

Equality Impact Assessment

Purpose of the Equality Impact Assessment process:

The Equality Act (2010) introduced the [Public Sector Equality Duty](#) (PSED) requiring public bodies to give due regard to the need to:

- Eliminate unlawful discrimination
- Advance equality of opportunity
- Foster good relations

Consideration must be given to the protected characteristics covered by the Equality Act (2010). Assessments should consider relevant evidence relating to persons with protected characteristics in relation to assessments of potential impact.

The purpose of an Equality Impact Assessment (EIA) is to ensure that policies, functions, plans or decisions (hereafter referred to as 'policy/ decision') do not create unnecessary barriers for people protected under the Act. Where negative impacts are identified these should be eliminated or minimised, and opportunities for positive impact should be maximised. An EIA is not required for a decision in relation to an individual.

Screening is a short exercise to determine whether a policy/ decision is relevant to equalities, and if so, whether a full EIA should be conducted.

Section 1: Equality Impact Assessment Screening

Title and description of the policy/ decision:	Revised MDH Income Management Policy
Job title of the person(s) undertaking the assessment:	MDH Policy Officer
Council service:	Mid Devon Housing
Date of assessment:	18 th March 2024
What are the aims, purposes, objectives and proposed outcomes of the policy/ decision?	
<p>This policy sets out the principles and the overall approach Mid Devon Housing (MDH) takes to collect rent, service charges and other payments, prevent arrears, manage arrears and ensure that effective and appropriate action is taken to maximise income and reduce debt. The policy applies to all properties owned and managed by MDH, including properties let on tenancies, licenses and leases.</p> <p>Aims</p> <p>To create a rent payment culture, ensuring that rent and charges are collected quickly and effectively, whilst supporting our tenants in matters relating to financial inclusion and the ability to manage their money.</p> <p>To sustain tenancies by offering a fair and balanced approach to the collection of rental income, and to ensure that early intervention measures are adopted in all instances.</p> <p>Possession action should be used as a last resort, and only where all other methods of intervention have failed.</p> <p>Objectives</p> <p>That there is a robust income management process to ensure that we have a stable and secure Housing Revenue Account to allow us to provide the services to our customers.</p> <p>To prevent rent arrears accruing.</p> <p>To clarify the process for dealing with current tenant arrears.</p>	
Who may be affected by the policy/ decision?	All tenants
How have stakeholders been involved in the development of the policy/ decision? E.g. a consultation exercise	<p>Consultation exercise was undertaken between 1st April 2024 – 30th April 2024 which included:</p> <ul style="list-style-type: none"> • Tenants • Members of the Homes PDG • Citizens Advice Bureau (CAB) • Churches Housing Action Team (CHAT)

Will there be scope for prompt, independent reviews and appeals against decisions arising from the policy/ decision?		MDH reviews its practices as lessons learned when dealing with complaints raised by tenants	
To which part(s) of the Public Sector Equality Duties is the policy/ decision relevant:			
	Yes	No	Details
1. Eliminate unlawful discrimination	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Having a clearly defined policy ensures consistency of approach and ensures that no tenant or resident is treated any more fairly or unfairly than any other.
2. Advance equality of opportunity	<input type="checkbox"/>	<input type="checkbox"/>	
3. Foster good relations between different groups	<input type="checkbox"/>	<input type="checkbox"/>	

Which of the protected characteristics is the policy/ decision relevant to?

Tick and briefly describe any likely equalities impact (positive, negative, or neutral)

Characteristic	Positive	Negative	Neutral	Comments
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Age	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Religion or Belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Pregnancy/ maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Marriage and Civil partnership*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

*Applies only to Employment and the duty to give regard to the elimination of discrimination.

Decision by Corporate Manager to recommend this policy/ decision for an Equality Impact Assessment?

Yes/ No

If the answer is “Yes”, please continue to the Section 2 and complete the Equality Impact Assessment. If the answer is “No”, please give a brief reason here.

EIA Screening Complete

Section 2: Equality Impact Assessment

Evidence and Consultation

What existing sources of information have you gathered to help identify how people covered by the protected characteristics may be affected by this policy/ decision? E.g. consultations, national or local data and/or research, complaints or customer feedback. Please identify any gaps in the available information that might make it difficult to form an opinion about the effect of the policy on different groups.

MDH has a collection of housing related policies. The use of these helps to ensure that service delivery is consistent and fair. These are currently being reviewed with the aim of aligning them more closely with the Regulatory Standards.

Furthermore, there is a regulatory requirement for registered providers of social housing to tailor their services to meet the needs of tenants. MDH collects data on the diversity of tenants and endeavours to tailor services to meet the needs of all tenants and to enable compliance to be monitored.

Where a tenant is considered vulnerable MDH will collaborate closely with them to avoid possession action where possible, and each case will be referred to the Neighbourhood Team Leader Income and/or other support services before any eviction order is sought.

Our electronic housing management system has been programmed to ensure that Officers are prompted to take action in cases where there is unpaid rent, in line with policy and other legislative requirements. The prompts suggest escalating action. Dependent upon circumstances. Officers have been instructed to record all action taken on the system. This ensures that cases are dealt with objectively ensuring that all tenants with housing-related debt are dealt with fairly in an open and transparent way.

Please complete this table for all the Protected Characteristics. If you have identified any negative impacts you will need to consider how these can be justified or where possible mitigated either to reduce or remove them. (Please add rows where needed)

Potential Impacts/ Issues Identified/ Opportunities identified	Mitigation required (action) or Justification	Lead Officer and target completion date	What is the expected outcome from the action?
Sex			
No Impacts/Issues or opportunities identified			
Age			
No Impacts/Issues or opportunities identified			
Disability			
No Impacts/Issues or opportunities identified			
Religion or Belief			
No Impacts/Issues or opportunities identified			
Race			
No Impacts/Issues or opportunities identified			
Sexual Orientation			
No Impacts/Issues or opportunities identified			
Gender Reassignment			

No Impacts/Issues or opportunities identified			
Pregnancy/ maternity			
No Impacts/Issues or opportunities identified			
Marriage and Civil partnership (Applies only to Employment and the duty to give regard to the elimination of discrimination)			
Not applicable			

Please provide details of arrangements to monitor and review the policy/ decision and any mitigating actions or actions to promote equality:

The policy is due for review every 10 years. There were no mitigating actions to be taken to promote equality.

Please state where the EIA will be published (e.g. on the Mid Devon District Council website):

MDH Website

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Equality Impact Assessment Sign off

For completion by Corporate Manager

Are you prepared to agree and sign off the EIA?

☒ **Yes** ☐ **No**

If "No", provide details of why and next steps:

Name: Simon Newcombe

Job Title: Head of Housing and Health

Date: 9th July 2024