2014).

5.2.3 Where no specific power exists, the Council could rely on Section 1 of the Localism Act 2011. This provides local authorities with a “general power of competence” and allows them to “do anything that individuals generally may do.”

5.2.4 Where legal proceedings are used to recover a debt, the Council must have regard to the requirements of the appropriate Pre-Action Protocol. Legal services will support the relevant services area when commencing legal proceedings to ensure that the threshold for initiating a legal process have been met.

6. Other implications

6.1. How will this contribute to the One Coventry Plan?

Maximising income collection contributes to the achievement of all three delivery priorities and both enabling priorities. Robust debt management is particularly relevant to the enabling priority of continued financial sustainability of the Council. Proportionate collection and financial inclusion are particularly relevant to the delivery priorities of improving outcomes and tackling inequalities and the enabling priority of the Council’s role as a partner, enabler and leader.

6.2. How is risk being managed?

The Council’s income collection systems are subject to bi-annual internal audit reviews.

6.3. What is the impact on the organisation?

Maximises corporate revenue whilst ensuring the Council is sensitive to the needs of our most vulnerable residents.

6.4. Equalities / EIA?

A full EIA on the strategy has been undertaken and is attached at Appendix 2 of this report.

6.5. **Implications for (or impact on) climate change and the environment?**

N/A

6.6. **Implications for partner organisations?**

N/A.

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Contributor/approver name	Title	Service Area	Date doc sent out	Date response received or approved
Contributors:				
Tom Robinson	Governance Services Officer	Law and Governance	22/06/26	22/06/26
Names of approvers for submission: (officers and members)				
Finance: Ewan Dewar	Head of Finance	Finance and Resources	22/06/26	22/06/26
Legal: Oluremi Aremu	Head of Legal Services and Procurement	Law and Governance	22/06/26	25/06/2026
Director: Barry Hastie	Director of Finance and Resources	Finance and Resources	29/06/26	07/07/26
Members: Cllr G Duggins on behalf of Cllr R Brown	Cabinet Member Strategic Finance and Resources		29/06/26	07/07/06

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Coventry City Council

Corporate Debt Recovery Strategy

coventry.gov.uk

Our vision for debt recovery

To manage debt in a way that maximises the collection of income, protects public funds and is responsive to the needs of our customers.

Introduction

Coventry City Council (the Council) is required to collect monies from both residents and businesses for the provision of a variety of goods and services. The Council recognises that prompt collection of local taxation and sundry charges are vital to help pay for the services we provide to local people. Many of the services provided by the Council are statutory and the Council has to provide them by law.

In order to continue to provide hundreds of services to our communities, including to our most vulnerable residents, it's essential that the Council maximises the collection of revenue. To do this, the Council endeavours to keep outstanding debt at the lowest possible level by having in place effective income and debt management practices.

The Council also has a responsibility to act proportionately in the management of debt and to ensure that debtors are not placed in undue financial hardship as a result of the Council's efforts to recover any outstanding debt.

Debt

For the purpose of this strategy, 'debt' is defined as any amount of Council revenue that is due to the Council but has not been paid. 'Overdue debt', or 'arrears', is defined as any amount of the revenue due to the Council which has not been paid by the due date.

Debtor

A debtor is anybody (whether an individual, organisation, staff member (current or previous) or councillor) who has received goods or services from the council, or is liable for a statutory debt, and who has not yet paid the full amount owed.

For council tax and business rates, a debtor is an individual or organisation that does not adhere to the statutory instalment scheme.

For Housing Benefit overpayments, a debtor is a benefit claimant, or alternative payee such as a landlord, who has been overpaid Housing Benefit because of a change in circumstances.

To reduce the number of debtors, service providers must attempt to obtain payment in advance or at the point of service delivery wherever possible. Invoices should only be raised where payment in advance for a service is inappropriate.

Strategic Context

This strategy supports all aspects of the One Coventry Plan. The collection of income supports the provision of all Council services and activities. In particular, this strategy supports the enabling priority of 'continued financial sustainability' of the Council.

Purpose of the strategy

This strategy is intended to provide an overarching framework for debt management. Individual income streams and the actions to recover debt within those streams, are subject to a wide range of processes, policies and statutory frameworks. This strategy sets out guiding principles which govern the Council's overall approach to recovering debt and maximising public revenue.

Specifically, this strategy is intended to:

- Set out the key guiding principles for the Council's approach to the recovery of debt.
- Optimise and increase the collection performance of income.
- Minimise the level of debt held by the Council.
- Minimise the levels of debt written off.
- Promote a robust, proportionate and fair approach in the Council's debt recovery processes.
- Ensure the Council discharges its statutory functions.

Scope of the strategy

The strategy covers all debts owed to the Council including:

- Council tax
- Business rates
- Business Improvement District
- Commercial rent
- Housing benefit overpayments
- Sundry fees and charges (adult social care, general services)
- Parking Fines / Penalty charge notices

The strategy relates to all customers of the Council, including residents, businesses and partner organisations.

Accountability and Responsibility

The Council's Section 151 officer has statutory responsibility to oversee the proper administration of the Council's financial affairs.

Responsibility for debt recovery rests with the Council's revenues and benefits department, except for road traffic in the form of penalty charge notices which are the responsibility of the Council's Highways department.

Corporate Directors have operational responsibility for monitoring and managing levels of income, debt and bad debt within their respective service areas.

For sundry fees and charges, budgets are credited with income at the point an invoice is raised. Directors should therefore ensure that budget holders have visibility of outstanding invoices even where the debt does not show on the cost centre.

If a debt is subsequently written off it is debited back to the originating cost centre.

Key principles

There are four guiding principles which shape the Council's approach to debt management.

Key principle 1 Robust and proportionate collection

- The Council takes all reasonable steps to pursue outstanding debt, including the application of all available statutory remedies.
- Proportionality is central to recovery action – the Council will consider the unique circumstances of each debtor as appropriate – taking account of the potential impact of enforcing the debt on an individual or organisation.
- Use public funds responsibly and ensure the likelihood of recovering a debt, and the level of the debt, justify the cost of pursuing the debt.

Key principle 2 Efficient administration

- Billing, invoicing and collection practices are efficient, accurate, utilise appropriate technology and encourage and facilitate payment of income before it falls due.

- Charges for services should, as far as possible, be settled in advance of provision.
- Convenient payment options are provided for customers.
- Charges are clearly set out and continuously reviewed.
- Plain English is used in all correspondence.

Key principle 3	Financial inclusion

- Promote income maximisation and benefit take up**.**
- Promote eligibility for reliefs and discounts.
- Work with partners to identify and support vulnerable customers.
- Target the underlying causes of indebtedness.

Key principle 4	Minimise arrears and bad debt

- Recovery practices and processes limit bad debt and levels of debt written off.
- Debts written off are subject to appropriate governance and scrutiny.
- Budget holders make adequate provision for bad debt.

Enforcement remedies

Where payment is not received, the Council will apply the appropriate enforcement measures to each debt type and the specific circumstances of the debt and debtor. The Council retains ultimate discretion to determine the appropriate legal means of recovery of any debt. Where a debt is deemed appropriate for recovery, the Council will adopt a robust approach using a range of measures including:

- Attachments of earnings
- Warrants of execution
- Third party orders
- Insolvency/Bankruptcy
- Instructing Enforcement Agents
- Possession proceedings

- Committal to prison
- Charging orders
- Orders for sale
- Deductions from benefits
- Registering debts at County Court

Where the Council incurs recoverable costs in pursuing a debt, the Council will normally seek to recover those costs from the debtor.

Customer commitment

The Council is committed to providing excellent customer service. Council officers will be courteous, professional and fair in their debt management activities.

The Council aims to take, as far as reasonable, an accommodating approach to managing the repayment of debt. Where appropriate, customers will be offered affordable and sustainable payment plans.

The Council recognises that, in certain circumstances, a firm and decisive approach to debt recovery is necessary to safeguard public funds and ensure that those who are able to pay, do so. This is particularly important when the debt has arisen as a result of a financial penalty or enforcement action.

The Council has a duty of care towards its employees and will not tolerate any form of abuse of officers carrying out their duties.

External Specialist Providers

The Council will work in partnership with a number of specialist companies to recover unpaid debts. These companies provide additional support and are specialists in their respective areas of recovery. External companies are used for tracing absconders, insolvency work and debt collection work. All external companies working with the Council are required to follow our policies and procedures at all times.

Customers in Difficulty

The Council will at all times try to help customers who are experiencing difficulties in paying. Wherever possible the Council will try to distinguish between those who cannot pay and those who will not pay, or are deliberately withholding, delaying or giving false information.

All available allowances, discounts and rebates will be granted where appropriate, at the first point of contact. The Council aims to ensure that all customers are dealt with efficiently so that they get the correct bill, any benefit advice and the best instalment agreement to maximise revenue to the Council and to meet the needs of the customer at the first point of contact.

The Council will also aim to work with external agencies to offer customers additional support. The Council will work in partnership to assist both the Council to secure debt recovery and the customer in obtaining the correct benefit and debt management advice to enable them to pay their bills.

The Council is committed to reducing poverty and hardship and ensuring benefits and other income is maximised. If the customer experiences considerable financial hardship or has multiple arrears the Council assesses each customer's case on its own merit. We would always expect the customer to pay their current financial years liabilities and then agree a payment plan for the arrears.

Debt advice

The Council will maintain effective working relationships with partners across the Advice Sector and ensure that customers are aware of available debt advice services. This includes working collaboratively with partners to respond to customer need and to undertake proactive data sharing campaigns to actively seek out and support vulnerable debtors.

The Council partners with the Money and Pension Service (MAPS) to provide debtors with direct referrals and warm handoffs for debt advice.

In addition to debt advice, the Council actively seeks to encourage income maximisation for debtors – using data intelligence to identify underclaiming of benefit, working with partners to engage with those with potential entitlement to additional benefits and providing on an online benefits calculator for debtors.

The Council is a signatory to the Collection of Council Tax Arrears Good Practice Protocol published by Citizens Advice in 2013 and will endeavour to satisfy the requirements of subsequent iterations of the protocol.

Bad and doubtful debts

The Council will exhaust all reasonable efforts and statutory remedies in pursuing outstanding debt. The Council recognises that in some circumstances it may be necessary to write off debt. The following sets out some of the circumstances in which the Council may consider writing off debt:

- All reasonable efforts to recover the debt have been exhausted.
- The cost of pursuing the debt exceeds the value of the debt and those costs incurred are unlikely to be recovered.
- The likelihood of recovery is such that the Council determines that no further resource should be allocated to pursuing the debt.
- Pursuing the debt would place the debtor in undue and extreme financial hardship.
- The Council is legally compelled to write off a debt.

- The debtor cannot be traced (the Council will undertake reasonable tracing measures including the use of credit reference agencies as appropriate).
- The debtor's vulnerability justifies writing off the debt.
- The debt is time barred, where the statute of limitation applies. Generally, this means that if a period of six years has elapsed without notifying the debtor of the amount owing, the debt cannot be enforced by legal action.

Writing off debt will also be subject to the governance and approval provisions set out in the Council's constitution.

Council budget holders will work with Finance Managers to ensure adequate provision for bad debt is made and maintained.

The Council can and will reinstate, within statutory deadlines, any debt where it becomes apparent the circumstances for write-off are no longer applicable.

Individual debt relief

There are a number of options available to individuals to assist them in dealing with debt – this includes breathing space (debt respite scheme), debt management plans, Individual Voluntary Arrangements and Debt Relief Orders.

Some debt relief schemes require the Council, as a creditor, to vote on whether to accept proposals put forward by a debtor or their representatives. This usually involves an offer of a percentage payment in the pound.

In such circumstances the Council would generally seek to maximise the level of debt recovered to the public purse. However the Council will consider the circumstances of individual applications including factors such as:

- The type, amount and age of outstanding debt.

- The applicant's specific circumstances and whether the debt relief application would allow the applicant to regain financial control which benefits the public purse in future.

Accounts in Credit

The Council will review credit balances annually. Where credit balances go unclaimed, and all reasonable efforts have been made to contact the debtor, credit balances may be written off.

The Council will make reasonable efforts to refund credit balances should a debtor subsequently seek to reclaim a written off credit.

Complaints

Certain income streams are subject to specific statute governing the manner by which a debtor may challenge liability. Generally, the Council's complaints procedure enables complaints to be made regarding Council services and complainants ultimately have recourse to the Local Government and Social Care Ombudsman.

Monitoring performance against this strategy

A number of indicators and metrics are used to monitor debt management performance including:

- In year/prior year collection rates and outstanding debt for local taxation.
- The amount and age of outstanding corporate debt (excluding local taxation).
- Levels of debt written off.
- Statutory reporting requirements for local taxation and housing benefit overpayments.

Local taxation collection performance is reported through the One Coventry Plan and subject to annual scrutiny by Finance and Corporate Services Scrutiny Board (Scrutiny Board 1).

Directorate management teams and budget holders have responsibility for monitoring levels of collection, debt and bad debt within their respective service areas.

Review

This strategy will be formally reviewed every three years. Council departments responsible for income collection will, as part of operational service delivery, ensure that income collection practices are reviewed continuously so that they are fit for purpose, represent best value, meet debtor need and make best use of existing and emerging technologies.

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COVENTRY CITY COUNCIL - EQUALITY IMPACT ASSESSMENT (EIA) 2025

Title of EIA		**Corporate Debt Recovery Strategy**
EIA Author	Name	**Oluremi Aremu**
	Position	**Head of Legal and Procurement Services**
	Date of completion	**22nd June 2026**
Head of Service	Name	**Barrie Strain**
	Position	**Head of Revenues and Benefits**
Cabinet Member	Name	**Cllr Richard Brown**
	Portfolio	**Cabinet Member for Strategic Finance and Resources**

PLEASE REFER TO EIA GUIDANCE FOR ADVICE ON COMPLETING THIS FORM

SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

☒New policy / strategy
☐New service
☐Review of policy / strategy
☐Review of service
☐Commissioning
☐Other project *(please give details)*

1.2 In summary, what is the background to this EIA?

To introduce an effective Corporate Debt Recovery Strategy to ensure the Council manages outstanding debts efficiently while meeting legal and ethical obligations with a focus on early intervention to prevent debt building up in the first place, including payment plans, application of discounts and exemptions and signposting customers to services, programmes and activities that support building financial resilience.

The Strategy applies to income owed to the Council from both individuals and businesses and will provide the framework for how services across the Council collect income in a fair, proportional, consistent and transparent manner.

The strategy includes commitments to:

- Act proportionately when recovering debt.
- Consider individual circumstances and vulnerability.
- Promote financial inclusion.
- Encourage benefit take-up and income maximisation.
- Offer affordable repayment arrangements where appropriate.
- Work with debt advice agencies and partners.
- Distinguish between those who cannot pay and those who will not pay.

These principles are explicitly set out within the strategy

1.3 List organisations and people who are involved in this area of work

The areas involved in this area of work are as follows:

- Council Tax
- Business Rates
- Housing Benefits
- Housing
- Commercial Assets
- Legal Services

The main stakeholders affected are as follows:

- Residents with debts owed to the Council.
- Businesses and commercial tenants.
- Housing benefit claimants.
- Vulnerable residents and households experiencing financial hardship.
- Advice agencies and voluntary sector partners.

1.4 Who will be responsible for implementing the findings of this EIA?

Coventry City Council Revenues and Benefits Service, Finance Service, Highways Service (for Penalty Charge Notices) and relevant service areas responsible for income collection.

SECTION 2 – Consideration of Impact

Refer to guidance note for more detailed advice on completing this section.

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and those who do not

Data Sources to consider are :

- Previous research - consultation or EIAs carried out
- Customer feedback - including complaints, comments, surveys
- Employee feedback - including surveys, workforce monitoring, trade unions
- Specialist feedback - including focus groups, technical experts, subject specialists
- Feedback from organisations - such as those representing target groups

- National and local statistics –
    - National guidance or legislative requirements
    - Census data
    - Audit information
    - JSNA
    - Public health profiles
    - LG inform
    - Census
    - Office for National Statistics
    - Facts about Coventry
    - Breakdown of Coventry by Protected Characteristic
    - Armed Forces Veteran Data

Where possible, when you are analysing the data please try and break the data down by protected characteristic and additional groups.

2.1 Baseline data and information to include data

Please include a summary of data analysis below, using both your own service level management information. Where possible, compare your data to local data using: Facts about Coventry; Census 2021; JSNA etc

Debt type	Value of debt (£m)	Number of debts
Penalty charge notice	0.2	61,437
Council tax	29.3	49,478
Business rates	19.8	3,036
Housing benefit	6.4	2,853
Sundry debt	15.4	1,803

Evidence Considered

The assessment has been informed by:

- The Corporate Debt Recovery Strategy.
- Equality Act 2010 protected characteristics.
- Public Sector Equality Duty requirements, which require public bodies to consider the impact of policies on protected groups and advance equality of opportunity.
- Knowledge of the relationship between financial hardship, debt and social exclusion.
- As a Marmot city, the Council is committed to reducing health inequalities by strengthening the building blocks of health.

Overall Assessment

The strategy is largely expected to have a positive impact on equality because it incorporates safeguards for vulnerable residents, promotes financial inclusion, supports access to benefits and debt advice, and requires proportionality when undertaking recovery action.

The strategy documents the Council's current approach to debt recovery and will not result in any material changes to the experience of people and organisations who owe money to the Council.

The strategy applies to all Council income streams and debt types and therefore will impact across a diverse range of indebted individuals and organisations.

There is potential for adverse impacts if recovery action is pursued against residents who experience barriers associated with disability, age, language, mental ill-health, caring responsibilities or wider socioeconomic disadvantage. These risks can be mitigated through robust operational procedures and staff training.

2.2 Please highlight which Marmot Principles this EIA supports

1. Give every child the best start in life
2. Enable all children, young people and adults to maximise their capabilities and have control over their lives
3. Ensure a healthy standard of living for all
4. Create fair employment and good work for all
5. Create and develop healthy and sustainable places and communities
6. Strengthen the role and impact of ill health prevention
7. Tackle racism, discrimination and their outcomes
8. Pursue environmental sustainability and health equity

SECTION 3 – Protected Groups and Additional Groups

3.1 Based on section 2, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)

Please include considerations of health and digital inequality as part of your analysis below.

Protected Characteristic	**Impact type** P, N, PN, NI	**Nature of impact and any mitigations required**
Age 0-18	**PN**	People under 18 do not pay Council tax and are legally disregarded as adults for billing purposes. For business rates, an under-18 can technically be liable to pay them if they own or lease a commercial property, but they generally cannot legally hold a commercial lease on their own.

		A person under the age of 18 can be held liable for a Penalty Charge Notice but the enforcement of any debt will be carried out in accordance with the principles of the strategy and this age group will not be disproportionately impacted by the strategy. People between the ages of 0 – 18 may be impacted if they live in households experiencing debt. For those persons who are 18, all customers will be treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of age with vulnerable residents specifically covered in the Strategy. When a person is recognised to be vulnerable, consideration will be given to additional measures that can be taken to support them and the appropriateness of recovery action. **Mitigation** • Individual circumstances considered before escalation. • Clear communications in accessible formats. • Signposting to financial support and debt advice
Age 19-64	**PN**	• All customers will be treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of age with vulnerable residents specifically covered in the Strategy. • When a person is recognised to be vulnerable, consideration will be given to additional measures that can be taken to support them and the appropriateness of recovery action. **Mitigation** • Individual circumstances considered before escalation. • Clear communications in accessible formats. • Signposting to financial support and debt advice
Age 65+	**PN**	• All customers will be treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of age with vulnerable residents specifically covered in the Strategy.

		• When a person is recognised to be vulnerable, consideration will be given to additional measures that can be taken to support them and the appropriateness of recovery action. **Mitigation** • Individual circumstances considered before escalation. • Clear communications in accessible formats. • Signposting to financial support and debt advice
Disability	**PN**	**Potential Positive Impact** • The strategy explicitly recognises vulnerability and financial hardship. • Support can be tailored through affordable repayment plans. • Partnership working with advice agencies may improve outcomes for disabled residents. **Potential Negative Impact** • Residents with learning disabilities, mental health conditions, sensory impairments or cognitive disabilities may find debt processes difficult to understand or engage with. • Enforcement action could have a disproportionate impact on disabled people with limited income. **Mitigation** • Reasonable adjustments and accessible communications. • Identification of vulnerability before enforcement. • Referral to welfare, benefits and debt advice services. • Staff awareness training regarding disabilities and hidden disabilities.
Gender reassignment	**PN**	**Potential Positive Impact** • Strategy applies equally to all customers. All customers treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of gender recognition. **Potential Negative Impact** • Risk of inappropriate handling of personal information if systems are not maintained accurately. **Mitigation** • Compliance with data protection requirements.

		• Debt collection practices should be respectful of an individual's chosen name and gender identify. This includes ensuring all communications reflect their affirmed identity and written in gender neutral language. • Staff awareness and equality training.
Marriage and Civil Partnership	**NI**	All customers treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of marriage or civil partnership.
Pregnancy and maternity	**PN**	**Potential Positive Impact** • Recognition of individual circumstances enables consideration of temporary financial hardship linked to pregnancy or maternity. **Potential Negative Impact** • Recovery action may place additional stress on individuals and their unborn child during pregnancy or maternity leave. **Mitigation** • Consider vulnerability and affordability. • Offer realistic repayment arrangements where appropriate.
Race (Including: colour, nationality, citizenship ethnic or national origins)	**PN**	**Potential Positive Impact** • Use of inclusive language in correspondence promotes accessibility. **Potential Negative Impact** • Some residents may face language barriers and have difficulty understanding debt notices or recovery processes. **Mitigation** • Translation and interpretation services where required. • Accessible customer contact channels. • Engagement through community and advice organisations

Religion and belief	**NI**	All customers treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of religion and belief.
Sex	**NI**	All customers treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of sex.
Sexual orientation	**NI**	All customers treated fairly and consistently to ensure that no one receives less favourable treatment on the grounds of sexual orientation.

3.2 Based on section 2, complete the table below to show what the potential impact is for each of the additional groups.

Group	**Impact type** P, N, PN, NI	**Nature of impact and any mitigations required**
Care Experienced	**NI**	Care experienced are not required to pay council tax until the age of 25 which mitigates the potential impact of debt collection on this group.
Armed Forces	**NI**	All customers treated fairly and consistently to ensure that no one receives less favourable treatment due to service in the armed forces.
Socio Economic Groups	**NI**	The strategy recognises that financial vulnerability is a clear consideration for decisions on how debt is pursued and whether it should be written off.

SECTION 4 –Next steps

Planned Action	**Owner**	**Timescale**
Corporate Debt Policy to be communicated to all officers involved with the Debt Recovery Process	Revenues and Benefits	Ongoing

4.2 How will you monitor and evaluate the effect of this work?`

Monitoring of collection rates, benefit take-up, number of enforcement notices issued, reasons for write-offs and number of referrals to other relevant services will indicate whether the policy is successful.

SECTION 5 – Impact on Council Staff

5.1 Will this area of work potentially have an impact on Council staff? No
If yes
Nature of impact and any mitigation required

5.2 Please provide headcounts for the below.
If you think by completing this section's headcounts, employees will become identifiable please email equality@coventry.gov.uk for advice on data protection implications

Impact on Council staff - Sex

Female

Male

Impact on Council staff - Disability

Disabled

Not disabled

Prefer not to state

Unknown

Impact on Council staff - Ethnicity

White

Black, Asian, Minority ethnic

Prefer not to state

Unknown

Impact on Council staff – Sexual orientation

Heterosexual

LQBT+

Prefer not to state

Unknown

Impact on Council staff – Age

16-24

25-34

35-44

45-54

55-64

65+

Impact on Council staff – Religion

Any other

Buddhist

Christian

Hindu

Jewish

Muslim

No religion

Sikh

Prefer not to state

Unknown

SECTION 6 – Completion Statement

As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:

No impact has been identified for one or more protected groups ☒
Positive impact has been identified for one or more protected groups ☐
Negative impact has been identified for one or more protected groups ☐
Both positive and negative impact has been identified for one or more protected groups ☒

Before you submit this form - please save your progress and forward the email you receive with any questions to equality@coventry.gov.uk. The team will review your Equality Impact Assessment and provide you with feedback.

SECTION 7 - Approval

Name of Head of Service: Barrie Strain	**Date approved by Head of Service: 23/06/26**
Name of Director: Barry Hastie	**Date sent to Director:**
Name of Lead Elected Member: Cllr Richard Brown	**Date sent to Councillor:**

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