

# Equality Impact Assessment

[Guidance](#) on how to complete this form is available on StaffNet. Click on the links below to find specific guidance and examples for each section. Further supporting information is also available in the appendices at the end of the guidance.

This form is to be completed in stages to ensure the production of a robust assessment. The completion process is detailed on StaffNet.

Please contact [Tim Greaves](#) if you need this form in a different format.

## 1. [What are you assessing?](#)

Rent Recovery Policy
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## 2. [Who is responsible?](#)

<b>Name</b>	Alison Wood	<b>Job Title</b>	Income Manager
<b>Team</b>	Income Team	<b>Directorate</b>	Housing & Environmental

## 3. [When is the assessment being carried out?](#)

<b>Date of start of assessment</b>	February 2017
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## 4. [Describe the proposal?](#)

<b>What is the purpose of the proposal?</b>
To introduce a revised rent recovery policy to support tenants to pay their rent and ensure the Council collects the rental income due.
<b>Why do you need to put it in place?</b>
To ensure the Council is responding to the challenges posed by Welfare Reform and supporting the tenants through the Welfare Reform changes which are currently being

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introduced.

The introduction of the welfare reform changes has resulted in fundamental changes to the way tenants in receipt of Housing benefit receive payment and furthermore in many cases will reduce the amount of housing benefit they are eligible to receive which will be included in the Universal payment as a housing allowance on a monthly basis.

We are currently developing an understanding of both the customer and the Vale of Glamorgan council requirements around the impact of welfare reform, this includes IT requirements, policy and procedure reviews and composition of the team. We currently have four Income Officers and three Money Advice Officers which can provide a supporting network to our customers.

It will be necessary following the changes not only to develop a culture of payment and responsibility for tenants but to ensure that they receive the support needed to succeed and sustain their tenancy.

It is important to set out a framework of advice and assistance for tenants to maximise their income and be in a stronger position to pay their rent.

This will ensure the range of appropriate actions and support is in place, which is compliant with the Court Pre action Protocol and maximise rental income to the Council to continue to offer this service.

It is also important to set out clear guidelines in respect of the write off process of former tenant's debts which are no longer economical to pursue.

## **Do we need to commit significant resources to it (such as money or staff time)?**

We continually commit the Money Advice Team to carry out the support to our customers. We ensure our customers are guided through the benefit system and to maximize their income and to maintain their tenancy.

## **What are the intended outcomes of the proposal**

To ensure the Council is responding to the challenges posed by Welfare Reform and is minimising any negative impacts on tenants.

To set out guidelines in respect of the write off of former tenants debts which are no longer economical to pursue?

There will be no discrimination as a result of the introduction of these changes in the policy; implementation will offer equal opportunity to all around dealing with the impact of Welfare Reform on Council Tenants.

## **Who does the proposal affect?**

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The service user
<b>Will the proposal affect how other organisations work?</b>
No
<b>Will the proposal affect how you deliver services?</b>
The delivery of the implementation of the policy will increase tenancy sustainability and would promote the desired outcome.
<b>Will the proposal impact on other policies or practices?</b>
No
<b>Can you change the proposal so that it further promotes equality of opportunity and fosters good relations?</b>
We will continue to examine ways in which we can promote equality and foster good relationships between our customers. Equality training has and will continue for all staff that is working within the Rents Department to ensure we continue to provide a service fit for purpose.
<b>How will you achieve the proposed changes?</b>
It will replace the current Rent Policy which is now outdated.
<b>Who will deliver the proposal?</b>
The Income team will collect and recover income due to the council.  The Policy identifies the principles to be applied to debt management across the Council and aims to ensure that all monies due are collected and that debt owed to the Council is kept to a minimum.  The council has both a legal duty and a responsibility to its citizens to ensure that income due is paid promptly.
<b>How will you know whether you have achieved the proposal's purpose?</b>
The council is committed to using the most effective recovery methods available and this policy aims to ensure that the council complies with relevant legislation; official guidance

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and best practice to ensure the following objectives are met.

- All debtors, taxpayers are treated fairly
- The use of recognised best practice to debt collection
- A coordinated approach to managing debt owed
- To identify appropriate support which may be required by those owing money to the council and ensure their circumstances are taken into consideration
- Action taken is fair and open, and that no debtor receives less favourable treatment because of their race, nationality colour, ethnic or national origin, religion belief, gender, marital status, sexual orientation, age or disability.

## 5. What evidence are you using?

### **Engagement (with internal and external stakeholders)**

We offer support and assistances to every tenant if they have an outstanding balance on their rent account. The Money Advice Team will carry out a home visit or office interview to maximize their benefits, sign post for debt advice, offer various tariffs for fuel, electric and schemes to reduce water bill. We currently work with the Food Bank and tap into various charities to help our residents maintain their home.

### **Consultation (with internal and external stakeholders)**

We have consulted with DWP to ensure that claims are dealt with quickly and information is received and supplied quickly to support our residents.

The Money Advice Officer and the Income Manager Team regularly attends the Financial Inclusion meetings to consult on best practise with other agencies and to set an overarching action plan to help support the community in the Vale of Glamorgan. We work with other organisations ie. Foodbank to support the community along with attending open events and publish material to promote our service to our tenants

The Income Manager carries out regular meetings with DWP, Accounts Department and Housing Benefit on a quarterly basis to discuss concerns with the process of claims and changes within the Welfare Reform.

### **National data and research**

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Welfare Reform Bill

Scope of this response

The Equality and Human Rights Commission is responding to the Welfare Reform Bill in line with its statutory duties and powers, under the Equality Act 2006, and responsibilities as a National Human Rights Institution (NHRI), as set out in the Paris Principles.

There is strong evidence to show clear links between having a protected characteristic, not being in employment and having a low income. Groups within our remit are therefore likely to be overrepresented amongst those who require welfare support.

The following evidence supports this view:

- Lone parent households with dependent children had the highest percentage of workless households at 39.7 per cent . 90 per cent of lone parent households are headed by women.
- Families with a disabled member, lone parent households, and some ethnic minorities are also at greater risk of persistent poverty.
- The employment rate for disabled men without qualifications halved between the mid-1970s and early 2000s.
- People with learning difficulties, substance misuse or mental health will be able to have their housing element payment paid straight to the landlord to ensure they can maintain their tenancy with an Alternative Payments Arrangement. The Income Department will ensure that this is applied when setting up the Housing Element payments with the DWP.

## Local data and research

National Assembly for Wales, Responding to Welfare Reform in Wales.

There are clear advantages to landlords having a better understanding of their tenants' situation and being able to respond proactively and quickly to tenant's problems.

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## 6. How robust is the evidence?

<b>Does it show what the impact will be (positive and negative)?</b>
<p>There is a large amount of evidence both negative and positive for the Welfare Reform and the effects this will have on our customers. The Vale of Glamorgan will continually support our residents through the changes of the Welfare Reform.</p> <p>The main group that will be affected are the lone parents which are normally single females with children and the under 35 year old which will be effected by the single room rent.</p>
<b>What are the gaps?</b>
<p>There have been no gaps in the evidence but we will continue to monitor the groups and the impact by carrying out a survey with all the residents that we deal with on a daily basis.</p>
<b>What will you do about this?</b>
<p>We will continue to assist these groups by applying to any local charities (ie. food bank, vicar's relief scheme), applications for Discretionary Housing Payments and maximize benefits.</p>
<b>What monitoring data will you collect?</b>
<p>We will continue to monitor the services that we provide to our tenants, the level of arrears and the number of residents that are affected by the Welfare reform, Universal Credit and Benefit cap to ensure that we are maintaining tenants and providing a service which is fit for purpose.</p> <p>We ensure that a Money Advice appointment is offered to our residents who have an arrear on their rent account or is suffering with money problems. We will monitor these appointments to clearly identify if we have any gaps in our services and we will continue to monitor the Age, Disability, Gender reassignment, marriage and civil partnership, pregnancy and maternity, race religion and belief, sex, sexual orientation and welsh</p>

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language to identify if any group is not access the services and ways in which the service can be improved.

## How often will you analyse and report on this?

We analyse these reports on a monthly basis to improve particular areas if arrears increase.

We will publish annual data within the council annual monitoring report and analysis the findings to identify and group which is not engaging and tailoring the service to the needs of our customers to improve the service.

## Where will you publish monitoring data and reports?

These will become part of our KPI's which are reported monthly

## 7. [Impact](#)

### Is there an impact?

Arrears will increase as customers will have their housing element paid monthly in arrears by DWP instead of weekly from the Housing Benefit Section. We will continue to offset this by supporting the entire identified groups that have been affected by the Welfare Reform.

### If there is no impact, what is the justification for thinking this? Provide evidence.

As we previously explained that we work with every local authority council tenant that requests support and engages.

### If there is likely to be an impact, what is it?

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**Age** – This group will be affected by the Under 35 single room rent which we have already started to monitor our residents and advise them of this change. Under 25 year olds without children have lower entitlement to benefits therefore greater risk of financial hardship (includes apprentices). Lower allowance for couple if they are both under 25 under Universal Credit so they will be worse off. Young people/care leavers less likely to have the experience and skills to manage on a low income and deal with changes to benefits. Mixed age couples – under current system only one member of the couple needs to be of pension age for them to claim Pension Credit and a higher benefit entitlement. Under Universal Credit, if one person is of working age they will only be able to claim Universal Credit. Reduction in benefits could lead increased child poverty.

**Disability** – The migration from Disability Living Allowance to Personal Independent payments could increase anxiety, insecurity. Risk of reduction income and likely to have higher expenditure so greater risk of poverty. People who are getting the severe disability premium in their current benefits may lose out under Universal Credit, because the addition due to being disabled could drop in some cases from £86.35 a week to £28.15. Communication difficulties for the deaf and blind.

**Gender reassignment, including gender identity** – No evidence of change of circumstances, we will continue to monitor.

**Marriage and civil partnership (discrimination only)** – No evidence, we will continue to monitor

**Pregnancy and Maternity** – Pregnant women may be affected by the bedroom tax when allocated a property in advance of the birth of their baby. Large families more likely to be affected by the benefit cap leading to reduction in income.

**Race** – Language barriers – misunderstandings and misinformation. May not understand the changes or claim the right benefits leading to rent arrears, poverty and increased debt. Also harder to fully take up services and training opportunities available and find employment.

**Religion and belief** – Particularly young men from minority ethnic groups, are more likely to go into arrears and evicted

**Sex** – No evidence, we will continue to monitor

**Sexual orientation** – No evidence, we will continue to monitor

**Welsh language** – No evidence, we will continue to monitor

**Human rights** – No evidence

**How do you know?**

**Explain this for each of the relevant protected characteristics as identified above.**



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**Age – As above**

**Disability – Change from DLA to PIP which has had an impact and a large number of customers being assessed fit for work so being put on JSA – As above**

**Gender reassignment, including gender identity – No evidence**

**Marriage and civil partnership (discrimination only) – As above**

- **Pregnancy and Maternity –** Lone parent households with dependent children had the highest percentage of workless households at 39.7 per cent . 90 per cent of lone parent households are headed by women.

**Race – As above**

**Religion and belief – As above**

**Sex –** 90 per cent of lone parent households are headed by women which are the poorest client group currently.

**Sexual orientation – no evidence of impact**

**Welsh language – No evidence of impact**

**Human rights – No evidence of impact**

**What can be done to promote a positive impact?**

**Explain this for each of the relevant protected characteristics as identified above.**

Continue to work with every tenant that would like budgeting advice or assistance to apply to maximize the benefits working around the resident's needs and request to ensure that an excellent service is provided.

**What can be done to lessen the risk of a negative impact?**

**Explain this for each of the relevant protected characteristics as identified above.**

To continue to engage with our tenants and support residents when they have a change of circumstance offering Money Advice and affordable payments plans. A positive impact as everyone will continue to receive a Money Advice appointment at the start of their tenancy and will be notified if they are going to be effected by the Welfare Reform and how they will need

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to deal with these issues to maximize their benefit and ensure that they maintain a household budget. They will also be advised on any grants or assistance that they may receive during starting their tenancy to assist them gaining furniture, white goods and food if required.

### **Is there a need for more favourable treatment to achieve equal outcomes? (Disability only)**

The most favourable treatment is to treat everyone as an individual and offer the services that are required. Offer choice and sign post to other agencies if we do not have the specialism for the individuals needs to ensure that they maintain their home and this is affordable.

### **Will the impact be positive, negative or neutral?**

**Explain this for each of the relevant protected characteristics as identified above.**

This will have a positive impact to the individual as it will work on an individual tailored approach, led by the tenant's needs and affordability. on a daily basis. We will always support any resident that is facing hardship.

## 8. [Monitoring ongoing impact](#)

### **Date you will monitor progress**

We will continue to monitor on monthly basis to ensure that we collate our engagement with our customers to reflect the equality of our service to these groups and can reflect in ways to improve our services whilst we collate on an annual basis whilst feeding into the Annual Equality Monitoring report which is prepared by the Local Authority and will publish on annual basis.

### **Measures that you will monitor**

We will continue to measure the rent arrears figures across all of our stock. We will also break this down to identify the impact of Universal Credit claimants, number of arrears, former debt and number of Notices placed on residents per month. We also measure the amount gained from grants, white goods and appointments with Money Advice that are carried out monthly to maximize the household benefits to increase the household income.

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<b>Date you will review implemented proposal and its impact</b>
We will carry out review of the proposals and its impact on a monthly basis to ensure that we are continually supporting our residents and collecting the rental income.

### 9. Further action as a result of this equality impact assessment

Possible Outcomes	Say which applies
No major change	
Adjust the policy	
Continue the policy	We should continue with the policy to continue to improve our improve our service and monitor the impact of the Welfare Reform..
Stop and remove the policy	

### 10. Outcomes and Actions

<b>Recommend actions to senior management team</b>
We need to update the Rent Policy which has not been reviewed for a number of years.  This policy ensures that we continue to improve, support our residents and continue to collect the rent due whilst preparing for the Welfare Reform changes.
<b>Outcome following formal consideration of proposal by senior management team</b>

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## 11. [Important Note](#)

Where you have identified impacts, you must detail this in your Cabinet report when seeking approval for your proposal.

## 12. [Authorisation](#)

Approved by (name)	
Job Title (senior manager)	
Date of approval	
Date of review	

## 13. [Publication](#)

You must send a copy of your approved assessment to [Tim Greaves](#), Equality Co-ordinator, to publish on the equality pages of the Vale of Glamorgan website. Please detail any additional publication undertaken.

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