

Colchester Borough Homes

Equality Impact Assessment Form - An Analysis of the Effects on Equality

Section 1: screening stage

Name of policy, service or strategy to be assessed:

- Income Collection Policy

1. What is the main purpose of the policy, service or strategy?

- To collect rent, service charges, leasehold service charges and ground rents, leasehold major work charges, rechargeable repairs, commercial income and homelessness related costs that CBC is legally entitled to as a social landlord

2. What main areas or activities does it cover?

- Accounting processes
- Rent arrears recovery

3. Who are the main audience, users or customers who will be affected?

- Current and former tenants

4. What outcomes do you want to achieve from the policy, service or strategy?

- All current rent and former tenant debt is collected fairly and in a timely way

5. Are other service areas or partner agencies involved in delivery? If so, please give details below:

- Open Road, Citizens Advice, Citizens Against Poverty, British Legion, SAFFA and Specialist welfare rights and financial inclusion officers.

6. Does the policy, service or strategy help to further or facilitate our 'general duty'¹ to:

- (a) eliminate unlawful discrimination, harassment and victimisation?
- (b) advance equality of opportunity between people who share a 'protected characteristic'² and those who do not?
- (c) foster good relations between people who share a protected characteristic and those who do not?

Yes

Rent is charged to all tenants and collected in the same way regardless of their protected characteristic.

Support is offered to all tenants regardless of their protected characteristic and tailored to any specific needs they have.

Any reports of Anti-Social behaviour towards tenants with regards to any of the protected characteristics will be investigated and dealt with on an individual basis according to our anti social behaviour policy.

If you have answered 'no', please give details of the reasons for this decision:

¹ These three points summarise the 'general duty' as it applies to public sector organisations in the Equality Act 2010

² The Equality Act's 'protected characteristics' include age, disability, gender reassignment, pregnancy and maternity, race, religion or belief and sex and sexual orientation. It also covers marriage and civil partnerships, but not for all aspects of the duty.

7. If you answered 'yes' to any of the sections in Question 6 (above), please complete the following in order to identify how the policy, practice or strategy furthers the aim of the 'general duty':

'Protected characteristic' group		How does it help to 'eliminate unlawful discrimination, harassment and victimisation'?	How does it help to 'advance equality of opportunity between people who share a protected characteristic and those who do not'?	How does it help to 'foster good relations between those who share a protected characteristic and those who do not'?

'Protected characteristic' group		How does it help to 'eliminate unlawful discrimination, harassment and victimisation'?	How does it help to 'advance equality of opportunity between people who share a protected characteristic and those who do not'?	How does it help to 'foster good relations between those who share a protected characteristic and those who do not'?
Age	Older people (60+)	Aims to support tenants by: maximising their income; advising them of the methods available to pay; set up this method; personal support from a Community Housing Officer and partner agencies; referrals are made to specialist partner agencies such as Age Concern, Open Road, Citizens Advice, Citizens Against Poverty, specialist welfare rights officer, floating support provider (One Support at present). Where someone had a number of issues we would call a case conference with the appropriate support agency e.g. Community mental health team.	All tenants, regardless of their characteristics are supported to maximise their income. We ask tenants about their family and financial circumstances so we can enable them to receive all the welfare benefits they are entitled to; and give them advice about how to prioritise their expenditure so they can pay their major bills first.	Staff are trained to encourage respect between neighbours and to discourage discriminatory behaviour by tenants Any reports of Anti-Social behaviour towards tenants with regards to any of the protected characteristics will be investigated and dealt with on an individual basis.

'Protected characteristic' group		How does it help to 'eliminate unlawful discrimination, harassment and victimisation'?	How does it help to 'advance equality of opportunity between people who share a protected characteristic and those who do not'?	How does it help to 'foster good relations between those who share a protected characteristic and those who do not'?
	Younger people (17-25) and children (0-16)	Aims to support tenants by: maximising their income advising them of the methods available to pay set up this method Personal support by CHO and partner agencies. We encourage young tenants to take support offered by the Youth Enquiry Service, and the Citizens Advice.	A trustee is appointed to support the under 18 year old to sustain their tenancy. All under 25's have to attend a Pre tenancy workshop where we promote managing your money and your tenancy. We ask tenants about their family and financial circumstances so we can enable them to receive all the welfare benefits they are entitled to; and give them advice about how to prioritise their expenditure so they can pay their major bills first.	Staff are trained to encourage respect between neighbours and to discourage discriminatory behaviour by tenants
Disability	Physical	Welfare benefits targeted at people with disabilities are promoted, advising people to go to the CA who have specialist knowledge of disability benefits; or our own specialist welfare rights worker. Home visits are now offered to help people access these services	All tenants regardless of their characteristics are supported to maximise their income. We ask tenants about their family and financial circumstances so we can enable them to receive all the welfare benefits they are entitled to; and give them advice about how to prioritise their expenditure so they can pay their major bills first.	Staff are trained to encourage respect between neighbours and to discourage discriminatory behaviour by tenants

'Protected characteristic' group		How does it help to 'eliminate unlawful discrimination, harassment and victimisation'?	How does it help to 'advance equality of opportunity between people who share a protected characteristic and those who do not'?	How does it help to 'foster good relations between those who share a protected characteristic and those who do not'?
	Sensory	Staff give advice by the appropriate communication method with specialist communicators / support staff present where required.	All tenants regardless of their characteristics are supported to maximise their income. We ask tenants about their family and financial circumstances so we can enable them to receive all the welfare benefits they are entitled to; and give them advice about how to prioritise their expenditure so they can pay their major bills first.	Staff are trained to encourage respect between neighbours and to discourage discriminatory behaviour by tenants
	Learning	Staff give advice by the appropriate communication method with specialist communicators / support staff present when available We work with support workers to help people with learning disabilities to sustain their tenancy.	All tenants regardless of their characteristics are supported to maximise their income. We ask tenants about their family and financial circumstances so we can enable them to receive all the welfare benefits they are entitled to; and give them advice about how to prioritise their expenditure so they can pay their major bills first.	Staff are trained to encourage respect between neighbours and to discourage discriminatory behaviour by tenants
	Mental health issues	Staff give advice by the appropriate communication method with specialist communicators / support staff present when available. The Community Mental Health team work with us to enable tenants to sustain their tenancy.	All tenants regardless of their characteristics are supported to maximise their income. We ask tenants about their family and financial circumstances so we can enable them to receive all the welfare benefits they are entitled to; and give them advice about how to prioritise their expenditure so they can pay their major bills first.	Staff are trained to encourage respect between neighbours and to discourage discriminatory behaviour by tenants
	Other – <i>please specify</i>			

'Protected characteristic' group		How does it help to 'eliminate unlawful discrimination, harassment and victimisation'?	How does it help to 'advance equality of opportunity between people who share a protected characteristic and those who do not'?	How does it help to 'foster good relations between those who share a protected characteristic and those who do not'?
Ethnicity ³	White	Services are offered to all tenants fairly and individual needs and appropriate communication methods are chosen with the tenant.	All tenants regardless of their characteristics are supported to maximise their income. We ask tenants about their family and financial circumstances so we can enable them to receive all the welfare benefits they are entitled to; and give them advice about how to prioritise their expenditure so they can pay their major bills first.	Staff are trained to encourage respect between neighbours and to discourage discriminatory behaviour by tenants
	Black		All tenants regardless of their characteristics are supported to maximise their income.	Staff are trained to encourage respect between neighbours and to discourage discriminatory behaviour by tenants
	Chinese		All tenants regardless of their characteristics are supported to maximise their income.	Staff are trained to encourage respect between neighbours and to discourage discriminatory behaviour by tenants
	Mixed Ethnic Origin		All tenants regardless of their characteristics are supported to maximise their income.	Staff are trained to encourage respect between neighbours and to discourage discriminatory behaviour by tenants
	Gypsies/ Travellers	Staff would work through CBC's Gypsy liaison officer – where appropriate	All tenants regardless of their characteristics are supported to maximise their income.	Staff are trained to encourage respect between neighbours and to discourage discriminatory behaviour by tenants
	Other – <i>please state</i>			

³ Census 2011 categories are: Bangladeshi, Indian, and Pakistani, Other Asian (Asian or Asian British); African, Caribbean, Other Black (Black or Black British); White and Black African, White and Asian, White and Black Caribbean (Mixed); British, Irish; Other White (White); Chinese, Other (Other ethnic group).

'Protected characteristic' group		How does it help to 'eliminate unlawful discrimination, harassment and victimisation'?	How does it help to 'advance equality of opportunity between people who share a protected characteristic and those who do not'?	How does it help to 'foster good relations between those who share a protected characteristic and those who do not'?
Language	English not first language	Staff identify the first language of the tenant and make appropriate arrangements to communicate confidential matters through specialist translation services	Staff give advice by the appropriate communication method with specialist communicators / support staff present when appropriate	Staff are trained to encourage respect between neighbours and to discourage discriminatory behaviour by tenants
Pregnancy and Maternity	Women who are pregnant or have given birth in last 26 weeks		All tenants regardless of their characteristics are supported to maximise their income.	Staff are trained to encourage respect between neighbours and to discourage discriminatory behaviour by tenants
Religion or Belief	People with a religious belief (or none) ⁴	Staff are aware of the major religious festivals and will arrange for female staff to arrange the delivery of service when appropriate. When specific washing arrangements are required CBH will arrange these.	All tenants regardless of their characteristics are supported to maximise their income.	Staff are trained to encourage respect between neighbours and to discourage discriminatory behaviour by tenants
Sex	Men		All tenants regardless of their characteristics are supported to maximise their income.	Staff are trained to encourage respect between neighbours and to discourage discriminatory behaviour by tenants
	Women		All tenants regardless of their characteristics are supported to maximise their income.	Staff are trained to encourage respect between neighbours and to discourage discriminatory behaviour by tenants

⁴ For example, Buddhist, Christian, Hindu, Jewish, Muslim, Sikh or no religious belief.

'Protected characteristic' group		How does it help to 'eliminate unlawful discrimination, harassment and victimisation'?	How does it help to 'advance equality of opportunity between people who share a protected characteristic and those who do not'?	How does it help to 'foster good relations between those who share a protected characteristic and those who do not'?
	Transsexual / gender reassignment	Services are offered to all tenants fairly and individual needs addressed; appropriate communication methods are chosen with the tenant.	All tenants regardless of their characteristics are supported to maximise their income.	Staff are trained to encourage respect between neighbours and to discourage discriminatory behaviour by tenants
Sexual Orientation	Lesbian, gay and bisexual	Services are offered to all tenants fairly and individual needs addressed; appropriate communication methods are chosen with the tenant.	All tenants regardless of their characteristics are supported to maximise their income.	Staff are trained to encourage respect between neighbours and to discourage discriminatory behaviour by tenants
Marriage and Civil Partnership ⁵	People who are single, married or in a civil partnership	Services are offered to all tenants fairly and individual needs addressed; appropriate communication methods are chosen with the tenant.	All tenants regardless of their characteristics are supported to maximise their income	not applicable

⁵ Our legal duty in respect of 'marriage or civil partnership' extends only to the need to eliminate unlawful discrimination.

8. Are there any concerns that the policy, service or strategy could have a differential impact in terms of equality?

- no

Please use the table below to indicate how the policy, service or strategy could have a positive or negative effect on any of the following equality groups (known under the Equality Act as ‘protected characteristics’). Include reference to any consultation, data or information that you have used in making this assessment about positive or negative effects.

Are there any people who may experience a negative impact because of the rent collection ? If you cannot think of any say none.

‘Protected characteristic’ group		Positive Impact	Explain how it could benefit the group	Negative Impact	Explain how it could disadvantage the group
Age	Older people (60+)	X	A robust and clear income collection policy will have a positive impact on all.		None identified
	Younger people (17-25) and children (0-16)	X	As above		None identified
Disability	Physical	X	As above		None identified
	Sensory	X	As above		None identified
	Learning	X	As above		None identified
	Mental health issues	X	As above		None identified
	Other – <i>please specify</i>				
Ethnicity	White	X	As above		None identified
	Black	X	As above		None identified
	Chinese	X	As above		None identified
	Mixed Ethnic Origin	X	As above		None identified
	Gypsies/ Travellers	X	As above		None identified
	Other – <i>please state</i>				
Language	English not first language	X	As above		None identified

'Protected characteristic' group		Positive Impact	Explain how it could benefit the group	Negative Impact	Explain how it could disadvantage the group
Pregnancy and Maternity	Women who are pregnant or have given birth in last 26 weeks	X	As above		None identified
Religion or Belief	People with a religious belief (or none)	X	As above		None identified
Sex	Men	X	As above		None identified
	Women	X	As above		None identified
	Transsexual / gender reassignment	X	As above		None identified
Sexual Orientation	Lesbian, gay and bisexual	X	As above		None identified
Marriage and Civil Partnership	People who are single, married or in a civil partnership	X	As above		None identified

9. Could the policy, service or strategy discriminate⁶ against any 'protected characteristic', either directly or indirectly?

- no

10. If you have identified any negative impacts above, have you been able to minimise or remove them, and if so, how?

- n/a

⁶ Direct discrimination occurs when a person is treated less favourably than another in a comparable situation because of their 'protected characteristic' whether on grounds of age, disability, pregnancy and maternity, ethnicity; religion or belief; sex (gender), sexual orientation, or Marriage and Civil Partnership. Indirect discrimination occurs when an apparently neutral provision or practice would nevertheless disadvantage people on the grounds of their 'protected characteristic' unless the practice can be objectively justified by a legitimate aim.

Summary and findings of Initial Equality Impact Assessment – screening stage

11. Please put a tick in the relevant box to confirm your findings, and what the next step is:

Findings	Action required
No likely negative impacts have been identified and this has been justified with reference to consultation, data or information. X	None
Likely negative impacts have been identified but have been minimised or removed. <input type="checkbox"/>	
Likely negative impacts were identified but have not been minimised or removed. <input type="checkbox"/>	
There is insufficient evidence to make a judgement. <input type="checkbox"/>	

12. Name and job title of person completing this form:

- Karen Williams, Head of Housing Management

13. Date of completion:

- November 2017

14. Date for update or review of this screening:

- November 2020