## **Integrated Impact Assessment (IIA) Report**

This form should be completed when a screening form has indicated a full Integrated Impact Assessment is required and found to be relevant to Equality Act 2010, Socio-economic Duty and Well-being of Future Generations (Wales) Act 2015

Please refer to the 'IIA Report Form Guidance' while completing this form. If you need further support, please contact accesstoservices@swansea.gov.uk.

#### Which service area and directorate are you from?

Service Area: Housing and Public Health. Landlord and Community Housing Services Directorate: Place

Q1(	(a)	What	are	you	assessi	ng?
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New and revised policies, practices or procedures
Service review, re-organisation or service changes/reductions, which affect the wider community, service users and/or staff
Efficiency or saving proposals
Setting budget allocations for new financial year and strategic financial planning
New project proposals affecting staff, communities or accessibility to the built environment, e.g., new construction work or adaptations to existing buildings, moving
to on-line services, changing location
Large Scale Public Events
Local implementation of National Strategy/Plans/Legislation
Strategic directive and intent, including those developed at Regional Partnership Boards and Public Services Boards which impact on a public bodies functions
Medium to long term plans (for example, corporate plans, development plans, service delivery and improvement plans)
Setting objectives (for example, well-being objectives, equality objectives, Welsh language strategy)
Major procurement and commissioning decisions
Decisions that affect the ability (including external partners) to offer Welsh language opportunities and services

## (b) Please name and fully <u>describe</u> initiative here:

The Housing Rents Management Strategy 2022 - 2026 and the accompanying Action Plan sets out the guiding principles for the development and delivery of Swansea Council's Housing Rents Management Service, which is delivered for all Council tenants, over the next 4 years. It considers the national and local context that the Housing Rents Management Service is currently working within, identifies current and future challenges and sets out how we will seek to address these challenges through our objectives and priorities.

(c) It was initially screened for relevance on: 29th September 2020 (EIA)

A full EIA was then opened and was subsequently replaced by the IIA which has been continuously updated throughout consultation.

Lead Officer (d)

(e) Approved by Head of Service Name: Helen Andrew Name: Mark Wade

Job title: Rents Team Manager Job title: Head of Housing & Public Health

Date: 2<sup>nd</sup> December 2021 Date:

## **Section 1 - Aims**

#### What are the aims of the initiative?

The overall strategic aim of Swansea Council's Housing Rents Management Strategy is to 'effectively prevent rent arrears to ensure that Council tenancies are sustained and income to the Housing Service is maximised'.

This will be achieved through the adoption of the following four objectives:

Objective 1: Maximise the collection of rental income to the Housing Revenue Account (HRA)

**Objective 2:** Prioritising early intervention and prevention of rent arrears

**Objective 3:** Minimise rent arrears when they occur and support Council tenants to sustain tenancies and prevent eviction

Objective 4: Mitigate the impacts of Welfare Reform on Council tenants and the Housing Service

It is important to recognise that the objectives are interconnected and therefore should not be considered in isolation from each other. For example, prioritising early intervention and prevention of rent arrears will in-turn maximise the collection of rental income to the Housing Revenue Account.

The following issues have emerged as areas for priority development:

- 1. Provide and promote a range of payment methods that are accessible, flexible, easy to use and have the most cost effective transaction costs.
- 2. Continue to develop our approach to early welfare benefits, financial inclusion and income maximisation advice and support and consider how this should be delivered.
- 3. Work to minimise the number of evictions undertaken in respect of rent arrears.

Whilst there is no statutory obligation to produce a Housing Rents Management Strategy the environment within which the Housing Rents Management Service exits has changed significantly in recent years. Factors including, but not limited to, Welfare Reform, including the introduction of Universal Credit, poverty, austerity measures, general economic climate and, more recently, the COVID-19 pandemic have and continue to impact the delivery of the service. These factors have changed the demands upon the service and it is necessary to continue to develop the way the service is delivered in order to meet the demands; the Housing Rents Management Strategy sets out how this will be done.

### Who has responsibility?

- Rents Team Manager
- Operations Manager with responsibility for Rents.
- Housing Finance and IT Co-ordinator
- Landlord Services Manager
- Head of Housing and Public Health
- Cabinet Member for Climate Change & Service Transformation (Deputy Leader)
- Landlord and Community Housing Services staff including (but not limited to); Rents Team Leaders, Rents Officers, Housing Advisors Rents, Area Housing Managers, Deputy Area Housing Managers, Neighbourhood Officers, Housing Strategic Services Officers, Homelessness Section, Tenancy Support Unit.

#### Who are the stakeholders?

All Council tenants are stakeholders and have been consulted in respect of the Strategy.

In addition there are a range of organisations and internal Council services who are stakeholders and have been involved in the development of the Strategy or as specific consultees.

Including:

- Housing Service including Area Housing Office Service, Homelessness Services, Tenancy Support Unit, Tenant Participation Service, Housing Strategic Services
- Internal Partners such as Tackling Poverty Services; including Employability Services and Welfare Rights Team, the Revenues and Benefits Service, Social Services, Community Mental Health Teams, Local Area Co-ordinators and Finance.
- External partners such as, the Department for Work and Pensions (DWP), Prison and Probation Services, Support Service providers, Health Services, Shelter Cymru and Citizens Advice.

# Section 2 - Information about Service Users (See guidance)

In order to complete this section you will need to look to data such as Census data, research and performance management information, surveys, future trends, service user data, socio-economic data from recent consultations, engagement and research

Children/young people (0-18)	$\boxtimes$	Sexual orientation	
Older people (50+)	$\boxtimes$	Gender reassignment	$\boxtimes$
Any other age group	$\boxtimes$	Welsh language	
Future generations (yet to be born)	$\boxtimes$	Poverty/social exclusion	
Disability	$\boxtimes$	Carers (including young carers)	

Race (including refugees)	$\boxtimes$	Community cohesion	
Asylum seekers	$\boxtimes$	Marriage & civil partnership	
Gypsies & Travellers	$\boxtimes$	Pregnancy and maternity	
Religion or (non-)belief	$\boxtimes$		
Sex	$\boxtimes$		

## Please provide details of the information you hold in relation to the groups above:

The Housing Services most recent full tenants survey took place in 2017 and over 2800 responses (approximately 20% of tenants) were received, the information in relation to the protected characteristics from that survey is presented below. A new survey was carried out in October/November 2021 and the results will be available in February 2022.

# **About You Tenants survey 2017**

Are you?	
Male	990 (36.9%)
Female	1692 (63.1%)

Which age group are you	in?
Under 18	2 (0.1%)
18-24	84 (3.1%)
25-39	443 (16.4%)
40-59	868 (32.2%)
60-74	759 (28.1%)
75 or over	542 (20.1%)

Is your gender identity the same as you were assigned at birth (i.e. born male and currently living as a man or born female and currently living as a woman)?		
Yes	2434 (96.5%)	
No	87 (3.5%)	

What is your sexual orientation?		
Bisexual	44 (1.8%)	
Gay/ Lesbian	33 (1.4%)	

Hetrosexual/ Straight	2208 (91.5%)
Prefer not to say	117 (4.8%)
Other (please write in)	11 (0.5%)

Would you describe yourself as (Please cross all that apply or write in)		
British	901 (38.4%)	
Welsh	1193 (50.9%)	
English	72 (3.1%)	
Irish	15 (0.6%)	
Scottish	8 (0.3%)	
Prefer not to say	16 (0.7%)	
Other British (please write in)	31 (1.3%)	
Non-British (write in below)	76 (3.2%)	
Refugee	32 (1.4%)	
Asylum seeker	1 (0.04%)	

What is your ethnic group		
White - British	2399 (89.8%)	
White - Any other White background	61 (2.3%)	
Mixed - White & Black Caribbean	1 (0.04%)	
Mixed - White & Black African	3 (0.1%)	
Mixed - White & Asian	7 (0.3%)	
Mixed - Any other mixed background	0 (0%)	
Asian or Asian British - Indian	2 (0.07%)	
Asian or Asian British - Pakistani	5 (0.2%)	
Asian or Asian British - Bangladeshi	13 (0.5%)	
Asian or Asian British - Chinese	6 (0.2%)	
Asian or Asian British - Any other	14 (0.5%)	
Asian background		
Black or Black British - Caribbean	2 (0.07%)	
lack or Black British - African	50 (1.9%)	
Black or Black British - Any other Black	1 (0.04%)	
background		
Other ethnic group - Gypsy or Traveller	0 (0%)	
Other ethnic group - Arab	6 (0.2%)	
Other ethnic group - Any other, (please write in)	101 (3.8%)	

What is your religion or (non) belief, even if you are not currently practising?		
No religion/ belief	907 (34.5%)	
Christian (including Church of England,	1502 (57.2%)	
Catholic Protestant and all other		
Christian denominations)		
Buddhist	12 (0.5%)	
Hindu	3 (0.1%)	
Jewish	4 (0.2%)	
Muslim	57 (2.2%)	
Sikh	1 (0.04%)	
Prefer not to say	83 (3.2%)	
Any other religion/ belief system (please	58 (2.2%)	
write in)		

Do you consider that you are actively practising your religion or belief?		
Yes	593 (27.0%)	
No	1378 (62.8%)	
Prefer not to say	222 (10.1%)	

Can you understand, speak, read or write Welsh?		
Understand spoken Welsh	134 (5.7%)	
Speak Welsh	19 (0.8%)	
Read Welsh	21 (0.9%)	
Write Welsh	3 (0.1%)	
Learning Welsh	77 (3.3%)	
None of these	1975 (84.7%)	
Prefer not to say	107 (4.6%)	

Which languages do you use from day to day?		
English	2525 (96.0%)	
Welsh	8 (0.3%)	
British Sign Language	4 (0.2%)	
Other (please write in)	95 (3.6%)	

Do you have any long-standing illness, disability or infirmity?	
Yes 1471 (56.5%)	

No	965 (37.1%)
Prefer not to say	167 (6.4%)

Does this illness or disability limit your normal day-to-day activities in any way?		
Yes	1314 (61.5%)	
No	661 (31.0%)	
Prefer not to say	160 (7.5%)	

# Housing Rents Management Strategy Consultation - 'ABOUT YOU' Equalities Monitoring

In August 2020 consultation was carried out specifically in respect of the Housing Rents Management Strategy. Letters were sent to all Council tenants (13,226 letters sent) informing them about the Housing Rents Management Strategy and inviting them to complete a survey in respect of the Draft Strategy. Both the Draft Strategy, an Easy Read version of the Draft Strategy and survey were available in Welsh and English, online, in paper and in other alternative formats.

In the region of 500 enquiries were received and whilst these were predominantly by telephone, 84 responses (online or in writing) were received in response to the survey from Council tenants. An 'About You' form was included for respondents to complete after submitting their consultation responses. Of the 84 Council tenants who responded, 13 completed the 'About You' form.

The information in relation to the protected characteristics from that survey is presented below.

### Q1. Are you male or female?



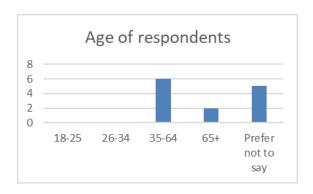
Q2. Is your gender identity the same as you were assigned at birth (i.e. born male and currently living as a man or born female and currently living as a woman)?





# Q3. What is your date of birth?

Respondent ages in	37
ascending order.	41
	46
5 respondents did not	50
provide a valid date of	52
birth.	59
	66
	84



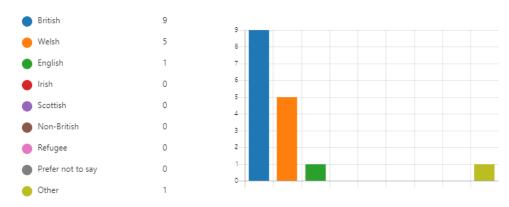
# Q.4 What is your sexual orientation?





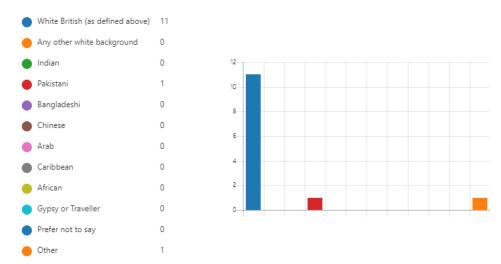
Q.5 Would you describe yourself as... (Please cross all that apply or write in)

## 'Other' was specified as Poland



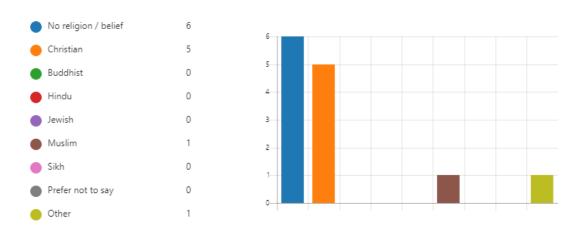
Q.6 What is your ethnic group? (Please cross one box and write in if appropriate)

## 'Other' was specified as Poland

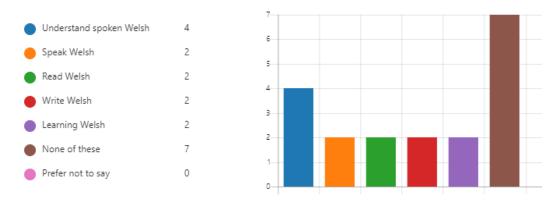


Q7. What is your religion or (non) belief, even if you are not currently practising? (Please cross one box or write in)

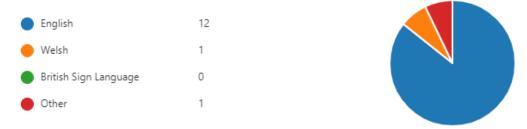
'Other' was specified as Baptist



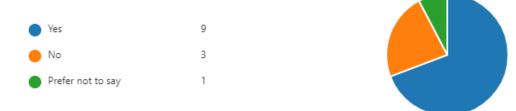
# Q.8 Can you understand, speak, read or write welsh? (Please cross all that apply)



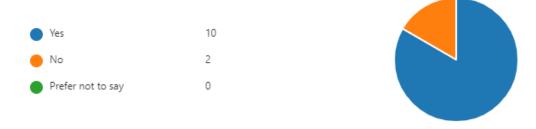
Q.9 Which languages do you use from day to day? (Please cross all that apply)



Q.10 Do you have any long-standing illness, disability or infirmity? By long-standing we mean anything that has troubled you over a period of time or that is likely to affect you over time. This could also be defined Under the Equality Act 2010 as: "Having a physical or mental impairment which has a substantial and long term adverse effect on your ability to carry out normal day to day activities."



Q.11 Does this illness or disability limit your normal day-to-day activities in any way?



Whilst the response rate to the Housing Rents Management Strategy Consultation 'About You' form was relatively small it was broadly reflective of the full tenants survey that had been previously conducted.

Of particular note is that there were a higher proportion of responses from those identifying themselves as female, that those over 40 years old made up a higher proportion of responses than those under 40 years old and that a significant proportion of tenants indicated that they have a long standing illness, disability or infirmity.

#### **Qualitative Data**

In addition to this quantitative data the Housing Service also holds significant amounts of qualitative data in respect of individual tenants and their specific circumstances, which continuously evolves as circumstances change. The person centred approach employed by the Housing Rents Management Service allows for these specific circumstances to be considered in service delivery and any change in circumstances to be taken into account.

# Any actions required, e.g. to fill information gaps (write below and add to action plan)?

The 'About You' information from the full tenants survey and the specific Housing Rents Management Strategy consultation has captured information about our service users. Some protected characteristics e.g. pregnancy and maternity and marriage and civil partnership are not included in this but would be contained within individual tenancy records where applicable. In respect of other equality factors consultation was undertaken with relevant service leads such as; community cohesion – consultation with Regional Community Cohesion Coordinator,

gypsies/traveller ethnic group – consultation with the Area Housing Manager with responsibility for gypsies and travellers service provision, poverty / social inclusion - consultation undertaken with Tackling Poverty Services.

We continue to ask 'About You' questions on satisfaction surveys and questionnaires when we consult with Council tenants. The information gathered from those surveys will need to be collated and used to inform future Strategies/reviews etc.

The Housing Service continues to collect qualitative data in respect of individual tenants and this is updated constantly as circumstances change.

# **Section 3 – Assessing the Impact (See guidance)**

Please consider the possible impact on the different protected characteristics and statutory considerations:

Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
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	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Race	The Strategy promotes a person centred approach and that individual circumstances continue to be taken into consideration, including ethnicity and nationality, which will ensure that appropriate services are provided and any potential barriers to accessing services are removed. For example, there is an action in the Action Plan to ensure that correspondence is reviewed to ensure that it contains the use of plain language, an accurate description of the situation and the consequences of no action by the tenant in different languages if required. In respect of language, interpreter provision is available if required.  The Housing Service has a dedicated Gypsy Traveller Liaison Office who provides specific support/advice in respect of rents supported by the Rents Team. The Gypsy Traveller Accommodation Assessment is currently being renewed. In respect of refugees/asylum seekers consultation has been undertaken with the resettlement team and appropriate support/advice is provided on individual cases linked to liaison with relevant support services.	Positive	Ethnicity Nationality Gypsies / Travellers Language: interpreter provision Refugee / Asylum Seekers Migrants Awareness events United Nations Convention on the Elimination of All Forms of Racial Discrimination (UNCERD)

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Disability	Disability is recorded on individual tenancy records and the Strategy promotes a person centred approach and that individual circumstances are taken into account so appropriate services are provided. Over 50% of tenants surveyed in the full tenants survey identified that they have a disability. This is more than double the number from the 2011 census for Swansea as a whole (23%). The consultation in respect of the Strategy also identified that a significant proportion of those who responded had a long standing illness, disability or infirmity. The Strategy contains Action Plan points in respect of provision of services that are flexible, accessible, easy to use; including a range of payment methods and numerous methods of communication. In addition providing Rents Management Services which are easy to access and conveniently located; including the provision of rents surgeries and home visits.  The Strategy also contains Action Plan points in regard to promoting the uptake of welfare benefits, which would include disability related benefits. Further to this an action in respect of improving partnership working and collaboration with partners involved in supporting Council tenants, including Social Services, CMHT and Health Care Services. Both the Draft Strategy, an Easy Read version of the Draft Strategy and survey were available online, in paper and in other alternative formats and will be available in respect of the finalised Strategy and Action Plan.	Positive	Mobility / Dexterity Blind or Visually impaired Deaf or Hearing impaired Mental Health Learning Disabilities Dementia Neurological difference / Autism Access to buildings/ facilities Access to communication methods Dietary requirements Other Long Term Health Conditions United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Carers	Whilst data in respect of Carers has not been collected in Housing surveys it is determined in respect of individual tenancies. The Strategy promotes a person centred approach and that individual circumstances continue to be taken into consideration to ensure that appropriate services are provided.  In addressing the needs of Council tenants who may be carers or receiving care the Strategy also contains Action Plan points in regard to promoting the uptake of welfare benefits, which would include benefits related to carers e.g. extra room for a carer, carers allowance.	Positive	Providing unpaid and informal care A child caring for a disabled parent An older person caring for a friend who has a mental health issue A young adult caring for a sibling with substance misuse difficulties An adult caring for an older relative who is elderly, frail or experiencing dementia
Sex	The Strategy promotes a person centred approach and that individual circumstances continue to be taken into consideration to ensure that appropriate services are provided.  Data continues to be collected regarding the gender and gender identity of Council tenants and where necessary services are provided on gender basis only, for example for victims of domestic abuse.	Positive	Men / Women Gender Identity Childcare Gender Pay Gap Domestic abuse United Nations Convention on the Elimination of All Forms of Discrimination against Women (UNCEDAW)

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Age	Data is collected in respect of the age of Council tenants and the Strategy promotes a person centred approach and that individual circumstances continue to be taken into consideration to ensure that appropriate services are provided.  In addition, for example, the Strategy Action Plan includes an action in respect of profiling council tenant's households to proactively identify the impact of Welfare Reform measures and develop strategies to mitigate those impacts. A significant profile factor in determining the impact of Welfare Reform is age and the strategies developed to mitigate the impact of welfare reform measures would have a positive impact.  (Children and Young people – see UNCRC section for further information)	Positive	Older People including citizens with dementia. Could the initiative contribute to the 'age friendly' agenda or improve the experience of getting older in Swansea Children, Young People Cross-generational working offers a wide variety of benefits  Working Age People, Young Families  Demographics  NB: Where children / young people are affected complete the Childrens Rights Checklist  United Nations Convention on the Rights of the Child (UNCRC)  Caring responsibilities

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Future generations (yet to be born)	The Strategy ensures that the needs of the present are met in respect of the provision of services and support and advice to current Council tenants. There are Action Plan points that ensure that service provision evolves to future-proof service delivery to meet the changing needs of Council tenants and that the services delivered are fit now and for the future, for example, Deliver a Housing App / Portal where Council tenants can pay rent and access rent account information and support via self-service functionality.  The Strategy has focus on sustainability, ensuring sustainable tenancies and building sustainable communities to support future generations. For example, the objective of maximising the income to the Housing Revenue Account (HRA) to invest in Council housing stock (particularly in terms of decarbonisation and energy efficiency) will make a significant contribution to the delivery of the Council's priorities and result in wider benefits to communities, estates and the local economy, both now and for future generations of Council tenants.	Positive	We must ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs
Religion & Belief	Data has been collected in respect of the religion and beliefs of Council tenants. The Strategy promotes a person centred approach and that individual circumstances continue to be taken into consideration to ensure that culturally appropriate services are provided when required.	Positive	Faith Communities Non Beliefs Dietary requirements Vegetarianism/Veganism Other philosophical beliefs Dress code/uniforms Religious festivals/activities, agile working

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Sexual Orientation	Data has been collected in respect of sexual orientation. The Strategy promotes a person centred approach and that individual circumstances continue to be taken into consideration to ensure that appropriate services are provided when required.	Positive	Gay Lesbian Bi-sexual Heterosexual Terminology Confidentiality about sexuality https://www.stonewall.org.uk/
Gender Reassignment	Data continues to be collected regarding the gender and gender identity of Council tenants and is updated in respect of individuals if information is received that a Council tenant proposes to, starts or changes their gender identity. The Strategy promotes a person centred approach and that individual circumstances continue to be taken into consideration to ensure that appropriate services, including the use of appropriate language, are provided when required.	Positive	A person who proposes to, starts or has changed their gender identity Transgender Appropriate language use, ie, appropriate pronouns
Marriage & Civil Partnership	Marriage and civil partnership data is determined in respect of individual tenancies. The Strategy promotes a person centred approach and that individual circumstances continue to be taken into consideration to ensure that appropriate services are provided. Marital or civil partnership status continues to be considered in respect of tenancy management, for example in respect to succession to tenancies and rent implications surrounding this.	Positive	Marital status Civil Partnership status

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Pregnancy & Maternity	The Strategy promotes a person centred approach and that individual circumstances continue to be taken into consideration to ensure that appropriate services are provided.  Whilst data is not collected in surveys information is kept on individual tenancy records when supplied.	Positive	Pregnant mothers Those entitled to maternity and paternity leave Foster/Adoption Breastfeeding mothers

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Welsh Language	The Housing Service records the language preference of Council tenants in order to ensure that they are communicated with in their language of preference minimising barriers to the use of the Welsh language. Any promotional information / consultation / engagement in respect of this Strategy has been promoted in Welsh and English. This is always the case in line with Welsh Language Standards ensuring that Welsh is not treated less favourably than English.  The Strategy Action Plan also contains an action to review all correspondence to ensure that it contains the use of plain language, an accurate description of the situation and the consequences, this relates to correspondence in all languages including Welsh. Promotional information / literature from the Housing Rents Management Service will continue to be promoted in Welsh e.g. Posters, leaflets.  The Housing Rents Management Service can provide services in Welsh – there are currently two permanent full time members of staff in the Rents Team and others throughout the Housing Service who are designated welsh speakers in the Councils Directory and numerous others within the Housing Service. This maximises opportunities for the Welsh language to be used.	Positive	Ensuring equal status of both Welsh and English languages. Availability of and access to services, activities and information. Rights of individuals to ask for WL services. Impact on Welsh speaking communities, including: Positive / negative effects on opportunities to use the WL. Possible changes to number/percentage of Welsh speakers Job opportunities / Staffing changes. Training needs and opportunities Availability of Welsh medium education

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Socio Economic Considerations	See section 5 – Socio Economic Duty	Positive	People living in less favourable social and economic circumstances than others in the same society.  Disadvantage may be exacerbated by many factors of daily life, not just urban or rural boundaries.  The impact on limited incomes are significant but also consideration needs to be given to service accessibility and barriers to participation.  'Intersectionality' issues - where identity compounds socio-economic status, e.g., single parents (often women), disabled people, some BAME groups.
Human Rights	The Strategy will have a positive impact in respect of Human Rights, for example, Article 8 Respect for private life, family, home and correspondence, the Strategy reinforces sustaining tenancies and enforcement action in respect of tenancies is an action of last resort. There is an Action Plan point to develop rent arrears recovery processes to ensure that they are aimed at avoiding litigation and eviction unless all other options have been exhausted.	Positive	See Human Rights Articles.
Intersectionality	The Strategy promotes a person centred approach and that individual circumstances continue to be taken into consideration to ensure that appropriate services are provided. This equally applies to the multiple characteristics and social identities that a council tenant may have.	Positive	The way in which power structures based on factors such as gender, race, sexuality, disability etc. interact with each other and create inequalities, discrimination and oppression.  (the multiple layers of discrimination)

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Community Cohesion	Any impact in respect of Community Cohesion is likely to be positive. The Housing Rents Management Strategy contributes to community cohesion by providing support to Council tenants so that they can live in safe good quality homes; building sustainable communities. It assists in building stronger communities by ensuring that people can get the financial support that they have a right to. This strategy ensures equality of access to all Council tenants and promotes social inclusion and community cohesion.  The Regional Community Cohesion Coordinator has been consulted in respect of the Draft Strategy and had no adverse comments to make.	Positive	Think about relationship between people from different backgrounds, community tensions, community facilities <a href="http://gov.wales/topics/people-and-communities/communities/communitycohesion/?lang=en">http://gov.wales/topics/people-and-communities/communitycohesion/?lang=en</a>
Other (please state) All	The Strategy will have positive impacts for all groups and characteristics. For example, one of the priority areas for the Strategy is to work to minimise the number of evictions undertaken in respect of rent arrears, which will have a direct positive impact on homelessness.  As a further example the impact of Covid is currently a significant challenge and rents management services have adapted and continue to evolve throughout the COVID19 pandemic. Responding to the to the pandemic including the provision of financial and well-being advice and support to Council tenants impacted by COVID 19 and proactively identifying and targeting those Council tenants who may require additional support.	Positive	Eg, Modern Slavery, Safeguarding, Other Covid effects, Ex-offenders, Veterans, Care Leavers, Substance Abuse, Homeless

Human Rights Act 1998		Article 8	Respect for private life, family, home and correspondence
<ul> <li>Article 2</li> </ul>	Right to life	<ul> <li>Article 9</li> </ul>	Freedom of thought, belief and religion
<ul> <li>Article 3</li> </ul>	Freedom from torture and inhuman or degrading treatment	Article 10	Freedom of expression
<ul> <li>Article 4</li> </ul>	Freedom from Slavery and forced labour	Article 11	Freedom of Assembly and association
<ul> <li>Article 5</li> </ul>	Right to liberty and security	Article 12	Right to marry and start a family
<ul> <li>Article 6</li> </ul>	Right to a fair trial	Article 13	Right to access effective remedy if rights are violated
<ul><li>Article 7</li></ul>	No punishment without law	Article 14	Protection from discrimination

# If you have identified any areas which need further investigation, these will need to be added to your action plan

N/A

#### **Section 4 - Involvement**

Please consider all of your involvement activities here, e.g. participation, consultation, engagement, co-productive approaches, etc.

What involvement has been undertaken to support your view? How did you ensure this was accessible to all?

The development of the Housing Rents Management Strategy has been significantly influenced and informed by the consultation and engagement undertaken. Detailed consultation has taken place with service users, internal partners and partner organisations to ensure that the development of the strategy is an inclusive process.

## **Service Users – Council Tenants**

The impact of the COVID-19 pandemic has meant that it has not been possible to carry out formal face to face consultation with Council tenants in respect of the Draft Housing Rents Management Strategy. Engagement activities therefore had to be undertaken in other accessible ways including over the phone, online, in writing and alternative formats. The wealth of information in respect of tenants views gathered informally on a day-to-day basis delivering the service both during and prior to the pandemic has also informed the Strategy.

#### Stage 1 – July 2020 Preliminary Consultation with members of the Tenants Consultative Panel.

Initially we undertook a preliminary consultation with members of the existing Tenants Consultative Panel, predominantly over the telephone, who were invited to consider the Draft Strategy or Easy Read Draft Strategy (having been sent copies) and provide feedback in respect of the strategy and the questions that formed the proposed survey about the Strategy. This was to establish if the questions posed were the right ones to appropriately gather Council tenant's views about the Strategy.

#### Stage 2 – August 2020 Full Tenant Consultation

In August 2020 consultation was carried out specifically in respect of the Draft Housing Rents Management Strategy. Letters were sent to all Council tenants (13,226 letters sent) informing them about the Housing Rents Management Strategy and inviting them to complete a survey in respect of the Draft Strategy. Both the Draft Strategy and survey were available online, in writing and in alternative formats in English and in Welsh and other languages as required. In addition an Easy Read version of the strategy, in English and in Welsh, was available.

In the region of 500 enquiries were received and whilst these were predominantly by telephone, 84 responses to the survey (online or in writing) were received from Council tenants.

#### **Housing Commissioning Review**

In addition to the above a Housing Commissioning Review was undertaken, which began in 2019, to identify how the service could work differently to deliver efficient, modern services which are sustainable, meet future needs and contribute to the Council's Transformation and Future Council development objective. The review consulted with Council tenants in respect of the services delivered. The outcome of the review acknowledged that the priority is to continue to deliver a frontline face to face housing services that Council tenant's value but to improve the way we do it. The review looked at agile/mobile working and how that can positively influence the way the service is provided by ensuring staff have the right tools to carry out their role and spend more time in the community on home and estate visits. In addition it looked at widening access for service users via better online facilities, more home visits and surgeries in local community buildings. The relevant findings of the Commissioning Review were considered in the development of the Strategy.

#### **Stakeholders**

Consultation has taken place with internal partners and partner organisations to ensure that the development of the strategy is an inclusive process. The following consultation has taken place:

- Workshop as part of the Housing Commissioning Review a discussion workshop with internal stakeholders took place in respect of the delivery of Housing Rents Management services.
- Internally the Draft Strategy was considered within Housing Services and by internal partners including Legal Services, the Tackling Poverty Service, Revenues and Benefits Service and Community Cohesion. The draft Strategy was sent to all Councillors.
- External Partners the Draft Strategy was considered by external partners including Shelter Cymru, Crisis and Citizens Advice Swansea Neath Port Talbot.

#### What did your involvement activities tell you? What feedback have you received?

Across all the consultation responses some clear, common issues emerged and the views provided were considered when developing the strategy and actions for the strategy.

#### Stage 1 – Preliminary Consultation with members of the Tenants Consultative Panel.

The preliminary consultation told us that the questions and the order of the questions in the survey could be of more value if they were reordered and rephrased. The questions in the survey were subsequently amended to reflect this prior to the full tenants survey.

## Stage 2 - Full Tenant Consultation

The survey provided the opportunity for Council tenants to have their say on the aim, objectives and priorities of the Strategy. There was also an opportunity to comment on these and provide a view in respect of the strategy achieving the aim of treating people fairly and according to their needs.

#### **Summary of Findings:**

The tenants survey gathered the following quantitative data:

Do you agree with the **priorities** of the strategy?

• Yes – 66%. No – 4%. Some of them – 20%. Most of them – 10%

Do you agree with the **objectives** of the strategy?

• Yes – 71%. No – 6%. Some of them – 16%. Most of them – 6%

In addition to this the survey gathered the following qualitative data:

46 people made comments about the **priorities**. Categorised as follows:

• Positive Comments – 57%. Constructive Suggestions – 22%. Negative – 17%. Unrelated – 4%

Comments surrounded common themes such as; agreeing that preventing eviction is a priority, that helping people with housing related and other welfare benefits is important and offering easy to use, flexible payment methods and rent account information is of benefit.

36 people made comments about the **objectives**. Categorised as follows:

• Positive Comments – 50%. Constructive Suggestions – 33%. Negative – 11%. Unrelated – 6%

Comments surrounded common themes such as; considering personal circumstances in service delivery and offering support and advice in respect of rent, helping people to sustain their tenancies and keep them in their homes and providing support and advice from the beginning of a tenancy, making sure that Council tenants understand their responsibilities in respect of rent payment, using the income generated from rent payments to provide housing services.

We are committed to treating people **fairly and according to their needs**. Do you think that the Strategy achieves this or not. Please tell us why? 45 people responded to this question.

• Positive Comments – 62%. Constructive Suggestions – 11%. Negative – 18%. Unrelated – 9%

Those who completed the survey were also offered the opportunity to be contacted to discuss any issues raised further, however no one chose to take advantage of this option.

#### **Housing Commissioning Review**

From the tenant consultation in respect of the Housing Commissioning Review 858 responses were received. Tenants responded to a question specifically on whether staff should spend more time on home and estate visits with the use of mobile technology. Of these 68.7% agreed/strongly agreed and 31.3% disagreed/strongly disagreed.

746 tenants responded to a question specifically on whether improvements should be made to the way tenants can make online transactions and access housing services online. Of these 53.3% agreed/strongly agreed and 46.5% disagreed/strongly disagreed.

During the COVID-19 pandemic all the Area Housing Offices were closed to the public but service users were able to access all services via the phone and online. This included paying rent and getting financial advice and support. Findings show that more tenants than anticipated were able to make the transition to online/telephone services with significantly more rent payments now being carried out online.

#### **Stakeholders**

Feedback from stakeholders was positive and there was agreement in respect of the vision of the strategy. Common themes emerged, particularly in respect of the need to maximise income to the Housing Revenue Account, mitigating the impacts of welfare reform and the approach of prevention and early intervention, sustaining tenancies and preventing eviction. Feedback received confirmed that the aims and objectives of the strategy predominantly aligned with the aims and objectives of stakeholders consulted.

#### How have you changed your initiative as a result?

There was general agreement in respect of the Council's proposals and vision for the delivery and development of the Housing Rents Management Service over the next 4 years. Overall the consultation responses to the Strategy and Action Plan have been positive and constructive and have reinforced that the aim, objectives and emerging priorities are the right ones. The feedback from a negative perspective was also considered and any issues addressed in the development of the strategy.

A number of suggestions have been made to create some additional actions and modify a number of existing actions and where possible these suggestions were incorporated into the final strategy and action plan. For example, in respect of preventing eviction an existing action plan point was further developed in respect of improving partnership working and collaboration with partners involved in supporting Council tenants, with a specific point added to develop links and working relationships with external advice and Support Services, specifically Citizens Advice and Shelter Cymru.

Following the consultations the Strategy was updated with sections detailing the consultation that had taken place in its development to ensure that stakeholders are aware of how their involvement has informed the decisions.

Any actions required (e.g. further engagement activities, mitigation to address any adverse impact, etc.)? (Add to action plan)

No adverse impact is anticipated in producing this strategy. The Strategy will be monitored and further consultation will take place at review points to ensure that Council tenants and stakeholders continue to be involved to ensure transparency and maintain an ongoing dialogue.

# Section 5 - Duties (please see guidance)

Please consider how the initiative might address the following issues. How will the initiative impact on the duties set out below? Think about what work you have already done to improve the outcomes.

# Public Sector Duty - how will the initiative address the below?

Foster good relations between different groups	The Housing Rents Management service is delivered for all Council tenants over a broad geographical area of Swansea comprising a diverse range of communities and different groups. The Rents Team participate in community events promoting that services are provided to all Council tenants. The Strategy promotes equality and encourages mutual understanding, for example by recognising that some Council tenants, particularly those who may be vulnerable, may face difficulties in managing their responsibility for rent payment and require support and advice. The feedback from the tenant consultation undertaken in respect of the Strategy contained themes in respect of mutual understating in that some tenants may require reasonable adjustments in rents management services provided in order to meet their needs where as some tenants do not.
Elimination of discrimination,	The Strategy ensures that every Council tenant is treated fairly and it is not determined that anyone
harassment and victimisation	would be negatively affected by the initiative. The Strategy directly delivers on the corporate well-
	being objective of safeguarding people from harm by working with partners to address all aspects of
	safeguarding children and vulnerable adults.
Advance equality of opportunity between different groups	The Strategy ensures that every Council tenant is treated fairly promoting equality of opportunity. The Strategy promotes a person centred approach where individual circumstances are considered ensuring that the needs of people from protected groups are met where these are different from the needs of other people. Every Council tenant will benefit equally from the approach outlined in the strategy and it ensures that services delivered are tailored to the individual.  The Strategy Action plan contains actions which will advance equality of opportunity, for example, to develop and enhance welfare benefits, financial inclusion and income maximisation advice and support delivered by the Rents Team in order that Council tenants are able to access appropriate and affordable financial products and services and have the knowledge, confidence and skill to use them. As part of the tenants consultation survey a question was included in respect of treating people fairly and according to their needs and if the strategy achieved that; the majority response being that it did.

Socio-economic Duty - Describe any issues identified as a result of the initiative for those people experiencing

and living in poverty

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a) Communities of place	The Strategy will deliver a positive influence on Socio-economic inequalities, those people
	experiencing and living in poverty. In respect of Communities of Place (those who share a
	geographical location), information from the 2019 Welsh Index of Multiple Deprivation (WIMD)
	identifies that 17 of Swansea's Lower Super Output Areas are in the most deprived 10 per cent in
	Wales. Council housing is present in each of these areas. The Strategy will have a positive impact in
	respect of the localities where Council tenants live and where they may spend a substantial
	proportion of their time.
	The Strategy makes a significant contribution to tackling poverty by maximising income to the
	Housing Service to invest to improve housing and build more energy efficient Council homes. By
	preventing homelessness and supporting people to sustain their tenancies enabling people to live in
	safe, good quality homes to help provide stability and security for families and building sustainable
	communities in order to safeguard health and well-being and prevent socio-economic disadvantage.
b) Communities of interest	The Strategy aims to reduce the inequalities of outcome resulting from socio-economic disadvantage
	in respect of communities of interest. As detailed in the potential impacts when assessing the impact
	(Section 3) on groups or people who share protected characteristics the Strategy promotes a person
	centred approach and that individual circumstances continue to be taken into consideration to ensure
	that appropriate services are provided promoting equality of opportunity.
	The Strategy supports tackling poverty by, for example, helping to address the impacts of Welfare
	Reform, such as supporting people to claim the full benefits they are entitled to so that they are able
	to maximise their income; by helping to support individuals to overcome barriers to employment
	through referrals to co-ordinated person-centred employability support, contributing to ensuring that
	people live and age well by providing support so that people can get information, advice and help and
	contributing to stronger communities by ensuring that people can get the financial support that they
	have a right to.
How does your proposal ensure	e that you are working in line with the requirements of the Welsh Language
	easure (Wales) 2011)? (beyond providing services bilingually)
a) To ensure the Welsh language	The Housing Service records the language preference of Council tenants in order to ensure that they
is not treated less favourably	are communicated with in their language of preference minimising barriers to the use of the Welsh
than the English language	language. Any promotional information / consultation / engagement in respect of this Strategy has
	been promoted in Welsh and English. This is always the case in line with Welsh Language Standards
	ensuring that Welsh is not treated less favourably than English.

this relates to correspondence in all languages including Welsh.

The Strategy Action Plan also contains an action to review all correspondence to ensure that it contains the use of plain language, an accurate description of the situation and the consequences,

b) That every opportunity is taken	Promotional information / literature from the Housing Rents Management Service will continue to be
to promote the Welsh language	promoted in Welsh e.g. Posters, leaflets. Council tenants will be communicated with in Welsh
	according to their preference.
c) Increase opportunities to use and learn the language in the community	The Housing Rents Management Service can provide services in Welsh – there are currently two permanent full time members of staff in the Rents Team who are designated welsh speakers in the Councils Directory and numerous others within the Housing Service. This maximises opportunities for the Welsh language to be used.

United Nations Convention on the Rights of the Child (UNCRC): Many initiatives have an indirect impact on children and you need to consider whether the impact is positive or negative in relation to both children's rights and their best interests

Will the initiative have any impact (direct or indirect) on children and young people (think about this age group holistically e.g. disabled children, those living in poverty or from BME communities)?

The Housing Rents Management Strategy will have both a direct and an indirect impact on children and young people.

The Council operates equitable tenancies which, in certain circumstances, allows children and young people to be housed with the Council and the legal title of the tenancy is held in trust by an adult (or corporate entity). The objectives of and plans within this Strategy will directly impact those children and young people in a positive way.

The Strategy will also have an indirect impact on other children and young people who live with Council tenants by improving sustainability of tenancies and the homes in which children of Council tenants live.

#### All initiatives must be designed / planned in the best interests of children and young people.

Best interests of the child (Article 3): The best interests of children must be the primary concern in making decisions that may affect them. All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers.

Please explain how you meet this requirement:

The Housing Rents Management Strategy is designed and planned in the best interests of children. It ensures the needs of children and young people are a primary concern when assisting families who are in or at risk of being in rent arrears, for example, by supporting families to obtain the correct welfare benefits relating to children to ensure that rent can be paid (Article 26 (social security) or working with families to sustain their tenancies to ensure that eviction action is always an action of last resort and that children have a safe and secure home. (Article 18 (parental responsibilities and state assistance). The action plan points in the Strategy could potentially lift families out of poverty and poverty can seriously limit the life chances of children.

The objective in the strategy to minimise evictions for rent arrears will significantly reduce the risk of homelessness for children within households with rent arrears. This is critical for families with children, as experiencing homelessness in childhood is an adverse childhood experience and can have a significant impact on children's future health and wellbeing.

# **Section 6 - Sustainable Development**

The Well-being of Future Generations Act (Wales) 2015 places a well-being duty on Swansea Council to carry out sustainable development. This is in line with the Council's Sustainable Development Policy and our Corporate Plan's Well-being Objectives. We must work in a way that improves the economic, social, environmental and cultural well-being of Wales, by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.

The sustainable development principle means we must act in a manner, which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. We do this by applying the five ways of working.

PLEASE OVERWRITE OR DELETE GUIDANCE/SUGGESTIONS IN RED

## 6a) The Sustainable Development Principle's Ways of Working

The Five Ways of Working	Examples or summary of how applied
Long term - The importance of balancing short-term needs while safeguarding the ability to also meet long-term needs	The Strategy and Action Plan place strong emphasis on assisting Council tenants to sustain their tenancies through effective support.  It identifies current and future challenges and the Action Plan has been developed in consideration of these. It recognises that demands could change and looks to future proof services e.g. implementation of a Housing App/Portal  The Strategy is currently a 4 year plan with intention to review yearly. Yearly reviews will consider demand/needs change context and adapt accordingly.  The Strategy looks to safeguard the income to the Housing Service to reinvest in the service to meet short term requirements and longer term needs.
Prevention - Acting to prevent problems occurring or getting worse	Through its objectives this Strategy places strong emphasis on early intervention and prevention of rent arrears. Acting to prevent problems occurring or getting worse.  The Strategy has a specific objective in respect of prioritising early intervention and prevention of rent arrears and Action Plan points to achieve this objective, including one which is identified as a key priority e.g. Continue to develop the approach to early welfare benefits, financial inclusion and income maximisation advice and support and how this is delivered and focus on providing advice and support to new tenants so that they do not fall in to rent arrears.

Integration -Considering impacts upon each of the well-being goals, well-being objectives, local well-being objectives, or on the objectives of other public bodies	Ensuring our objectives do not contradict each other and compliment those of other public bodies, the objectives of this Strategy will be delivered working alongside other public bodies. The Strategy considers the national context that the Housing Rents Management Services operates within and more locally to ensure that it aligns with other plans, strategies and policies.  The Strategy links to the Swansea Public Services Board Local Well Being Plan and this is detailed within the Strategy. Housing is a key theme within the plan and the Housing Rents Management Strategy supports the delivery of some of the drivers identified to achieve the priorities, including:  Contributing to ensuring that people live and age well by providing support so that people can get information, advice and help and enabling people to live in safe, good quality homes.  Contributing to stronger communities by ensuring that people can get the financial support that they have a right to.
Collaboration - Acting together with other services or external organisation towards our well-being objectives	Collaborative working and working in partnership is key to the delivery of the Housing Rents Management Service and emphasised within this Strategy. It is recognised that Housing's objectives and outcomes for Council tenants can only be achieved by working in partnership and delivering joined up services. The Service works collaboratively with other parts of the Housing Service including Homelessness Services and the Tenancy Support Unit; and with internal partners, such as Tackling Poverty Services; including Employability Services and Welfare Rights Team, with the Revenues and Benefits Service, Social Services, Community Mental Health Teams, Local Area Co-ordinators and Finance.
	Furthermore the Service collaborates with a number of external partners not limited to, but including, the Department for Work and Pensions (DWP), Prison and Probation Services, Support Service providers, Health Services, Shelter Cymru and Citizens Advice.  The Action plan contains specific points in respect of collaboration such as, improve partnership working and collaboration with partners involved in supporting Council tenants and work collaboratively with others and share best practice in respect of new initiatives in response to Welfare Reforms.
Involvement - Involving people with an interest in achieving the well-being goals (everybody), and ensuring that those people reflect the diversity of the area served	This will be achieved by working with Council tenants, including the consultation completed in respect of this Strategy. Tenant participation is key to the delivery of the Housing Rents Management Service. Council tenants have been involved and consulted in respect of the development of this Strategy through the Tenants' Consultative Panel and survey to ensure that it accurately captures the needs and aspirations of the Councils tenants. The Action Plan contains actions which seek to ensure that tenant participation remains a key focus of the delivery of the Housing Rents Management Service.

# 6b) Contribution to Swansea Council's Well-being Objectives

Our Corporate Plan's Well-being objectives	Are directly supported	Are not directly	May be in conflict or
- Car Corporato i lari o tron bonig objectivo	Trio anddily dapported	i i i i i i i i i i i i i i i i i i i	may be in commet or

	by this initiative	impacted by this initiative	adversely impacted by this initiative
Safeguarding People from harm			
Improving Education and Skills			
Tackling Poverty			
Transforming our economy and infrastructure			
Maintaining and enhancing Swansea's natural resources and biodiversity			
Transformation and Future Council development			

6c) Thinking about your answers above, does the initiative support our Corporate Plan's Well-being Objectives when considered together?

Please consider the positives and negatives as a whole. This is an opportunity to analyse the global impact of the proposal where some objectives will be advanced whilst others may be impacted. Where there is a residual negative impact for one or more objectives please show that we have considered mitigation to ensure that negative impacts are lessened. Please detail any conflicts gaps and mitigation measures.

The Strategy supports our Corporate Well-being objectives when considered together and no negative impacts are identified.

The Housing Rents Management Strategy reflects and indirectly delivers in relation to all the corporate well-being objectives and delivers directly in relation to the following two objectives:

Safeguarding people from harm

- By working with partners to address all aspects of safeguarding children and vulnerable adults.
- **Tackling Poverty**
- By helping to address the impacts of Welfare Reform, such as supporting people to claim the full benefits they are entitled to so that they are able to maximise their income.
- By maximising income to the Housing Service to invest to improve housing and build more energy efficient Council homes.
- By preventing homelessness and supporting people to sustain their tenancies to help provide stability and security for families and communities in order to safeguard health and well-being and prevent social exclusion.
- By helping to support individuals to overcome barriers to employment through referrals to co-ordinated person-centred employability support.

In respect of the other corporate well-being objectives the Strategy reflects and indirectly delivers including supporting the delivery of other Housing Strategies which directly deliver on the well-being objectives.

6d) How is contribution to the National Well-being Goals maximised? Where can you add value? Consider the full goal description not just the title. Consider relevant <u>Journey Checkers</u>. Complete the table below <u>PLEASE OVERWRITE OR DELETE GUIDANCE/SUGGESTIONS IN RED</u>

Well-being Goal (click to view definition)	Primary Goals - tick if key	Any significant positive and/or negative impacts/contributions considered/mitigated
A Prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work		Positive contribution by helping to support individuals to overcome barriers to employment through referrals to co-ordinated person-centred employability support.
A Resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).		Positive contribution by supporting the delivery of other Housing Strategies and plans which add direct value to this well-being goal e.g. Housing Estate Management Strategy 2021 - 2025
A Healthier Wales A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.		Positive contribution by supporting people to act with compassion and facilitating understanding of mental wellbeing. PIE and Trauma informed approach.
A More Equal Wales A society that enables people to fulfil their potential no matter what their background or circumstances.		Positive contribution to ensuring that people fulfil their potential no matter what their background, through for example, action plan points to embed employability services within the Rents Team and work with Swansea Working to signpost and support Council tenants and to explore trauma informed approaches and psychologically informed environments in our approach to rent management.

A Wales of Cohesive Communities  Attractive, viable, safe and well-connected communities.	Positive contribution by supporting people to sustain their tenancies enabling people to live in safe, good quality homes to help provide stability and security for families and building sustainable communities.
A Wales of Vibrant Culture & Thriving Welsh	Positive contribution to welsh language – see welsh language information
Language	section 5.
A society that promotes and protects culture,	
heritage and the Welsh language, and which	
encourages people to participate in the arts,	
sports and recreation.	
A Globally Responsible Wales	Positive contribution through focus on sustainable behaviour; sustaining
A nation which, when doing anything to improve the	tenancies and building sustainable communities supporting future
economic, social, environmental and cultural	 generations. In addition the objective of maximising the income to the
well-being of Wales, takes account of whether	Housing Revenue Account which is invested to meet key strategic
doing such a thing may make a positive	objectives including the achievement of the Welsh Housing Quality Housing
contribution to global well-being.	Standard and delivery of a More Homes scheme to build new Council
Continuation to global well-being.	· ·
	housing and contribute towards decarbonisation.

# **Section 7 - Cumulative Impact/Mitigation**

What is the cumulative impact of this proposal on people and/or communities when considering all the impacts identified within the IIA and any other key decisions affecting similar groups/ service users made by the organisation?

(You may need to discuss this with your Service Head or Cabinet Member to consider more widely if this proposal will affect certain groups/ communities more adversely because of other decisions the organisation is making/have made.

For example, financial impact/poverty, withdrawal of multiple services and whether this is disadvantaging the same groups, e.g., disabled people, older people, single parents (who are mainly women), etc.)

In respect of the cumulative impact it is anticipated that the overall impact of the Housing Rents Management Strategy be positive. The objectives of the Strategy of maximising the collection of rental income to the Housing Revenue Account (HRA), prioritising early intervention and prevention of rent arrears, minimising rent arrears when they occur and support Council tenants to sustain tenancies and prevent eviction and mitigating the impacts of Welfare Reform on Council tenants and the Housing Service will have positive outcomes for all.

The Strategy recognises the need to maximise rental income in order to maintain high standards of service delivery. The investment in the Council housing stock will make a significant contribution to the delivery of the Council's priorities and result in wider benefits to communities, estates and the local economy. It will also contribute to the wider national and local well-being, prevention and poverty agenda. However the strategy also recognises that some Council tenants, particularly those who may be vulnerable, may face difficulties in managing their responsibility for rent payment. The Strategy therefore ensures emphasis on the provision of support and advice to Council tenants and the accompanying action plan contains actions to ensure that services are accessible, appropriate and responsive to all groups in order to ensure that Council tenants can maintain and sustain their tenancies, consequently preventing eviction and building sustainable communities.

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#### Any mitigation needed:

It is important that you record the mitigating actions you will take in developing your final initiative.

Record here what measures or changes you will introduce to the initiative in the final draft, which could:

- reduce or remove any unlawful or negative impact/ disadvantage
- improve equality of opportunity/introduce positive change
- support the Well-being of Future Generations Act (Wales) 2015
- reduce inequalities of outcome resulting from socio-economic disadvantage

Unlawful or Negative Impact Identified	Mitigation / Positive Actions Taken in the initiative (add to action plan)		
N/A			

**Section 8 - Monitoring arrangements:** The IIA process is an ongoing one that does not end when the initiative is agreed and implemented. Please outline the monitoring arrangements and/or any additional data collection that will help you monitor any equality impacts, risks, sustainability of your initiative once implemented:

## **Monitoring arrangements:**

Progress towards achieving the strategy's aim and objectives will be measured and monitored on a regular basis and the IIA will form part of the annual monitoring arrangements. In order to achieve this the following activities will be carried out:

- The action plan will be reviewed on an annual basis and progress reported to the Cabinet Member Climate Change & Service Transformation (Deputy Leader)
- An annual update will be produced including action plan progress and an up-date of the key data.

In addition to the annual review of progress, key performance measures and service indicators will be used to monitor on-going success, progress and demand for services:

- The value and number of transactions of rent payments made by each payment method.
- Measure of rent collected as a percentage of rent charged.
- The amount of Current Tenant rent arrears.
- The amount of Former Tenant rent arrears.
- The number of evictions carried out on grounds of rent arrears.
- The number of solutions provided to tenants that demonstrate the work of the Rents Team in respect of sustaining tenancies, the prevention of homelessness and the wider tackling poverty agenda.

The impact of Welfare Reform on the Housing Revenue Account and associated Business Plan.
Further appropriate measures will be considered and existing performance measures developed over time as the action plan is updated.
Actions (add to action plan): No further actions identified at this time.

## **Section 9 – Outcomes:**

Having completed sections 1-8, please indicate which of the outcomes listed below applies to your initiative (refer to the guidance for further information on this section).

Outcome 1: Continue the initiative – no concern	$\geq$
Outcome 2: Adjust the initiative – low level of concern	
Outcome 3:Justify the initiative – moderate level of concern	
Outcome 4: Stop and refer the initiative – high level of concern.	

For outcome 3, please provide the justification below:

N/A

**For outcome 4**, detail the next steps / areas of concern below and refer to your Head of Service / Director for further advice: N/A

# **Section 10 - Publication arrangements:**

On completion, please follow this 3-step procedure:

- 1. Send this IIA report and action plan to the Access to Services Team for feedback and approval <a href="mailto:accesstoservices@swansea.gov.uk">accesstoservices@swansea.gov.uk</a>
- 2. Make any necessary amendments/additions.
- 3. Provide the final version of this report to the team for publication, including email approval of the IIA from your Head of Service. The IIA will be published on the Council's website this is a legal requirement.

# **Action Plan:** Please outline below any actions identified throughout the assessment or any additional data collection that will help you monitor your initiative once it is implemented:

Action	Dates	Timeframe	Lead responsibility	Progress	Add to Service Plan
Continue to ask 'About You' questions on satisfaction surveys and questionnaires when we consult with Council tenants. The information gathered from those surveys will need to be collated and used to inform future Strategies/reviews etc.	Ongoing	Ongoing	Housing Service		
Continue to collect qualitative data in respect of individual tenants and this is updated constantly as circumstances change.	Ongoing	Ongoing	Housing Service		
The Strategy will be monitored and further consultation will take place at review points to ensure that Council tenants and stakeholders continue to be involved to ensure transparency and maintain an ongoing dialogue.	1 year from publication	Annually	Rents Team Manager		

<sup>\*</sup> Please remember to be 'SMART' when completing your action plan (Specific, Measurable, Attainable, Relevant, Timely).