

# Equality Impact Assessments Toolkit

## EqlA Template



You must consider the [Equality Impact Assessment Guidance](#) when completing this template.

The EDI team can provide help and advice on undertaking an EqIA and also provide overview quality assurance checks on completed EqIA documents.

EDI team contact email: [edi\\_team@sandwell.gov.uk](mailto:edi_team@sandwell.gov.uk)

<b>Quality Control</b>	
Title of proposal	The review of council tenant rents and housing related property charges
Directorate and Service Area	Place – Housing
Officer completing EqIA	Sonia Ward
Contact Details	sonia_ward@sandwell.gov.uk
Other officers involved in completing this EqIA	N/A
Date EqIA completed	17 October 2024
Date EqIA signed off or agreed by Director or Executive Director	
Name of Director or Executive Director signing off EqIA	Alan Lunt
Date EqIA considered by Cabinet	4 December 2024
Where the EqIA is Published  (please include a link to the EqIA and send a copy of the final EqIA to the EDI team)	N/A

## **Section 1.**

The purpose of the project, proposal or decision required

Each year council tenants, leaseholders and other residents are notified of the rent and other related housing charges to be set from the following April. The purpose of the cabinet report is to seek approval to implement these charges for the new financial year 2025/26.

The council has to achieve the right balance between supporting tenants to mitigate the continued cost of living pressures and protecting the Housing Revenue Account (HRA) to ensure we can continue to provide affordable social housing for our residents.

## **Section 2.**

Evidence used and considered. Include analysis of any missing data

In line with the Welfare Reform and Work Act 2016, Sandwell Council reduced housing rents by 1% per year for four years, between 2016/2017 and 2019/20.

In 2019, the government set a rent policy for social housing that would permit rents to increase by up to CPI+1% per annum and made clear its intention to leave this policy in place until 2025.

From 2020 Sandwell Council has had control over its own rent setting in line with the Department for Levelling Up, Housing and Communities (DLUHC) Rents Standard, and Policy Statement on Rents for Social Housing.

Local housing authorities are required by s.74 of the Local Government and Housing Act 1989 to keep a Housing Revenue Account (HRA) unless the Secretary of State has consented to their not doing so. The HRA identifies major elements of housing revenue expenditure, such as maintenance, administration and contributions to capital costs, and how they are funded by rents and other income.

S.24 of the Housing Act 1985 gives local authorities the power to make reasonable charges for the tenancy or occupation of dwellings. Rent setting must be seen in the context of the statutory duty to set a balanced HRA budget.

The Council is required to review from time to time that the rents and service charges that it charges for the tenancy or occupation of its dwellings are fair and reasonable. The review of rents is now subject to further

restrictions arising from the provisions of the Welfare Reform and Work Act 2016. In October 2017, the Government confirmed details for future social rents and from 2020/21, providers are able to increase rents up to a limit of CPI plus 1% each year. This policy is designed to provide more certainty over rent levels.

The Council may amend the rent for its tenants by giving at least 28-days notice. The notice period arises from s.102 (1)(b) of the Housing Act 1985 and in the terms of the Council's standard tenancy agreement.

### **Section 3.**

#### Consultation

The Council is not required to consult on the review of council tenant rent and housing related property charges; however as best practise, the proposals for rent setting for 2025/26 has been presented to the Tenant and Leaseholders Scrutiny Group (TLSG).

Consultation has been undertaken with the Tenant and Leaseholder Scrutiny Group (TLSG). The TLSG acknowledged that money management is a key factor for tenants and leaseholders and recommended promoting the Welfare Rights service to offer advice, support, and benefits checks as required.

Relevant internal stakeholders have been consulted and feedback has been included in the final cabinet report.

### **Section 4.**

Summary assessment of the analysis at section 4a and the likely impact on each of the protected characteristics (if any)

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**Section 4a - What are the potential/actual impacts of the proposal on the protected characteristics?**

<b>Reviewed Characteristic</b>	<b>Impact? Positive (P) Negative (N) Neutral (Ne)</b>	<b>Details of impact</b>	<b>Actions to address negative impact or promote positive impact (use section 8 table)</b>	<b>Owner of action/ Timescale</b>
<b>Age</b>	Ne	There requirements are the same regardless of the protected characteristics of the tenant(s) / leaseholder(s).	N/A	N/A
<b>Disability</b>	Ne	There requirements are the same regardless of the protected characteristics of the tenant(s) / leaseholder(s).	Information can be provided in large print on request. Information available in the Councils internet pages is available in accessible formats and read by assistive technology.	N/A
<b>Gender Reassignment</b>	Ne	There requirements are the same regardless of the protected characteristics of the tenant(s) / leaseholder(s).	N/A	N/A
<b>Marriage and civil partnership</b>	Ne	There requirements are the same regardless of the	N/A	N/A

Reviewed Characteristic	Impact? Positive (P) Negative (N) Neutral (Ne)	Details of impact	Actions to address negative impact or promote positive impact (use section 8 table)	Owner of action/ Timescale
		protected characteristics of the tenant(s) / leaseholder(s).		
Pregnancy and maternity	Ne	There requirements are the same regardless of the protected characteristics of the tenant(s) / leaseholder(s).	N/A	N/A
Race	N	There requirements are the same regardless of the protected characteristics of the tenant(s) / leaseholder(s). However, there may be a language barrier if English is not a first language.	<p>Tenant(s) / leaseholder(s) can make use of translation services provided by voluntary organisations or the use of an interpreter if calling the Council.</p> <p>General communications can be shared with communications with voluntary organisations.</p>	N/A

<b>Reviewed Characteristic</b>	<b>Impact? Positive (P) Negative (N) Neutral (Ne)</b>	<b>Details of impact</b>	<b>Actions to address negative impact or promote positive impact (use section 8 table)</b>	<b>Owner of action/ Timescale</b>
<b>Religion or belief</b>	Ne	There requirements are the same regardless of the protected characteristics of the tenant(s) / leaseholder(s).	N/A	N/A
<b>Sex</b>	Ne	There requirements are the same regardless of the protected characteristics of the tenant(s) / leaseholder(s).	N/A	N/A
<b>Sexual Orientation</b>	Ne	There requirements are the same regardless of the protected characteristics of the tenant(s) / leaseholder(s).	N/A	N/A
<b>Could other socio-economic groups be affected?</b>				
<b>Carer Low income groups Veterans/Armed Forces Community</b>	Ne	The requirements are the same regardless of the socio-economic group.  Approx. 74.6% of tenants are in receipt of full or partial benefits.	The Income and Money Advice Service have implemented positive initiatives to support tenants that contribute towards their rental payment. The Welfare Rights Team assist the residents of Sandwell to claim the benefits that	N/A

Reviewed Characteristic	Impact? Positive (P) Negative (N) Neutral (Ne)	Details of impact	Actions to address negative impact or promote positive impact (use section 8 table)	Owner of action/ Timescale
Other		This represents a mix of customers on Housing Benefit or Universal Credit.	<p>they are entitled to through benefit maximisation, representing clients where claims have failed.</p> <p>The Housing Income and Money Advice Services actively promote and signpost customers to services provided through the partnership work with agencies such as; Citizens Advice Sandwell, SCVO, Think Sandwell Employment and Skills Team, Connexions Sandwell and proactive promotion of these services.</p> <p>Additional funds have been sought through the Local Welfare Provision (LWP) to purchase furniture and white goods. Where customers are not eligible to be supported via the LWP, the HRA Hardship Fund will be</p>	



Reviewed Characteristic	Impact? Positive (P) Negative (N) Neutral (Ne)	Details of impact	Actions to address negative impact or promote positive impact (use section 8 table)	Owner of action/ Timescale
			<p>utilised where customers are eligible for support. The current hardship fund available is £100k.</p> <p>The Household support Fund is used to help customers manage their on-going rent charge, and in exceptional circumstances rent arrears and other essential bills. Where the HSF has been used to help with on-going rent and or manage rent arrears, officers are taking the opportunity to change behaviours, encourage direct debit payments, and direct payments for rent. The HSF presents and incentivised opportunity for Income Management to re-educate customers and ensure rent is treated as a priority debt moving forwards.</p>	

Reviewed Characteristic	Impact? Positive (P) Negative (N) Neutral (Ne)	Details of impact	Actions to address negative impact or promote positive impact (use section 8 table)	Owner of action/ Timescale
			<p>Further information is available on the Councils website  <a href="https://www.sandwell.gov.uk/resilientresidents">https://www.sandwell.gov.uk/resilientresidents</a></p> <p>or by contacting the Welfare Rights Service on 0121 569 3158 for free independent and impartial advice and support of all welfare benefits.</p>	

If there are no adverse impacts or any issues of concern or you can adequately explain or justify them, then please move to Sections 6.

5. What actions can be taken to mitigate any adverse impacts?

Signposting customers to additional support available as noted in section 4a.

6. Section 6: Decision or actions proposed

None.

7. Monitoring arrangements

No direct monitoring arrangement are required as part of the Cabinet report and EIA.

Rent arrears are monitored regularly by Income Management Team to and staff provide advice and guidance as required.

The Income Management team provide an early help, customer centred service that has made a real tangible difference to customers in sustaining their tenancy and reducing the negative impact debt creates for customers.

The collecting with care pledge has transformed the relationship the team have with customers and how they work. The team have embraced a softer, supportive, 'we want to help you' approach which has taken away the stigma of being in debt and increased contact from customers.

Leasehold arrears are monitored regularly by Home Ownership Services and staff provide advice and guidance as required.

**Section 8 Action planning (if required)**

<b>Question no. (ref)</b>	<b>Action required</b>	<b>Lead officer/ person responsible</b>	<b>Target date</b>	<b>Progress</b>
N/A	N/A	N/A	N/A	N/A

If you have any suggestions for improving this process, please contact [EDI\\_Team@Sandwell.gov.uk](mailto:EDI_Team@Sandwell.gov.uk)