

# Customer Access Review – Full Assessment

<b>Assessment details</b>	
<b>Assessment area</b>	Leaseholder Arrears Policy
<b>Date of assessment</b>	July 2024
<b>Directorate and Service</b>	Housing and Public Protection, Housing Services
<b>Manager</b>	Housing Scheme & Finance Manager
<b>Officer conducting assessment</b>	Housing Policy & Performance Officer
<b>Step 1: Scoping the assessment</b>	
<b>1. What are the aims and objectives of the activity or proposal?</b>	<p>The Leaseholder Arrears Policy sets out Dartford Borough Council's ('The Council') approach to preventing and managing leaseholder arrears within its housing stock. The Policy applies to anyone who has purchased a lease where the Council is the owner of the property.</p> <p>The Council is committed to offering support and advice to all leaseholders to help them to understand their responsibilities with making payments. Where a leaseholder does find themselves in arrears, the Council will respond sensitively whilst taking prompt action to recover any debt.</p> <p>The overall objective of the Leaseholder Arrears Policy is to minimise the level of leaseholder arrears.</p> <p>To achieve this, the Council aims to:</p> <ul style="list-style-type: none"> <li>• Ensure all leaseholders are aware of their responsibility to pay for ground rent, service charges and major works where required;</li> <li>• Ensure leaseholders have the information and support they need to prevent or minimise their debt;</li> <li>• Enable leaseholders to maximise their income;</li> <li>• Monitor levels of arrears and have early intervention mechanisms in place to prevent arrears accruing further;</li> <li>• Promote and offer a wide variety of payment options;</li> <li>• Ensure all communications are clear and encourage contact;</li> <li>• Take appropriate and proportionate action in accordance with the level of arrears accrued;</li> <li>• Ensure all leaseholders are treated in a fair, respectful, empathetic and consistent way.</li> </ul>
<b>2. Who will be affected by the activity or proposal?</b>	The Policy will affect Dartford Borough Council leaseholders.
<b>3. How does the activity or proposal contribute to:</b>	<p>a) The Leaseholder Arrears Policy does not contribute to any key performance indicators.</p> <p>b) The Leaseholder Arrears Policy contributes to the Housing ambitions in the draft Corporate Plan 2024-2027 to 'ensure that our homes are well maintained' and 'provide a high quality and responsive housing</p>

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<b>Step 1: Scoping the assessment</b>	
<p>a) any key performance indicators?</p> <p>b) policies, values or objectives of Dartford Borough Council?</p>	<p>service that's built on respect. We want to be practical, honest and straightforward in all the information and advice we give.'</p>
<p>4. Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?</p>	<p>The Leaseholder Arrears Policy and its delivery is intended to be compatible with the following relevant legislation and regulation:</p> <ul style="list-style-type: none"> <li>• Leasehold Reform Act 1967</li> <li>• Housing Act 1985</li> <li>• Landlord and Tenant Act 1985</li> <li>• Landlord and Tenant Act 1987</li> <li>• Leasehold Reform, Housing and Urban Development Act 1993</li> <li>• Commonhold and Leasehold Reform Act 2002</li> <li>• Leasehold Reform (Ground Rent) Act 2022</li> </ul>
<b>Step 2: Information collection</b>	
<p>5. What do you know about the groups of people who will be affected? (i.e. demographic information in relation to the protected characteristic groups of age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment, marriage and civil partnership)</p>	<p><b>Dartford population profile</b></p> <ul style="list-style-type: none"> <li>• <b>Gender</b> – There are slightly more female residents than male residents in Dartford where 51% are female and 49% are male, which is the same as the overall England ratio of females and males.</li> <li>• <b>Age</b> – The median age in Dartford is 37 years, which is slightly lower than the overall England mean age of 40 years. 21.1% of Dartford's population is aged 14 years or under. This is followed by residents aged 35 to 44 years (15.7%), 25 to 34 years (15.2%), 45 to 54 years (13.3%), 55 to 64 years (10.8%), 15 to 24 years (10.2%), 65 to 74 years (7.4%), and aged 75 years and over (6.4%)</li> <li>• <b>Ethnicity</b> – The largest ethnic group that people in Dartford identify with is White at 74.5%. This is followed by Black, Black British, Black Welsh, Caribbean or African (10.50%), Asian, Asian British or Asian Welsh (9.90%), Mixed or Multiple ethnic groups (3.10%), and Other ethnic groups (2.00%)</li> <li>• <b>Disability</b> – 15.9% of Dartford's population are disabled. Of this, 6.6% of people's activities are limited a lot and 9.3% of people's activities are limited a little.</li> <li>• <b>Religion</b> – 48.1% of Dartford's population connect or identify with the Christian religion, followed by 3.8% Hindu, 3.5% Muslim, 1.7% Hindu, 0.6 Buddhist, 0.1% Jewish, 0.4% other religion. 36.5% of Dartford's population did not connect or identify with any religion and 5.3% did not answer this question in the Census.</li> </ul>

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Step 2: Information collection	
	<ul style="list-style-type: none"> <li>• <b>Sexual orientation</b> – 91.2% of Dartford’s population aged 16 years and over identified as straight or heterosexual. 1.5% described themselves as gay or lesbian. 0.91% described themselves as bisexual. 0.14% described themselves as pansexual; 0.03% described themselves as asexual; 0.00% described themselves as queer. 0.01% described themselves as ‘other sexual orientation’. 6.54% did not answer this question in the Census. (Source: Census 2021, Office for National Statistics)</li> </ul> <p><b>Leaseholder profile</b> – There are currently 481 leasehold properties. The conveyancing process is managed by external bodies and legal transfers which do not collect personal data concerning the protected characteristics of new home owners. The Housing Service does not receive or hold any personal data regarding leaseholders other than name and address.</p>
<p><b>6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings</b></p>	<p>Internal consultation on the draft Leaseholder Arrears Policy has been carried out with Council officers.</p>
<p><b>7. Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?</b></p>	<p>The Council is committed to ensuring the voice of its tenants and leaseholders is heard on matters that affect them. The Regulator of Social Housing places a requirement on social housing landlords to comply with the Transparency, Influence and Accountability Standard 2024, by ensuring that residents are given a wide range of opportunities to influence and be involved in the formulation of their landlord’s housing-related policies and strategies. Consultation with Council leaseholders will be undertaken, as follows:</p> <ol style="list-style-type: none"> <li>1. All Council leaseholders will be invited to comment on the draft Leaseholder Arrears Policy.</li> <li>2. The Dartford Tenants’ and Leaseholders’ Forum (DTLF) will be invited to comment on the draft Leaseholder Arrears Policy. The DTLF aims to ensure that the services delivered by the Council are accessible to all. The Forum works as a group to ensure that the views and housing needs of residents are recognised and addressed by the Council, and that those needs and views are placed at the centre of housing services delivery.</li> <li>3. The Housing Advisory Board (HAB) will be invited to comment on the draft Leaseholder Arrears Policy. The HAB considers reports on proposed policy, strategy and performance in relation to housing issues and makes recommendations to Cabinet as appropriate. The HAB includes representation from Council officers, elected Members and DTLF members.</li> </ol>

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## Step 3: Assessing the equality impact

8. Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the Public Sector Equality Duty:

- a) tackling unlawful discrimination
- b) promoting equality of opportunity
- c) promoting good relations

NOTES:

- The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration
- For existing activities, consider how they are working in practice for each relevant protected group
- For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group
- If there is no identified equality impact, please tick the 'No Impact' box and explain why in question 9
- If the equality impact is unclear, please tick the 'Unknown' box and explain why in question 9

## Step 3: Assessing the equality impact

PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Age	<p><b>Vulnerable adults</b> If the Council is aware that a leaseholder has difficulty in reading or understanding information regarding making payments for the required charges, reasonable steps will be taken to ensure that the leaseholder understands any information given. This may include signposting to appropriate support services and providing information in alternative formats.</p>		<input type="checkbox"/>	<input type="checkbox"/>
Disability	<p><b>Vulnerable adults</b> As outlined under 'vulnerable adults' in the 'age' category.</p> <p><b>Communication needs</b> In accordance with the Council's Equality &amp; Diversity Document Framework, the Leaseholder Arrears Policy can be provided in</p>		<input type="checkbox"/>	<input type="checkbox"/>

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	alternative formats, including: Braille, audio tape and large print versions of documents. British Sign Language interpreting services can also be provided upon request. Calls can also be received via Relay UK.			
<b>Sex</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Gender reassignment</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Race</b>	<b>Alternative format and interpreting services</b> In accordance with the Council's Equality & Diversity Document Framework, the Leaseholder Arrears Policy can be provided in alternative formats including documents translated into other languages. Telephone and face-to-face language interpreting services can also be provided upon request.		<input type="checkbox"/>	<input type="checkbox"/>
<b>Religion/Belief</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sexual Orientation</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Pregnancy/Maternity</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Marriage and Civil Partnership*</b>	Not applicable as the Policy does not apply in the context of employment.	Not applicable as the Policy does not apply in the context of employment.	<input type="checkbox"/>	<input type="checkbox"/>

\* Regarding the protected characteristic of Marriage and Civil Partnership – public bodies need to comply with the first aim of the Public Sector Equality Duty and only in the context of employment.

Step 3: Assessing the equality impact	
<b>9. If 'no impact' or 'unknown' was selected, please explain</b>	There are no known circumstances where the policy will have relevance to or a disproportionate equality impact on the protected characteristic groups of sex, gender reassignment, religion/belief, sexual orientation and pregnancy/maternity.

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<b>Step 3: Assessing the equality impact</b>	
<b>10. If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups</b>	The Council does not work directly with any partners to deliver the Policy, however will signpost leaseholders to organisations who will be able to offer support and guidance in areas such as money management and benefits advice.
<b>11. Any other comments</b>	No.

<b>Step 4: Action plan</b>	
<b>12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:</b> <b>a) any gaps in information and consultation</b> <b>b) how any negative impacts on equality will be mitigated or eradicated</b>	

**a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?**

<b>Information needs</b>	<b>Action</b>	<b>Intended outcome</b>	<b>Date for completion</b>	<b>How this will be monitored</b>	<b>Responsible officer</b>
Views from all Council leaseholders	Invite comment and input on the draft policy from all Council tenants and leaseholders	Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy	August 2024	Details of the consultation and amendments made to the draft policy as a result of the consultation will be included in the Cabinet report	Housing Policy & Performance Officer
Views from the Dartford Tenants' and Leaseholders' Forum on the draft policy	Invite comment and input on the draft policy from the Dartford Tenants' and Leaseholder's Forum	Feedback will, at a formative stage, inform any further changes that may be required to the draft	August 2024	Details of the consultation and amendments made to the draft policy as a result of the	Housing Policy & Performance Officer

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Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
		policy in advance of seeking approval for the policy		consultation will be included in the Cabinet report	
Views from the Housing Advisory Board	Invite comment and input on the draft policy from the Housing Advisory Board	Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy	October 2024	Details of the consultation and amendments made to the draft policy as a result of the consultation will be included in the Cabinet report	Housing Policy & Performance Officer

**b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?**

Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer

**Step 5: Decision making and future monitoring**

<b>13. Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?</b>	Head of Legal Services and Director of Housing & Public Protection
<b>14. Is the subject of the Customer Access Review going to committee? If yes, include your findings in the committee report and attach this assessment to the report</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>15. How will you continue to monitor the activity or proposal on protected characteristic groups?</b>	The Leaseholder Arrears Policy will be reviewed every three years to monitor its effectiveness. The Policy will be reviewed earlier to address any legislative, regulatory, best practice or operational issues.
<b>16. When will you review this Customer Access Review?</b>	New Customer Access Review assessments will be undertaken in conjunction with the review of the policy.

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## Step 6: Final steps

17. Once this Customer Access Review has been approved, send this assessment to the Policy & Projects Officer
18. Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded

### Reviewed by Legal Services:



1/8/2024

### Reviewed by Director of Housing & Public Protection:



31.7.2024