

# Diversity impact assessment

**TITLE**

Name / description of the issue being assessed

Tenancy Fraud policy

**DATE**

Date the DIA is completed

13<sup>th</sup> November 2017

**LEAD OFFICER**

Name, title and dept of person responsible for carrying out the DIA.

Katherine Bishop – Business Development Officer

**1 Summary description of the proposed change**

- What is the change to policy / service / new project that is being proposed?
- How does it compare with the current situation?

The Tenancy Fraud policy was due to be reviewed and has been updated to ensure that it reflects the current process. Recovering properties occupied fraudulently means that the Council can ensure their housing is only occupied by those in priority need according to our Allocations Policy. The policy seeks to ensure that tenant reside in the property as their principal home, whilst providing support to victims of unlawful subletting. It details how occupancy data will be monitored through regular reviews of all housing applications to check for changes in circumstances and ensure that people on the register remain eligible. The policy also details that Tenancy Audits are undertaken to identify tenancy fraud, and provide reporting mechanisms for staff and members of the public.

It enables the Council to make best use of our housing stock, reduces the housing register and reduces the number of families placed in temporary accommodation pending an offer of suitable permanent (or fixed term) housing.

The refreshed policy identifies the involvement of the Corporate Anti Fraud Team.

**2 Summary of evidence used to support this assessment**

- Eg: Feedback from consultation, performance information, service user records etc.
- Eg: Comparison of service user profile with Medway Community Profile

**Tenancy Audits**

Date	Number of Tenancy Audits
2016-2017	120
2014-2015	228
2013	59

There has been 1 tenancy fraud case that is currently going through the courts. This involved a customer with no protected characteristics.

**Customer Consultation**

The policy was placed online for a period of 3 weeks from 27<sup>th</sup> October – 12<sup>th</sup>

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November. In this time 17 customers responded to the survey and all respondents noted that they understood the policy and agreed with the content.

### 3 What is the likely impact of the proposed change?

Is it likely to:

- Adversely impact on one or more of the protected characteristic groups?
- Advance equality of opportunity for one or more of the protected characteristic groups?
- Foster good relations between people who share a protected characteristic and those who don't?

(insert ✓ in one or more boxes)

Protected characteristic groups	Adverse impact	Advance equality	Foster good relations
Age			
Disability			
Gender reassignment			
Marriage/civil partnership			
Pregnancy/maternity			
Race			
Religion/belief			
Sex			
Sexual orientation			
Low income groups			✓

### 4 Summary of the likely impacts

The policy will be applied generically to all of our tenants.

Vulnerable people such as those with learning difficulties, elderly residents or people for whom English is not their first language may be more likely to be coerced into committing tenancy fraud. This may be because they are being pressured into it by a third party or they do not understand that what they are doing is fraudulent.

### 5 What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?

Measures have been taken in the policy to ensure that vulnerable tenants are supported throughout cases of tenancy fraud and the correct advice given. Officers will support vulnerable customers that are victims of tenancy fraud.

Communications and publicity campaigns regarding tenancy fraud must be available in alternative languages and translation services adopted when communicating with tenants regarding fraud investigations.

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The Corporate Anti Fraud Team will ensure cases are in the public interest and therefore may have consideration to the impact on cases that involve persons with certain protected characteristics.

Although some investigations will involve officers attending a property without prior appointment, a password scheme is available to tenants so that they can verify that the officer is a genuine employee of Medway Council.

Officers will refer to Academy before conducting a tenancy audit to identify any circumstances that may identify the tenant as being vulnerable and requiring extra measures. Where it is identified that a tenant is vulnerable and requires an advocate to be present, this will be arranged prior to the audit taking place. Other special circumstance will be considered such as whether a translator is required for the audit.

Details of how to report Housing Fraud is publicised in the tenant's magazine and online on the council website.

## 6 Action plan

- *Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence*

Action	Lead	Deadline or review date
Monitor Complaints to identify any negative trends with regards to the Tenancy Fraud policy.	E Ditton - Policy and Partnership Manager	May 2018
Advertise details of how to report Housing Fraud in the tenants magazine and online on the council website.	E Ditton - Policy and Partnership Manager	May 2018

## 7 Recommendation

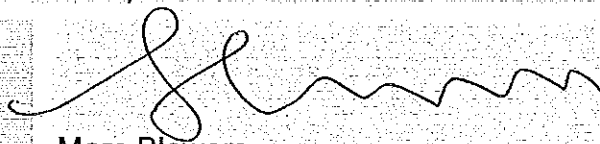
To proceed with the implementation of the revised policy.

## 8 Authorisation

*The authorising officer is consenting that:*

- *the recommendation can be implemented*
- *sufficient evidence has been obtained and appropriate mitigation is planned*
- *the Action Plan will be incorporated into the relevant Service Plan and monitored*

**Authorising Officer**



Marc Blowers  
Head of Housing Management

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Date

15/11/2017

Contact your Performance and Intelligence hub for advice on completing this assessment

RCC: phone 2443 email: [annamarie.lawrence@medway.gov.uk](mailto:annamarie.lawrence@medway.gov.uk)

C&A: (Children's Social Care): contact your normal P&I contact

C&A (all other areas): phone 4013 email: [chrismckenzie@medway.gov.uk](mailto:chrismckenzie@medway.gov.uk)

BSD: phone 2472/1490 email: [corppi@medway.gov.uk](mailto:corppi@medway.gov.uk)

PH: phone 2636 email: [david.whiting@medway.gov.uk](mailto:david.whiting@medway.gov.uk)

Send completed assessment to the Corporate Performance & Intelligence Hub (CPI) for web publication  
([corppi@medway.gov.uk](mailto:corppi@medway.gov.uk))