

Charnwood Borough council

Equality impact assessment 'Knowing the needs of your customers and employees'

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 Charlwood 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
2. Indirect discrimination
3. Harassment
4. Victimisation
5. Discrimination by association
6. Discrimination by perception
7. Pregnancy and maternity discrimination
8. Discrimination arising from disability
9. Failing to make reasonable adjustments

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

Step 1 – Introductory information

Title of the policy	Housing income and financial inclusion policy
Name of lead officer and others undertaking this assessment	Andrew Staton
Date EIA started	16 March 2017
Date EIA completed	18 February 2019

Step 2 – Overview of policy/function being assessed:

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

The objectives of this policy are:

- to maximise rental income to the council's housing revenue account from its current tenants;
- to reduce rent arrears to a level that is financially and politically acceptable to the council;
- to have operating procedures to recover unpaid rent that are rigorous, firm but fair but that recognise and attempt to mitigate the risks of eviction through rent arrears that many council tenants face from a range of vulnerabilities¹ they may have; and
- to act early in identifying tenants who may be at risk from tenancy failure through non-payment of rent and to make all reasonable efforts to obtain clearance of a debt at the earliest possible stage;
- to view eviction as a last resort in the majority of cases;
- to make all reasonable efforts to help prevent tenants being evicted from their homes through rent arrears by offering appropriate support from within the council and through outside agencies at the earliest appropriate opportunity;
- to operate our procedures in compliance with the Equalities Act 2010 (and any successors), and our own equality and diversity policy;
- to operate our procedures in compliance with the county court pre-action protocol for possession claims by social landlords and its successors;
- to support tenants to maximise their income to sustain their tenancy;
- to support staff involved in delivering this policy's objectives in their professional and personal development through effective training.

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

All current tenants of council-owned and leased dwellings

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

This is a new policy and so requires full consultation

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

A range of diversity information is available from our records and held in QL (our housing management system) for all those customers receiving housing management services. 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)

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)
This information enables support to be directed to the most vulnerable tenants, and also shape our services to meet the needs of vulnerable people across a range of diverse groups.

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

In light of the answers you have given in step 2, do you need to consult specific groups to identify needs / issues? If not please explain why.
Staff in the income, financial inclusion, tenancy management, tenancy support and housing needs teams have been consulted. Tenants have been consulted at the Charnwood Housing Residents' Forum and Housing Management Advisory Board

Step 5 – Assessing the impact

In light of any data/consultation/information and your own knowledge and awareness, please identify whether the policy has a positive or negative impact on the individuals or community groups (including what barriers these individuals or groups may face) who identify with any 'protected characteristics' and provide an explanation for your decision (please refer to the general duties on the front page).	
	Comments
Age	<p>Support will be available to tenants of all ages where deemed appropriate and beneficial to the tenant and the council's income collection.</p> <p>Many of our tenants are elderly and/or vulnerable.</p> <p>Owing to their age, older people are less able to identify and access benefits to which they may be entitled. This increases their vulnerability and leads to deterioration in their health and wellbeing. Support will address this by providing financial inclusion and welfare benefits advice.</p> <p>Income officers will offer help and advice if any tenant is experiencing difficulties in payment their rent but will refer on to the financial inclusion and/or tenancy support teams for specialist advice and support where that is deemed to be appropriate and beneficial. We will, if necessary try to refer the tenant to an external tenancy support agency that might be able to offer longer term more structured or specialist support or to another service such as Social Care or Health.</p>
Disability (Physical, visual, hearing, learning disabilities, mental health)	<p>Support will be available to tenants with disabilities where deemed appropriate and beneficial to the tenant and the council's income collection.</p> <p>Many of our tenants have mobility, mental health and other disability needs. People with disabilities are likely to be more vulnerable but disability in itself should not mean that the tenant is likely to be less able to pay their rent without support.</p> <p>Health problems, including mental health problems and learning difficulties (which may also include problems with reading and writing) might, however, affect how a person can manage the rent payments on their tenancy.</p>

	<p>Income officers will offer help and advice if any tenant is experiencing difficulties in payment their rent but will refer on to the financial inclusion and/or tenancy support teams for specialist advice and support where that is deemed to be appropriate and beneficial. We will, if necessary try to refer the tenant to an external tenancy support agency that might be able to offer longer term more structured or specialist support or to another service such as Social Care or Health.</p>
Gender reassignment (Transgender)	<p>Support is available to all tenants regardless of their gender identity but will be offered to transgender tenants where deemed appropriate and beneficial to the tenant and the council's income collection..</p> <p>Income officers will offer help and advice if any tenant is experiencing difficulties in payment their rent but will refer on to the financial inclusion and/or tenancy support teams for specialist advice and support where that is deemed to be appropriate and beneficial. We will, if necessary, try to refer the tenant to an external tenancy support agency that might be able to offer longer term more structured or specialist support or to another service such as Social Care, Health or transgender support organisations.</p>
Race	<p>Support is available to all tenants regardless of their race but will be offered to tenants where deemed appropriate and beneficial to the tenant and the council's income collection..</p> <p>People from abroad or who do not have English as a first language may be susceptible to tenancy failure</p> <p>Income officers will offer help and advice if any tenant is experiencing difficulties in payment their rent as a result of their race, origin or national identity. We will refer on to the financial inclusion and/or tenancy support teams for specialist advice and support where that is deemed to be appropriate and beneficial. We will, if necessary, try to refer the tenant to an external tenancy support agency that might be able to offer longer term more structured or specialist support or to another service that supports people from other countries offering language and cultural support. Gaining access to external support may also include paying for interpreting services such as Language Line.</p>
Religion or belief (Includes no belief)	<p>Support is available to all tenants regardless of their religion or belief.</p> <p>Income officers will offer help and advice if any tenant is experiencing difficulties in payment their rent but will refer on to the financial inclusion and/or tenancy support teams for specialist advice and support where that is deemed to be appropriate and beneficial. We will make reasonable adjustments in the nature of support offered according to someone's religious or cultural needs. We will, if necessary try to refer the tenant to an external tenancy support agency that might be able to offer longer term more structured or specialist support or to another service that supports people of other religions or beliefs.</p>
Sex	<p>Support is available to all tenants regardless of their sex.</p> <p>Income officers will offer help and advice if any tenant is experiencing difficulties in payment their rent but will refer on to the financial inclusion and/or tenancy support teams for specialist advice and support where that is deemed to be appropriate and beneficial. We will make reasonable adjustments in the nature of support offered according to someone's sex.</p>

<p>Sexual orientation</p>	<p>Support is available to all tenants regardless of their sexual orientation.</p> <p>Income officers will offer help and advice if any tenant is experiencing difficulties in payment their rent but will refer on to the financial inclusion and/or tenancy support teams for specialist advice and support where that is deemed to be appropriate and beneficial. If necessary we will make reasonable adjustments in the nature of support offered according to someone's sexual orientation. We will, if necessary try to refer the tenant to an external support agency that might be able to offer longer term more structured or specialist support or to another service that supports LGB tenants.</p>
<p>Other protected groups (pregnancy & maternity, marriage & civil partnership)</p>	<p>Support is available to all tenants, including these protected groups. Pregnant tenants and / or those on maternity are more likely to be vulnerable and in need of support.</p> <p>Income officers will offer help and advice if any tenant is experiencing difficulties in payment their rent but will refer on to the financial inclusion and/or tenancy support teams for specialist advice and support where that is deemed to be appropriate and beneficial. We will make reasonable adjustments in the nature of support offered according to someone's pregnancy & maternity, marriage & civil partnership status. We will, if necessary try to refer the tenant to an external tenancy support agency that might be able to offer longer term more structured or specialist support or to another service such as Social Care or Health.</p>
<p>Other socially excluded groups (carers, low literacy, priority neighbourhoods, health inequalities, rural isolation, asylum seeker and refugee communities etc.)</p>	<p>These groups are more likely to be vulnerable and in need of tenancy or financial inclusion support if they are having difficulty in paying their rent.</p> <p>Income officers will offer help and advice if any tenant is experiencing difficulties in payment their rent but will refer on to the financial inclusion and/or tenancy support teams for specialist advice and support where that is deemed to be appropriate and beneficial. We will, if necessary try to refer the tenant to an external tenancy support agency that might be able to offer longer term more structured or specialist support or to another service such as Social Care or Health.</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.

Please note:

- a) If you have identified adverse impact or discrimination that is illegal, you are required to take action to remedy this immediately.
- b) 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.

There is no adverse impact or discrimination identified in this assessment.

Financial inclusion and tenancy support will benefit vulnerable tenants by providing help and support when needed to sustain their tenancies.

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).

Delivery of the council's general equalities duties is supported by the provision of general professional advice and assistance from the income management team and specialist advice and support from the financial inclusion and tenancy support teams.

Step 6- Monitoring, evaluation and review


Are there processes in place to review the findings of this assessment and make appropriate changes? In particular, how will you monitor potential barriers and any positive/ negative impact?
The needs of tenants are assessed and monitored at every contact with our income management team: Performance of the income management and financial inclusion teams will continue to be monitored by the Housing Management Advisory Board.
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/problems in this action plan: The problems etc identified should inform your service plan and, if appropriate, your consultation plan			
Reference number	Action	Responsible officer	Target date
	No actions have been identified in this assessment		

Step 8- 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 EIA's)
Employees	✓	Team meetings
Tenants	✓	Publication on the council's website
Partners and stakeholders	✓	Publication on the council's website
Others	✓	Future and potential tenants through publication on the council's website.
To ensure ease of access, what other communication needs/concerns are there?		None identified.

Please delete as appropriate
I agree with this assessment
If disagree, state action/s required, reasons and details of who is to carry them out with timescales: NA
Signed (service head): Peter Oliver - Head of Landlord Services 
Date: 18/02/19

Please send completed & signed assessment to Suzanne Kinder for publishing.

Step 9- Conclusion (to be completed and signed by the service head)