

SSA EQUALITY IMPACT AND NEEDS ANALYSIS

Directorate	Housing and Regeneration / Resources
Service Area	Rent Collection
Service/policy/function being assessed	A and B Rent Payments
Which borough (s) does the service/policy apply to	WANDSWORTH
Staff involved	Martina Kane / Kay Willman
Date approved by Policy and Review Manager	03.07.2018
Date submitted to Directors' Board	

SUMMARY

Please summarise the key findings of the EINA.

The changes are not designed to have a direct impact on any group of people from a protected characteristic. However, it is anticipated that some tenants may not understand the changes and may perceive the Council to be charging them more rent, when this is not the case. For instance, tenants may receive a rent arrears letter following the changes, whereas under the old system they would not. This could potentially cause some distress to residents and lead to a significant increase in enquiries to the Rent Collection Service (RCS). To mitigate this, the changes will not be implemented immediately, but at the same time as the new IT system goes live in May 2019. Extensive consultation will be carried out with residents to help them understand these changes and the RCS will directly target those who will be most affected. These changes will have no impact on the terms of their tenancy agreement, as the current terms allow for the collection of rent weekly in advance.

1. Background

The tenancy agreement and tenancy conditions set out that rent and other charges are due on Monday of each week. However, the Rent Collection Service (RCS) currently request tenants make rent payments every two weeks on a Monday, effectively paying one week in advance and one in arrears. These are known as either week 'A' or week 'B'. This process was put into place decades ago for convenience and effective management of collecting rent so that council officers were not overwhelmed with tenants paying cash at the Council's offices at the same time. Also, so that officers collecting rent door to door could cope with their visits. The way rent arrears are calculated and any debts are pursued have been

set to allow for this basis of fortnightly rents.

However, rent and charges payment methods and trends have modernised since this arrangement was implemented and the Council no longer has any tenants paying cash at council offices since their closure in 2009. Also, cash is no longer collected door to door. Tenants can still pay cash, but they now do this via swipe cards, which they can do weekly at their local post office or pay-point outlet. Additionally, tenants can pay their rent and charges in other ways, including: on-line, standing order, direct debit and over the phone to the automated payment service.

The Council is often asked to provide statistical returns at benchmark dates but with half the accounts being due one week and half the following the Council cannot provide comparative figures.

Officers working to rationalise work processes in the new IT system have identified rent and charges collection as an area which could be streamlined. This includes the way in which rents and the arrears escalation policies are set up and working practices going forward. Therefore, it is an appropriate time to consider regularising the way rents and charges are collected and how tenants are asked to pay to properly reflect the legal position in the tenancy agreement and tenancy conditions.

2. Analysis of need and impact

Protected group	Findings																																																																							
Age	<p>Census 2011:</p> <table border="1"> <thead> <tr> <th rowspan="2">2011 Census Table KS102 Age structure</th> <th colspan="3">Wandsworth</th> </tr> <tr> <th>No.</th> <th>%</th> <th>Rank/348 Las</th> </tr> </thead> <tbody> <tr> <td>Age 0 to 4</td> <td>21,670</td> <td>7.1</td> <td>46</td> </tr> <tr> <td>Age 5 to 7</td> <td>9,230</td> <td>3.0</td> <td>286</td> </tr> <tr> <td>Age 8 to 9</td> <td>5,344</td> <td>1.7</td> <td>339</td> </tr> <tr> <td>Age 10 to 14</td> <td>12,521</td> <td>4.1</td> <td>344</td> </tr> <tr> <td>Age 15</td> <td>2,241</td> <td>0.7</td> <td>345</td> </tr> <tr> <td>Age 16 to 17</td> <td>4,621</td> <td>1.5</td> <td>345</td> </tr> <tr> <td>Age 18 to 19</td> <td>5,541</td> <td>1.8</td> <td>344</td> </tr> <tr> <td>Age 20 to 24</td> <td>23,699</td> <td>7.7</td> <td>59</td> </tr> <tr> <td>Age 25 to 29</td> <td>47,217</td> <td>15.4</td> <td>2</td> </tr> <tr> <td>Age 30 to 44</td> <td>93,803</td> <td>30.6</td> <td>1</td> </tr> <tr> <td>Age 45 to 59</td> <td>43,539</td> <td>14.2</td> <td>346</td> </tr> <tr> <td>Age 60 to 64</td> <td>10,658</td> <td>3.5</td> <td>343</td> </tr> <tr> <td>Age 65 to 74</td> <td>14,455</td> <td>4.7</td> <td>343</td> </tr> <tr> <td>Age 75 to 84</td> <td>8,763</td> <td>2.9</td> <td>343</td> </tr> <tr> <td>Age 85 to 89</td> <td>2,355</td> <td>0.8</td> <td>340</td> </tr> <tr> <td>Age 90 and over</td> <td>1,338</td> <td>0.4</td> <td>335</td> </tr> </tbody> </table>	2011 Census Table KS102 Age structure	Wandsworth			No.	%	Rank/348 Las	Age 0 to 4	21,670	7.1	46	Age 5 to 7	9,230	3.0	286	Age 8 to 9	5,344	1.7	339	Age 10 to 14	12,521	4.1	344	Age 15	2,241	0.7	345	Age 16 to 17	4,621	1.5	345	Age 18 to 19	5,541	1.8	344	Age 20 to 24	23,699	7.7	59	Age 25 to 29	47,217	15.4	2	Age 30 to 44	93,803	30.6	1	Age 45 to 59	43,539	14.2	346	Age 60 to 64	10,658	3.5	343	Age 65 to 74	14,455	4.7	343	Age 75 to 84	8,763	2.9	343	Age 85 to 89	2,355	0.8	340	Age 90 and over	1,338	0.4	335
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Pregnancy and maternity	There is no reliable housing data for those tenants who are currently pregnant or on maternity leave.																																			

Race/ethnicity	Census 2011			
	2011 Census Table KS201 Ethnic group	Wandsworth		
		No.	%	Rank/348 Las
	White: English/Welsh/Scottish/Northern Irish/British	163,739	53.3	319
	White: Irish	7,664	2.5	10
	White: Gypsy or Irish Traveller	163	0.1	254
	White: Other White	47,650	15.5	12
	TOTAL White	219,216	71.4	
	Mixed/multiple ethnic group: White and Black Caribbean	4,642	1.5	26
	Mixed/multiple ethnic group: White and Black African	2,034	0.7	23
	Mixed/multiple ethnic group: White and Asian	3,887	1.3	19
	Mixed/multiple ethnic group: Other Mixed	4,678	1.5	15
	TOTAL Mixed/multiple ethnic group	15,241	5.0	
	Asian/Asian British: Indian	8,642	2.8	59
	Asian/Asian British: Pakistani	9,718	3.2	42
	Asian/Asian British: Bangladeshi	1,493	0.5	72
	Asian/Asian British: Chinese	3,715	1.2	36
	Asian/Asian British: Other Asian	9,770	3.2	28
	TOTAL Asian/Asian British	33,338	10.9	
	Black/African/Caribbean/Black British: African	14,818	4.8	24
	Black/African/Caribbean/Black British: Caribbean	12,297	4.0	14
	Black/African/Caribbean/Black British: Other Black	5,641	1.8	15
	TOTAL Black/African/Caribbean/Black British	32,756	10.6	
	Other ethnic group: Arab	2,350	0.8	29
	Other ethnic group: Any other ethnic group	4,094	1.3	26
	TOTAL Other ethnic group	6,444	2.1	
	Total	306,995	100	

Below is a table detailing the ethnicity of the tenants within the social housing stock of Wandsworth. The ethnicity of 25% of tenants is unknown, so analyses can only be done on that data that is available. 39% of tenants are from white ethnic backgrounds, which is considerable lower than the Borough population, where 71% are from white ethnic groups. Nearly 25% of tenants are from black ethnic backgrounds, which is considerable higher than the Borough population of 10.6%, so black tenants will be disproportionately affected by this change. Tenants from Asian backgrounds make up 7.5% of tenants, which is less than the Borough's 10%, so will be less affected by the change.

Table: Wandsworth – Tenant profile		
Number	%	Ethnic Group
81	0.5	ASIAN/ASIAN BRIT BANGLADESHI
157	0.8	ASIAN/ASIAN BRITISH-INDIAN
576	3	ASIAN/ASIAN BRITISH-OTHER
546	2.8	ASIAN/ASIAN BRITISH-PAKISTANI
31	0.1	ARAB
991	5.1	BLACK/BLACK BRITISH-OTHER
1650	8.6	BLACK/BLACK BRITISH-CARIBBEAN
2181	11.2	BLACK/BLACK BRITISH-AFRICAN
71	0.4	CHINESE
237	1.21	MIXED WHITE & BLACK CARIBBEAN
5	0.02	GYPSY/ROMANY/IRISH TRAVELLER
113	0.55	MIXED – OTHER
163	0.9	NOT ASKED
584	3.00	OTHER GROUPS
231	0.2	REFUSED TO DISCLOSE
68	0.5	MIXED WHITE AND BLACK AFRICAN
6282	32.2	WHITE BRITISH
160	0.9	WHITE IRISH
564	2.9	WHITE OTHER
22	0.12	MIXED - WHITE AND ASIAN
4812	25	NOT KNOWN

Religion and belief, including non belief		
Census 2011		
2011 Census Table QS210		
Religion (broad groups)	Wandsworth	
	No.	%
Christian	162,590	53.0
Buddhist	2,574	0.8
Hindu	6,496	2.1
Jewish	1,617	0.5
Muslim (Islam)	24,746	8.1
Sikh	832	0.3
Other religion	1,283	0.4
No religion	82,740	27.0
Religion not stated	24,117	7.9
Total	306,995	100

There is no reliable information for the religion and belief of residents

Sexual orientation	Sexual orientation
	The 2011 census did not have a specific question regarding sexual orientation. Information about applicants' sexual orientation has not been historically collected.

Across groups	Across groups
	From the analysis above you would expected older women from black ethnic backgrounds to be disproportionately affected by this change, compared to the profile of the Borough's population.

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Data gaps.

Data gap(s)	How will this be addressed?
Sexual orientation, religion, disability and gender identity.	The changes will be monitored across all groups and recording of tenants protected characteristics have been improved by the redesign of the online housing application forms.

3. Impact

Protected group	Positive	Negative
Age	<i>None identified</i>	The Council have 8% of tenants aged 60-64, 12% of tenants aged 65-74, 8.5% of tenants aged 75-84, 2% of tenants aged 85-89 and 1.4% of tenants aged 90 and over. Given the older age groups are over represented in our social housing stock, these age groups will be more affected by the changes being implemented than those living across all housing tenures in the borough. It is anticipated that some tenants may not understand the changes and may perceive the Council to be charging them more rent, when this is not the case. For instance, tenants may receive a rent arrears letter following the changes, whereas under the old system they would not. This could potentially cause some distress to residents and lead to a significant increase in enquiries to the Rent Collection Service (RCS). This may be particularly the case for older residents. To mitigate this, the changes will not be implemented immediately, but at the same time as the new IT system goes live in May 2019. Extensive consultation will be carried out with residents to help them understand these changes and the RCS will directly

		target those who will be most affected.
Disability	<i>None identified</i>	No specific negative impact identified but mitigating actions will be implemented as in age section
Gender (sex)	<i>None identified</i>	<p>Females are over represented in our housing stock, with 64.5% of tenant being female compared to 48.5% of the Boroughs population, so will be more affected by the changes than men.</p> <p>It is anticipated that some tenants many not understand the changes and may perceive the Council to be charging them more rent, when this is not the case. For instance, tenants may receive a rent arrears letter following the changes, whereas under the old system they would not. This could potentially cause some distress to residents and lead to a significant increase in enquiries to the Rent Collection Service (RCS). To mitigate this, the changes will not be implemented immediately, but at the same time as the new IT system goes live in May 2019. Extensive consultation will be carried out with residents to help them understand these changes and the RCS will directly target those who will be most affected.</p>
Gender Identity	<i>None identified</i>	No specific negative impact identified but mitigating actions will be implemented as in age section
Marriage and civil partnership	<i>None identified</i>	No specific negative impact identified but mitigating actions will be implemented as in age section
Pregnancy and maternity	<i>None identified</i>	No specific negative impact identified but mitigating actions will be implemented as in age section
Race/ethnicity	<i>None identified</i>	Nearly 25% of tenants are from black ethnic backgrounds, which is

		<p>considerable higher than the Borough population of 10.6%, so black tenants will be disproportionately affected by this change.</p> <p>It is anticipated that some tenants many not understand the changes and may perceive the Council to be charging them more rent, when this is not the case. For instance, tenants may receive a rent arrears letter following the changes, whereas under the old system they would not. This could potentially cause some distress to residents and lead to a significant increase in enquiries to the Rent Collection Service (RCS). To mitigate this, the changes will not be implemented immediately, but at the same time as the new IT system goes live in May 2019. Extensive consultation will be carried out with residents to help them understand these changes and the RCS will directly target those who will be most affected.</p> <p>When we contact residents to notify them of these changes, the letter will be sent on paper that has various common languages spoken in the Borough on the back of it, to ensure that tenants whose first language is not English have the ability to have the document fully translated for them.</p>
<p>Religion and belief, including non belief</p>	<p><i>None identified</i></p>	<p>No specific negative impact identified but mitigating actions will be implemented as in age section</p>
<p>Sexual orientation</p>	<p><i>None identified</i></p>	<p>No specific negative impact identified but mitigating actions will be implemented as in age section</p>

4. Actions

Action	Lead Officer	Deadline
To mitigate any problems caused by these changes, the changes will not be implemented immediately, but at the same time as the new IT system goes live in May 2019. Extensive consultation will be carried out with residents to help them understand these changes and the RCS will directly target those who will be most affected.	Terry Dunklin – Head of Rent Collecting and Accounting	

5. Consultation. (optional section– as appropriate)

The changes proposed will be detailed at the Borough Residents Forum (BRF) and the Area Housing Panel's in July 2018.

Extensive communication will be undertaken with residents through letters, announcements on the Council's website, social media, Residents Associations (RA) meetings, the AHP's general contact through the RCS and by directly targeting tenants who are affected the most.