

Equality Impact Assessment (EIA)

Document control

Title of activity:	Income Collection & Arrears Recovery Policy
Type of activity:	Policy
Lead officer:	Peter Doherty, Tenancy Sustainment Service Manager
Approved by:	
Date completed:	October 2016
Scheduled date for review:	April 2018

Did you seek advice from the Corporate Policy & Diversity team?	Yes
Does the EIA contain any confidential or exempt information that would prevent you publishing it on the Council's website?	No

1. Equality Impact Assessment Checklist

The Equality Impact Assessment (EIA) is a tool to ensure that your activity meets the needs of individuals and groups that use your service. It also helps the Council to meet its legal obligation under the [Equality Act 2010 and the Public Sector Equality Duty](#).

Please complete the following checklist to determine whether or not you will need to complete an EIA. Please ensure you keep this section for your audit trail. If you have any questions, please contact the Corporate Policy and Diversity Team at diversity@havering.gov.uk

About your activity

1	Title of activity	Income Management Policy
2	Type of activity	Policy
3	Scope of activity	<p>This policy applies to the following categories of residents and tenancies</p> <ul style="list-style-type: none"> • General Needs Introductory and secure tenants • Leaseholders • Shared Ownership • Sheltered Housing • Private Sector Leasing • Houses in multiple occupation • Garages • Hostels • Careline/Telecare <p>It applies to the payment and recovery of:</p> <ul style="list-style-type: none"> ➢ Current rent liability and arrears ➢ Leasehold Service Charges ➢ Shared Ownership Rents & Service Charges ➢ Garage rents ➢ Temporary accommodation charges ➢ Use and occupation charges ➢ Court and Bailiff costs ➢ Careline/Telecare accounts ➢ Rechargeable accounts
4a	Is the activity new or changing?	yes
4b	Is the activity likely to have an impact on individuals or groups?	yes
5	If you answered yes:	<i>Please complete the EIA on the next page.</i>
6	If you answered no:	<i>Please provide a clear and robust explanation on why your activity does not require an EIA. Please keep this checklist for your audit trail.</i>
Completed by:		Janis Robert-Edwards – Income Manager, Housing Services
Date:		October 2016

2. Equality Impact Assessment

Purpose

Housing Services manages approximately 9,700 Council tenancies, 2,500 leasehold properties and is responsible for the income collection and recovery of rent and other charges on those, plus the collection of charges on 4,342 accounts for garages, Helpline, hostels and Private Sector leased properties due to the Council. Housing Services is committed to sustaining tenancies wherever possible by delivering an efficient and effective service whilst being sensitive to the needs of tenants, some of whom are vulnerable.

The Welfare Reform Act 2012 is gradually being rolled out nationally and Havering Council tenants are already being affected by Universal Credit, the under occupancy charge and benefit cap. Universal Credit was introduced in Havering in February 2016 for single new claimants of Jobseeker's Allowance. This means that the housing costs element of Universal Credit will be paid directly to those claimants and they will have the responsibility of paying the full rent to the Council. Tenants in receipt of housing benefit have not had to budget for this in the past, and this new way of managing may prove to be challenging for some tenants as all working age tenants, irrespective of household composition will be migrated from Housing Benefit on to the Housing costs element of Universal Credit by 2021. An additional financial pressure for tenants is that the Council Tax support scheme, which was introduced in Havering in 2015¹ for all residents under pensionable age, now relies on all liable residents having to at least 15 per cent of the annual council tax charge, even if they are in receipt of income-based welfare benefits

The purpose of this document is to ensure that Housing Services staff have a fair and consistent approach to the collection and recovery of income due to the Council and that the needs of tenants are always considered.

Scope

The policy applies to all Housing Services staff who have a responsibility to collect and recover income due to the Council and recipients of the service.

Aims, objectives and outcomes

The policy aims to ensure that staff tailor the delivery of the service to meet the needs of tenants and that other factors may have to be considered to achieve appropriate outcomes, while at the same time protecting the Council's income streams.

¹ Band D 15% from April 2015

Age: Consider the full range of age groups

Please tick (✓) the relevant box:

Positive

Neutral

Negative

Overall impact:

People under 35 are more likely to get into rent arrears. This policy is attempting to mitigate this by signposting or referring younger tenants to services that are age appropriate. For example, referring younger tenants to Family Mosaic who can provide several weeks' intensive support.

Evidence:

We have analysed tenants owing more than 1 week's rent against the number of current tenants and banded into age groups and this has shown the following :

Age Band	Number of Tenants	1 week rent +	Percentage
Under 25	246	132	54.9%
25-34	1332	588	50.4%
35-44	1975	615	45.22%
45-54	2313	572	32.85%
55-64	1908	298	18.51%
65-74	1566	85	5.74%
75-84	991	37	3.88%
85-89	341	9	2.71%
90+	223	6	2.76%
Total	9400		

From this data we are able to determine the age groups of tenants who owe more than one week's rent. We also know from data collected over the last 4 years that 45 (36%) of the 124 tenants evicted for rent arrears are under 35 and this group is disproportionately more likely to get into rent arrears.

Sources used:

Housing Services Arrears diversity report April 2016

Disability: Consider the full range of disabilities; including physical mental, sensory and progressive conditions	
<i>Please tick (✓) the relevant box:</i>	
Positive	<input checked="" type="checkbox"/>
Neutral	<input type="checkbox"/>
Negative	<input type="checkbox"/>
<p>Overall impact: This policy will have a positive impact for tenants with a disability. The Housing Management computer system alerts users when there is a disability recorded and that a service adjustment may be required. This means reasonable adjustments can be offered when communicating with a tenant about rent arrears, such as large print letters, audio tapes, sign language and so on. Where a tenant's needs may require the involvement of an advocate or support services, officers will signpost residents or make direct referrals, and will subsequently liaise with the support workers to resolve any issues. All enforcement action is suspended while residents are engaging with support workers.</p>	
<p>Evidence:</p> <p>We have carried out an analysis of tenants owing more than one week's rent against the number of current tenants to determine how many have a disability recorded. There is a total of 11,374 tenants (joint and sole), occupying 9,536 council tenancies. From the data we currently hold 3,075 (27%) have a recorded disability or vulnerability. Four hundred and thirty tenants (14%) tenants with a recorded disability or vulnerability owe more than 1 weeks rent.</p>	
<p>Sources used:</p> <p>Housing Services Rent Arrears diversity report April 2016.</p>	

Sex/gender: Consider both men and women																					
<i>Please tick (✓) the relevant box:</i>																					
Positive	<input type="checkbox"/>																				
Neutral	<input checked="" type="checkbox"/>																				
Negative	<input type="checkbox"/>																				
<p>Overall impact: The policy is unlikely to impact on people of different gender but will be monitored to ensure there are no equality implications.</p>																					
<p>Evidence</p> <p>The table below shows the percentage of current tenants by gender and demonstrates that there are similar proportions of those in arrears.</p> <table border="1"> <thead> <tr> <th>Gender</th> <th>Total</th> <th>%</th> <th>No in arrears of 1 week +</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Male</td> <td>3,441</td> <td>36.1%</td> <td>649</td> <td>18.9%</td> </tr> <tr> <td>Female</td> <td>6,095</td> <td>63.9%</td> <td>1317</td> <td>21.6%</td> </tr> <tr> <td></td> <td>9400</td> <td>100%</td> <td></td> <td></td> </tr> </tbody> </table>		Gender	Total	%	No in arrears of 1 week +	%	Male	3,441	36.1%	649	18.9%	Female	6,095	63.9%	1317	21.6%		9400	100%		
Gender	Total	%	No in arrears of 1 week +	%																	
Male	3,441	36.1%	649	18.9%																	
Female	6,095	63.9%	1317	21.6%																	
	9400	100%																			
<p>Sources used:</p> <p>Housing Services Rent Arrears diversity report April 2016</p>																					

Ethnicity/race: Consider the impact on different ethnic groups and nationalities		
<i>Please tick (✓) the relevant box:</i>		Overall impact: The policy will have a neutral impact for people of different ethnicities. Council tenants who face language barriers in accessing and getting information about services can request translation assistance by contacting the service area they require. In addition, Havering works in partnership with the Language Shop to provide interpreting and translation services when relevant.
Positive	<input type="checkbox"/>	
Neutral	<input checked="" type="checkbox"/>	
Negative	<input type="checkbox"/>	
Evidence: Currently 90% of tenants who have provided this information are of White British origin. The remaining 10% of tenants are of; Black African, White other or White Irish origin. This roughly reflects the population of Havering.		
Sources used: Housing Services Diversity Report: July 2016		

Religion/faith: Consider people from different religions or beliefs including those with no religion or belief		
<i>Please tick (✓) the relevant box:</i>		Overall impact: We do not think people from different religious groups are more likely to be disproportionately impacted by rent arrears.
Positive	<input type="checkbox"/>	
Neutral	<input checked="" type="checkbox"/>	
Negative	<input type="checkbox"/>	
Evidence: From the 8,344 council tenants who provided information on their religion or faith, forty eight per cent said they were Christians, 39.4 per cent have no religion and 4.9 per cent preferred not to provide this information. The remaining 7.2 per cent is made up of tenants from another religious background. This includes the Muslim, Jewish, Buddhist, Hindu and Sikh faiths). We have no information relating to which religious groups are more likely to get into rent arrears.		
Sources used: Housing Services Diversity Report: July 2016		

Sexual orientation: Consider people who are heterosexual, lesbian, gay or bisexual		
<i>Please tick (✓) the relevant box:</i>		Overall impact: We do not think people with different sexual orientations are disproportionately impacted by rent arrears but will be monitored to ensure there are no equality implications of this policy.
Positive	<input type="checkbox"/>	
Neutral	<input checked="" type="checkbox"/>	
Negative	<input type="checkbox"/>	
Evidence: There is a deficit in the data held on the sexual orientation of Council tenants. Housing Services' most recent information shows that: 66% of current tenants confirmed that they were Heterosexual, while 33% of tenants preferred not to say. Less than 1% of tenants confirmed that they were either Lesbian, Gay or bi-sexual.		
Sources used: Housing Services Diversity Report: July 2016		

Gender reassignment: Consider people who are seeking, undergoing or have received gender reassignment surgery, as well as people whose gender identity is different from their gender at birth		
<i>Please tick (✓) the relevant box:</i>		Overall impact: We do not think this protected characteristic is disproportionately impacted by rent arrears but will be monitored to ensure there are no equality implications of this policy.
Positive	<input type="checkbox"/>	
Neutral	<input checked="" type="checkbox"/>	
Negative	<input type="checkbox"/>	
Evidence: This information has not been collected by Housing Services so there is no evidence presumed or otherwise on the housing management data base concerning gender reassignment.		
Sources used: No data is currently available concerning this protected characteristic		

Marriage/civil partnership: Consider people in a marriage or civil partnership	
<i>Please tick (✓) the relevant box:</i>	
Positive	<input type="checkbox"/>
Neutral	<input checked="" type="checkbox"/>
Negative	<input type="checkbox"/>
<p>Overall impact:</p> <p>It is unlikely that the policy will have any impact on people in this group but will be monitored to ensure there are no equality implications.</p>	
<p>Evidence:</p> <p>We do not collate data on the marital status of council tenants</p>	
<p>Sources used:</p> <p>None</p>	

Pregnancy, maternity and paternity: Consider those who are pregnant and those who are undertaking maternity or paternity leave	
<i>Please tick (✓) the relevant box:</i>	
Positive	<input checked="" type="checkbox"/>
Neutral	<input type="checkbox"/>
Negative	<input type="checkbox"/>
<p>Overall impact:</p> <p>The policy will have a positive impact on this group. If they have difficulties making rent payments, they will be offered support and advice on claiming additional benefits such as housing benefit, maternity benefits and child tax credits. In addition, they will be offered budgeting advice.</p>	
<p>Evidence:</p> <p>The only data which Housing Services collects for this protected characteristic is due dates for pregnancy, usually collated at the point of entry to the Housing Register. This data is used to ascertain the size of property and the number of bedrooms a tenant requires under the 'bedroom standard'.</p> <p>However, due to the nature of the protected characteristic, it would be difficult to collect accurate data.</p>	
<p>Sources used:</p> <p>This information is extracted from our Housing Management System OHMS</p>	

Socio-economic status: Consider those who are from low income or financially excluded backgrounds	
<i>Please tick (✓) the relevant box:</i>	
Positive	<input checked="" type="checkbox"/>
Neutral	<input type="checkbox"/>
Negative	<input type="checkbox"/>
Overall impact: The policy will have a positive impact on this group. By taking early action & making contact with tenants as soon as an account goes into arrears we can establish whether the tenant is on a low income and can provide the appropriate help and support. Where tenants on ² housing benefit are affected by the welfare reforms they are contacted and initiatives and options explained to them. As more financial initiatives are introduced such as “fee free” bank accounts we will make sure tenants are kept up to date in our communications.	
Evidence: Housing Services maintain a detailed data base of Council tenants who are in receipt of housing benefit and likely to be affected by welfare reforms. The Financial Inclusion & Welfare Benefit team contact ³ tenants affected by the reforms to explain how this will affect them and what they can do to ⁴ mitigate the impact.	
Sources used: None	

² Approximately 65% of Council tenants claim housing benefit

³ 1,090 tenants affected by welfare reforms - H&H data January 2015

⁴ 131 tenants have downsized to smaller properties – H&H data January 2015

Review

Housing Services aim to carry out an EIA review every three years, with interim reviews should the policy impact on any groups directly or where any legislative changes or other initiative arise. The review will be carried out at the same time the Income Management Policy is reviewed in April 2018 by the policy author.