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| **London Borough of Lambeth****Initial Equality Impact Assessment Report** |
|  **Date** | 23 March 2015 |
| **Sign-off path for EIA** (please add/delete as applicable) | Corporate EIA Panel  |
| **Title of Project, business area, policy/strategy** | Revisions to the council’s Income and Debt Recovery Strategy |
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| **London Borough of Lambeth** **Initial Equality Impact Assessment Report** |
| **1.0 Introduction** |
| **1.1 Business activity aims and intentions** | The council has reviewed and revised its corporate Income and Debt Recovery Strategy and a new strategy is being presented to Cabinet for sign off in April 2015. This strategy sets out how the council will manage income collection and debt recovery and commits the council to key principles/activity around preventing and tackling debt and maximising income with a particular focus on vulnerable debtors. The strategy has strong links with the council’s Financial Resilience Strategy with much of the review being informed by scoping and co-production work undertaken through the financial resilience work stream. The strategy contributes strongly to the Corporate Plan outcome around improving financial security. The income collected by the council pays for core services so balancing the need to maximise collection/enforce debt and support those who genuinely cannot pay is critical.The key changes within the new version of the strategy are as follows:* We guarantee that when enforcing any Council Tax debt we will not send residents from our Income and Debt Strategy Protected Groups for bailiff action. Our Income and Debt Strategy protected group includes - carers, those affected by the benefit cap, war widow[er]s, disabled people, pensioners, those affected by the bedroom tax, those receiving DHP and those receiving local welfare assistance.
* Bailiffs will be considered as a last resort for all other CTS recipients once all other enforcement and support options have been considered/attempted.
* A commitment to reach out to those receiving a court summons for council tax debt at or before Final Notice stage and make a pro-active offer of debt support, with the summons (and any associated charges) cancelled if that debt support is taken up
* Ensuring that vulnerable debtors are flagged on the system so that enforcement action can be tailored accordingly and support offered where appropriate. A definition of vulnerability is included in appendix E of the Income and Debt Manual.
* Establishment of a local debt forum of relevant agencies and interested citizens and businesses to keep the strategy and related activity under review
* More flexible payment methods and more options/encouragement to pay in advance
* Clearer letters and bills and online billing and payments achieved through mylambeth
* All bills and arrears statements to include details of how to get advice through the CAB
* Pre eviction panels for LL tenants in rent arrears who are in the Income and Debt Strategy Protected Groups category. The panel will ensure that all efforts have been made to support the resident in their tenancy to ensure that eviction is only ever a final resort.

The data available to inform this impact assessment is limited. The information collected by Lambeth Living in respect of rent arrears is limited in equalities terms and provides only a partial picture. The information collected in respect of leaseholder charges and debts and parking debts is similarly incomplete and the data recorded by Revenues and Benefits and Capita in respect of council tax debt and overpayments also does not allow a full equality impact to be undertaken. This EIA should therefore be considered an initial and first stage impact assessment.The work set out in the strategy about joining up and improving data systems and providing for a more systematic recording of vulnerability should improve things and allow a more complete picture to develop over time. Though, of course, much of the debt that households owe – which impacts on their ability to meet their obligations to the council – does not originate with us as it relates to utilities, store card, payday loans, mortgage, loan, overdraft and other forms of debt which we do not have access to information about.National reports have been considered as part of this assessment including:* London in the Red, Step Change Debt Charity, May 2012
* Changing Household Budgets, Money Advice Service, June 2014
* London’s Poverty Profile, NPI, October 2013

However, while interesting, these reports do not contact enough specific information to enable us to inform the EIA in a meaningful sense. As part of the process of developing the council’s Financial Resilience Strategy, ethnographic research was undertaken with 8 low income households. This data is rich in terms of what it tells us about attitudes to spending and money management and how residents might prefer to get support around debt, benefits and budgeting but it is not a large enough sample to draw any equalities inferences. In 2014, Lambeth advice agencies interviewed a random sample of 100 of the 542 individuals who owed the council the most money across the areas of council tax and rent (known as “multiple debtors”). These interviews concentrated on examining attitudes about debt, debt support and how the council’s processes around income and debt management were experienced rather than collating demographic information. However, they provide information which supports many of the changes set out above as debtors reported feeling confused about how to get advice, concerned about the lack of joined up working on behalf of council services seeking to collect debt and an unwillingness on the part of those collecting debt to consider their vulnerability/ability to pay and adapt their approach accordingly.Lambeth Living have provided information from Jan 2015 on tenants who owe more than £600 in rent arrears (2,903 tenants out of 23,613 – around 12%) and this data has been used in this assessment.Revs and Bens have provided data on council tax debtors and recipients of CT support and this data has also been used in this assessment.To support vulnerable debtors a number of actions and preventions already take place in Lambeth and an overview of these services is included below to provide context for this EIA:**Council Tax Summons Project** : We use an independent debt charity to try and engage with all residents that have received a final notice for their Council Tax debt, with the offer of wiping their court costs if they engage with the offer of debt support. **Multiple debtors pilot project:** We continue to seek out and offer pro-active support to multiple debtors. This is a cohort that is made up of individuals that often owe the council a considerable sum of money in more than one area of debt and who are struggling to the point that they can no longer cope. We use independent debt charities to make contact and offer support to maximise take up and use any feedback given by debtors to refine our practice.**Social Care Debtor Home Visits**: Where social care clients are identified as likely enforcement cases due to non-payment of social care charges, a home visit has been introduced to the recovery process, jointly made with a Social Worker and Solicitor acting for the Council. This allows the council to take account of individual circumstances and ensures clients understand precisely why they have to pay the care charges and the potential consequences for non-payment. The aim of the visit is to engage with the client and try and reach amicable solutions which will prevent the Council from taking more aggressive forms of enforcement.**Bank Account take up project:** The council funds a local charity to work with High Street banks and the local Credit Union on a project to encourage and support those using Post Office Card Accounts to take up a new bank account ahead of the introduction of Universal Credit. It has been successful in supporting hundreds of residents across Lambeth to get new accounts, including vulnerable residents using day centres, hostels, Children’s Centres and food banks. After opening accounts, residents are supported as needed to set up wage/benefit payments into the account and then to set up direct debits for bills and charges. The project contributes to the council maximising its income while also supporting residents to become less financially excluded.**Money Champions:** a local charity is being funded to deliver a project to increase people’s confidence to talk about money worries and encourage them to seek help if they need it. They will recruit and train hundreds of local Money Champions who live or work in Lambeth who will be able to talk to people about money and direct them to the local services that they might need to help with debt, work or benefits.**One Lambeth Advice:** The council funds the Citizens Advice Bureau (CAB) to run the One Lambeth Advice service which provides a Freephone advice line and independent volunteer Advice Guides at a range of community locations across the borough. Acting as a visible support service, that is separate from the Council, they help people in debt find the support they need on the internet or by phone and can facilitate access to a debt caseworker from one of our advice agencies as needed.**Simplifying Council Tax Bills:** We have tested different styles and layouts of bills with customers to understand how we can present information on bills more simply and in a way that encourages residents to respond. **Use of Mixed Media:** We send SMS text messages alongside letters for final notices and reminders. These extra and more informal reminders have increased levels of Council Tax payment. We also include information about how to get debt advice via One Lambeth Advice on all rent statements and council tax bills. |
| **2.0 Analysing your equalities evidence** |
| **2.1 Evidence**  |
| **Protected characteristics and local equality characteristics** | **Impact analysis** |
| **Race** | Unknown Lambeth Living data from Jan 2015 shows that there are 2,903 tenants who owe more than £600 in rent arrears. This equates to 12% of the total LL tenant population. The breakdown in terms of race is as follows:

|  |  |  |
| --- | --- | --- |
|  | Number  | % in arrears (of all tenants of this race) |
| Black  | 1,801 | 17% |
| Asian | 55 | 9% |
| Chinese/Vietnamese | 162 | 10% |
| White | 618 | 18% |
| Mixed | 91 | 8% |
| Unknown | 176 | n/a |

 . The new efforts to provide Income and Debt Strategy Protected Groups (defined in 1.1) with more support prior to eviction proceedings (pre-eviction panels) is likely to be positive for those groups who are disproportionately in arrears but we cannot be conclusive about this as we cannot cross reference the data on the race of LL tenants in arrears against the Protected Group categories.Two thirds of all Lambeth Advice Network clients are from a BME background. It is not possible to ascertain what proportion of these clients come forward with a debt, housing or benefits need (or a combination) but the high numbers suggest that improved debt support/processes are likely to be beneficial for this group. The racial breakdown for recipients of Council Tax Support (CTS) (who will receive additional protection from bailiff action) is not very complete. The breakdown from the available data is as follows:Asian – 2%Black Caribbean – 10%Black African – 9%White - 5%Chinese – 1%Mixed – 3%Other – 13%Not recorded/refused – 55%Data is not collected in this area for council tax payers who do not qualify for Council Tax Support so we cannot look at the demographics for debtors in this respect.The measures in the strategy which relate to improving the accessibility of advice, pro-actively reaching out to council tax debtors and council staff working in a more joined up way when collecting/writing off debt are likely to be positive for all equalities’ groups. |
| **Gender** | UnknownThe breakdown of CTS recipients according to gender is as follows:Male – 39%Female – 61%Women will therefore be more likely to benefit from the extra protection from bailiff action afforded by the strategy.Lambeth Living data from Jan 2015 shows that there are 2,903 tenants who owe more than £600 in rent arrears. This equates to 12% of the total LL tenant population. The breakdown in terms of gender is as follows:

|  |  |  |  |
| --- | --- | --- | --- |
|  | Number  | % of 2,903 tenants in arrears | % in arrears (of all tenants of this gender) |
| Female | 1,895 | 65% | 13% |
| Male | 1,007 | 35% | 12% |
| Unknown | 1 | 0% | n/a |

 This shows that female and male tenants are equally likely to be in arrears and at a level that matches the average for the tenant group as a whole.The new commitment to provide Protected Groups with more support prior to eviction proceedings (pre-eviction panels) is likely to be positive for all tenants in arrears but we cannot be conclusive about this as we cannot cross reference the data on the gender of LL tenants in arrears against the Protected Group categories. We know that carers and those affected by the benefit cap are more likely to be female but these numbers are small within the overall protected cohort.Two thirds of all Lambeth Advice Network clients are female. It is not possible to ascertain what proportion of these clients come forward with a debt, housing or benefits need (or a combination) but the high numbers suggest that improved debt support/processes are likely to be beneficial for this group. Data is not collected in this area for council tax payers who do not qualify for Council Tax Support so we cannot look at the demographics for debtors in this respect.The measures in the strategy which relate to improving the accessibility of advice, pro-actively reaching out to council tax debtors and council staff working in a more joined up way when collecting/writing off debt are likely to be positive for all equalities’ groups. |
| **Gender re-assignment** | UnknownWe do not have data which allows us to assess the impact for those residents undergoing gender reassignment. LL records this but has a very incomplete dataset with the status unrecorded in 2,779 out of 2,903 cases. The CTS database does not record details around this protected characteristic.Data is not collected in this area for council tax payers who do not qualify for Council Tax Support so we cannot look at the demographics for debtors in this respect.The measures in the strategy which relate to improving the accessibility of advice, pro-actively reaching out to council tax debtors and council staff working in a more joined up way when collecting/writing off debt are likely to be positive for all equalities’ groups. |
| **Disability** | UnknownWe do not have the data we need to allow us to assess the impact for residents according to their disability. LL records this but has a very incomplete dataset with health status mixed in with disabilities and a vulnerability status that is drawn much more widely in accordance with a local vulnerability policy. A disability, health or vulnerability need is only recorded in 134 out of the 2,903 cases of tenants in arrears of more than £600. A record of disability benefits cross referenced to arrears is not kept as DLA/PIP are benefits which do not affect HB/CTS entitlement and the tenant is therefore not obligated to report them.One third of all Lambeth Advice Network clients have a health or disability need. It is not possible to ascertain what proportion of these clients come forward with a debt, housing or benefits need (or a combination) but the high numbers suggest that improved debt support/processes are likely to be beneficial for this group. The CTS database records exemption from cuts to CTS according to whether a disability premium is paid to the household and 17% of households receive full CTS in accordance with this. We cannot conclude though that this means that 83% of CTS recipients are not disabled – they may be but they may have an exemption from the cuts to CTS under another category (eg: ben cap, age, carer).Data is not collected in this area for council tax payers who do not qualify for Council Tax Support so we cannot look at the demographics for debtors in this respect.The measures in the strategy which relate to improving the accessibility of advice, pro-actively reaching out to council tax debtors and council staff working in a more joined up way when collecting/writing off debt are likely to be positive for all equalities’ groups. |
| **Age** | UnknownLambeth Living data from Jan 2015 shows that there are 2,903 tenants who owe more than £600 in rent arrears. This equates to 12% of the total LL tenant population. The breakdown in terms of age is as follows:

|  |  |  |  |
| --- | --- | --- | --- |
|  | Number  | % of 2,903 tenants in arrears | % in arrears (of all tenants of this age) |
| Under 25 | 141 | 5% | 26% |
| 25-44 | 1,348 | 46% | 18% |
| 45-64 | 1,252 | 43% | 12% |
| Over 65 | 158 | 5% | 3% |
| Unknown | 4 | 0% | n/a |

 This shows that younger tenants (especially those under 25) are disproportionately likely to be in arrears. Older tenants (over 65) are four times less likely than the average to be in arrears. The new commitment to provide Income and Debt Strategy Protected Groups with more support prior to eviction proceedings (pre-eviction panels) is likely to be positive for all tenants in arrears but we cannot be conclusive about this as we cannot cross reference the data on the age of LL tenants in arrears against the Protected Group categories. We know that pensioners are specifically protected but the numbers getting into difficulty are relatively small. Finding a way of increasing the take up of debt support amongst under 25s is a specific policy challenge which is being attempted to be met by the FACE project funded by the Big Lottery with limited success.2% of CTS recipients are under 25, 34% are considered of state pension age (between 61-68)and 66% are listed as being of working age. The protection from bailiff action for CTS recipients will benefit these age groups in these proportions. Elderly people get more protection but are less likely to be in arrears.10% of all Lambeth Advice Network clients are over 65. It is not possible to ascertain what proportion of these clients come forward with a debt, housing or benefits need (or a combination) but the relatively high numbers suggest that improved debt support/processes are likely to be beneficial for this group.Data is not collected in this area for council tax payers who do not qualify for Council Tax Support so we cannot look at the demographics for debtors in this respect.The measures in the strategy which relate to improving the accessibility of advice, pro-actively reaching out to council tax debtors and council staff working in a more joined up way when collecting/writing off debt are likely to be positive for all equalities’ groups. |
| **Sexual orientation** | UnknownWe do not have data which allows us to assess the impact for those residents according to their sexuality. LL records this but has a very incomplete dataset with the status unrecorded in 2,573 out of 2,903 cases.The CTS database does not record details around this protected characteristic.Data is not collected in this area for council tax payers who do not qualify for Council Tax Support so we cannot look at the demographics for debtors in this respect.The measures in the strategy which relate to improving the accessibility of advice, pro-actively reaching out to council tax debtors and council staff working in a more joined up way when collecting/writing off debt are likely to be positive for all equalities’ groups. |
| **Religion and belief** | UnknownWe do not have data which allows us to assess the impact for those residents according to their religious beliefs. LL records this but has a very incomplete dataset with the status recorded in only 19% of cases (551 out of 2,903 cases).Data is not collected in this area for council tax payers who do not qualify for Council Tax Support so we cannot look at the demographics for debtors in this respect.The CTS database does not record details around this protected characteristic. |
| **Pregnancy and maternity** | UnknownWe do not have any data that pertains to this.The measures in the strategy which relate to improving the accessibility of advice, pro-actively reaching out to council tax debtors and council staff working in a more joined up way when collecting/writing off debt are likely to be positive for all equalities’ groups.Data is not collected in this area for council tax payers who do not qualify for Council Tax Support so we cannot look at the demographics for debtors in this respect.The CTS database does not record details around this protected characteristic. |
| **Marriage and civil partnership** | UnknownWe do not have any data that pertains to this.The measures in the strategy which relate to improving the accessibility of advice, pro-actively reaching out to council tax debtors and council staff working in a more joined up way when collecting/writing off debt are likely to be positive for all equalities’ groups.Data is not collected in this area for council tax payers who do not qualify for Council Tax Support so we cannot look at the demographics for debtors in this respect.The CTS database does not record details around this protected characteristic. |
| **Socio-economic factors** | Unknown/PositiveWe do not have any specific data that pertains to this. Neither the LL nor the CTS database does not record details around this protected characteristic. However, debtors are more likely to be in lower socio economic groups and the measures in the strategy which relate to improving the accessibility of advice, pro-actively reaching out to council tax debtors and council staff working in a more joined up way when collecting/writing off debt are likely to be positive for this group.Data is not collected in this area for council tax payers who do not qualify for Council Tax Support so we cannot look at the demographics for debtors in this respect. |
| **Language** | UnknownWe do not have any data that pertains to this.The CTS database does not record details around this protected characteristic.Data is not collected in this area for council tax payers who do not qualify for Council Tax Support so we cannot look at the demographics for debtors in this respect.The measures in the strategy which relate to improving the accessibility of advice, pro-actively reaching out to council tax debtors and council staff working in a more joined up way when collecting/writing off debt are likely to be positive for all equalities’ groups. |
| **Health** | UnknownWe do not have the data we need to allow us to assess the impact for residents according to their health. LL records this but has a very incomplete dataset with health status mixed in with a vulnerability status that is drawn much more widely in accordance with a local vulnerability policy. A health or vulnerability need is only recorded in 134 out of the 2,903 cases of tenants in arrears of more than £600. A record of disability benefits cross referenced to arrears is not kept as DLA/PIP are benefits which do not affect HB/CTS entitlement and the tenant is therefore not obligated to report them.The CTS database does not record details around this protected characteristic.One third of all Lambeth Advice Network clients have a health or disability need. It is not possible to ascertain what proportion of these clients come forward with a debt, housing or benefits need (or a combination) but the high numbers suggest that improved debt support/processes are likely to be beneficial for this group. Data is not collected in this area for council tax payers who do not qualify for Council Tax Support so we cannot look at the demographics for debtors in this respect.The measures in the strategy which relate to improving the accessibility of advice, pro-actively reaching out to council tax debtors and council staff working in a more joined up way when collecting/writing off debt are likely to be positive for all equalities’ groups. |
| **2.2 Gaps in evidence base***What gaps in information have you identified from your analysis? In your response please identify areas where more information is required and how you intend to fill in the gaps. If you are unable to fill in the gaps please state this clearly with justification.* | There are significant gaps in data around debtors which the new strategy seeks to address as a core activity. This will require all key partners to look at what is being collected and better cross reference/pull across data from other systems to create a more complete picture. Some of this work will be necessary in order to meet the new requirement to protect vulnerable groups from bailiff action.The situation is likely to be further improved by the intended process of streamlining and joining up financial assessments across the council as this will, in theory, ensure that data around social care needs, disability benefits and core benefits such as HB and CTS is better recorded and shared. There is likely to be an on-going problem accessing data for all the protected characteristics relating to residents willingness to share personal data (like sexuality, religious beliefs) but some of the missing information (about marital or maternity status) could be gathered if the systems were set up to record and cross reference this information. Language needs is a further challenge – it is important in the context of debt recovery and prevention as so much of the communication we have with debtors is written (and in English as a default). Work needs to be done in this area to consider the needs and whether certain groups are disadvantaged in this respect. The same is true for those who have a sight impairment which may mean that written communication about income/debt (in print or online) is not effective. Again, data in this regard is not routinely collected/recorded so the service cannot be adapted as necessary.Services providing advice interventions around debt are being asked (from 1.4.15) to record better information about language needs. They already collect service user demographics in the main equalities areas (age, race, gender, health/disability) but this new data is likely to create more questions than answers as, without a borough-wide baseline which tells us the proportion of debtors who fall into each equalities group, we cannot assess whether debt support is being taken up proportionately and therefore whether our interventions are reaching the most in need. |
| **3.0 Consultation, Involvement and Coproduction** |
| **3.1 Coproduction, involvement and consultation** *Who are your key stakeholders and how have you consulted, coproduced or involved them? What difference did this make?* | The strategy has been developed with the involvement of debt advice providers, landlords, partners, businesses, councillors and residents. Specifically, officers have:* Qualitatively interviewed 100 multiple debtors about their experiences of being in debt, being dealt with by the council and how they might want to access advice and preventative support in future
* Reviewed the strategy with the main debt advice providers in the borough
* Reviewed the strategy with ward councillors at a well attended “drill down” session chaired by the Cabinet Lead for Finance and Investment
* Discussed the issue of tackling problematic debt and what the priorities for a council strategy would be with partners in the Financial Resilience stakeholder group
* Held a national debt conference at Coin Street in July 2014 with over 80 attendees – including all the main national debt charities and Demos. The conference used plenary sessions and workshops to look at the reasons for debt, the barriers to accessing debt advice, how problematic debt can be prevented, how creditors like local authorities and other landlords can manage debt and income collection better to prevent problematic debt and share potential solutions and best practice.
* Ensured that relevant delivery, commissioning and enabling colleagues have been brought together to formulate the strategy and revise the manual that underpins it
* Undertaken ethnographic research with low income families to understand how debt/income is managed
* Taken on feedback from national organisations like Child Poverty Action Group

The strategy is more robust and ambitious as a result of this consultation and commits to several new activities/priorities around identifying and supporting vulnerable debtors in particular. Main changes as set out above. |
| **3.2 Gaps in coproduction, consultation and involvement***What gaps in consultation and involvement and coproduction have you identified (set out any gaps as they relate to specific equality groups)?*  | We have not consulted with particular equalities groups in developing the strategy to see if the needs of debtors in the particular groups is demonstrably different. This could be a planned for future activity to inform the six month review of the strategy.We need to consider the issue of how we identify those with a sight impairment and adapt our billing and collection activity accordingly.  |
| **4.0 Conclusions, justification and action** |
| **4.1 Conclusions and justification** *What are the main conclusions of this EIA? What, if any, disproportionate negative or positive equality impacts did you identify at 2.1? On what grounds do you justify them and how will they be mitigated?* | It is not possible to draw firm conclusions. The strategy does not involve the taking away of any support or changing processes in any way that is likely to be harmful to any group of residents – however, we need to be mindful of any unintended consequences when the strategy is reviewed in October. This can be achieved by involving equality groups within the 6 month review of the strategy. The overall suite of changes (as set out above) provide more protection for vulnerable debtors, commit the council to a more joined up approach to debt and to improve data on record and it can be reasonably assumed that these steps will be positive ones for all debtors, regardless of the equalities’ group into which they may belong.  |
| **4.2 Equality Action plan***Please list the equality issue/s identified through the evidence and the mitigating action to be taken. Please also detail the date when the action will be taken and the name and job title of the responsible officer.*  |
| **Equality Issue** | **Mitigating actions** |
| 1: Absence of clear process for identifying those with language or sight needs that impact ability to respond to written information | * Ways of identifying and responding to needs to be considered by relevant staff within Revs/Bens, Housing, Parking and all other agencies involved with income and debt collection.
* Collect languages information from debt advice agencies
 |
| 2: Lack of demographic data about CT debtors | * Look at the matching of demographic data from council systems to better understand the breakdown of CT debtors.
* Conduct a more thorough analysis of bailiff referrals.
* A review of demographic data to be considered more widely by EIA panel.
 |
| 3. Missing information about certain protected characteristics on all systems | * Consider how/if gaps can be filled, provision of data can be incentivised.
* Increasing numbers of mylambeth accounts may be a good opportunity to increase data.
 |
| **4. Enforcement action can worsen the situation for vulnerable residents who are unable to pay.**  | * We guarantee that when enforcing any Council Tax debt we will not send residents from our Income and Debt Strategy protected groups for bailiff action. Our Income and Debt Strategy protected group includes carers, those affected by the benefit cap, war widow[er]s, disabled people, pensioners, those affected by the bedroom tax, those receiving DHP and those receiving local welfare assistance. Bailiffs will be considered as a last resort for all other CTS recipients once all other enforcement and support options have been considered/attempted.
* A commitment to reach out to those receiving a court summons for council tax debt at or before Final Notice stage and make a pro-active offer of debt support, with the summons (and any associated charges) cancelled if that debt support is taken up
* Ensuring that vulnerable debtors are flagged on the system so that enforcement action can be tailored accordingly and support offered where appropriate. A definition of vulnerability is included in appendix E of the income and debt manual.
* Establishment of a local debt forum of relevant agencies and interested citizens and businesses to keep the strategy and related activity under review
* More flexible payment methods and more options/encouragement to pay in advance
* Clearer letters and bills and online billing and payments achieved through mylambeth
* All bills and arrears statements to include details of how to get advice through the CAB
* Pre eviction panels for LL tenants in rent arrears who are in the Income and Debt Strategy Protected Groups category. The panel will ensure that all efforts have been made to support the resident in their tenancy to ensure that eviction is only ever a final resort
 |
| 5. Unintended consequences of this strategy.  | * Conduct a 6 month review
* Involve equality groups in the the 6 month review of the strategy
* Monitor if the number of bailiff referrals have reduced.
* Measure any increase the amount of demographic data we hold.
* Review if numbers of multiple debtors have reduced.
* Increase the number of frontline staff who are Money Champions.
* A review of why younger tenants (especially those under 25) are disproportionately likely to be in arrears and what we can do to support them further.
* Compare levels of accumulated debt from previous years.
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| **5.0 Publishing your results** |  |
| The results of your EIA must be published. Once the business activity has been implemented the EIA must be periodically reviewed to ensure your decision/change had the anticipated impact and the actions set out at 4.2 are still appropriate.  |
| **EIA publishing date** | Tbc |
| **EIA review date** | 1.10.15 |
| **Assessment sign off (name/job title):** |  |

All completed and signed-off EIAs must be submitted to equalities@lambeth.gov.uk for publication on Lambeth’s website. Where possible, please anonymise your EIAs prior to submission (i.e. please remove any references to an officers’ name, email and phone number).