



Full Equality Impact Assessment

Income management and Arrears Recovery Policy

Aims of the Policy

The purpose of this policy is to explain how West Lancashire Borough Council will collect rent and other charges from its tenants and the approach it adopts to recovering rent arrears.

The policy contains the following statements and commitments:

We recognise that our customer's circumstances are diverse and many may occasionally experience personal circumstances which makes it difficult to pay their rent on time. We will therefore have procedures in place which makes it as easy as possible for customers to pay their rent and access information about their rent account. We will offer support for customers through well trained staff, in-house Money Advice and a links with partners who can help with maximizing income and managing debt. We will demonstrate excellent customer care and respect in all of our actions and listen to our service users so they can help us shape the 'Rents Service'.

POLICY STATEMENT

West Lancashire Borough Council aims to collect rent and other charges due promptly from tenants in order to sustain tenancies and protect the provision of services. The key aims are therefore to maximise income collection and minimise bad debts. In cases where rent arrears do accrue, these are kept to a minimum and effectively reduced through a fair, responsive and, where necessary, firm approach.

KEY AIMS OF THE POLICY

The key aims of the Income Management and Arrears Recovery Policy is to sustain tenancies by preventing arrears accruing in the

first place and by pro-actively encouraging tenants to clear any debts that do occur. With this in mind, the objectives are:

- To ensure that all existing and new tenants are aware of their responsibility to pay the rent and, where appropriate, any other charges.
- To inform tenants promptly of any changes to rent charges
- To inform tenants of the different payment methods available to them
- To maximise Housing Benefit take up by raising awareness of entitlement and assisting with the completion of application forms where appropriate
- To ensure that all those tenants entitled to Housing Benefit are aware of that it is their responsibility to provide necessary documentation in relation to their claim, and to follow up claims with the Housing Benefit Office.
- To liaise with and operate a Service Level Agreement with the Housing Benefit Office to ensure tenants receive the best possible service and prompt payment of housing benefit.
- To provide, or sign-post advice and assistance on welfare benefits to maximise tenant income.
- To promote Financial Inclusion
- To provide money and debt advice, or sign-post tenants to other agencies who can help maximise their income.
- To ensure that all communications are clear, customer friendly and encourage contact.
- To act promptly by providing personal contact and to offer advice to a tenant who falls into arrears, establishing the reason for non-payment.
- To work closely with any advice agency or authorised person, acting on behalf of the tenant.
- To undertake financial assessment of tenant's circumstances, and ability to pay with a view to making realistic arrangements to pay off arrears.
- To identify where tenants owe the Council more than one debt and to ensure that recovery action and/ or repayment arrangements takes account of the total amount owed in accordance with corporate debt procedures.
- To advise tenants of the next course of action and the ultimate consequences of non- payment throughout the recovery process.

- To take legal action against tenants who persistently fail to pay rent and other charges
- To treat all tenants fairly and consistently and to act lawfully.
- To maximise the use of IT systems to monitor and record rent payments.
- To train colleagues to ensure they maximise the use of resources, such as IT and benefits advice.
- To provide colleagues with guidance on relevant legislation and recovery methods available to recover unpaid rent and service charges
- To have a rent recovery procedure that is clear, easy to follow and complies with all of the above, ensuring all arrears cases are actioned in a consistent and fair manner
- To encourage and support the formation of credit unions.

The rent arrears recovery process will be regularly reviewed and updated to incorporate areas of best practice, in particular with reference to the characteristics of an excellent service provider in the Audit Commission's Housing Income Management Key Line of Enquiry No. 4 (KLOE 4).

The evidence

Specific equality data

West Lancashire is in the process of collecting resident data by equality characteristic. This involves creating and maintaining a new data base, which will greatly enhance and inform the equality impact assessment process in the future.

However, currently, there is no equality data regarding rent or arrears. This will be addressed as a priority as soon as this data is collected.

However, there are some issues, which current expertise from within the sector indicates should be of high priority:

- The age characteristic. It is accepted from amongst staff and user groups, that the general profile of current tenants is disproportionately older. This is further supported by the fact that there is a large proportion of the current housing stock

which provides sheltered accommodation for older age profile residents.

Older people may be more vulnerable to debt.

- There may also be access and appropriate provision issues regarding younger age groups. Younger people may need more support services in respect of income management, particularly if they are inexperienced in tenancy.
- In particular single parents, the majority of whose households are headed by women may need particular support
- Gypsy travellers and their needs
- Migrant workers
- Ethnic minority groups
- Disabled people

What are the alternatives?

Specific alternatives in service provision have not been identified here due to the lack of disaggregated data. However, specific actions to advance equality for all groups are contained in the joint Housing Services Equality Action Plan attached.

Consultation

In addition to collecting, analysing and using the above information to demonstrate impact on the service, expert views can be gathered from:

- Residents involvement groups
- Disable people and Disability expert groups
- Different ethnic minority groups and Race equality expert groups
- Transgender expert group
- Age related expert groups and older and younger people
- Gypsy Traveller Groups and their representatives

A specific consultation exercise has been run with tenant representatives.

This should be built on in the future with more effective consultation with the above groups.

Consideration should also be given to working with other public authorities in the region and with Lancashire County Council to utilise other expert groups and fora and to utilise others data and findings.

A specific stakeholder's event was held on the 27th October with representatives from a range of tenant participant groups.

Overall the stakeholders did not express any equality concerns regarding the income management policy. They concentrated more on the effective use and implementation of the voids and allocations process, the new choice based lettings approach, repairs, maintenance, aids and adaptations and estate management including anti-social behaviour.

This does not mean that access to, and issues for particular equality groups are not relevant to the strategy. Further information and views should be sought from expert groups as detailed above.

An expert workshop for policy staff was held on the 14th of October. Due to the lack of data staff did not identify any particular negative impact of the policy by equality group. However, they did identify some actions to increase access which are contained in the joint action plan for the Housing Services.

A fully informed judgement is difficult to make at this stage as detailed above. However, once data is collected by equality characteristic both regarding existing tenants and prospective tenants, a further analysis should be undertaken

Monitoring arrangements

An action plan is being drawn up to conduct further targeted consultation and involvement of equality characteristic groups.

This action plan will include drawing up actions and timescales to collect and analyse disaggregated data.

As the strategy is implemented, a regular review process will be included in the action plan to monitor and measure impact on protected characteristics.

A scrutiny equality steering group will review the quality of impact assessments, the delivery of the action plan and the on-going strategy of the authority in relation to equality and diversity and compliance with the public sector duties.

Publishing arrangements

This full equality impact assessment will be available on our website and will be made available either electronically or in hard copy to interested parties, the above consultation group and anyone asking to see it.

Action Plan

Please see combined action plan for the Housing Services.

Name Service

Signed Dated

Human Resources Manager

Review/approval Date