

Charnwood Borough Council

Equality Impact Assessment 'Knowing you customers needs'

Background

An Equality Impact Assessment is an improvement tool. It will assist you in ensuring that you have thought about the needs and impacts of your service/policy/function in relation to the protected characteristics. It enables a systematic approach to identifying and recording gaps and actions.

Legislation - Equality duty:

As a local authority that provides services to the public, Charnwood Borough Council has a legal responsibility to ensure that we can demonstrate having paid due regard to the need to:

- ✓ Eliminate discrimination, harassment and victimisation
- ✓ Advance Equality of Opportunity
- ✓ Foster good relations

For the following protected characteristics:

1. Age
2. Disability
3. Gender reassignment
4. Marriage and civil partnership
5. Pregnancy and maternity
6. Race
7. Religion and belief
8. Sex
9. Sexual orientation

What is prohibited?

1. Direct discrimination, including by association and perception.
2. Indirect discrimination – now covers all characteristics.
3. Pregnancy and maternity discrimination.
4. Harassment.
5. Third party harassment.
6. Discrimination arising from disability.
7. Duty to make reasonable adjustments.

Note: Complete the action plan as you go through the questions

Title of the policy	Housing Income Collection Policy
Date	13 November 2014
Lead Officer	Aabeda Choksi, Housing Policy & Performance Officer
Who else is involved in undertaking this assessment?	Tim Clarke, Income Team Leader

Step 1: Overview of policy/function being assessed

A. Outline: What is the purpose of this policy? (specify aims and objectives)

The existing 'Housing Income, Current Tenant Arrears Recovery Procedures' (October 2012) combines operational procedures for income collection with income strategy and policy over some 223 pages.

The draft Housing Income Collection Policy details the council's policy in a concise and accessible format by separating out the policy from strategy and operational matters.

B. What specific group(s) is the policy designed to affect/impact?

The draft Housing Income Collection Policy is relevant to all CBC tenants and persons inhabiting CBC properties.

However the policy directly affects only those tenants that may be experiencing difficulties meeting rent payments and those that have fallen into arrears.

The policy may also affect former CBC tenants with debts to the council.

A particular focus of the Income team is the prevention of arrears from occurring and/or increasing, hence Income Officers are proactive in identifying new cases, to better support tenants.

C. Which groups have been consulted as part of the creation or review of the policy?

The following have been consulted as part of the development of this policy:

- Income Team Leader
- Income Officers
- Tenancy Support Team Leader
- Principal Officer, Tenancy & Income Management
- Landlord Services Manager
- Charnwood Housing Residents Forum

Step 2: What we already know and where there are gaps

A. List any existing information/data you have/monitor about different diverse groups in relation to this policy? Such as in relation to ethnicity, religion, sexual orientation, disability, age, gender, transgender etc.

Data/information such as:

- Consultation
- Previous Equality Impact Assessments
- Demographic information
- Anecdotal and other evidence

The following diversity information is routinely collected – where supplied – as part of the application process to join the council's Housing Register:

- Age
- Gender
- Ethnicity
- Disability
- Sexual orientation
- Religion / belief

B. What does this information / data tell you about diverse groups? If you do not hold or have access to any data/information on diverse groups, what do you need to begin collating / monitoring? (please list)

Tenant diversity information was most recently updated in 2012 however an exercise to refresh this information is likely to begin imminently. A snapshot of diversity information taken on 15 October 2014 is available at Appendix A.

Diversity information is used to inform income collection action to direct the advice and support provided and to ensure we remain fully aware of circumstances which may affect payment.

From time to time, we will assess the impact of arrears actions on outcomes for these differing groups.

Step 3: Do we need to seek the views of others? If so, who?

A. In light of the answers you have given in step 2, do you need to consult with specific groups to identify needs / issues? If not please explain why.

A key aim of the draft Housing Income Collection policy is to maximise income collection. The policy recognises that certain tenants are at greater risk of experiencing difficulties with meeting rent payments and/or falling into arrears.

The policy aims to ensure that all tenants – including those that may be vulnerable due to protected characteristics – continue to remain supported to sustain tenancies, through in-house support from our Tenancy Support team and/or Financial Inclusion Officer, or referrals to appropriate external agencies.

Step 4: Assessing the impacts

	In light of any data/consultation/information and your own knowledge and awareness, please identify whether the policy has a positive or negative on the groups specified and provide an explanation for your decision. (please refer to the general duties on the front page)
Age	<p>Age data is held on 99% of tenants.</p> <p>In cases where tenants are struggling to meet rent payments or have fallen into arrears, support will be offered irrespective of age. Hence the policy has no discernible impact on tenants due to reasons of age.</p>
Disability (physical, visual, hearing, learning disabilities, mental health)	<p>Disability information is available for 40% of tenants. In cases where information has not been supplied, the assumption is that disability is not an issue.</p> <p>Where physical disability occurs during the course of a tenancy, usually following ill health or an accident, tenants self-refer to Housing Officers enabling issues to be dealt with.</p> <p>Mental health issues however are often identified in tenants struggling to meet rent payments and those that have fallen into arrears. Tenants in these cases will be referred to our Tenancy Support team [for in-house support or referral to local agencies] to ensure that appropriate support is in place to enable tenants to sustain tenancies.</p> <p>Hence the policy has a positive, and appropriate, impact on tenants with a mental health disability.</p>
Gender / Sex	<p>Gender data is held on 100% of tenants.</p> <p>In cases where tenants are struggling to meet rent payments or have fallen into arrears, support will be offered irrespective of gender/sex. Hence the policy has no discernible impact on tenants due to reasons of gender/sex.</p>
Hate crimes: <ul style="list-style-type: none"> • Religious belief • Racial group • Sexual orientation • Transgender 	<p>In cases where tenants are struggling to meet rent payments or have fallen into arrears, support will be offered irrespective of vulnerability to hate crimes due to religious belief, racial group, sexual orientation, transgender status or any other reason.</p> <p>On a case by case basis, these factors will be taken into consideration on a tenant's ability/capacity to make regular payments.</p> <p>Hence the policy may have a positive impact on tenants vulnerable to hate crimes.</p>

<p>Other protected groups (pregnancy & maternity, marriage & civil partnership)</p>	<p>Pregnancy and maternity information is routinely collected, where supplied, as part of the application process to join the council's Housing Register.</p> <p>On a case by case basis, pregnancy/maternity will be taken into consideration on a tenant's ability/capacity to make regular payments and hence the policy may have a positive impact on these tenants.</p>
<p>Other socially excluded groups (low literacy, priority neighbourhoods, socio-economic, etc)</p>	<p>Financial inclusion</p> <p>In cases where tenants who may be excluded due to socio-economic and/or related reasons are struggling to meet rent payments or have fallen into arrears, support will be offered irrespective of socio-economic status and/or other reasons.</p> <p>A particular focus of the Housing Income Collection Policy is financial inclusion to enable tenants who do not come under any other protected groups but may be at risk of failing to meet rent payments, or those that have fallen into arrears due to financial exclusion, to be offered advice and support.</p> <p>Hence the policy has a positive impact on tenants experiencing financial exclusion.</p> <p>Literacy issues</p> <p>English may not be the first language for approximately 5% of tenants identifying as bme whilst low literacy may be an issue for a further 81% identifying as White British or White Irish.</p> <p>The arrears process begins as soon as tenants have accrued 1 week's arrears, when a letter will be issued requesting they contact the income team. A second letter is issued at 2 week's arrears. Letters are designed to be clear and easy to read with language in plain English. Important information is highlighted in colour and visual representation is used to show tenants where they are in arrears process.</p> <p>The letters are followed by a combination of phone calls, text messages and home visits to enable appropriate support mechanisms to be put in place as soon as practicable.</p> <p>Hence the policy may have a positive impact on tenants where English is not the first language and/or tenants with low literacy levels.</p>
<p>All</p>	<p>The draft Housing Income Collection Policy summarises existing CBC policy in relation to income collection.</p> <p>Hence the policy continues to have a positive impact on all CBC tenants who are experiencing difficulties with meeting rent payments or have fallen into arrears, including those who may be vulnerable due to protected characteristics.</p>

Step 5: Action Plan

Please include any identified concerns/actions/issues in this action plan:

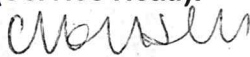
The issues identified should inform your Service Plan and, if appropriate, your Consultation Plan

Number	Action	Responsible Officer	Target Date
	Monitor 'No of tenants in arrears' by: <ul style="list-style-type: none"> • Age • Sex / gender • Disability • Race • Religion / faith • Sexual orientation 	Income Team Leader	Ongoing
	Monitor 'No tenants with court orders for possession' by: <ul style="list-style-type: none"> • Age • Sex / gender • Disability • Race • Religion / faith • Sexual orientation 	Income Team Leader	Ongoing
	Monitor 'No of evictions' by: <ul style="list-style-type: none"> • Age • Sex / gender • Disability • Race • Religion / faith • Sexual orientation 	Income Team Leader	Ongoing

Step 6: Who needs to know about the outcomes of this assessment and how will they be informed?

	Who needs to know (Please tick)	How they will be informed (we have a legal duty to publish EIAs)
Employees	✓	Via team meetings: <ul style="list-style-type: none"> • Housing Income Officers • Financial Inclusion Officer • Tenancy Support Team • Housing Services Team
Service users	✓	<ul style="list-style-type: none"> • Charnwood Residents' Housing Forum • Tenants via the tenant newsletter
Partners and stakeholders	✓	<ul style="list-style-type: none"> • Advice agencies in Charnwood who may support vulnerable tenants in arrears and those that are facing possession proceedings or evictions
Others		<ul style="list-style-type: none"> •
To ensure ease of access, what other communication needs/concerns are there?		<ul style="list-style-type: none"> •

Step 7: Conclusion (to be completed and signed by the Service Head)

Please delete as appropriate
I agree / disagree with this assessment / action plan
If <i>disagree</i>, state action/s required, reasons and details of who is to carry them out with timescales:
Signed (Service Head): 
Date: 17.11.14

Please send completed & signed assessment to: Rachel Beaumont

APPENDIX A: TENANT PROFILES AS AT 15 OCTOBER 2014

NUMBER OF TENANCIES	NUMBER OF SOLE / JOINT TENANTS
5,611	6,714

Clients by Age Band

Age Band	Total	%
Under 25	267	3.98
25-34	841	12.53
35-44	1027	15.30
45-54	1301	19.38
55-60	624	9.29
61-70	1097	16.34
71-80	833	12.41
81-90	575	8.56
91-100	139	2.07
Over 100	2	0.03
Unknown	8	0.12
	6714	100.00

Clients by Ethnicity

Ethnicity	Total	%
Asian - Bangladeshi	35	0.52
Asian - Chinese	8	0.12
Asian - Indian	46	0.69
Asian - Other	39	0.58
Asian - Pakistani	9	0.13
Black - African	33	0.49
Black - Caribbean	8	0.12
Black - Other	3	0.04
Other	31	0.46
Other - Mixed	7	0.10
Prefer Not to Say	12	0.18
Unknown	919	13.69
White - British	5394	80.34
White - Irish	24	0.36
White - Other	103	1.53
White & Asian	11	0.16
White & Black African	7	0.10
White & Black Caribb'n	25	0.37
	6714	100.00

Clients by Religion

Religion	Total	%
Bahai	1	0.01
Buddhist	11	0.16
Christian	2706	40.30
Hindu	39	0.58
Jedi	4	0.06
Jewish	1	0.01
Muslim	73	1.09
No Religion	1339	19.94
Other	118	1.76
Pagan	3	0.04
Prefer Not to Say	158	2.35
Sikh	4	0.06
Unknown	2257	33.62
	6714	100.00

Clients by Disability

Disability	Total	%
Impaired Hearing	97	1.44
Impaired Mental Health	350	5.21
Impaired Mobility	952	14.18
Impaired Speech	6	0.09
Impaired Vision	86	1.28
Learning Difficulties	70	1.04
None	1138	16.95
Unknown	4015	59.80
	6714	100.00

Clients by Gender

Gender	Total	%
Female	4018	59.85
Male	2694	40.13
Transgender	1	0.01
Unknown	1	0.01
	6714	100.00

Clients by Sexuality

Sexuality	Total	%
Bisexual	19	0.28
Heterosexual	5013	74.66
Lesbian or Gay	33	0.49
Prefer Not to Say	295	4.39
Unknown	1354	20.17
	6714	100.00