

Equality Impact Assessment

**Online self-enquiry form –
rent account**

- **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, victimisation.
- ✓ Advance Equality of Opportunity
- ✓ Foster good relations

For the following protected characteristics:

- ✓ Age
- ✓ Disability
- ✓ Gender reassignment
- ✓ Marriage and civil partnership
- ✓ Pregnancy and maternity
- ✓ Race
- ✓ Religion and belief
- ✓ Sex (Gender)
- ✓ Sexual orientation

What is prohibited?

- ✓ Direct Discrimination
- ✓ Indirect Discrimination
- ✓ Harassment
- ✓ Victimisation
- ✓ Discrimination by association
- ✓ Discrimination by perception
- ✓ Pregnancy and maternity discrimination
- ✓ Discrimination arising from disability
- ✓ Failing to make reasonable adjustments

Complete this action plan as you go through the questions

- **Step 1 – Introductory information**

Title of the policy	Online self-enquiry form – rent account
Lead officer and others undertaking this assessment	Kal Gokal
Date EIA started	09/02/2024
Date EIA completed	29/02/2024

- **Step 2 – Overview of policy/function being assessed**

Outline: What is the purpose of this policy? (Specify aims and objectives)

One of the aims in the Housing Annual Report 2023 – 2024 was:

“We will look at introducing new ways so tenants can have access to their rent account information and manage their payment methods”.

This project will aim to provide the customer with a mini statement of the last few transactions of their rent payment history.

The customer will complete an online form that requires the completion of some personal information to identify the customer as being a Council tenant and providing them with the last five weeks transactions.

The details of the transactions will be broad, so it does not identify the customers personal information, especially in relation to income and benefits.

What specific group/s is the policy designed to affect/impact and what is the intended change or outcome for them?

Customers that are tenants of the Council’s own housing stock. The ability to access their recent rent transactions is an enhancement to the current options available which is to ring up and request a statement or enquire about their rent account balance

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

Consultation has involved rent housing income team and principal officer responsible for income, the rent control officer, the housing systems team that administer the QL system, wider customer services representatives as well as the data protection officer.

There has yet not been any consultation with customers. This will take place after implementation to inform on feedback and improvements. Nevertheless, this is seen as a positive step towards customers having free access to their data.

- **Step 3 – What we already know and where there are gaps**

List any existing information/data do you have/monitor about different diverse groups in relation to this policy? Such as in relation to age, disability, gender reassignment, marriage and civil partnership, pregnancy & maternity, race, religion or belief, sex, sexual orientation etc.

Data/information such as:

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

This will be a new process which is available to all customers with a Council tenancy.

QL holds data on diversity, which is from their housing application form. All new applications and tenant’s details are now on Home Connections. This includes information on age, gender, ethnicity,

sexual orientation, and disability. The range of information is limited in relation to certain characteristics (e.g., sexual orientation)

The access to this service would be limited by customers that do not have the facility to go online, including by phone and tablet and does not necessarily restrict access to any of the protected characteristics except for those that do not have any understanding of the English language. QL does record this information in the contact management screen.

There may be a further limitation for customers in the age characteristic where there may be limited understanding of technology among the older age group that may not know how to access or use the online form. QL does not record data the customer’s ability to use devices or online accessibility.

What does this information / data tell you about diverse group? 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)

Although there is no specific requirement to introduce additional data collection for the use of the online form as customers still have access to the existing methods, it may prove useful to explore the possibility of adding an alert on QL to identify customers restricted in this way. This may help other aspects of service provision such as supporting universal credit claimants that do not have the required IT skills to manage their claims.

● **Step 4 – Do we need to seek the views of others? If so, who?**

Considering the answers given in Step 2, do you need to consult with specific groups to identify needs / issues? If not explain why.

Consultation with customers has not taken place. The online form is seen as an improvement in the ability to access data, however, once developed, feedback can be sought using the Charnwood Housing Residents’ Forum or via online service feedback forms.

● **Step 5 – Assessing the impact**

Considering any data/consultation/information and your own knowledge, identify whether the policy has a positive or negative impact on the individuals or community groups who identify with any ‘protected characteristics’ and provide an explanation for your decision. Please refer to the general duties on the front page.

Age	Neutral impact - Making information online can have restrictions to this characteristic as older age groups may not have the capacity or the means to access. Customers impacted in this way can ring and request a rent statement. The Council also send out quarterly rent statement to customers.
Disability <ul style="list-style-type: none"> ● Physical ● Visual ● Hearing ● learning disabilities ● mental health 	Neutral impact - Customers with a visual disability may not be able to access the online form depending on their degree of capacity to complete the form or view results. The Council Website is able to enlarge font size.
Gender Reassignment (Transgender)	No adverse effect – Neutral impact

Race	Negative impact – Customers with a very limited understanding of English may not be able to navigate through to the verification process on the online form, which is a requirement to extract the information to produce the data. Customers impacted in this way can ring and request a rent statement. The Council also send out quarterly rent statement to customers.
Religion or Belief (Includes no belief)	No adverse effect – Neutral impact
Sex (Gender)	No adverse effect – Neutral impact
Sexual Orientation	No adverse effect – Neutral impact
Other protected groups <ul style="list-style-type: none"> • Pregnancy & maternity • Marriage & civil partnership 	No adverse effect – Neutral impact
Other socially excluded groups <ul style="list-style-type: none"> • Carers • Low literacy • Priority neighbourhoods • Health inequalities • Rural isolation • Asylum seeker and refugee communities • Current and ex-armed HM forces personnel (Veterans) 	No adverse effect – Neutral impact

<p>Where there are potential barriers, negative impacts identified and/ or barriers or impacts are unknown, please outline how you propose to minimise all negative impact or discrimination.</p> <ul style="list-style-type: none"> • If you have identified adverse impact or discrimination that is illegal, you are required to take action to remedy this immediately. • Additionally, if you have identified adverse impact that is justifiable or legitimate, you will need to consider what actions can be taken to mitigate its effect on those groups of people.
<p>There are limited adverse impacts identified. The online form is an enhancement to the ways customers can have access to their transactions data and will not replace existing methods such as ringing up, emailing etc to request a rent statement.</p> <p>Ongoing monitoring will take place once the form is live to capture feedback and usage.</p>
<p>Summarise your findings and give an overview as to whether the policy will meet Charnwood Borough Council's responsibilities in relation to equality and diversity (please refer to the general duties on the front page).</p>
<p>The introduction of the online self-enquiry form enhances customer access to information and does not replace existing methods and supports the equality and diversity duties of the Council.</p>

- **Step 6- Monitoring, evaluation, review**

Are there processes in place to review the findings of this Assessment and make appropriate changes? How will you monitor potential barriers and any positive/ negative impact?
The success and usage of the online form will be monitored internally and if there are further developments in customers being able to use the form that may not be able to access due to language difficulties, these will be employed as part of the Council's general website improvements. The Charnwood Housing Residents' Forum will feedback on the online form and adjustment will be made where it is possible to do so.
How will the recommendations of this assessment be built into wider planning and review processes? e.g. policy reviews, annual plans and use of performance management systems.
No recommendations have been identified in this assessment.

- **Step 7- 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			
Reference Number	Action	Responsible Officer	Target Date
001	Monitor success and usage of online form.	Service	Ongoing
002	Explore possibility of adding alert to QL that identifies IT accessibility.	IMTL	June 2024

- **Step 8- Who needs to know about the outcomes of this assessment and how will they be informed?**

	Who needs to know?	How they will be informed (we have a legal duty to publish EIA's)
Employees	Yes	Team meetings Email
Service users	Yes	Newsletter, social media, rent letters, website
Partners and stakeholders	No	
Others	No	
To ensure ease of access, what other communication needs/concerns are there?		None identified. Existing methods of access to information still exist.

- **Step 9- Conclusion (to be completed and signed by the **Service Head**)**

Delete as appropriate

I agree with this assessment

Signed (Service Head):



Jan Glass
Head of Landlord Services

Date: 01/05/2024

Please send completed & signed assessment to **Vicky Brackenbury** for publishing.