



EQUALITY IMPACT ASSESSMENT INITIAL SCREENING

Name of policy / strategy / project (the “initiative”):

Rent Arrears Policy

Provide a brief summary of the aims and main activities of the initiative: (bullet points)

- Ensure fair and consistent treatment to all tenants in arrears whilst at the same time ensuring that maximum rental income is achieved and performance targets are met.
- Reflecting our awareness of our diverse customer base and the need to be flexible to meet the myriad of different circumstances faced by our customers.
- Maximising personal contact to ensure that Chevin is fully aware of our tenants’ personal needs and circumstances.
- To ensure that we comply with County Court protocol to promote payment without the need for court action.

Completed by: Denise Johnson

Manager / Team Leader:

Date: 10th June 2009

STAGE 1: SCREENING

This stage establishes whether a proposed initiative will have an impact from an equality perspective on any particular group of people or community – i.e. on the grounds of race, religion/faith/belief, gender (including transgender), sexual orientation, age, disability, or whether it is “equality neutral” (i.e. have no effect either positive or negative).

Q 1. Who will benefit from this initiative? Is there likely to be a positive impact on specific groups/communities (whether or not they are the intended beneficiaries), and if so, how? Or is it clear at this stage that it will be equality ‘neutral’ i.e. will have no particular effect on any group?
Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

Our tenants have told us that they prefer to talk to somebody about circumstances behind their arrears. The new Policy stresses the importance of maximising personal contact with our customers pre-tenancy to make sure that any support needs are identified and addressed in order to prevent the possibility of our tenants falling into arrears. We therefore anticipate that the new policy will have a positive impact on all groups. Current data reflects that we need to take on a more proactive approach towards our younger tenants within the 16 to 34 age group (see Q3 below.) and the new procedures will take account of this. The post-tenancy contact will be followed up at the six weekly ‘settling in’ visit where debt and rent arrears or any other personal financial issues will be discussed

with the tenant.

Q 2. Is there likely to be an adverse impact on one or more minority/under-represented or community group as a result of this initiative? If so, who may be affected and why: Or is it clear at this stage that it will be equality 'neutral'?

Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

There is no suggestion of an adverse impact on one or more minority or under-represented group for the reasons identified in Q1 above. The approach reflects our fair and consistent approach towards all tenants.

Q 3. Is there sufficient data on the target beneficiary groups/communities? Are any of these groups under or over represented? Do they have access to the same resources? What are your sources of data and are there any gaps?

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Figures relating to arrears and legal action for the period January to March 2009 inclusive reflects that 50% of legal action was taken against males (males account for 39% of the Chevin population in total.) However, it may be necessary to analyse these figures over a longer period of time to obtain a more balanced picture. 74% of court orders were issued against tenants between the ages of 16 and 34 (overall Chevin tenant population in this age group is 21%). This group is disproportionately in arrears, with us taking more legal action against them and more court action – costing us more money and staff time and effort to recover the debt. We are hoping that our new preventative approach plus greater personal contact will see a reduction in this figure over time. Only 5% of tenants with arrears over £500 are aged over 60 years and no court orders were issued to anybody in this age group.

Only five tenants were evicted during this quarter – three male and two female. Figures are too small to draw any meaningful conclusions and once again, we feel that figures need to be analysed over a longer period of time.

17% of court orders in this period were issued to BME customers (overall tenant population is 10%). However, we feel that this could be due to the age profile of these tenants rather than being due to ethnicity. This will need further analysis over time.

We are currently in the process of collecting more personal data for the areas of sexuality and religion / faith via our latest CENSUS exercise. Data is still be uploaded onto our IBS housing management system and it is hoped that by the time of the six monthly review, more data will be available.

The Policy stresses the importance of staff addressing the IBS system to identify vulnerability. All communication will take account of individual tenants' communication requirements and we will continue to offer interpretation / translation services where required. The more personal approach will help us to identify communication requirements where these are not yet known, e.g., language requirements, illiteracy where this may be a problem, large print requirements, and catering for hearing or voice impaired tenants. Some correspondence is sent via e-mail where this has been requested by tenants.

The new Policy makes the arrears progression process as simple as possible for staff to follow and staff are encouraged to provide signposting information for debt advice agencies, CABs and credit unions wherever possible. This information is also available via the website and intranet.

Our Tenancy Support Officers have an important role to play in assisting tenants in maximising their income.

Q 4. Outsourced services – if the initiative is partly or wholly provided by external organisations / agencies, please list any arrangements you plan to ensure that they promote equality and diversity.

Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

Not applicable.

Q 5. Is the impact of the initiative (whether positive or negative) significant enough to warrant a full impact assessment – see guidance? If not, will there be monitoring and review to assess the level of impact over a period of time?

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We will continue to monitor arrears and legal action on a quarterly basis in order to highlight any anomalies and annually to identify trends. Data is recorded on our IBS system and can be reported on a weekly basis. Housing Officers go through the arrears progression process every Thursday.

Residents will attend a policy review day in July 2009 in order to consult on the content of the policy and the policy will be amended in line with comments received. At this stage, we do intend to undertake a full impact assessment based on evidence to date. However, we will continue to monitor and review the impact of the new policy once the new system is up and running.

Q 6. To be completed at six monthly review Detail actions taken to assess the level of impact over a period of time, or to address any gaps in data.

Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

Guidelines: Things to consider

- Where a negative (i.e. adverse) impact is identified, it may be appropriate to make a full EIA (see Stage 2), or, as important, take early action to redress this – e.g. by abandoning or modifying the initiative. **NB** If the initiative contravenes equality legislation, it **must** be abandoned or modified.
- Where an initiative has a positive impact on groups/community relations, the EIA should make this explicit, to enable the outcomes to be monitored over its lifespan.
- Where there is a positive impact on particular groups, does this mean there could be an adverse impact on others, and if so can this be justified? - e.g. Are there other existing or planned initiatives which redress this?

- It may not be possible to provide detailed answers to some of these questions at the start of the initiative. The EIA may identify a lack of relevant data, and that data-gathering is a specific action required to inform the initiative as it develops, and also to form part of a continuing evaluation and review process.
- It is envisaged that it will be rare for full impact assessments to be required. Usually, where there are particular problems identified in the screening stage, it is envisaged that changing the approach at this stage, and/or setting up a monitoring/evaluation system to review a policy's impact over time will tackle the problem.