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| **TITLE**  *Name / description of the issue being assessed* | | | Current Tenant Rent Arrears Policy | | | | |
| **DATE**  *Date the DIA is completed* | | | February 2020 | | | | |
| **LEAD OFFICER**  *Name, title and dept of person responsible for carrying out the DIA*. | | | Aisling Sims – Policy and Partnerships Manager | | | | |
| 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 existing policy has been reviewed with minor changes proposed.  The current policy was introduced following changes introduced as a result of the Welfare Reform Act 2012 and the introduction of Universal Credit. | | | | | | | |
| 1. **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* | | | | | | | |
| At the end of January 2020 current rent arrears were at £197,442 and this has remained below the target of £205,000. Despite the reforms that have been introduced, this shows that the support provided to tenants in terms of managing money and making rent payments is effective.  As of December 2019 there was a total of 433 HRA tenants known to be claiming Universal Credit. This number is set to increase over the coming months and years, putting more emphasis on rent payments and subsequently the rent arrears policy and process.  In benchmarking exercises, we perform well in terms of income collection and rent arrears in comparison with similar sized organisations. | | | | | | | |
| 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?* | | | | | | | |
| **Protected characteristic groups** | | **Adverse impact** | | | **Advance equality** | **Foster good relations** | |
| **Age** | |  | | | ***✓*** |  | |
| **Disabilty** | |  | | | ***✓*** |  | |
| **Gender reassignment** | |  | | |  |  | |
| **Marriage/civil partnership** | |  | | |  |  | |
| **Pregnancy/maternity** | |  | | |  |  | |
| **Race** | |  | | |  |  | |
| Religion/belief | |  | | |  |  | |
| **Sex** | |  | | |  |  | |
| **Sexual orientation** | |  | | |  |  | |
| **Other (eg low income groups)** | |  | | | ***✓*** |  | |
| 1. **Summary of the likely impacts**  * *Who will be affected?* * *How will they be affected?* | | | | | | | |
| The Current Tenant Rent Arrears Policy will only serve to advance equality, by offering greater support to those who do, or are likely to fall into rent arrears. Access to support from the team is available to all tenants and contact details are regularly advertised in a range of ways.  No adverse impacts have currently been recorded but should any be identified this will trigger a review of the DIA and where appropriate mitigating actions will be built in to the policy. | | | | | | | |
| 1. **What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?**  * *Are there alternative providers?* * *What alternative ways can the Council provide the service?* * *Can demand for services be managed differently?* | | | | | | | |
| The Income and Welfare Reform Teams work closely with vulnerable tenants in arrears to help negate the impact of the enforcement side of the policy, by supporting households to resolve any financial issues they have.  The teams have processes in place to identify potentially vulnerable customers and prevent them falling into rent arrears at the earliest possible stage. | | | | | | | |
| 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 rent arrears on a monthly basis | | | | Housing Manager | | | Ongoing |
| Monitor the households moving on to Universal Credit and support as necessary | | | | Income Manager | | | Ongoing |
| Monitor the number of households evicted as a result of rent arrears | | | | Housing Manager | | | Ongoing |
| Recommendation *The recommendation by the lead officer should be stated below. This may be:*   * *to proceed with the change, implementing the Action Plan if appropriate* * *consider alternatives* * *gather further evidence*   *If the recommendation is to proceed with the change and there are no actions that can be taken to mitigate likely adverse impact, it is important to state why.* | | | | | | | |
| Continue to adopt the Current Tenant Rent Arrears Policy | | | | | | | |
| 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** | **Head of Housing** | | | | | | |
| **Date** | February 2020 | | | | | | |