

Cabinet – 4 September 2019

Walsall Council Income and Commercial Policy

Portfolio: Councillor Bird, Leader of the Council (Lead Portfolio)

Related portfolios: All

Service: Finance – Council Wide

Wards: All

Key decision: Yes

Forward plan: Yes

1. Aim

- 1.1 To implement an internal framework that provides consistent guidance and advice for Walsall Council officers and Members on why, when and how the authority seeks to recover the costs of service delivery and generate income in support of our corporate priorities.
- 1.2 To request approval to consult on four income generating proposals. Each proposal either relates to a new fee to recover costs of delivering an existing service, or the introduction of new income generating service offer.

2. Summary

- 1.1 Given the recent and ongoing reductions in main government grant funding one of the work streams of the Walsall Proud Programme has focused on the opportunity for Walsall Council to seek to improve its income generation activities and processes in support of delivering corporate priorities.
- 1.2 A key element of this work stream is the development of the 'Walsall Council Income and Commercial Policy' which aims to provide consistent guidance and advice on the process that should be followed and areas that should be considered in relation to income generation. This policy is attached at Appendix 1 of the report.
- 1.3 Whilst the policy itself does not contain individual proposals in relation to existing / new charges, it is expected that as services across the Council review income generation activity and opportunities that the guidance contained within the policy will be applied to these areas and to the management of income levels that would be considered significant. As such, the approval of the policy is a key decision.
- 1.4 This report also seeks approval to consult on four income generating proposals. These proposals either relate to the introduction of a new fee to recover the cost of delivering an existing service, or the implementation of a new income generating

service offer. These proposals were developed through the Income Generation work stream and in accordance with the guidelines of the income and commercial policy. Following consultation and impact assessment, if approved, they will provide an opportunity for the Council to generate additional income in support of its corporate priorities.

3. Recommendations

- 3.1 That Cabinet approves the Walsall Council Income and Commercial Policy, attached at **Appendix 1**, which will become effective immediately following this decision.
- 3.2 That Cabinet approve consultation is undertaken on the four income generating proposals contained within section 4.9 of this report.

4. Report detail

Context

- 4.1 The Walsall Proud Programme was launched in April 2019 as the Council's transformation programme and has three core aims: to improve customer experience, improve staff satisfaction, and deliver service efficiencies of up to £80m. In December 2018, Cabinet approved a total investment of up to £26m to support the delivery of the programme and achieve maximum benefits. The Policy that Cabinet are being asked to approve is a deliverable from the *income generation and cost recovery* work stream of the programme, which aims to maximise income revenue into the organisation.
- 4.2 There is currently no existing overarching framework within Walsall Council which provides consistent guidance on why, when and how the authority should seek to recover the costs of service delivery and generate income. The Income and Commercial Policy aims to provide clear advice on the process that should be followed and areas that should be considered in relation to income generation. This policy is attached at **Appendix 1** of the report. **Appendix 2** contains the equality impact assessment.
- 4.3 The Income Generation work stream has also identified and is developing a number of proposals to optimise income and improve cost recovery and proposals will be presented to Cabinet for approval throughout the financial year. Four of these proposals relate to the introduction of a new fee to help recover the cost of delivering an existing service, or implementing a new income generating service offer and Cabinet are asked for approval for officers to consult on these proposals. They are:
 - 1. Adult Social Care - Introducing fees for self-funding clients who specifically ask the Council to arrange for their non-residential care and support
 - 2. The introduction of a change of name deeds service through the registry office
 - 3. Expansion of planning pre-application service through the introduction of new categories of pre-application advice. The implementation of this proposal will be delivered as part of the wider service transformation of the Planning service.

4. Introduction of pre-licencing surgery and advise to enable applicants to be better prepared when requesting business and premises licenses
- 4.4 The 'Walsall Council Income and Commercial Policy', along with the development of the Income Management processes, will enable the consistent application of income management principles that are required for effective running of income generating services.
- 4.5 In support of the application of the 'Walsall Council Income and Commercial Policy', income management processes have also been developed through the Income Generation work stream. These set out the activities that should be undertaken and the roles and responsibilities in relation to annual reviews of areas of income to enable better recovery of service costs and optimisation of income.

Council Corporate Plan priorities

- 4.6 Sound processes and guidance in relation to recovering the costs of service delivery and generation of income will support the delivery of the authority's corporate priorities.

Risk management

- 4.7 There are no risks directly attributable to the approval of the policy itself. As services across the council review income generation activity and opportunities and apply the guidance contained within the policy to new / existing areas of income they will undertake impact assessments to identify any risks associated with individual proposals at that point

Financial implications

- 4.8 There are no direct financial implications directly attributable to the approval of the policy itself. As services across the council review income generation activity and opportunities, and apply the guidance contained within the policy to new / existing areas of income the financial implications of each proposal will be identified at that point.
- 4.9 The implementation of the income generating proposals will provide an opportunity for the council to generate additional income in support of its corporate priorities. The following tables set out the services proposed to be offered, subject to consultation, the proposed fee for each service offer and the estimated net income.

| 1. Adult Social Care – Introducing arrangement fee for self-funding clients | | | |
|--|-------------------------|--|---------------------------------|
| Service offered | Fee | Fee Rationale | Estimated Net income p/a |
| Setting up care arrangements | £300 administration fee | Fee to enable recovery of current cost of providing arrangement services to self-funding clients | £62k - £75k |
| Ongoing management of care arrangements | £200 annual fee | | |

| | | | |
|--|-------------|---|--|
| Arranging alternative support for self-funders | £265 charge | Benchmarking with other local authorities that provide similar services | |
|--|-------------|---|--|

| 2. Change of name deed | | | |
|---|-------------------------|--|---------------------------------|
| Service offered | Fee | Fee Rationale | Estimated Net income p/a |
| Change of name certificate | £50 per certificate | New service offer – Fee informed through benchmarking with other local authorities that provide similar services | £8.9k - £10.9k |
| Change of name – additional copy of certificate | £11 per additional copy | | |

| 3. Expansion of planning pre – application service | | | |
|--|--|---|---------------------------------|
| Service offered | Fee | Fee Rationale | Estimated Net income p/a |
| Major development - development team (50 dwellings or more, and to provide developers direct access to relevant technical and scientific specialists within the Council) | 1. Meeting with planning officer - £1,400 2. Development team and 2 letters - £1,400 | Revised service offer Fee- informed through benchmarking with other local authorities that provide similar services | £57.5k - £70.3k |
| Major development (10 – 49 dwellings or more, 1000 sqm or more) | 1. Meeting with planning officer - £700 2. Development team and 2 letters - £1,400 | | |
| Minor development (1-9 dwellings or less than 1000 sqm) | 1. No meeting, written letter only - £300 2. Meeting with planning officer - £550 3. Development team and 2 letters - £1,400 | | |
| Other development (telecoms, change of use, advertisement, tree works and listed buildings) | 1. No meeting, written letter only - £150 | | |

| | | | |
|-------------------------|---|--|--|
| Householder | 1. No meeting, written letter only - £50 2. Meeting with planning officer - £120 (from year 2) | | |
| General advice | 1. No meeting written letter only - £20 | | |
| Planning history search | 1. No meeting, written letter only - £40 | | |

| 4. Regulatory and advisory licencing services | | | |
|--|------------------------|--|---------------------------------|
| Service offered | Fee | Fee Rationale | Estimated Net income p/a |
| Pre – licensing surgery and advice | £60 per hour (exc VAT) | New service offer – Fee informed through benchmarking with other local authorities that provide similar services | £9.5k - £11.5k |

Legal implications

4.10 The key pieces of legislation relating to the recovery of total costs of service delivery for local authorities are:

- The Local Government Act 2003 - Section 93 contains powers for all local authorities to charge for 'discretionary services', whilst Section 95 permits local authorities to engage in commercial trading activity and to generate surpluses.
- The Localism Act 2011 introduced a new General Power of Competence (GPC), which explicitly gives Councils the power to do anything that an individual can do which is not expressly prohibited by other legislation. This activity can include charging or activity undertaken for a commercial purpose.
- General Power for Best Value Authorities to Charge for Discretionary Services - Guidance on the Power in the Local Government Act 2003.

4.11 For each individual service there may also be specific legislation, guidance or other requirements which impact on the potential to recover the total costs of service delivery. These must be taken into account in the development of any individual service proposals relating to income and kept under review.

4.12 Each of the four proposals contained within this report fall within the local authorities power to charge.

Procurement Implications/Social Value

- 4.13 None directly relating to this report.

Property implications

- 4.14 None directly relating to this report.

Health and wellbeing implications

- 4.15 None directly relating to this report.

Staffing implications

- 4.16 None directly relating to the income and commercial policy.

Reducing Inequalities

- 4.17 An outline and overarching Equality Impact Assessment (EqIA) has been undertaken whilst developing the 'Walsall Council Income and Commercial Policy'. As services across the council review income generation activity and opportunities and apply the guidance contained within the policy to new / existing areas of income they will need to update this EqIA to identify the potential groups who may be impacted by individual proposals and any relevant mitigating action / changes that may be required.
- 4.18 Equality impact assessments will be carried out on each of the four income generating proposals as part of the consultation process and the outcomes reported to Cabinet.

Consultation

- 4.19 Consultation on the policy has been undertaken across all internal services to allow feedback and the identification of required amendments prior to seeking formal approval.
- 4.20 As services across the council review income generation activity and opportunities and apply the guidance contained within the policy to new / existing areas of income they will need to identify any further relevant consultation that may need to be undertaken in relation to each proposal at that point.
- 4.21 Consultation on the 4 proposals will be undertaken as appropriate. With the findings reported back to Cabinet for a decision on whether to implement or not.

5. Decide

- 5.1 This report seeks approval for the 'Walsall Council Income and Commercial Policy' which aims to provide clear advice on the process that should be followed and areas that should be considered in relation to income generation.
- 5.2 The report further requests approval to consult on the four income generating proposals. These proposals either relate to the introduction of a new fee to recover

the cost of delivering an existing service, or the implementation of a new income generating service offer.

6. Respond

- 6.1 Following approval of the policy, service areas across the council will begin reviewing income generation activity and opportunities and applying the guidance contained within it to those areas. Where required Cabinet will receive further reports relating to the implementation of individual proposals.

7. Review

- 7.1 The policy itself will be reviewed on a frequent basis as part of the authority's overarching suite of financial documents. The development of the Income Management framework will also provide further clarification on roles and responsibilities for actions (including annual review work) required within the annual income management cycle.

Background papers

Walsall Proud Programme Contract Award Report - Cabinet 12/12/2018

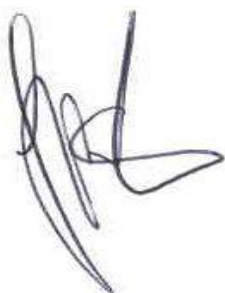
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27 August 2019



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27 August 2019

A handwritten signature in dark ink, appearing to read "Michael Bird". The signature is fluid and cursive, with the first name "Michael" and the last name "Bird" clearly distinguishable.

Councillor Bird
Leader of the Council

27 August 2019



Walsall Council Income and Commercial Policy

Document Information

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|---------------------------|--|-------------------------|-----------------|
| Document Title: | Walsall Council Income and Commercial Policy | | |
| Version: | 1.6 | Owner: | Head of Finance |
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| Last updated date: | 16/08/2019 | Last updated by: | Vicky Buckley |
| Purpose: | To provide guidance and advice for Walsall Council officers and Members on why, when and how we seek to recover the total costs of service delivery. | | |

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1. AIM

Introduction

- 1.1 The purpose of this document is to provide a framework, guidance and advice for Walsall Council officers and Members on why, when and how we seek to recover the total costs of service delivery and seek to generate income in support of our corporate priorities.
- 1.2 All services to the public and businesses are required to assess and report on appropriate proposals for income generation and cost recovery. Internal services will continue to recover costs through the reallocation of overheads. Where services to the public and businesses are provided externally on the Council's behalf then they should also have regard to this policy.
- 1.3 It is the responsibility of the Corporate Management Team, Assistant Directors, Heads of Service, Service Managers and Budget Holders to manage and account for recovery of total costs of service delivery and income generation. Assessment of individual services and potential income generation, including fees, charges, licenses, trading and commercial operations will be assessed, reviewed and reported in accordance with this policy.
- 1.4 The Head of Finance will be responsible for overall oversight of the policy, including ensuring it is up to date and reflects good practice and will provide corporate advice and support in implementing the policy in individual services. Services are accountable for implementation of the policy in their areas, including ensuring the policy is followed, and undertaking appropriate consultation and impact assessment. This policy is not establishing additional governance on income generation proposals, but instead the expectation is that all proposals should have consideration of this policy and the ability to recover total costs of service delivery and generate income.
- 1.5 This policy will be reviewed annually alongside the council's comprehensive suite of financial documents.

Executive summary and policy context

- 1.6 The reduction in main government grant funding means we will require significant changes and reform to how we think about resourcing the services that we deliver, including decisions about whether we can continue with some activities.
- 1.7 The ability of services to optimise income to recover the total cost of service delivery will become increasingly important to our funding strategy. Our ability to act needs to be framed within the complex rules and regulations that govern income generation, fees, charges and trading within local government, while



also being open to seeking changes in those requirements.

1.8 The key pieces of legislation relating to the recovery of total costs of service delivery for local authorities are:

- The Local Government Act 2003 - Section 93 contains powers for all local authorities to charge for 'discretionary services', whilst Section 95 permits local authorities to engage in commercial trading activity and to generate surpluses.
- The Localism Act 2011 introduced a new General Power of Competence (GPC), which explicitly gives Councils the power to do anything that an individual can do which is not expressly prohibited by other legislation. This activity can include charging or activity undertaken for a commercial purpose.
- General Power for Best Value Authorities to Charge for Discretionary Services - Guidance on the Power in the Local Government Act 2003.

1.9 For each individual service there may also be specific legislation, guidance or other requirements which impact on the potential to recover the total costs of service delivery. These must be taken into account in the development of any proposals and kept under review.

2.0 KNOW

Our overall approach

2.1 Our main sources of income currently include local Council Tax, local Business Rates, fees and charges and any money from investments. We also rely heavily on grants from central Government. These grants are reducing which means that our spending plans will need to be supported by Council Tax, local Business Rates and income that we generate in the provision of services.

2.2 By optimising income in line with this policy, Walsall Council can make a significant contribution to the overall financial position. Our aim for income optimisation is for all services to understand what must, could and should be done to become self-financing so that we make informed decisions on where best to subsidise delivery. We recognise in some services there are barriers to income generation, while in others there is potential for a surplus from trading and commercial operation to contribute toward corporate costs. Understanding this landscape and maximising the potential to become self-financing enhances funding available for our priorities while contributing to the on-going financial viability of services that cannot or should not seek to recover total costs of service delivery.



- 2.3 Traditionally, service cost recovery has focussed on fees, charges and trading. These continue to be important but we need to consider all potential mechanisms for generating additional income. This will become fundamental to our future funding strategy and annual budget process. As such, each year we will need to assess the total costs of service delivery that have been recovered so that we reduce the need for subsidy.
- 2.4 We will take the following factors into account when setting and reviewing fees and charges:
- corporate strategy and priorities
 - duties, powers and responsibilities
 - total cost to serve
 - communities
 - market conditions
- 2.5 Consideration will also be given to the structure of charging mechanisms to ensure that they remain relevant and reasonable in the context of the service as a whole.
- 2.6 This document sets out the framework and principles within which total cost recovery and income generation will be assessed, agreed, reported and reviewed as part of the annual budget process and the link to our Corporate Plan and strategic priorities. The Head of Finance will have responsibility for monitoring the impact of this policy.

Scope

- 2.7 This policy is intended to introduce a consistent framework across all service lines. Therefore its scope includes:
- All income generated from fees and charges to the public, business and other organisations (e.g. academies and the NHS);
 - Voluntary income generated from donations and gifts;
 - One off income releases, such as asset disposals. While these will only deliver a one off income boost (i.e. receipts from a sale) the impact on existing income streams should be considered;
 - Income generated from other organisations through the sharing of services or Council resources;
 - Analysis of market opportunities, legislative drivers and the decision making process for establishing Council, wholly owned or majority owned trading companies;
 - Services to support income generation including cash receipting, card



payments, e-commerce platforms, Direct Debit, invoicing and debt recovery.

2.8 This policy supports and also covers where Councils are providing discretionary services under the General Power of Competence (GPC). In summary, the GPC enables Councils to do things:

- an individual may generally do;
- anywhere in the UK or elsewhere;
- for a commercial purpose or otherwise, for a charge or without charge; and
- without the need to demonstrate that it will benefit the authority, its area or persons resident or present in its area (although in practice Councils will want to realise such benefits).

2.9 The policy is intended to provide a consistent framework for decision making around income generation and recovery of the total costs of service delivery which considers principles of fairness, transparency and commercial return when assessing whether to:

- Introduce new charges;
- Adjust existing charges including scope, level and structure;
- Influence demand for services, through pricing, eligibility and awareness raising;
- Respond to external factors (wider economy, changes in legislation); and
- Reduce or withdraw services where it is not possible to recover the total costs of service delivery or they do not contribute to corporate priorities.

2.10 The policy requires consideration of the principles included within it and the specific aims of charging. This must identify in each case:

- The Total Cost of service delivery, including the relevant contribution to Directorate and Corporate overheads as defined in Non-Distributed Costs as part of the annual budget planning cycle;
- Any limitation and restriction on recovering total costs of service delivery (for example through a statutory prohibition or limitation to only recover costs on a different basis to the calculation above);
- The objective and purpose of the current cost recovery approach including any background decisions and context (for example a manifesto commitment or prior decision) including whether the intention is to recover unavoidable costs, address a market failure, encourage or discourage activity or generate surplus;
- The current performance in relation to total cost recovery including:



- the level of income generated;
 - a forecast of future income; and
 - any current subsidy defined as the difference between the Total Service Cost and current cost recovery;
 - The basis for any concessions or discounts – including the purpose, eligibility and cost in terms of foregone income. This might be related to different customer groups (for example people in receipt of specific benefits or for registered charities) or for different behaviours (for example prompt payment or bulk orders);
 - The price setting methodology including a schedule of charges that will be incorporated into the corporate fees and charges register, and assessment of demand to inform budget setting;
 - The basis for income collection and management (for example payment at point of access online);
 - The potential call on Council Tax or other funding if assumptions about demand and cost recovery are not met.
- 2.11 The presumption is that, where permissible, services should seek to optimise income to recover the Total Cost of service delivery.
- 2.12 The following sources of income are deemed to be out of scope:
- *Internal recharging* – ensuring that internal recharging provides an effective mechanism for redistributing central overheads to individual services. The approach to internal recharging of overheads needs greater transparency, and action to help reduce the overall cost to all individual services, but this will be tackled by the wider transformation programme.
 - *Revenue support from central Government, including specific grants* – the objective of this policy is to reduce the Council's dependence upon revenue support from central Government. Confirmed grant income needs to be taken into account when calculating cost recovery.
 - *Council tax* – the objective of this policy is to reduce dependence upon local, as well as national, taxation.
 - *Business rates* - The Council will retain 100% of this by 2020/21, and scale will be highly dependent on local business success and growth. This policy will look to reduce dependency on Business rates.

3.0 DECIDE

Income and total cost recovery principles and requirements

- 3.1 The following principles inform decision making on income generating and total cost recovery proposals.



Principle 1: We recover total costs of service delivery on a fair and transparent basis, to sustain and support service delivery and development as we move to a self-financing position as a Council.

Principle 2: We will seek to recover the total costs of service delivery and generate a surplus, to contribute toward corporate costs, unless there is a legal barrier to doing so or it has been otherwise agreed by Cabinet.

Principle 3: We assess our total costs each year using a standard method of assessing total cost, which includes directorate and corporate overheads.

Principle 4: We will only trade where we are confident that by doing so we are contributing to our corporate objectives and can do so on a sustainable basis.

Principle 5: Where we decide locally to subsidise services, including providing any concessions, we do so based on a clear understanding of the rationale, link to our objectives and outcomes and associated income potentially foregone.

Principle 6: We will expect payment in advance, or at point of sale, unless there is a rationale for not doing so, and will develop and use the most cost efficient collection channels available.

Principle 7: We will have a consistent framework and approach, led corporately, and using service understanding of demand and volume to forecast income within our budget planning and reporting processes.

Principle 8: Charging should be used to promote fairness and to influence public behaviour where it is appropriate to do so.

Details Included within each Principle

Principle 1: We recover total costs of service delivery on a fair and transparent basis, to sustain and support service delivery and development as we move to a self-financing position as a Council.

Our rationale for charging is to recover the total costs of service delivery so that we are better able to invest in our strategic priorities. By generating income and promoting the recovery of total costs of service delivery we are moving towards a self-financing model, which is necessary given the reductions in central Government funding, and will enable more resources to be focussed on where we create the most value.



Generating income and recovering total costs of service delivery is about more than financing and funding. We are also developing our framework for total cost recovery to help us to utilise pricing strategies that meet wider objectives including:

- *Encouraging demand* – there are some services where we are actively seeking to stimulate demand and take up of services. Our pricing should be encouraging access and utilisation of Council services. This objective will include setting prices at competitive levels and also intelligent charging strategies that encourage utilisation by fostering a sense of *investment* among users.
- *Encouraging pride in services* – that the Council delivers services to a standard that warrants the levying of fees and charges that should be a source of organisational pride.
- *Encouraging high professional standards* – charging, particularly at a *market rate*, obliges service delivery to high standards.

The impact of total cost recovery on market efficiency should be considered, particularly where the Council has a monopolistic position in a particular service area (e.g. the provision of local land information), or is subsidising a service which is operating in a market where there are other private providers.

Principle 2: We will seek to recover the total costs of service delivery and generate a surplus, to contribute toward corporate costs, unless there is a legal barrier to doing so or it has been otherwise agreed by Cabinet.

We must have the legal power to recover the total costs of service delivery for the relevant service or, alternatively, there must be no legal barriers to recovering costs. It is the responsibility of the service to consult and seek advice on the basis for total cost recovery.

The amount of revenue raised from a total cost recovery proposal must be sufficient to meet the costs of implementation and enforcement of a new service.

We start from the assumption that, for an existing service, we will be targeting total cost recovery unless there is a limitation to this.

A mechanism for implementing and enforcing total cost recovery must exist, and should be well tested beforehand.



Users can only be compelled to pay for a service if those who do not pay can be excluded from consuming the service (i.e. where the service is not a public good) or where targeted concessions or exceptions are implemented as part of an agreed process. Where a service is a public good, it should explore the option of voluntary contributions.

Principle 3: We assess our total costs each year using a standard method of assessing total cost, which includes directorate and corporate overheads.

The total cost of a local authority service is made up of all expenditure required to deliver the service, including overheads. There may be fees and charges for all or part of the service.

In determining the total cost, the local authority is free to decide what methodology it wishes to adopt. Drawing on existing and familiar principles as set out in the CIPFA Best Value Accounting Code of Practice (the Code) the total cost will be determined by the amalgamation of the Code's definition of Total Cost, an appropriate contribution for Corporate and Democratic Core (CDC) and Non-Distributed Costs (NDC), as those terms are defined in the Code, as a part of the costs of provision.

The total cost of delivering a unit of service needs to be understood in order to provide a basis for pricing decisions and efficient management of the service. Accurate data on volumes of units delivered needs to be maintained in order to calculate unit cost.

To help achieve this, our financial systems and processes may need to evolve to support us to:

- Keep expenditure separate from income;
- Keep expenditure and income relating to statutory services and grant funded services separate from those of other services;
- Allocate all components of total cost down to services and individual cost centres using a consistent method that reflects actual costs incurred.

Our pricing should be compared with those of other public, private and third sector services. If we are unable to recover our total costs on a comparable basis then we should be asking whether we need to provide the service and, if so, what value we add. Likewise, we also need to consider if, by providing the service, we are stopping others supplying services and preventing competition that would benefit our communities.



Full use of differential charging, discounting and other alternative pricing structures should be made to maximise commercial benefit and target service take-up amongst target groups in line with our policy objectives.

Prices should be informed by data and intelligence on current and potential service users and customers and supply from other providers in order to understand the nature of supply and demand in each market the Council is operating in. Forecasting techniques should be used to model future income.

In order to improve recovery performance, current service expenditure needs to be challenged as well as income. We remain totally committed to being an efficient service provider.

By virtue of section 93(4) of the 2003 Act, authorities are to secure that for “each kind of service” the income from charges does not exceed the total costs of provision over a period as specified by the local authority. The local authority is allowed to compare the charges for and income from similar or related services together and so offers some flexibility to group services together when assessing compliance with the duty imposed by section 93(3) of the 2003 Act. Any service or group of similar or related services that consistently over-recover over a period specified by the local authority should present a proposal with options for addressing consistent over recovery, which may include an option to trade.

We will seek to recover the total costs of delivering services funded through specific grants through the grant funding arrangement itself.

Principle 4: We will only trade where we are confident that by doing so we are contributing to our corporate objectives and can do so on a sustainable basis.

Services that are achieving, or have the potential to achieve, total cost recovery, from charging, will be encouraged to operate more commercially in order to reduce dependence on revenue support and stimulate efficiency. Where a service (group of services) has consistently over recovered over a period and is able to demonstrate how it will achieve sustainable, significant commercial benefits over and above current levels of recovery, then a trading and commercial model may be considered for that service.

Any decision to consider the use of a trading / commercial model should be based on a business case with robust validation to determine if setting up such a company would be beneficial. The business case must demonstrate that there



is potential to both enhance delivery of our corporate objectives and to generate an agreed return per annum within two years of trading.

Principle 5: Where we decide locally to subsidise services, including providing any concessions, we do so based on a clear understanding of the rationale, link to our objectives and outcomes and associated income potentially foregone.

The decision on whether to subsidise a service is for Cabinet. The advice they receive should be informed by discussion at CMT, following Directorate Team discussions where relevant or based on advice through delegated authority.

A decision to subsidise a service needs a clear rationale. This is separate to the prior decision about whether total cost recovery is permissible and is therefore focussed on local decisions about additional subsidy and concessions. The decision should be linked to our strategic priorities, but may also include pricing decisions to encourage take up, stimulate alternative providers to improve service availability and quality and/or prototyping and testing of new service models.

The financial impact of subsidy decisions on the authority needs to be identified, both individually and collectively, and actively managed and reviewed. Likewise the impact of total cost recovery decisions on communities must also be considered through the relevant Equalities Impact Assessment.

In deciding whether to subsidise services which are also provided by other suppliers on a fully commercial basis, the rationale and degree of commonality with other suppliers must be discussed with the relevant governance Board prior to approval by Cabinet. Such decisions may have implications for competition, State Aid and may require expert legal advice.

The overall level and profile of service subsidy agreed must be made available to decision makers.

The principles governing concessionary pricing for particular users are limited to promoting equity and increasing access to services, particularly amongst those that would otherwise be unable to pay or are specifically targeted groups.

Differential pricing for one type of user should be readily defensible and easily explained to all users. It must also be readily enforceable based on simple business rules requiring limited discretion and oversight.



Any concessionary price for different types of user agreed must be applied consistently and transparently across all Council services. This should be captured in our business processes and in our register and recording of total cost recovery mechanisms. Eligibility should only need to be assessed once and then applied across all relevant services.

The impact of subsidies must be monitored, reviewed and evaluated as part of the annual review.

Principle 6: We will expect payment in advance, or at point of sale, unless there is a rationale for not doing so, and will develop and use the most cost efficient collection channels available.

Our starting position is that we should seek payment in advance of service delivery. This will depend on the nature of the service being delivered. For example it may be an annual license, a one off payment or a regular fee. We will be developing our processes and technology to facilitate easier payment and cost recovery.

Pricing and total cost recovery should be administered to maximise ease of collection and minimise the costs of collection, from both the Council and user perspective.

We will increasingly introduce modern methods of payment and cost effective channels, seeking to phase out high cost and labour intensive methods of income collection and debt management to reduce transaction costs. Chasing payment for services increases our overheads and charges for all services. We will increasingly automate this process.

Principle 7: We will have a consistent framework and approach, led corporately, and using service understanding of demand and volume to forecast income within our budget planning and reporting processes.

See section in relation to Income Management Annual Cycle process below (section 5.11)

Principle 8: Charging should be used to promote fairness and to influence public behaviour where appropriate to do so.

Charging can be used to rationalise or manage demand due to available resources or to influence behaviours and choices. This might also include penalties for anti-social and negative behaviours which have adverse



consequences on others. Understanding our aim will be fundamental to our pricing decisions.

Income dimension of wider Council strategies

- 3.2 This policy should be considered in the development of all service policies to demonstrate consideration of potential for total cost recovery.

Commissioning – the impact on current and future income should be fully considered when decisions to commission service provision outside the Council are being taken. The Council should look to use mechanisms such as profit share in commercial agreements on outsourcing in order to continue to benefit from future revenue.

Asset management – the impact on current and future income should be fully considered when decisions to sell or transfer assets are being taken.

Impact and equality assessment – the impact on total cost recovery proposals must include an understanding of the impact on residents and should include the relevant equalities impact assessment, to inform decisions.

4.0 RESPOND

Process for deciding whether to charge

- 4.1 To help inform whether income optimisation should be considered for a given service, decision steps have been developed to establish:

Step 1 - Legal basis: What level of income generation is legally permissible.

Step 2 - Additional constraints: Whether there are other constraints on income recovery, is there a strong enough rationale for not charging (or not charging the full amount).

Step 3 - Total cost recovery rationale: Whether rationale for recovering total costs is consistent with the corporate framework, transparent, fair and equitable.

Step 4 - Feasibility: Consider the feasibility and cost of income collection and management.

Step 5 - Process for deciding on the level of charge / price: Where discretion is permitted, decisions on when and where to charge will be informed by this advice but remain a political choice.

Step 6 - Concessionary pricing: The use of concessionary pricing to encourage uptake of services from groups in greatest need.



4.2 **Step 1: Legal basis**

The legislative framework for recovering total costs is complex and it will be for each service to assess what is permissible under current legal requirements and if there are any restrictions on what and who can be charged. This will require a current knowledge of the relevant service legislation and guidance as well as the wider enabling legislation for local government.

The starting presumption should be that the Council can rely on the Localism Act 2011 General Power of Competence and the Local Government Act 2003: The Power to Trade and the Discretionary Charging Powers unless there is a specific power or duty in other legislation.

The decision on whether charging is possible should be agreed between the relevant Head of Service, Legal and Finance before being fully documented. As part of the annual review process this should be kept under review, in particular where new legislation, guidance or case law has impacted on the ability to charge. Any change in circumstances should be reported alongside any assessment of whether or not to introduce new or amended charges.

Where services are provided commercially on a traded basis there are additional legal requirements that must be considered. This will include an assessment of the right corporate structure for the traded function to support the development and growth of the traded service as a commercial entity.

4.3 **Step 2: Additional constraints**

Once a legal basis for recovery of the total costs of service delivery has been established it is necessary to establish any other limitations on total cost recovery. This may include:

- Contractual limitations where we have commissioned services where pricing is the responsibility and decision of the service provider. Examples could include situations where funding has been supplied in the form of a grant to an organisation and costs are not expected to be recovered;
- Market limitations where the Council is providing services in competition with alternative service providers and total cost recovery by the Council may result in a reduced market share and overall income. In this situation there should be a clear rationale for why the Council is continuing to subsidise service provision. For example it may be making a deliberate decision to subsidise services to influence the quality of services available to residents.
- Where the service is trading commercially, the Council wants to demonstrate that it is not abusing a monopoly position if this exists;
- Economic limitations where the Council income is dependent on wider

economic conditions, such as retail conditions which may reduce the income potential.

4.4 Step 3: Total cost recovery rationale

The service will want to confirm that the rationale for recovering total costs is consistent with the corporate framework, which should result in a transparent decision making process and a clear link to the Council's strategic priorities.

The presumption is that services should seek to recover total costs wherever possible from users, while ensuring that in doing so any fees and charges would be fair and equitable.

The assessment for each service should also include the specific service objectives and obligations from the proposed approach to recovering total costs. These may include:

- Supporting the achievement of corporate priorities and outcomes;
- Meeting statutory requirements;
- Sustaining socially necessary services;
- Targeting activity in specific user groups;
- Generating income from additional / enhanced service provision;
- Influencing resident and business behaviour.

Where the decision is to trade commercially and to generate a profit, there should be a clear analysis of the market opportunity for the Council, including an understanding of the associated risks of underperformance. This will include provision of services to other public bodies under the Local Authorities (Goods and Services) Act 1970.

The pricing strategy should also link to the corporate strategic priority in particular around decisions on any discounts and concessions for different user groups. The presumption is that discounts and concessions should be limited to statutory requirements or linked to a specific policy objective so that charges are considered equitable.

4.5 Step 4: Feasibility

Decisions on total cost recovery should also consider the feasibility and cost of income collection and management. At present this may prevent some charges where the costs of collection and administration would outweigh the income potential.

Introducing simple, modern and effective tools for taking and receiving payments will be required. For residents and other users, any charges and fees for services should be:



- Clear and transparent;
- Explained in advance of service delivery;
- Agreed in advance of service delivery;
- Paid in advance of service delivery.

4.6 **Step 5: Process for deciding on the level of charge / price**

The aspiration for price setting should be to optimise income to achieve recovery of the total costs of service delivery. Price setting should be informed by a number of factors:

- An assessment of the total cost of service delivery divided by the forecast volume to devise a unit cost.
- Historic charging – where previously no charges have been levied or charges have been kept low, increasing to a market rate or total cost recovery may need to be done incrementally.
- Benchmarking with other authorities – particularly geographical neighbours and our statistical family group – will help inform the reasonableness and defensibility of charging.
- Competitor analysis – where Council services exist within a market of other suppliers, their prices need to be considered. This is not to say that the Council should aspire to be the lowest cost provider, but should seek to differentiate based on quality and service.
- Administrative requirements – for example changing Direct Debit payments requires all customers to be written to in advance, which presents both an administrative burden and can also disrupt a stable customer base.
- Any statutory or national pricing limitations.

Once a baseline price has been established for a service it will, where permissible, be reviewed annually – with a presumption towards a price increase. Price increases as a minimum should be amended in line with:

- the rate of CPI inflation published by HM Treasury or;
- factors that informed the setting of the baseline if these are more than the rate of inflation (This includes changes to total cost of service delivery)

Any decision *not* to increase charges, and the rationale in each situation (for example taking account of price sensitivity, demand and required behavioural change, and/or Council initiatives e.g. to improve health for example), should be agreed annually.

4.7 **Step 6: Concessionary charging**

Particularly where there is a public good associated with a service or where the



Council service exists as a result of market failure, concessionary pricing may be desirable to encourage uptake of services from groups in greatest need. Whilst it should not be assumed that charging is a barrier to participation (as discussed in Principle 1) there are occasions where financial incentives may help encourage participation from target groups.

When setting, and reviewing charges, any decision to seek to offer concessionary charging should be based on a consistent and clear rationale. The decision should be linked to our strategic priorities, but may also include legal requirements to provide concessions to individual groups, pricing decisions to encourage take up, stimulate alternative providers to improve service availability and quality and/or prototyping and testing of new service models.

Where there is a decision to offer concessions, these would normally be extended to the dependents of those qualifying.

Unless otherwise required by legal provisions, concessions should only normally be applied to Walsall borough residents / businesses.

5.0 REVIEW

Income management

- 5.1 This policy introduces a Council wide corporate approach to total cost recovery and income generation, with consistency of policy and practice across all directorates and trading units. The nature and level of charges will be decided through the Council's political framework for decision-making, including use of officer delegation where appropriate.

Accountabilities

- 5.2 The Head of Finance will provide senior level responsibility for income management and monitoring the achievement of income and total cost recovery targets, with responsibilities devolved to individual departments and service areas.
- 5.3 A named individual ('Accountable Officer') for each service will be held centrally, with responsibility for reporting performance, assessing future charges and maintaining the Corporate Fees and Charges Register.
- 5.4 For significant proposals in terms of potential income and risk, the Head of Finance will oversee a programme management approach, making use of existing governance, to ensure sufficient focus on business case development, benefits delivery and risk management. Development of new income proposals



will need to be taken forward through a business case approach.

- 5.5 Service areas will be accountable for collecting and reporting good quality data on volumes so that unit cost can be monitored, and that regular forecasting is used to anticipate changes in income levels as part of a centrally co-ordinated approach overseen by finance.
- 5.6 Financial systems, guidance and business rules are required to enable consistent apportionment of overheads to a given service in line with the income principles.
- 5.7 Regular monitoring, review and evaluation of the impact of charging on the Council and the wider area is required, including the use of modelling where appropriate to show the overall impact on the Council's finances of setting charges at different levels, and how external factors (e.g. lower than expected growth, changing customer demand) could impact.
- 5.8 Regular monitoring, review and evaluation of the impact of charging on the different customer groups should also be considered.
- 5.9 Accountable Officers need to be sufficiently empowered and supported to pursue more commercial approaches to income generation.
- 5.10 There needs to be full transparency throughout the income process, including publication of an income policy and targets, a fees and charges register, subsidies and concessions. There needs to be regular engagement with service users on income generation as part of the Council's wider programme of customer engagement (for example through the annual budget consultation process).

Annual cycle

- 5.11 These principles can be delivered through a five stage annual cycle, aligned to the Council's existing strategic and financial planning cycles:
 - 1. *Identify* – understanding the baseline position in terms of income generation, total cost recovery, market conditions and the legal and policy framework;
 - 2. *Analyse* – reviewing and updating the Council income policy and assessing current income performance against this, identifying opportunities for generating income and improving total cost recovery, developing high level business cases and completing a market assessment;
 - 3. *Prepare* – setting and cascading recovery targets, put in place governance and management arrangements, securing the necessary resources for implementing the business cases;
 - 4. *Implement and manage* – implementing the business cases, ongoing monitoring of benefits, market conditions, changes to legislation and policy;



5. *Review* – reviewing recovery performance overall and for individual directorates / services, evaluate impact (local economy, access to services etc.), forecast cost pressures, market conditions, changes to legislation and policy, agree income targets for the following year, develop and sign off individual business cases.

Activities, responsibilities, and timings for each of these stages are set out in more detail within the Council's Income Management Framework, which is available on the Finance Intranet page.

A cost recovery register

- 5.12 An accurate cost recovery register, setting out details of all cost recovery mechanisms is a key document and will inform business planning and budget process. It will also provide transparency for residents and communities.

The approach will include:

- An accountable officer in finance for the coordination and maintenance of the income and cost recovery register;
- Each line of the register being allocated to a service owner;
- Each owner being responsible for reviewing total cost recovery annually, in line with the total cost recovery methodology used for the business cases, and any guidance from the accountable officer;
- Each owner agreeing with finance, alignment of each cost recovering line to a Revenue Outturn (RO) line in accordance with the CIPFA returns guidance;
- Updating of the register with any material changes;
- A report is developed twice a year, in line with the timescales set out within the Council's Income management Framework, to highlight the current position and inform key decisions regarding changes in total cost recovery; and
- Any material changes being submitted to the relevant governance board for consideration enabling monitoring, oversight and assessment key performance and risks.

Governance

- 5.13 To support the development and embedding of this policy, existing Governance Boards (e.g. Corporate Management Team) will be expected to have regard to this policy. This will enable the Council to manage income transparently and make effective decisions as part of existing governance framework.
- 5.14 Cabinet will have overall responsibility for the approval and implementation of this policy, and for formal sign off for individual fees and charges, including the



use of officer delegation where appropriate. A number of items will be reported to Cabinet:

- The introduction of new charges for services;
- Annual total cost recovery process as part of the budget process and ad hoc opportunity reviews;
- Reporting on a cost recovery register providing a central point of reference;
- In year monitoring of income generation; and
- Agreement of the delegations to officers to change fees, charges or other cost recovery mechanisms.

Appendix A. Definitions

Key terms in this policy are defined according to the table below.

| Term | Definition |
|--|--|
| A service | A level of activity at which a charge is made (e.g. wasp catching, book lending, property rental, a bus journey). |
| Concession | A charge for a service which the Council has decided to set below the unit cost of delivering the service in order to promote take up amongst particular individuals. |
| Cross-subsidy | Charging below unit cost for a given service as a result of charging above unit cost for another service. |
| Discretionary service | A service which a local authority may decide whether to provide or not. |
| Internal Recharge | A policy of recharging the full cost of support services and facilities to the relevant service area. |
| Non-distributed costs (NDC) and Corporate and democratic core (CDC) costs | Classes of expenditure defined within the Chartered Institute of Public Finance and Accountancy (CIPFA) Best Value Accounting Code of Practice (BVACOP) as costs that are not to be recharged to services. |
| Outsourcing | Outsourcing involves the contracting out of a business process (e.g. payroll processing) and operational, and/or non-core functions to another party. |
| Overheads | Overhead is an accounting term that refers to all ongoing business expenses not including or related to direct employee and non-employee costs (Costs required to run a business, but which cannot be directly attributed to any specific business activity, product, or service). |
| Statutory service (duties and discretionary) | A statutory service are services a local authority is legally allowed to provide. Local authorities have legal duties to carry out many functions, including providing or making accessible a range of services. Local authorities also have the power to provide services which are not part of legal duties (discretionary services). The local authority may choose to charge for this service where it is permissible. |

| | |
|--------------------------|--|
| | <p>There are a wide range of statutory requirements and permissions in relation to charging for these services, including:</p> <ul style="list-style-type: none"> ▪ a requirement to provide free of charge; ▪ a requirement to levy a fixed charge (e.g. planning application fees); ▪ permission to levy a maximum charge; ▪ permission to recover the total costs of providing a service (e.g. building control fees); ▪ permission to recover or over-recover total costs provided that income is ring fenced for improving specific services (e.g. certain types of parking income must be reinvested in transport). |
| Subsidy | Setting of a charge at below the level of unit cost. |
| Total cost | <p>The total cost of a service is made up of all expenditure required to deliver the service, including central overheads such as Non-Distributed costs and Council and Democratic Core costs. This definition is consistent with current CIPFA guidance.</p> <p>The only exception to this should be in relation to the requirement to recover any depreciation and impairment costs charged to the service - as for local authorities these are non-cash costs with statutory accounting processes in place that effectively remove any burden on local Council tax payers.</p> |
| Unavoidable Costs | Costs which cannot be avoided at least for the short term. This means that unavoidable cost can be said to be more or less a fixed cost in the short term which cannot be changed. |

Equality Impact Assessment (EqIA) for Policies, Procedures and Services

| | | | |
|--------------------------------|--|---|------------|
| WPP Theme | Income Generation & Cost Recovery | | |
| Proposal name | Income & Commercial Policy | | |
| Directorate | All | | |
| Service | All | | |
| Responsible Officer | Lloyd Haynes | | |
| Proposal planning start | 20/05/2019 | Proposal start date (due or actual date) | 04/09/2019 |

| | | | |
|----------|---|--|-----------------------|
| 1 | What is the purpose of the proposal? | Yes / No | New / revision |
| | | | |
| | Policy | Yes | New |
| | Procedure | | |
| | Guidance | | |
| | Is this a service to customers/staff/public? | It will affect the design of charges for services provided to customers / public | |
| | If yes, is it contracted or commissioned? | Both | |
| | Other - give details | | |
| 2 | What is the business case for this proposal? Please provide the main purpose of the service, intended outcomes and reasons for change? | | |
| | <p>To implement an internal framework that provides consistent guidance and advice for Walsall Council officers and Members on why, when and how the authority seeks to recover the costs of service delivery and generate income in support of our corporate priorities.</p> <p>There is currently no existing overarching framework within Walsall which provides consistent guidance on why, when and how the authority should seek to recover the costs of service delivery and generate income.</p> <p>Given the recent and ongoing reductions in main government grant funding one of the workstreams of the Walsall Proud Programme (WPP) has therefore focused on the opportunity for Walsall Council to seek to improve its income generation activities and processes.</p> <p>A key element of this workstream relates to the development of the 'Walsall Council Income and Commercial Policy' which aims to provide clear advice on the process that should be followed and areas that should be considered in relation to income generation.</p> | | |



The 'Walsall Council Income and Commercial Policy', along with the development of the Income Management processes, will provide clear guidance which ensures consistent application of income management principles across the authority which support the recovery of the costs of service delivery and generate income in support of our corporate priorities.

As services across the Council review income generation activity and opportunities and apply the guidance contained within the policy to new / existing areas of income they will need to update this EqlA to identify the potential groups who may be impacted by individual proposals and any relevant mitigating action / changes that may be required.

3 Who is the proposal likely to affect?

| People in Walsall | Yes / No | Detail |
|-------------------|---|---|
| All | Potentially all of those individuals who utilise payable Council services | As the 'Income & Commercial Policy' will provide a set out consistent principles for Council services to consider when setting charges there may be an effect / change / increase in existing charges as new / existing areas of income are reviewed against these principles. The exact impact and the groups that may be affected cannot be identified at present, but this EqlA will be updated as individual proposals are developed and any relevant mitigating action / changes that may be required are identified. |
| Specific group/s | | |
| Council employees | | |
| Other (identify) | | |

4 Please provide service data relating to this proposal on your customer's protected characteristics.

Whilst there is some high level data available that would provide some indication of the number of individuals with some protected characteristics that live within Walsall (e.g. census data) this on its own would not provide clarity on how many of those individuals currently utilise / access Council services, and also would not provide any information regarding individuals who live outside of Walsall who access these services.

As such overall data regarding the number of individuals with protected characteristics that access / utilise chargeable Council services, and an understanding of those that may be affected by any future changes in charges as the policy is applied is not available.

Therefore as services across the Council review income generation activity and opportunities and apply the guidance contained within the policy to new / existing areas of income they will need to update this EqlA to identify the potential groups who may be impacted by individual proposals and any relevant mitigating action / changes that may be required.

5 Please provide details of all engagement and consultation undertaken for this proposal. (Please use a separate box for each engagement/consultation).

Consultation has been undertaken with all internal Council services when drafting the policy. Feedback from service areas focused on clarity on what should be included in Total Costs.

The original definition when consultation was undertaken was as follows:

| | |
|-------------------|--|
| Total cost | The total cost of a service is made up of all expenditure required to deliver the service, including central overheads such as Non-Distributed costs and Council and Democratic Core costs. This definition is consistent with current CIPFA guidance. |
|-------------------|--|

Feedback from services asked for greater clarity on this definition and questioned whether depreciation ought to be included in the definition as it is not a cash cost to the authority.

Following this feedback the definition for Total Cost has been updated to the following to reflect the fact that local authority accounting practices remove these costs so that they do not place a burden on local tax payers:

| | |
|-------------------|---|
| Total cost | <p>The total cost of a service is made up of all expenditure required to deliver the service, including central overheads such as Non-Distributed costs and Council and Democratic Core costs. This definition is consistent with current CIPFA guidance.</p> <p>The only exception to this should be in relation to the requirement to recover any depreciation and impairment costs charged to the service - as for local authorities these are non-cash costs with statutory accounting processes in place that effectively remove any burden on local Council tax payers.</p> |
|-------------------|---|

The other area of feedback focused on including costs of central support services within Total Cost as service areas do not have direct control over these costs and wanted clarity on the processes that would be followed to ensure these costs were efficient and appropriate.

Following review the definition has not been amended to exclude the need to recover central costs, as although services will not have direct control over these costs, there are the same processes in place within the authority to ensure these services are efficient and appropriate as there are for other service areas, and these are appropriate costs to support the provision of services overall that should be included within charging models, this is supported by the fact that external providers of services would need to recover costs for provision of payroll, HR, ICT, finance etc when setting their charges.

Consultation Activity

| | | | |
|--|--|-------------|----------------------|
| Type of engagement/consultation | Circulation of draft policy to internal service areas of the Council for review and feedback | Date | 14/06/19 to 24/06/19 |
| Who attended/participated? | All internal Council services | | |
| Protected characteristics of participants | Internal review, not involving service users with protected characteristics | | |

Feedback

Feedback from service areas focused on clarity on what should be included in Total Costs. The original definition when consultation was undertaken was as follows:

| | |
|-------------------|--|
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|-------------------|--|

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|-------------------|---|

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Following review the definition has not been amended to exclude the need to recover central costs, as although services will not have direct control over these costs, there are the same processes in place within the authority to ensure these services are efficient and appropriate as there are for other service areas, and these are appropriate costs to support the provision of services overall that should be included within charging models, this is supported by the fact that external providers of services would need to recover costs for provision of payroll, HR, ICT, finance etc when setting their charges.

| | | | | |
|---|--|--|---------------|---|
| 6 | Concise overview of all evidence, engagement and consultation | | | |
| <p>The consultation feedback has to date been internal but has not identified any views that the policy will have any adverse impacts on certain groups.</p> <p>Existing information regarding individuals with protected characteristics that access / utilise chargeable Council services and any understanding of those that may be affected by any future changes in charges as the policy is applied is not available.</p> <p>Therefore as services across the Council review income generation activity and opportunities and apply the guidance contained within the policy to new / existing areas of income they will need to update this EqlA to identify the potential groups who may be impacted by individual proposals and any relevant mitigating action / changes that may be required.</p> | | | | |
| 7 | How may the proposal affect each protected characteristic or group? The effect may be positive, negative, neutral or not known. Give reasons and if action is needed. | | | |
| Characteristic | | Affect | Reason | Action needed Yes / No |
| Age | | <p>As the 'Income & Commercial Policy' will provide a set out consistent principles for Council services to consider when setting charges there may be an effect / change / increase in existing charges as new / existing areas of income are reviewed against these principles.</p> <p>The exact impact and the groups that may be affected cannot be identified at present, but this EqlA will be updated as individual proposals are developed and any relevant mitigating action / changes that may be required are identified.</p> | | |
| Disability | | | | |
| Gender reassignment | | | | |
| Marriage and civil partnership | | | | |
| Pregnancy and maternity | | | | |
| Race | | | | |
| Religion or belief | | | | |
| Sex | | | | |
| Sexual orientation | | | | |
| Other (give detail) | | | | |
| Further information | | | | |
| 8 | Does your proposal link with other proposals to have a cumulative effect on particular equality groups? If yes, give details. | | | (Delete one) Yes / No / Potentially |
| <p>The development of an 'Income and Commercial Policy' is one workstream of the overall Walsall Proud Programme, a whole Council transformation programme, and as such there may be other workstreams within the programme that along with the development of an 'Income and Commercial Policy' may have a cumulative effect on a particular equality group, however there is no evidence of this at present, and as such as services across the Council review income generation activity and opportunities and apply the guidance contained within the policy to new / existing areas of income they will need to update this EqlA to identify any potential cumulative impact on particular equality groups.</p> | | | | |

| | | |
|---|---|---|
| 9 | Which justifiable action does the evidence, engagement and consultation feedback suggest you take? | |
| | A | No major change required |
| | B | <p>Adjustments needed to remove barriers or to better promote equality Existing information regarding individuals with protected characteristics that access / utilise chargeable Council services and any understanding of those that may be affected by any future changes in charges as the policy is applied is not available.</p> <p>Therefore as services across the Council review income generation activity and opportunities and apply the guidance contained within the policy to new / existing areas of income they will need to update this EqlA to identify the potential groups who may be impacted by individual proposals and any relevant mitigating action / changes that may be required.</p> |
| | C | Continue despite possible adverse impact |
| | D | Stop and rethink your proposal |

| Action and monitoring plan | | | | |
|---|---------------|-----------------------|---------------------|----------------|
| Action Date | Action | Responsibility | Outcome Date | Outcome |
| <p>As services across the Council review income generation activity and opportunities and apply the guidance contained within the policy to new / existing areas of income they will need to update this EqlA to identify the potential groups who may be impacted by individual proposals and any relevant mitigating action / changes that may be required.</p> <p>Individual updates to the EqlA and identification of any collective impact will be reviewed annually to understand if further actions are required to mitigate possible impacts.</p> | | | | |

| Update to EqlA | |
|-----------------------|---------------|
| Date | Detail |
| | |

Contact us

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Email equality@walsall.gov.uk

Inside Walsall: http://int.walsall.gov.uk/Service_information/Equality_and_diversity