



## Income Management Policy

Policy:	Income Management Policy
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Policy Owner:	Executive Director of Housing
Policy Author(s):	Head of Neighbourhoods
Accountable Executive:	Executive Director of Housing
Approved by:	Executive Director of Housing
Equality Assessment:	Yes
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Policy Grade:	2
For the full version history of this policy, see the back page	

Please avoid referring to printed versions of this policy. Printed versions may quickly go out of date – the latest version will be on the Policy Hub or contact the Governance Team for further information. For support and advice regarding the Policy, please contact the Policy Owner.

## 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 Our core purpose and vision and priorities

- 2.1 Our core purpose is to provide safe and decent homes for our customers of today and tomorrow.
- 2.2 Our vision is to provide great homes, strong communities, and inspired people for Sunderland.
- 2.3 The safety of our customers and colleagues will always be our number one priority.
- 2.4 We have identified six further priorities which will guide the delivery of our services.
- 2.5 We live our values in everything we do from the boardroom to the front room, to deliver our priorities for our customers.
- We know our customers.
  - We provide great homes.
  - We help communities to thrive.
  - We are a great place to work.
  - We spend our money wisely.
  - We are well governed.
- 2.6 Our values are what we stand for and what we want to be known for. They are what makes us, us.
- We care about people.
  - We take accountability.
  - We shape the future.
  - We bring leadership.
  - We deliver.

## Roles and Responsibilities

As a Housing Association, we have a statutory responsibility to comply with all relevant regulations and legislation in relation to allocations. Our Regulator sets out the Tenancy Standard which we must meet. Failure to properly discharge these responsibilities could lead to a serious detriment or other judgement from the Regulator if we breach the Standards in place at the time.

The Director of Customer is accountable for ensuring this policy has regard to all legislation, regulation, and best practice and for ensuring implementation of this policy effectively.

The Director of Customer is accountable for adequate resourcing and having effective processes in place to implement this policy.

The Heads of Neighbourhoods are responsible for the day-to-day delivery of this policy.

### **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
- Breathing Space Moratorium Regulations 2020
- Social Housing (Regulation) Act 2023

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 tenant is considered for a property, where we will carry out an income review. Our sign-up process and series of welcome emails are also designed to prevent rent accounts falling into arrears in the first place. In terms of early Intervention, some of our methods include regular home visits, income reviews 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

4.4 We will manage customers' 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:

- Card payments, including debit card and credit card
- Internet payments
- Telephone payment line

- Deductions from DWP benefits including Universal Credit
- Standing order
- Direct debit
- A door-to-door collection service in exceptional circumstances customers

4.6 It is Gentoo's preference that enforcement action 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 customers to maximise their income, and enabling them to pay their rent. Wherever possible, we 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 states.
- 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 all its customers. The way we deal with debt recovery is tailored to the customer's 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 relationships with other organisation's where it will add value.

4.9 We want to empower customers to take control of their finances through emphasising the importance of paying rent. 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 regarding this Policy and is attached in Appendix 1.

## 5.0 Roles and responsibilities

### 5.1

Roles	Responsibilities
Executive Director of Housing	Is accountable for ensuring effective implementation of this Policy
Director of Customer	Is responsible for adequate resourcing and having effective processes in place to implement this Policy
Head of Neighbourhoods	Is responsible for ensuring this Policy is adhered to and that all staff are appropriately trained
All Housing 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 every 3 years, or in line with business need.
- 6.2 The accountability and responsibility for this Policy lies with the Executive Director of Housing.
- 6.3 This policy may be subject to an audit in line with the business' audit plan.
- 6.4 This Policy is a grade 2 and changes will need the approval of the Executive Director of Housing.
- 6.5 The KPIs for this service (see Appendix 2) are reported through the appropriate governance structure.

## **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 support where appropriate via our Money Matters Team, Neighbourhood Coordinator, or partner organisations
  - Legal action and arrears reduce, protecting the Groups income.

## **8.0 Records**

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

## 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.

<p><b>Income Management Policy</b> This document relates to our policy on Income Management and explains how we collect rental income.</p>
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#### 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.

<input checked="" type="checkbox"/>	<b>Yes – High impact</b> (reasonable or significant level of direct impact/contact, requiring a reasonable or significant level of knowledge and understanding of diverse groups)
<input type="checkbox"/>	<b>Yes – Low impact -</b> (infrequent contact which involves minimal interaction at a level which requires only basic awareness)
<input type="checkbox"/>	<b>No -</b> 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)

<input checked="" type="checkbox"/>	<b>All groups</b>	<input type="checkbox"/>	<b>Only specific groups</b>
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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, considering 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 tenant requirements, for example communication needs, disabilities etc. This information is accessible on MRI Housing
- Flexible Appointments – a wide range of flexible appointment times are available to fit around customers' 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 partnership with the Groups dedicated Learning & Development Advisors.
- Letterhead used to communicate with customers advice about availability of information in alternative formats, and of interpretation services.

**Staff/3<sup>rd</sup> 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.

**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 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 3 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"/>	<b>No</b> - This duty is <b>not</b> relevant to this "service".
<input type="checkbox"/>	<b>Yes</b> - This duty <b>is</b> 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.	Very confident	Confident but more	Not confident*

		<b>work required*</b>	
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.

<b>Action</b>	<b>Responsibility</b>	<b>Timescale</b>
Regular refreshers as part of the Groups staff training program	Vicky Gamblin	Annually or when a legislation change.

**Completed by: Vicky Gamblin**

**Date: 04/08/2023**

## **Appendix 2 KPIs**

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

- Total standard and HB recovery arrears
- Arrears as a percentage of debit
- Rent collected and a percent of rent due
- Total arrears of UC customers
- Rent collected as a percentage of rent due (UC Customers)
- Total Former Tenant debt
- Support referrals made.
- Legal action taken, including NOSPs, Court Action and Evictions

## Version Control

Version	Reason	Issuer	Date
0.4	Amended as per Mel Smith's comments	Sarah Treadwell	16/3/18
2.0	Approved	Sarah Treadwell	27/6/18
2.1	Amended names to job titles and added accountable Exec Director to front page	Sarah Treadwell	13/5/19
2.2	Added Coronavirus Act 2020 to paragraph 3.1 and removed 'cash or cheque at Gentoo office' from paragraph 4.5	Vicky Gamblin	12/10/20
3.0	Policy Renew – Added Breathing Space Legislation and updated Appendix 3 - local offers.	Vicky Gamblin	25/05/2021
3.1	Amended job titles and customer amended to tenant.	Clare McInroy	12/01/2022
3.2	Policy review	Vicky Gamblin & Catherine Loftus	04/08/2023