



Income Management Policy

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1.0 Introduction and scope

1.1 This Policy sets out our approach to maximising the income of our customers and the Group. This Policy along with the Income Management Toolkit is intended as a document of options to:

- prevent arrears from arising in the first place
- intervene early if arrears should accrue
- support our customers, either ourselves or through signposting to our partners
- enforce payment, using legal action where necessary, as a last resort.

1.2 The scope of this Policy covers:

Gentoo Group	X
Gentoo Homes	
Gentoo Developments Ltd	
Gentoo Genie	

It applies to:

General Needs rented properties	X
Supported Housing	X
Sheltered Housing	X
Leasehold/Shared ownership	X
Rent to Buy properties	X
Market rented properties (domestic)	X
Temporary Accommodation	X
Stock owned but not managed by the Group	
Communal Areas, including those relating to Leasehold/Shared Ownership properties	
Commercial Property (offices, depots etc)	

Stock managed by Gentoo on behalf of a third party	
Garages and outbuildings	X
Remote plant (district heating, electrical pumps etc)	
Curtilage	

2.0 Links to organisational goals

2.1 Our Vision and Values set the direction and culture of the Group. They ensure that the business is aligned around the desire to create sustainable homes and communities and to improve the lives of our customers. The Vision and Values ensure that all of our people understand Gentoo's ethos and are clear about what is expected of them and the contribution they can make.

Vision:

Great Homes - Strong Communities - Inspired People
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Values:

Do the right thing
Make a difference
Work together
Keep learning
Give all you've got

2.2 This Policy operates within our Vision and Values and links to the Tenancy Management Policy, Neighbourhood Management Policy and the Vulnerability Toolkit. This policy has due regard to the Group's risk register and sets out to mitigate the following risk:

- Welfare Reform

3.0 Regulation and legislation

3.1 This Policy helps to fulfil the following legislation:

- Pre Action Protocol and associated legislation
- RSH Regulatory Code
- Housing Act 1985, 1988 etc
- Data Protection Act 1998
- Protection from Eviction Act 1977

3.2 This Policy has been cross referenced with good practice.

4.0 Our Policy statement

4.1 Maximising the income of our customers and the Group is our number one priority. We will strive to ensure that every one of our customers has the support and advice they need to ensure they are not financially excluded.

4.2 To enable customers to remain in their homes or have access to rehousing with Gentoo, we are committed to ensuring that every opportunity has been provided to assist them in their tenancies. We will do this by explaining the importance of paying their rent, providing financial education, ensuring customers are claiming the benefits they are entitled to and by making referrals to impartial debt advice agencies where they will receive independent advice and tailored help. We have in place tailored support mechanisms and effective signposting to give our customers opportunities to maximise their incomes.

4.3 Prevention and early intervention are critical elements in the arrears process. Prevention starts from the moment a customer is considered for a property, where we will carry out an affordability assessment. Our sign up process and welcome visits are also designed to prevent rent accounts failing into arrears in the first place. In terms of early

intervention some of our methods include regular home visits, income and expenditure questionnaires when required, signposting to relevant debt advice agencies and the Early Help Team. We will also utilise our Money Matters Team whose purpose is to maximise income for customers and Gentoo by providing customers with appropriate support. Services offered from them include:

- Debt advice, support and solutions
- Welfare Benefits advice and claims
- Universal Credit Support
- Basic budgeting advice
- Access to the Gentoo Crisis fund
- Income Maximisation
- Income and Expenditure analysis

4.4 We will manage customer's accounts throughout the arrears process, this will involve ensuring contact with the customer is maintained, renegotiating rent payment agreements if necessary and progressing to enforcement if required.

4.5 We offer a range of convenient and flexible rent payment methods to maximise the opportunities for customers to pay their rent and to suit their individual needs. The different ways to pay that are available include:

- Cash or cheque at Gentoo office with this facility
- Card payments, including debit card and credit card
- Cheque or postal order payment by post
- Internet payments
- Telephone payment line
- Deductions from DWP benefits including Universal Credit
- Standing order
- Direct debit
- A limited door to door collection service for customer

4.6 It is Gentoo's preference that enforcement will not be necessary and we will seek to resolve financial issues by preventing arrears from arising in the first place, intervening as early as possible, supporting our customers to maximise their income, and enabling them to pay their rent. Wherever possible, we will aim to secure repayment without obtaining possession of the dwelling, for example by arranging direct payments. Failure to pay is, however, a ground for possession.

- A Postponed Possession Order (PPO) allows customers to remain in their home on the grounds that they pay their current rent plus whatever the amount the County Court state.
- An Absolute Possession Order (APO) can also be granted to end an assured tenancy usually within 28 days.

Should either order be breached then we must apply for a bailiff to carry out an eviction.

4.7 Gentoo aims to provide the highest level of service and care to its vulnerable tenants and service users. The way we deal with debt recovery with these customers will be tailored to their individual circumstances.

4.8 Partnership working is crucial in reducing the level of arrears our customers accrue, in addition to other debts they might have. We will continue to work closely with partners, while looking to develop authentic relationships with other organisations where it will add value.

4.9 In order to achieve our aspiration of income maximisation for both our customers and the Group, we want to empower customers to take control of their finances through emphasising the importance of paying rent, through financial education and also by advising them on their financial situation whether through our Money Matters Team, or via a referral to the relevant agency. Our success will be measured in terms of the level of arrears and the reduction in evictions based on arrears.

4.10 We are committed to the principles of diversity and inclusion throughout the organisation and aim to:

- Meet the needs and choice of people from all backgrounds.
- Ensure that our services are relevant, responsive and sensitive to the needs of our existing and future customers.
- Ensure that all sections of the community in which we work have equal access to our services.

Our Income Management Policy will ensure that customers will be treated as individuals and with fairness and respect. An Equality Assessment has been completed with regard to this Policy and is attached in Appendix 1.

5.0 Roles and responsibilities

5.1

Roles	Responsibilities
Executive Director (Operations)	Is accountable for ensuring effective implementation of this Policy
Deputy Director (Operations)	Is responsible for adequate resourcing and having effective processes in place to implement this Policy
Neighbourhood Operations Manager and Income Hub Manager	Is responsible for ensuring that this Policy is adhered to and that all staff are appropriately trained
All Neighbourhood Management and FTA staff	Should be trained in relation to this Policy and act accordingly

6.0 Monitoring and review

- 6.1 This Income Management Policy will be reviewed a maximum of every 3 years, or in line with business need.
- 6.2 The accountability for this Policy lies with the Executive Director (Operations) and responsibility for this Policy lies with the Deputy Director (Operations).
- 6.3 This policy may be subject to an audit in line with the internal audit plan.
- 6.4 This Policy is a grade 2 and changes will need the approval of the Executive Director (Operations) and Executive Director, Corporate Services.
- 6.5 The KPIs for this service (see Appendix 2) are reported through the appropriate governance structure.
- 6.6 The Local Service Offers for this service can be found in Appendix 3.

7.0 Policy outcomes

- 7.1 Our Income Management Policy aims to achieve the following outcomes:
- Customers income is maximised and they are able to sustain their tenancy
 - Customers are provided with the opportunity to be supported and advised either internally, or externally.
 - Legal action and arrears reduce, protecting Gentoo income.

8.0 Records

- 8.1 All records with reference to Income Management are held within the 'Rent Account' section of Orchard.

Appendix 1 Equality Assessment

Equality Assessment

1. What is this Equality Assessment being completed on?

Specify a clearly defined service area – too big becomes too hard to complete.

Income Management Policy

This document relates to our policy on Income Management and explains how we collect rental income.

2. Does the policy/service/project/process/function outlined above have an impact on people? Please tick relevant box ✓

People means staff, customers and other stakeholders who are either involved in it, in receipt of it or affected by it, either directly or indirectly.

✓	Yes – High impact (reasonable or significant level of direct impact/contact, requiring a reasonable or significant level of knowledge and understanding of diverse groups)
	Yes – Low impact - (infrequent contact which involves minimal interaction at a level which requires only basic awareness)
	No - If you select “no”, add an explanation below to justify your assessment.

If you have selected “no”, then subject to your justification above being validated, there will be no need to complete this Equality Assessment further. If you have selected “yes”, please continue....

3. Which groups of people* (“protected characteristics”) is it impacting? Please tick ✓ relevant box (See notes)

✓	All groups		Only specific groups
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*The “protected characteristics” are specified by equality legislation. They are: age, disability, gender reassignment, marriage & civil partnership, pregnancy & maternity, race, religion or belief, sex, sexual orientation. If you are selecting “All”, you still need to think about whether the “service” may be of

greater relevance/ have greater impact for any one or more of those groups, and include details.

Please detail which groups and why

All groups with protected characteristics are potentially affected by the service as it impacts upon all existing customers.

4. Please justify how you can be confident that this policy/service/project/ process/function is tailored and sensitive to individual needs, that it doesn't discriminate, and that it promotes equality of opportunity / levels the playing field? (See notes.)

Remember within every group there will be individual and different needs. See attached guidance/things to think about. Please list the measures you have in place to give you confidence.

The policy is tailored and sensitive to individual needs and the staff who are responsible for its implementation have received the appropriate training and guidance.

The Policy/process:-

- This document should not be read as a set process to be followed from beginning to end; staff should utilise the appropriate tools according to each individual case, taking into account the customers individual circumstances, such as potential underlying causes of arrears, benefit issues and/or vulnerability. Staff should be proactive and tailor the service to the customers' individual needs.
- Staff will work with colleagues in the Neighbourhood Team, Victim Support/Perpetrator Support, or Young or Older Persons Support Coordinators (if required) to ensure the customer is given appropriate guidance and support. Consideration towards an Early Help referral should be discussed with the customer if appropriate.
- Policy is aligned/cross referenced to Gentoo's Diversity and Inclusion commitment.
- User Defined Characteristics (UDCs) hold information about individual customer requirements, for example communication needs, disabilities etc. This information is accessible on the Orchard IT system.
- Flexible Appointments – a wide range of flexible appointment times are available to fit around working times and caring responsibilities.
- Training identified in this policy will be delivered having considered accessibility of venues, delivery styles and methods appropriate to individual needs of those attending, in liaison with the Groups dedicated Learning & Development Advisors.
- Letterhead used to communicate with customers advises about availability of information in alternative formats, and of interpretation services.

Staff/3rd Parties implementing it:-

- Staff Training – all Gentoo staff are required to attend mandatory equality and diversity training.
- Staff have access to relevant guidance and information to increase awareness and understanding of Diversity and Inclusion in relation to delivering services, via Diversity and Inclusion staff handbooks, newsletter articles and Diversity and Inclusion intranet section.

5. Please detail the checks and balances that you have in place which give you confidence that the above measures are in place and being implemented effectively. (See notes)

If you are unsure about effectiveness, or if as part of completing this assessment you have identified further work that is required in order for you to feel confident, please detail this in section 8 below.

- This policy may be subject to an audit in line with the internal audit plan- an equality assessment/review will be included as part of this audit.
- The Policy will be reviewed every 4 years.
- Staff attendance at mandatory Diversity and Inclusion training is recorded.
- Prior to any legal action checks are carried out by the NOM to ensure the offer of guidance and support has been offered where necessary.

6. The duty to foster good relations is about tackling prejudice and promoting awareness and understanding between those who share a protected characteristic and those who don't share it. Is this duty relevant to this "service"? Please tick relevant box. (See guidance notes)

This question will not be relevant to all assessments. See notes.

<input checked="" type="checkbox"/>	No - This duty is not relevant to this "service".
<input type="checkbox"/>	Yes - This duty is relevant to this service. *

*If this duty is relevant, please detail below how the "service" is fostering good relations.

If you identify further work that is required to comply with this duty, add actions in section 8 below.

7. Are you confident that the checks and balances that you have in place, effectively mitigate the equality and diversity risk to the Group? Please tick relevant box.

Level of confidence that checks and balances mitigate risks in respect of.....	Very confident	Confident but more	Not confident*

		work required*	
Legislation/legal action in relation to equality & diversity (e.g. harassment or discrimination, or failure to give due regard to all elements of the Public Sector Equality Duty)	√		
RSH Regulation in relation to E&D	√		
Reputation in relation to E&D	√		

(* Use Q.8 to specify your proposed actions to remedy your lack of confidence)

8. Actions to be completed following this EA:

Please detail the actions you will put in place following this EA and the timescales for your next review.

Action	Responsibility	Timescale
Staff training/briefing refresher sessions to be developed if necessary following feedback from Business Assurance audit	Vicky Gamblin	Estimated April 2018

Completed by: Sarah Treadwell/Vicky Gamblin Date: 09/12/2017

Appendix 2 KPIs

The following measures will be used to inform this Policy and Toolkit:

- Arrears as a percentage of debit
- The number of support referrals made and how customers engage
- Legal action taken, including NOSP, Court Action and Evictions
- The cost of staff against the revenue collected
- The key performance data being collated monthly as part of the Welfare Reform Report will help inform action for those affected.

Appendix 3 Local Service Offers

Description

We will:

<p>Income Management - to offer you advice, support and a range of ways to pay in order to maximise collection of rental income and other charges</p>	<ul style="list-style-type: none">• Provide advice, support and guidance to enable you to maximise your income• Take appropriate action to prevent your accounts from falling into arrears• Provide you with timely information in relation to your rent and other accounts• Offer advice, support and guidance on the most appropriate way to pay your rent and other charges
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