

Equality Impact Assessment [version 2.9]



Title: Rental Income and Arrears Policy	
<input checked="" type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input checked="" type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Growth and Regeneration	Lead Officer name: Mark Kempt
Service Area: Income Management	Lead Officer role: Income and Leasehold Manager

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

A policy (Rental Income and Arrears Management Policy) outlining Bristol City Council's intent to collect rent and the conditions that are attached to that as set out in the tenancy agreements, was written and subsequently agreed in June 2020, with an agreed accompanying EqIA.

Procedures that support the policy state that officers should familiarise themselves with the EqIA to ensure that they are able to offer support that might be specific for those groups who are most likely to go into arrears.

The aims and objectives of the policy are to:

- To maximise income collection and ensure effective management of rent collection.
- To minimise arrears through early intervention, advice and support that helps residents maintain their tenancy and avoid eviction.
- To provide a clear framework for staff of their responsibilities for rental income management and arrears recovery.
- To ensure we advise and support residents to maximise the use of housing related benefits prior to using any enforcement proceedings.
- To explain the responsibility of residents regarding paying rent, charges related to the property and arrears, and how and where those payments can be made.
- To communicate with residents by all means available and in accessible language to help them manage their debts.
- To refer tenants and residents to third party advice agencies for independent support and advice including referrals to Housing Related Support for those residents identified as 'vulnerable'. (Vulnerable Tenants Policy)
- To afford residents every opportunity to fulfil their obligations in terms of repaying arrears before taking initial or escalating existing enforcement action.

1.2 Who will the proposal have the potential to affect?

<input checked="" type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: <https://www.bristol.gov.uk/people-communities/measuring-equalities-success>.

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment Form](#)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
BCC Report Viewer / Tenants and Leaseholders / All tenants, residents, and leaseholders	<ul style="list-style-type: none"> 19.14% of residents are Black, Asian and minority ethnicity. Over half are women. (60%) Most BCC residents are aged 25-74, with a high proportion aged 45-54. 27% of residents are disabled people. The three most recorded impairment categories are 'long term illness', 'mental distress', and 'mobility impairment' 29% of BCC residents are Christian and 8% are Muslim

	<ul style="list-style-type: none"> 3% of BCC residents report that they require assistance for written and or spoken English 																																												
Internal Team – Moving Forward Together shared data from March 2021.	<table border="1"> <thead> <tr> <th></th> <th>Bristol</th> <th>Tenants</th> <th>Housing and Landlord Services Teams</th> </tr> </thead> <tbody> <tr> <td>Black, Asian and Minority Ethnicity</td> <td>16%</td> <td>19%</td> <td>11%</td> </tr> <tr> <td>Female</td> <td>50%</td> <td>61%</td> <td>37%</td> </tr> <tr> <td>Male</td> <td>50%</td> <td>38%</td> <td>63%</td> </tr> <tr> <td>Disabled people</td> <td>8%</td> <td>28%</td> <td>9%</td> </tr> <tr> <td>Lesbian, Gay and Bisexual</td> <td>9%</td> <td>1%</td> <td>4%</td> </tr> <tr> <td>Trans</td> <td>No data</td> <td>No data</td> <td>0</td> </tr> <tr> <td>Age 16 – 24</td> <td>16%</td> <td>2%</td> <td>5%</td> </tr> <tr> <td>Age 25 – 49</td> <td>39%</td> <td>15%* (25-44)</td> <td>28%</td> </tr> <tr> <td>Age 50-64</td> <td>14%</td> <td>37%</td> <td>37%</td> </tr> <tr> <td>Age 65+</td> <td>13%</td> <td>3%</td> <td>3%</td> </tr> </tbody> </table>		Bristol	Tenants	Housing and Landlord Services Teams	Black, Asian and Minority Ethnicity	16%	19%	11%	Female	50%	61%	37%	Male	50%	38%	63%	Disabled people	8%	28%	9%	Lesbian, Gay and Bisexual	9%	1%	4%	Trans	No data	No data	0	Age 16 – 24	16%	2%	5%	Age 25 – 49	39%	15%* (25-44)	28%	Age 50-64	14%	37%	37%	Age 65+	13%	3%	3%
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BCC report viewer rent arrears specific	<ul style="list-style-type: none"> Black Asian and minority ethnic tenants have higher than average arrears in every band, and lower than average in the zero balance or credit categories. Muslim residents are overrepresented in majority of arrears bands. <table border="1"> <thead> <tr> <th></th> <th>Credit</th> <th>Zero</th> <th>£0-50</th> <th>£50-100</th> <th>£100-250</th> <th>£250-500</th> <th>£500-1000</th> <th>£1000-2500</th> <th>>£2500</th> </tr> </thead> <tbody> <tr> <td>Black Asian & minority Ethnic %</td> <td>36.55</td> <td>13.98</td> <td>6.22</td> <td>4.99</td> <td>10.05</td> <td>10.56</td> <td>7.08</td> <td>7.11</td> <td>3.45</td> </tr> <tr> <td>Muslim %</td> <td>35.58</td> <td>12.83</td> <td>6.81</td> <td>5.88</td> <td>10.46</td> <td>11.47</td> <td>7.27</td> <td>6.74</td> <td>2.97</td> </tr> <tr> <td>Av.%</td> <td>41.08</td> <td>17.52</td> <td>5.46</td> <td>4.96</td> <td>8.05</td> <td>7.92</td> <td>6.01</td> <td>6.04</td> <td>2.96</td> </tr> </tbody> </table> <ul style="list-style-type: none"> Men and women are fairly evenly represented in terms of the average arrears – however women are marginally more likely to owe arrears than men and more likely to owe higher amounts. (this could be accounted for by the fact that more tenants are women e.g. 6.58% women compared to 4.98% owe between £500-£1k. Gay men are more likely to have arrears of £100-250 at 10.24 compared to the average 8.05%. Gay/Lesbian women are less likely to be in arrears until the top bracket of over £2500 at 3.23% compared with the average 2.96%. People with a known disability less likely to be in credit but also less likely to be in arrears in every band 		Credit	Zero	£0-50	£50-100	£100-250	£250-500	£500-1000	£1000-2500	>£2500	Black Asian & minority Ethnic %	36.55	13.98	6.22	4.99	10.05	10.56	7.08	7.11	3.45	Muslim %	35.58	12.83	6.81	5.88	10.46	11.47	7.27	6.74	2.97	Av.%	41.08	17.52	5.46	4.96	8.05	7.92	6.01	6.04	2.96				
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Quality of Life in Bristol Survey	<table border="1"> <thead> <tr> <th>Quality of Life Indicator</th> <th>% who find it difficult to manage financially</th> </tr> </thead> <tbody> <tr> <td>16 to 24 years</td> <td>13.8</td> </tr> <tr> <td>50 years and older</td> <td>5.5</td> </tr> <tr> <td>65 years and older</td> <td>3.7</td> </tr> <tr> <td>Female</td> <td>7.6</td> </tr> <tr> <td>Male</td> <td>5.9</td> </tr> <tr> <td>Disabled</td> <td>16.0</td> </tr> </tbody> </table>	Quality of Life Indicator	% who find it difficult to manage financially	16 to 24 years	13.8	50 years and older	5.5	65 years and older	3.7	Female	7.6	Male	5.9	Disabled	16.0																														
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Black Asian & Minority Ethnic	12.3
White Minority Ethnic	7.5
White British	6.0
Asian/Asian British	8.3
Black/Black British	23.7
Mixed Ethnicity	9.8
White	6.2
Lesbian Gay or Bisexual	11.5
No Religion or Faith	6.3
Christian Religion	5.7
Other Religions	23.3
Carer	8.9
Full Time Carer	16.9
Part Time Carer	6.3
Single Parent	22.7
Two Parent	5.8
Parent (all)	7.8
No Qualifications	10.3
Non-Degree Qualified	9.9
Degree Qualified	5.1
Rented (Council)	20.4
Rented (HA)	19.6
Rented (Private)	11.5
Owner Occupier	3.4
Most Deprived 10%	15.8
Bristol Average	6.8

Additional comments:

Research looking at national statistics suggested that disabled people and lone parents (majority of which are women) are more likely to be indebted. However, conclusive data looking at the relationship with debt and the other protected characteristics is not available. We are not able to establish a conclusive correlation between debt and gender reassignment, marriage and civil partnership, pregnancy and maternity, religion or belief, and sexual orientation.

2.2 Do you currently monitor relevant activity by the following protected characteristics?

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Age | <input checked="" type="checkbox"/> Disability | <input type="checkbox"/> Gender Reassignment |
| <input type="checkbox"/> Marriage and Civil Partnership | <input type="checkbox"/> Pregnancy/Maternity | <input checked="" type="checkbox"/> Race |
| <input checked="" type="checkbox"/> Religion or Belief | <input checked="" type="checkbox"/> Sex | <input checked="" type="checkbox"/> Sexual Orientation |

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

We know that there are gaps in our diversity data for some protected characteristics citywide, especially where this has not historically been included in census and statutory reporting. We also know there are some gaps in our organisational diversity information - especially where personal and confidential information is voluntarily requested from staff. For example, only 1% of BCC residents have disclosed in diversity monitoring that they are Lesbian, Gay or Bisexual – however there is a high level of underreporting. We have additional data on Nationality, Ethnicity, Language & Self-certified disability.

Bristol City Council tenant profile information may not be reliable. A tenancy audit is completed by BCC approximated every 5 years during the life of a tenancy, however equalities data is given voluntarily with a “prefer not to say” option. Bristol City Council may not be advised of changes in personal circumstance between audits, and it is not always possible to carry out a new tenancy audits immediately at the start of a new tenancy. Information about Leaseholders and/or their tenants may not be available. An updated tenancy audit policy and related processes is currently being produced.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol’s diverse communities. See <https://www.bristol.gov.uk/people-communities/equalities-groups>.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing change or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

The policy was due for cyclical review June 2020, however in the later part of 2021, newly elected Cllr Tom Renhard and Director Donald Graham reviewed the policy, making some additions.

The changes to the policy are limited in scope to:

- The addition of Strategic Context Section.
- Re-wording and additions to Policy Statement to include further references to early intervention.

The policy will now be presented to Cabinet for approval. Jan 2022.

This is an updated version of an existing policy. The changes to the policy do not change the principles of rent collection or arrears enforcement, neither do they impact the resident’s experience.

We did not seek resident’s views on the changes to this policy.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

The Equality Action Plan 2020-21 for Housing and Landlord Services says:

Tenants participating in engagement and involvement methods are not representative of our tenant profile. We will review and update tenant involvement models making sure they are more representative. This work is underway via the Moving Forward Together Programme.

The Rental Income and Arrears Management Policy relies on the contractual relationship between the landlord and the tenant(s) via the tenancy agreement. A review of the Tenancy Agreement with tenant consultation is planned from April 2022.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above, and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)

No significant negative impacts have been identified from the changes to the existing policy.

Being in debt is more than just having to pay money back. The financial burden causes a person to delay life plans, creates stress that affects their overall health, and impacts detrimentally on the whole family.

All tenants are affected as all tenants are expected to pay rent as per their tenancy agreement.

The policy emphasises the Councils' need to support tenants to pay their rent and take preventative action to stop a person from going into debt because of non-payment of rent. The policy balances this against the need to collect rent and pay that income forward into housing services and the impact high arrears can have on what can be offered.

The policy clearly sets out the council's responsibility in keeping the tenant informed of their rent arrears if relevant and action that is being taken. Correspondence with tenants takes into consideration any additional needs such as language or accessible formats for letters and contact.

There is provision within the policy for decisions to be made considering a tenant's individual circumstances.

Procedures that support the policy state that officers should familiarise themselves with the EqIA to ensure that they are able to offer support that might be specific for those groups who are most likely to go into arrears. Further procedures include a requirement to carry out a tenant information form that ensures the tenants individual circumstances are taken into consideration when working out how best to support a person to be able to make payments. This includes referrals to internal and external agencies specific to the person's needs that will include some services that offer targeted support to people with protected characteristics.

Because this effects on tenants is debt, much of the mitigations are the same – to offer support, advice, and signpost – procedures take this into account. Other resources are sited below.

[Housing - Bristol Mental Health](#)

[Help with debt - Citizens Advice](#)

PROTECTED CHARACTERISTICS

Age: Young People

Does your analysis indicate a disproportionate impact? Yes No

Potential impacts:

Younger tenants are more likely to go have rent arrears and according to the Bristol Quality of Life Survey more likely to find it difficult to manage financially.

Mitigations:	<p>When contacting a resident between ages of 16 and 24 about their arrears to ensure a tenant information form is completed to discover what areas of their lives might be affecting their ability to pay and offer support, referrals.</p> <p>A useful source of information or to signpost tenants to is to Citizen's Advice - Help with debt - Citizens Advice</p>
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	People over 64 are less likely to be in rent arrears.
Mitigations:	We will offer support, advice, and signpost tenants. Some age specific information and advice can be found at Age UK - Debt advice Age UK
Disability	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<p>We do not have reliable data for our tenants relating to their disability, it is self-assigned and may be out of date, changed over time etc.</p> <p>Based on the information we do have, amongst our tenants, those who identify as having a disability are not disproportionately affected by rent arrears.</p> <p>However nationally we know that people with a disability are more likely to be in debt.</p> <p>People with neurological differences including Dyspraxia, Dyslexia, ADHD, Dyscalculia, Autism, or Tourette Syndrome etc. may require adjustments in the way we engage and communicate with people.</p>
Mitigations:	<p>When contacting a tenant who is known to have a disability or it emerges during the contact that they have a disability, action should be taken to ensure that our records are up to date with details of the disability but also the impacts that the person might be experiencing. Offer support and referral as appropriate.</p> <p>We will make reasonable adjustments for disabled people through our communications, such as making sure that communication is clear, concise, and unambiguous; setting out timescales to give sufficient advance notice; or managing any known issues around anxiety or sensory sensitivities for face-to-face meetings.</p> <p>There is further information about the challenges that may be faced by our disabled residents here - Disability residents and isolation</p>
Sex	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Women are more likely to be in rent arrears and nationally lone parents (who are more likely to be women) are more likely to be in debt. Similarly in Bristol Quality of Life survey shows single parents are more likely to have difficulty with finances.
Mitigations:	<p>We will offer support, advice, and signpost tenants. There are some specific challenges faced by women in debt and some further information can be gained from this organisation's web pages – How Women Are Affected By Debt - StepChange</p> <p>A useful source of information or to signpost tenants to is to Citizen's Advice - Help with debt Housing - Bristol Mental Health Help with debt - Citizens Advice</p>
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Lesbian, Gay and Bisexual people are more likely to find it difficult to manage financially.

Mitigations:	We will follow procedures to offer support including completion of the tenant information form Read up on LGBT layout (housingdiversitynetwork.co.uk) A useful source of information or to signpost tenants to is to Citizen's Advice - Help with debt - Citizens Advice Housing - Bristol Mental Health
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	As above under heading 'sex' lone parents are more likely to have debt.
Mitigations:	See above mitigations under 'sex'
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	No impacts identified, but there may be similarities with the above – Sexual Orientation
Mitigations:	See above mitigations 'Sexual Orientation'
Race	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Black, Minority and Ethnic tenants are more likely to be in arrears. According to Bristol Quality of Life Survey they are also more likely to have difficulty financially, Black/Black British being much higher at 23.7% of those asked compared to the average 6.8%.
Mitigations:	We will follow procedures and offer support including completion of the tenant information form. We will offer support, advice, and signpost tenants, the following resources may be useful. Housing - Bristol Mental Health Help with debt - Citizens Advice
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Tenants who are Muslim are more likely to have rent arrears.
Mitigations:	We will follow procedures and offer support including completion of the tenant information form. We will offer support, advice, and signpost tenants, the following resources may be useful. Housing - Bristol Mental Health Help with debt - Citizens Advice
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	No impacts identified
Mitigations:	NA
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Much of our housing stock is in the most deprived areas of Bristol and BCC residents are more likely to be impacted by socio-economic factors. The deprivation gap in Bristol shows a difference of 14.8% for those with below average mental wellbeing between the most and least deprived.

Mitigations:	We will follow procedures and offer support including completion of the tenant information form. We will offer support, advice, and signpost tenants, the following resources may be useful. Housing - Bristol Mental Health Help with debt - Citizens Advice
Carers	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	16.9% of full-time carers in the Bristol Quality of Life Survey stated that they had difficulty financially compared to the average 6.8%. It can be reasoned that our tenants who are also full-time carers may be more likely to have rent arrears.
Mitigations:	We will follow procedures and offer support including completion of the tenant information form. We will offer support, advice, and signpost tenants, the following resources may be useful. Housing - Bristol Mental Health Help with debt - Citizens Advice
Other groups [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Looked after Children / Care Leavers; Homelessness]	
Potential impacts:	Some Asylum Seekers and Refugees for whom English is an additional language may have difficulty understanding written information about their rent or arrears.
Mitigations:	There is a commitment in the policy to inform residents of their responsibilities using a variety of methods and actions within procedures to ensure that when contact is made to check the residents' preferred method of communication.

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

By clearly setting out the council's rationale for rent recovery in policy there is an opportunity to address existing debt inequality for tenants on the basis of their protected characteristics.

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:

The continued use of the policy does not negatively impact tenants - the policy aim to address known issues for equalities groups

There is evidence that some groups are disproportionately affected by rent arrears, which was found by the initial assessment. The changes to the policy do not have a further positive or negative effect.

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

The policy will promote equality of opportunity through clear procedures that ensure each tenant's circumstances are taken into consideration and action is taken to support them to reduce their rental income arrears.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Publish the policy and related procedures in the Housing Information Resource (HIR) where it is easily accessible for Income Officers.	Policy Officer	Following Sign Off
Publish the EqIA in the HIR accessible for officers to refer to should they need to access links to support for referrals	Policy Officer	Following Sign Off
Ensure that the tenant information form remains a requirement of the work with tenants to discuss their individual needs including those linked to protected characteristics.	Policy Officer	Following Sign Off

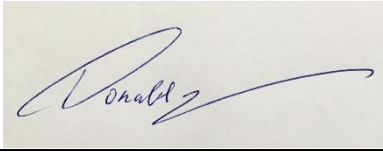
4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

This policy will be reviewed and updated every two years, in an ongoing review cycle process. Individual Policy EqIA Statements will be updated at policy review stage following the cycle of review.

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the [Equality and Inclusion Team](#) before requesting sign off from your Director¹.

Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i>	Director Sign-Off: Donald Graham, Director Housing and Landlord Services 
Date: 24/1/2022	Date: 27/01/2022

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.