

Section 01: Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	2021/22 Q2
Name & details of proposed activity (i.e. the policy/ strategy/ process/ function / service/ restructure/ programme etc) to be assessed - hereafter referred to as ' <i>proposed activity</i> '	<p>Title of EqIA: Rent Income and Arrears Policy</p> <p>Short summary: This policy covers the aims and objectives of RBKC Housing Management in its approach to the recovery of rent arrears and associated charges.</p> <p>This EqIA aims to set out the equalities impact of the policy on RBKC's tenants as a result of setting out Housing Management's intentions in relation to the protected characteristics. The EqIA considers whether the policy will impact disproportionately adversely on any group of tenants that share a protected characteristic/s.</p> <p>Collecting rent and housing income is vital to the Council's ability to deliver housing services to its residents. We are committed to improving the quality of our homes and neighbourhoods but rely on income for funding our services.</p> <p>RBKC will collect rent and other charges and provide a holistic service to those facing difficulty in paying their rent by looking at individual circumstances closely and tailoring our support accordingly. We will act early and use preventative measures to assist tenants in addressing any financial difficulties. We will give specialist advice and support to our tenants to sustain their tenancies through the dedicated Financial Inclusion team. The Council will adopt a fair approach in relation to the payment of rent.</p> <p>This policy reflects the organisational need for clear lines of accountability in the management of housing income.</p>
Lead Officers (i.e. those responsible for /managing the proposed activity)	<p>Name: Aggie Maresch Position: Head of Income and Financial Inclusion Email: aggie.maresch@rbkc.gov.uk Telephone No: 07812 484 173</p>
Single or BI-Borough	<p>Officer co-ordinating the EIA and other associated documentation – Aggie Maresch Lead Borough – Royal Borough of Kensington and Chelsea (single borough)</p>
Date of completion of final Full EqIA	17/06/2021

Section 02	Scoping of Full EqIA											
Plan for completion	<p>Timing: The Equalities Impact Assessment carried out at present has identified considerations for the proposed rent income and arrears policy and has potentially informed recommendations in the report to Leadership.</p> <p>Resources: The resources for this Equalities Impact Assessment include officer time and data & information from the HM Performance Team to help form the analysis.</p>											
Analyse the impact of the proposed activity	<p>The information provided in the table below outlines the impact identified on tenants in the protected characteristic groups on the proposed rent income and arrears policy, and consultation with tenants. We have identified areas within our proposals that impact groups in the protected characteristics. We will seek to ensure that the views of all identified groups are heard and, where possible incorporated, when formulating the final proposed tenancy agreement. This EqIA is a key tool in this process.</p> <table border="1" data-bbox="510 483 2152 1367"> <thead> <tr> <th data-bbox="510 483 757 619">Protected characteristic</th> <th data-bbox="757 483 1928 619">Borough Analysis</th> <th data-bbox="1928 483 2152 619">Impact: Positive, Negative, Neutral</th> </tr> </thead> <tbody> <tr> <td data-bbox="510 619 757 959">Age</td> <td data-bbox="757 619 1928 959"> <p>The policy is applicable for all residents regardless of age.</p> <p>The service is committed to ensuring all tenants have equal access to information and support. Therefore, they are prepared to tailor their approach as necessary to meet the needs of service users.</p> <p>In recognition that some residents (particularly older people) may be digitally excluded the service commits to traditional communication methods - such as the sending out of letters and use of posters.</p> </td> <td data-bbox="1928 619 2152 959">Positive</td> </tr> <tr> <td data-bbox="510 959 757 1367">Disability</td> <td data-bbox="757 959 1928 1367"> <p>Where blindness is a disability, we will ensure that these tenants have the same access to the information being provided. Particularly as a substantial amount of communication is delivered in writing.</p> <p>The service aims to overcome this at the sign-up stage as this disability should be made known to RBKC at onset and so the service can tailor their approach to the service being delivered. Tenants who are unable to read physical or online documents or have difficulty reading the proposed policy due to a disability (visual impairment, learning difficulties) may have difficulty reviewing the material. This will need to be considered when we consult and to seek different methods of providing material, including the use of braille services (upon request).</p> </td> <td data-bbox="1928 959 2152 1367">Negative</td> </tr> </tbody> </table>			Protected characteristic	Borough Analysis	Impact: Positive, Negative, Neutral	Age	<p>The policy is applicable for all residents regardless of age.</p> <p>The service is committed to ensuring all tenants have equal access to information and support. Therefore, they are prepared to tailor their approach as necessary to meet the needs of service users.</p> <p>In recognition that some residents (particularly older people) may be digitally excluded the service commits to traditional communication methods - such as the sending out of letters and use of posters.</p>	Positive	Disability	<p>Where blindness is a disability, we will ensure that these tenants have the same access to the information being provided. Particularly as a substantial amount of communication is delivered in writing.</p> <p>The service aims to overcome this at the sign-up stage as this disability should be made known to RBKC at onset and so the service can tailor their approach to the service being delivered. Tenants who are unable to read physical or online documents or have difficulty reading the proposed policy due to a disability (visual impairment, learning difficulties) may have difficulty reviewing the material. This will need to be considered when we consult and to seek different methods of providing material, including the use of braille services (upon request).</p>	Negative
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	Gender reassignment	No impact identified	Neutral	
	Marriage and Civil Partnership	No impact identified	Neutral	
	Pregnancy and maternity	<p>Potential impact for expecting women or women on maternity leave as their income might not necessarily be able to cover all of their costs.</p> <p>The service is committed to sustain tenancies by focusing on preventing arrears by providing tenants with the information, support and advice required to maximise their income and to prevent, minimise or manage debt. Where debt occurs, the service will work with the resident to support them, ensuring that a customer focused service is delivered according to the residents' needs. Information in relation to rent arrears will be accurate, easy to understand and contain clear information in relation to repayment options, methods of payments available and relevant support and advice agencies.</p>	Negative	
	Race	<p>Where English is not a 1st language for certain groups with protected characteristics, there may be a barrier in understanding information provided by the service.</p> <p>This could be overcome by adding to quarterly rent statements a sheet stating in different languages; "should you require rent related information to be provided in alternative formats and in different languages please use the contact details."</p>	Negative	
	Religion/belief (including non-belief)	No impact identified	Neutral	
	Sex	No impact identified	Neutral	
	Sexual Orientation	No impact identified	Neutral	
	<p>The following groups are not specifically protected by the Equality Act, but RBKC considers them as part of our broader approach to supporting equal outcomes for communities that may be disadvantaged, marginalised or excluded. Please consider whether they may be impacted.</p>			
	Socio-economic	<p>We have identified that the socio-economic group might impact the collection of rent.</p> <p>The service is will seek to maximise rental income through the consistent promotion of a payment culture amongst tenants with the intention of preventing tenants from getting into arrears in the first place and, where arrears already exist, to minimise and reduce the amount of arrears already owed.</p>	Negative	

	<p>The service will aim to sustain tenancies, using eviction as a last resort. We will focus upon preventing arrears by providing tenants with the information, support and advice required to maximise their income and to prevent, minimise or manage debt. This is a key aim as many of our residents have been adversely affected by changes to welfare benefits that came into effect from April 2013, as well as by the outbreak of the Coronavirus pandemic in winter of 2020.</p> <p>We will ensure that our residents and their representatives are treated equally, fairly and with respect by a customer focused service. Information in relation to rent arrears will be accurate, easy to understand and contain clear information in relation to repayment options, methods of payments available and relevant support and advice agencies.</p> <p>We will tailor our rent arrears actions to recognise the needs of vulnerable tenants.</p> <p>We will ensure that effective liaison arrangements are put in place with key partners such as RBKC Revenues & Benefits Service, RBKC Social Services and RBKC Legal Services to help provide a more efficient rent recovery service through the promotion of an ethos of cooperation and partnership working.</p>	
Geographical	We have identified that the geographical group does not impact the proposed policy.	Neutral
Carers	Carers have been considered within the disability group, where appropriate.	Neutral
Other relevant groups:	N/A	

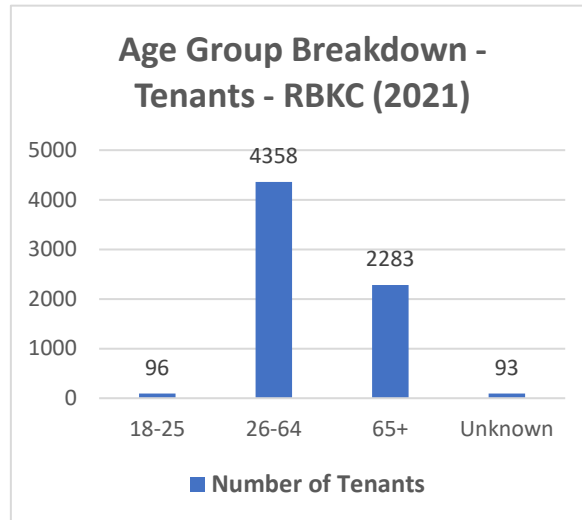
Human Rights & Children's Rights

<p>Does your proposal impact on Human Rights as defined by the Human Rights Act 1998? (See guidance for more information on this)</p> <p>No <input type="checkbox"/></p>
<p>Does your proposal impact on the rights of children as defined by the UN Convention on the Rights of the Child?</p> <p>No <input type="checkbox"/></p>

If your decision has the potential to affect Human Rights or Children’s Rights, please contact your Borough Lead for advice.

Section 03	Analysis of relevant data Examples of data include census data; customer satisfaction surveys; customer complaints data workforce demographic data. Data should involve specialist data and information and, where possible, should be disaggregated by different protected characteristics.
Documents and data reviewed	<p>The data and information obtained for this analysis is as follows:</p> <ul style="list-style-type: none">• Equality monitoring data of our current tenants in RBKC Housing Management.• Quantitative and qualitative feedback from residents through a consultation exercise, as well as from meetings with them• Census 2011 data <p>Equalities data obtained from our Performance Team includes:</p> <ul style="list-style-type: none">• A breakdown of the age groups of our tenants, allowing us to identify how many people are aged within certain age groups and the possible ways of engaging with tenants that are possibly harder to reach when consulting.• A breakdown of tenants with a disability in the borough, giving us an idea of how many tenants have a disability (known to us) and how many tenants may want alternative formats during consultation.• A breakdown of ethnicity and first language spoken in the borough, giving us an indication of how many tenants speak different languages and what we may need to factor in for consultation – if alternative language documentation/formats are required. <p>By looking at this data, we are in a position that allows us to identify the different experiences and needs of tenants (who are in the protected characteristics). It also provides an indication as to how many tenants may be impacted by the policy (as identified in Section 2).</p> <p>Understandably, some of the equality information for our tenants is incomplete, especially for older tenancies and where tenants have not wished to provide this information. Therefore, we have added in an unknown field to our results. We acknowledge the gaps within our datasets and have outlined this in our action plan later in the document. However, we are still able to consider relevant data patterns and trends.</p> <p>Analysis:</p>

Age:

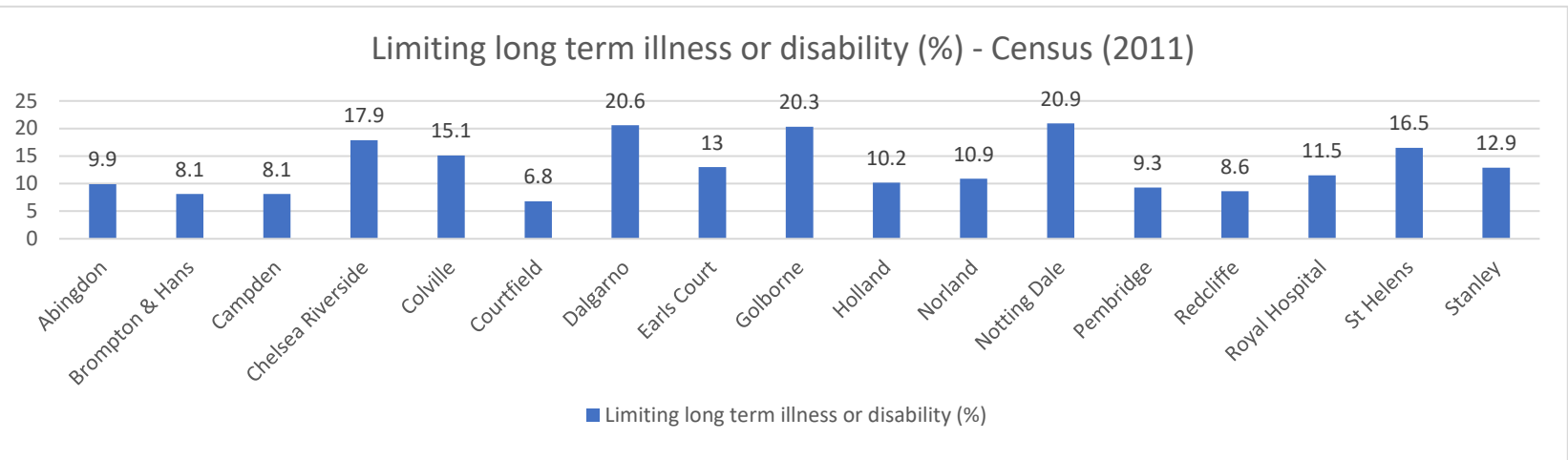


According to our own data on age groups of our tenants, 65% of our tenants are in a working age group (18-64) and 33% are over the age of 65.

By identifying the negative impacts above in the Age Protected Characteristic Group, we want to ensure older tenants can easily access all the information they need.

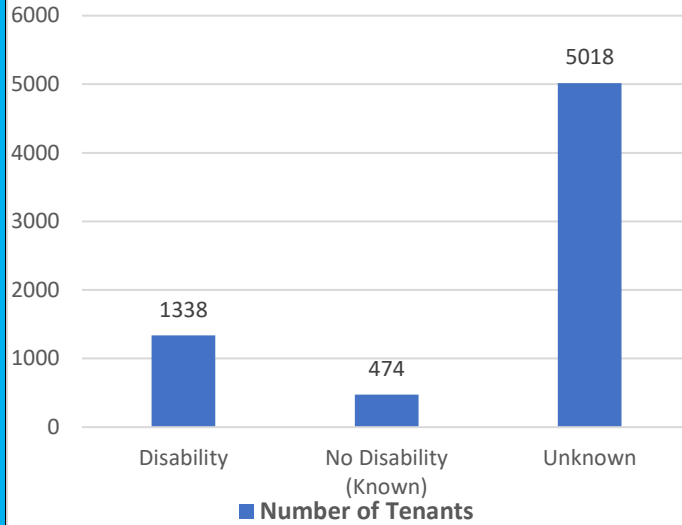
Where tenants (of any age) may require alternative formats to view material, including but not limited to larger text documents, digital versions, further hard copies, these can be provided upon request.

Disability:



According to ONS Census (2011), the percentages of ward residents suffering from limiting long-term illness or disability were generally higher in the Dalgarno (20.6%), Notting Dale (20.9%), Golborne (20.3%) and Chelsea & Riverside (17.9%) wards. The majority of these wards are located in the north of the borough.

Disability - RBKC (2021)



From our own data set, 20% of our total tenants have a known disability to the Council. We are able to break this down further to the types of disability, outlined below. Despite the unknown factor, it is likely there may be more tenants with a disability.

We recognise that people with disabilities and those that support them may be represented in one or more equality groups. The other related group that is usually referenced alongside disability is age. We recognise that people with disabilities who are young may have different experiences to elderly people and/or access to income. We also recognise that some tenants may have carers.

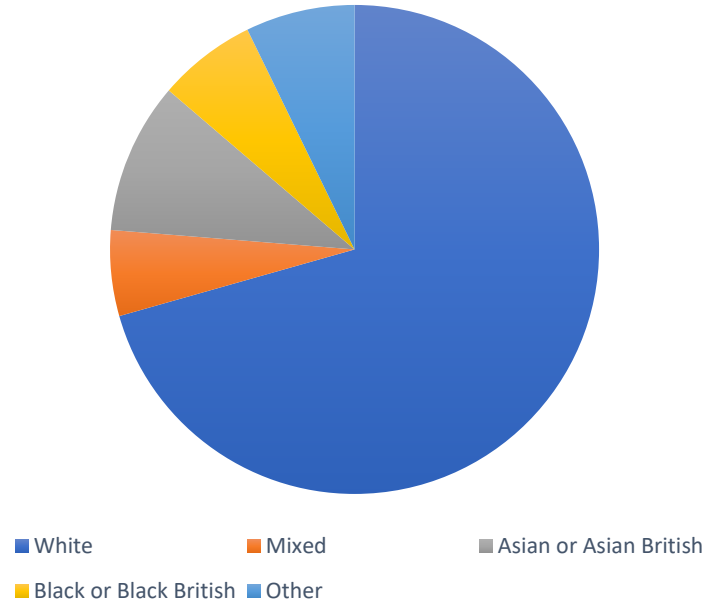
As the disability characteristic group covers a broad range of disability types, people with disabilities will experience a different level of impact to one another. For instance, reading the policy or letters may present difficulties for tenants with a visual impairment or a learning difficulty when reviewing the documents. Therefore, by identifying that 8% of tenants with a known disability has a visual impairment and 9% of tenants with a known

disability has a learning disability, we can possibly assume that tenants may require alternative formats when reviewing documents. This may include making materials accessible, larger text requirements and using braille services.

According to our data, 22% of tenants with a known disability has a physical disability. Where tenants are limited a lot with their disability, carrying out certain responsibilities outlined in the policy may prove difficult. We have identified these conditions and addressed them in the policy and EqlA document.

Race (Ethnicity):

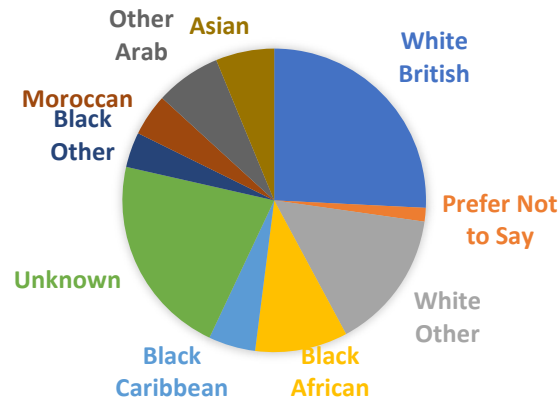
5 Ethnicity Groups - Census (2011)



According to the census data (2011), the main ethnicity type in the borough was 'White' people (71%), followed by 'Asian or Asian British' people (10%). 'Black or Black British' people accounted for 7% and people within the 'other ethnic group' accounted for 7%.

As part of the 'other ethnic group', those who identified themselves as Arab were also classed in this group. They accounted for 4.1% of the population of Kensington and Chelsea. From our own dataset below, we identified that 10% of our tenants classed themselves as Arab or Moroccan Arab – highlighting a main group of tenants that may be impacted by the policy (within the Race and Religion/Belief protected characteristic groups). We are able to potentially anticipate whether tenants may want our material in a different language.

ETHNICITY BREAKDOWN - TOP 10 - RBKC (2021)



We have also identified potential language requests for translated documents from tenants by looking at our dataset on tenant preferred language. These include Arabic, Somali and Spanish. Where requests are received from tenants for alternative language options, we will explore different options, including the use of translation services.

New research	N/A
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Section 04	Consultation
Consultation	<p>Complete this section if you have decided to supplement existing data by carrying out additional consultation with a) employees b) local communities</p> <p><u>Consultation:</u> Statutory Consultation took place in January 2021. Consultation was open for 16 weeks which will be an adequate time given for responses, especially during the Covid-19 pandemic. Consultation on the policy allowed all tenants the opportunity to provide their views, in accordance with <i>Section 103 Housing Act 1985</i>.</p> <p>The full set of consultation documents that was made available to tenants was:</p> <ul style="list-style-type: none"> • Draft Rent Income and Arrears Policy <p>These were available online on the Consultation Platform and mentioned in the Consultation Letter to tenants. The Consultation Platform stated details on how tenants could request hard copies of all materials by contacting the Council. If tenants required alternative formats during the consultation process, they were also able to contact us. This was outlined in our communications to tenants (via poster, electronic noticeboards, social media) and what we've potentially identified in our EqIA.</p> <p>When consultation started, tenants were advised to complete the online questionnaire if they wanted to submit their views. They also had the option of requesting any document as a hard copy, with details provided.</p> <p>The consultation findings were taken into account when the final decisions were made.</p>
Analysis of consultation outcomes	<p>Level of support for the policy</p> <ul style="list-style-type: none"> • Over half (14) indicated that they 'strongly support' or 'somewhat support' the draft policy. • However, eight were 'not sure' and three respondents either 'somewhat oppose' or 'strongly oppose' the draft policy. • Those that opposed the policy, or responded neutrally, were asked to explain why. The most commented on theme was in relation to support for those on low income/benefits (four comments). <p>Tenants' needs</p> <ul style="list-style-type: none"> • Nearly half (12) of respondents indicated that they 'strongly agreed' or 'agreed' that the draft policy gives adequate consideration to tenants' needs. • However, seven respondents responded neutrally and six respondents either 'disagreed' or 'strongly disagreed' that the draft policy gives adequate consideration to tenants' needs. <p>Customer obligations</p>

	<ul style="list-style-type: none"> • Over half (13) indicated that they ‘strongly agreed’ or ‘agreed’ with the proposed clauses related to customer obligations. • Seven respondents responded neutrally and five respondents either ‘disagreed’ or ‘strongly disagreed’ with the proposed clauses in relation to customer obligations. • Those that disagreed with the clauses, or responded neutrally, were asked to explain why. The most commented on themes were in relation to repair issues (three comments) or in relation to lack of improvements to homes (two comments). <p>Understanding the draft policy</p> <ul style="list-style-type: none"> • Respondents were asked to comment on any areas of the draft policy they didn’t understand. Most comments were fairly specific but two respondents commented on the need to see the related documents referred to in the draft policy. • Alternative suggestions put forward by respondents included: ‘supporting tenants finding it difficult to manage money/rent payments’ (four comments) and ‘monthly (online) rent statements’ (two comments). <p>Impact of the draft policy</p> <ul style="list-style-type: none"> • Respondents were asked how the draft policy might affect them, the people they live with or the tenant they are representing. The most commented on themes were in relation to ‘will have no impact/no impact as not in rent arrears’ (three comments) and ‘stress/impact on emotional health and wellbeing caused by actions of the Council to recover rent arrears’ (three comments).
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Section 05	Analysis of impact and outcomes
Analysis	<p>What has your consultation (if undertaken) and analysis of data shown?</p> <p>We have listed the different ways the Council can mitigate the risks from the policy and consultation and what to possibly be mindful of. This section is for any negative impacts identified.</p>

Section 06	Reducing any adverse impacts and recommendations
Outcome of Analysis	<p>Impact has been identified for the groups of Age, Disability, and Race, and Pregnancy and maternity, as well as in the socio-economic category.</p> <p>For Disability, when the disability is blindness, the responsible officers have made provision around distributing the policy using alternative methods so as to ensure that these tenants have the same access to the information being provided. This provision includes collecting equalities data at the sign-up stage as this disability should be made known to RBKC at onset and so we can tailor our approach to the service being delivered.</p> <p>For Race, again there is provision within the service for an individual to ask for a translator / interpreter, or that the material is distributed to them printed on the language of their choice. This includes adding to our quarterly rent statements a sheet stating in different languages; “should you require rent related information to be provided in alternative formats and in different languages please use the contact details.”</p>

For Age, in recognition that some residents (particularly older people) may be digitally excluded the service commits to traditional communication methods- such as the sending out of letters and use of posters.

For pregnancy and maternity, the service is committed to sustain tenancies by focusing on preventing arrears by providing tenants with the information, support and advice required to maximise their income and to prevent, minimise or manage debt. Where debt occurs, the service will work with the resident to support them, ensuring that a customer focused service is delivered according to the residents' needs. Information in relation to rent arrears will be accurate, easy to understand and contain clear information in relation to repayment options, methods of payments available and relevant support and advice agencies.

The service is committed to ensuring all tenants have equal access to information and support. Therefore, they are prepared to tailor their approach as necessary to meet the needs of service users.

The policy recognises that there are vulnerable groups and that services will be extended to meet their needs. Additionally, monitoring the delivery of rent and arrears service will be a continuous process which is also part of the commitment to residents in line with the policy.

We have considered the effect of the pandemic on our tenants and reflected this in the policy. The council has implemented an additional safety net for those tenants who may have been disproportionately affected by the pandemic through provision of the hardship fund to assist the most vulnerable tenants.

Introduction of much smaller income patches allows Income Officers to identify and understand much better tenants' circumstances in order to provide a tailored individual arrears recovery approach commensurate with the individual household circumstances. This includes due consideration of all protected characteristics and application of adequate mitigating measures, where appropriate.

Section 07	Action Plan					
Action Plan	Note: You will only need to use this section if you have identified actions as a result of your analysis					
	Issue identified	Action (s) to be taken	When	Lead officer and borough	Expected outcome	Date added to business/service plan
	Tenants may require alternative formats for consultation material in order to	Alternative formats that can be used, include:	Ongoing	Aggie Maresch - RBKC	Improved accessibility	-

	provide their views.	<ul style="list-style-type: none"> • Paper copies of all material • Larger text of all material • Making material accessible • Using braille services • Using in-house translation services 				
	Unknown data - obtaining more data on equalities monitoring	<p>Identifying equality data during:</p> <ul style="list-style-type: none"> • Annual home visits to tenant homes • Sign-ups with new tenants • Correspondence with tenants during their tenancy (capturing updated information if circumstances change over years – i.e. a new disability) • New Census data (which will provide supporting data to Council) 	Ongoing	Multiple RBKC Housing Management Teams. E.g. Neighbourhoods, Customer Services	Improving our datasets on key equality information, such as ethnicity and disability.	-

Section 08	
Director/ Head of Service sign-off	Name: Bernadette Fry Position: Assistant Director of Neighbourhoods Email: Bernadette.Fry@rbkc.gov.uk Telephone No:020 8964 6069
Key Decision Report (if relevant)	If the EqIA relates to a ' Key Decision ', sign off from the relevant lead Member is required. Name of Lead/ Cabinet Member: Cllr Kim Taylor-Smith Date of report to Lead/Cabinet Member: 07/07/2021 Key equalities issues have been included and the EqIA presented alongside the KDR: Yes
Lead ED&I Officer (where involved)	Name: Angelina Tsinouka Position: Service Improvement Manager Date advice / guidance given: 17/06/2021 Email: angelina.tsinouka@rbkc.gov.uk Telephone No: 07739316913
Review Date/s Recommended at: 3 months; 6 months and 12 months	1st Review: 2 nd Review: 3rd Review: