

## Appendix F – Equality Impact Assessment

### SUMMARY RAG RATING

<p>The outcome of this EIA has been assessed to be:</p>	<p style="text-align: center;"><b>Amber</b></p> <div style="text-align: center;">  </div>
<p>Decision rationale</p>	<p>There are identifiable negative impacts on some protected groups from rent and service charge increases, and from compliance and improvement programmes (e.g., decants, damp &amp; mould works). However, these risks can be mitigated through targeted financial assistance, accessible communications, reasonable adjustments, strengthened resident engagement, and close monitoring.</p>

### SECTION 1:

<p>Title</p>	<p><b>Housing Revenue Account (HRA) 30-Year Business Plan and Medium-Term Budgets 2026/27</b></p>
<p>What are you analysing?</p> <ul style="list-style-type: none"> <li>• What is the policy/project/activity/stategy looking to achieve?</li> <li>• Who is it intended to benefit? Are any specific groups targeted by this decision?</li> <li>• What results are intended?</li> </ul>	<p>The proposed 30-year HRA Business Plan and the 2026/27 revenue budget, rent and service charge changes, and the 5-year capital programme, including statutory compliance, damp &amp; mould response, decarbonisation, new build/acquisitions, and housing management improvements.</p> <p>To set sustainable rent and service charge levels (from April 2026), maintain a balanced HRA, and fund capital investment to meet safety and quality standards, improve tenant satisfaction and stock condition, and protect long-term viability.</p> <p>All HRA tenants and leaseholders, including groups with protected characteristics; prospective tenants; and residents affected by estate or building works and regeneration.</p> <p>Legal framework: Public Sector Equality Duty (Equality Act 2010), Rent Standard (from April 2026), Housing Act 1985 s.103 (rent variation notices), Local Government and Housing Act 1989 s.74 &amp; s.76 (HRA ringfence and balanced budget), Awaab’s Law requirements on damp and mould, and Regulator of Social Housing Consumer and Competence Standards.</p>

Details of the lead person completing the screening/EIA	(i) <b>Full Name:</b> Lisa Keating (ii) <b>Position:</b> Director of Housing (iii) <b>Service Area:</b> Regeneration , Housing and Environment (iv) <b>Email Contact Details:</b> lisa.keating@slough.gov.uk (v) <b>Date:</b> 03/02/2026
Date sent to Finance	03/02/26
Version number and date of update	1

SECTION 2:

<p>2.1</p>	<p>Please provide an overview of who uses/will use your service or facility and identify who are likely to be impacted by the proposal</p> <ul style="list-style-type: none"> <li><i>If you do not formally collect data about a particular group then use the results of local surveys or consultations, census data, national trends, or anecdotal evidence (indicate where this is the case). Please attempt to complete all boxes.</i></li> <li><i>Consider whether there is a need to consult stakeholders and the public, including members of protected groups, in order to gather information on potential impacts of the proposal</i></li> </ul>																		
	<p><b>Who is impacted?</b> 7,372 residents are directly impacted by the increase to Rent and Service Charge (5,948 tenants &amp; 1,424 leaseholders)</p>																		
	<p><b>The equality profile of groups on low incomes or in poverty</b></p> <p>Detailed equality analysis of those who pay Rent and Service Charges is not available as we do not capture this data as a matter of course. Housing launched a Tenancy Audit Programme in September 2025 and to date have visited around 1,000 homes and in Q4 2025/26 the data will be uploaded to NEC so we can carry out analysis in the future as we capture more data it will become statistically more reliable.</p> <p>Evidence sources used for this EQIA : HRA Business Plan &amp; Budget report; rent and arrears dataset (UC/HB/arrears/enforcement); Residents Board consultation (20 January 2026); internal operational data on damp &amp; mould and compliance; local poverty and demographics insight; and national regulatory context.</p> <p>Evidence snapshot (HRA and rent):</p> <table border="1" data-bbox="510 1002 2195 1369"> <tr> <td><b>HRA stock (tenanted / leasehold)</b></td> <td><b>5,948 / 1,424</b></td> </tr> <tr> <td><b>Proposed rent uplift (from Apr 2026)</b></td> <td><b>4.8% (CPI+1)</b></td> </tr> <tr> <td><b>Proposed service charge uplift (from Apr 2026)</b></td> <td><b>4.8% (phased full-cost recovery)</b></td> </tr> <tr> <td><b>Estimated tenants on UC (Jan 2026)</b></td> <td><b>2,634</b></td> </tr> <tr> <td><b>Estimated tenants on HB</b></td> <td><b>1,214</b></td> </tr> <tr> <td><b>Arrears (Dec 2025)</b></td> <td><b>5.50% of annual debit</b></td> </tr> <tr> <td><b>Annual debit (illustrative)</b></td> <td><b>£45,419,990.22</b></td> </tr> <tr> <td><b>HSF arrears cleared (last 12 months)</b></td> <td><b>£26,932.96</b></td> </tr> <tr> <td><b>Enforcement (CY 2025)</b></td> <td><b>3 evictions; 6 outright; 8 suspended; 4 adjourned; 3 warrants suspended</b></td> </tr> </table>	<b>HRA stock (tenanted / leasehold)</b>	<b>5,948 / 1,424</b>	<b>Proposed rent uplift (from Apr 2026)</b>	<b>4.8% (CPI+1)</b>	<b>Proposed service charge uplift (from Apr 2026)</b>	<b>4.8% (phased full-cost recovery)</b>	<b>Estimated tenants on UC (Jan 2026)</b>	<b>2,634</b>	<b>Estimated tenants on HB</b>	<b>1,214</b>	<b>Arrears (Dec 2025)</b>	<b>5.50% of annual debit</b>	<b>Annual debit (illustrative)</b>	<b>£45,419,990.22</b>	<b>HSF arrears cleared (last 12 months)</b>	<b>£26,932.96</b>	<b>Enforcement (CY 2025)</b>	<b>3 evictions; 6 outright; 8 suspended; 4 adjourned; 3 warrants suspended</b>
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**Key equalities considerations:**

- Children and families in larger homes may see higher absolute rent/charge increases; overcrowding is prevalent locally.
- Disabled residents and those with long-term conditions may be disproportionately affected by damp & mould and by temporarily disruptive works; reasonable adjustments and decant support may be required.
- Women (over-represented among lone parents) may be more exposed to affordability pressures.
- Ethnic minority residents (notably Asian/Asian British and Black groups) are over-represented in low-income cohorts locally; language and accessibility needs must be addressed.
- Older residents may be on fixed incomes but are less impacted by rent restructuring where HB/UC covers housing costs; attention needed for service charges in sheltered/communal settings.

The Council has produced a poverty insight report to support planning and decisions like this: [Poverty in Slough](#)  
Since then, the latest data on deprivation (index of deprivation) has also been published by Government.  
Taken together, people in poverty in Slough tend to be from the following groups:

**Age:**

- Children aged 0-15
- Over a quarter of residents in social rented homes are children.
- A quarter of residents living in deprived households are children.
- A third of Slough's children live in overcrowded homes.
- 24% of Slough's children aged 0-19 live in relative low-income families.
- Slough has a higher percentage of older people receiving pension credit than England.
- Just over a quarter of Sloughs' older residents live alone.

**Single parents**

- Slough has a higher percentage of recipients of the single with children entitlement of Universal Credit. Families with dependent children
- Slough has a higher percentage of recipients of the child entitlement of Universal Credit.

**Sex:**

## Women

- Almost a third of Slough's women were economically inactive in 2021.
- Single parents are more likely to be women.
- Slough Adult Social Care has higher activity with female residents.
- 53% of residents aged 65 and over are women, which intersects with older people being at more risk of poverty.

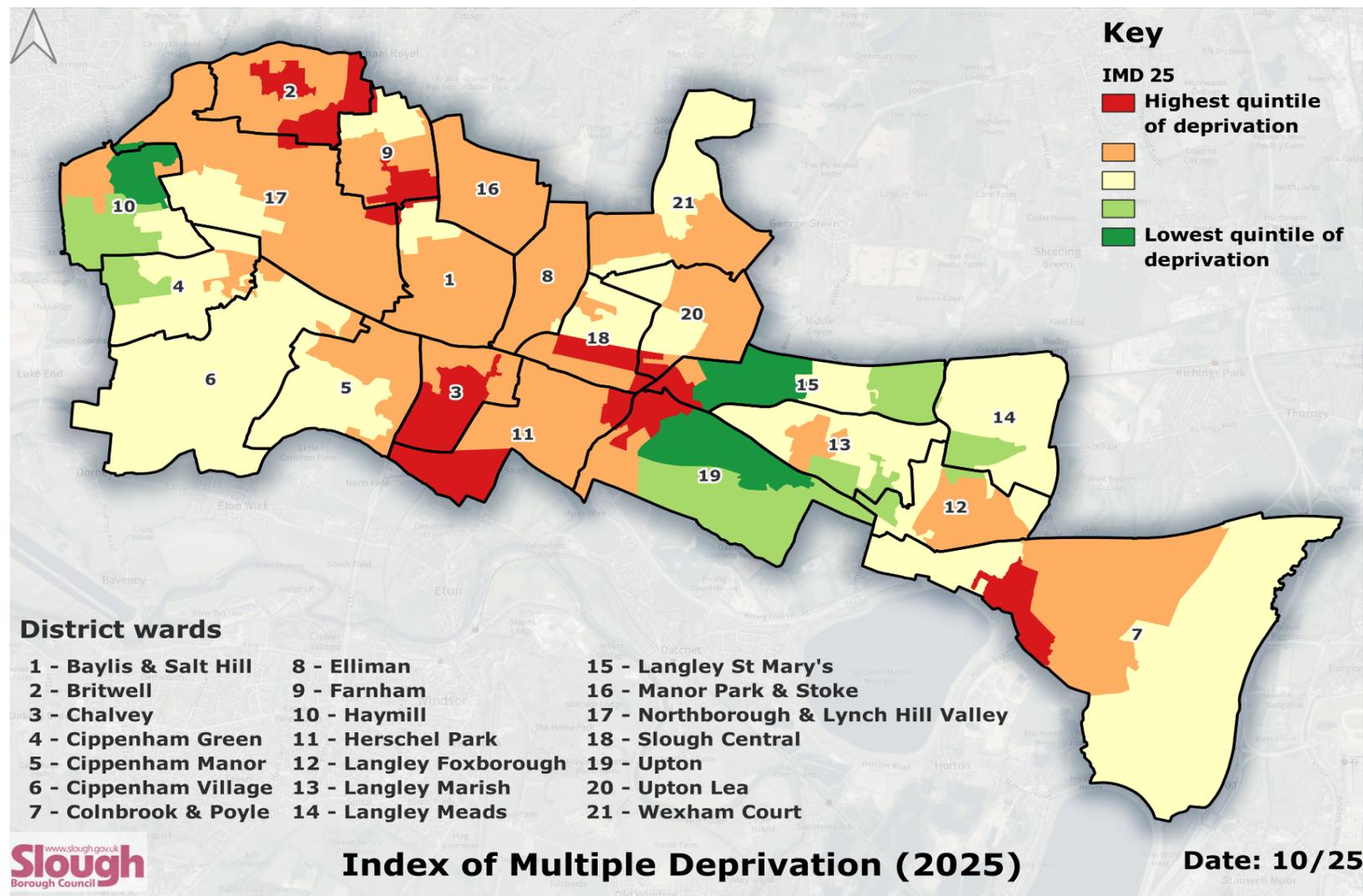
**Race:**

## Asian ethnic groups

- Slough has a much higher percentage of residents from Asian ethnic groups receiving Universal Credit than England.
- 46% of residents living in deprived households are from Asian ethnic groups. Just under a quarter are Pakistani.
- Half of Slough's children aged 0-15 are from Asian ethnic groups, which intersects with children and parents with dependent children being more at risk of poverty. Older people aged 65 and over

**Religion:**

- In 2021, 58% of Muslim residents were in employment compared to 69% for all Slough residents.
- 11% of Muslim residents were economically inactive due to being students (7% for all Slough residents) and 16% due to looking after family or home (9% for all Slough residents).



**Deprivation in wards**

- There are particularly severe pockets of deprivation in Britwell, Chalvey, Herschel Park, Farnham, Central Slough and neighbouring wards, and Colnbrook & Poyle -

<https://www.slough.gov.uk/downloads/file/4766/poverty-in-slough> Poverty in Slough

<p><b>2.2 Are there any groups with protected characteristic that are overrepresented in the monitoring information relative to their size of the population? <i>If so, this could indicate that the proposal may have a disproportionate impact on this group even if it is a universal service.</i></b></p>	<p>As stated above, detailed equality analysis of those who have to pay Rent or Service Charges is not available as we do not capture this data as a matter of course.</p> <p>Using the poverty insight report for those in receipt of Council Tax Support we have some data on those who were consulted :</p> <ul style="list-style-type: none"> <li>○ <b>Age</b></li> <li>○ <b>52.76%</b> had children; <b>46.01%</b> had caring responsibilities. [<a href="#">Appendix B...ck Summary   PowerPoint</a>]</li> <li>○ <b>Sex: 60.12%</b> female, <b>26.99%</b> male.</li> <li>○ <b>Disability: 45.40%</b> declared a disability; <b>50.92%</b> reported receiving a disability-related benefit.</li> <li>○ <b>Ethnicity:</b> largest group <b>White British (33.13%); Asian/Asian British (23.31%)</b> featured strongly; other groups present in smaller proportions.</li> <li>○ <b>Age:</b> majority between <b>25–69</b>.</li> <li>○ <b>Religion:</b> largest group <b>Christian 31.9%</b></li> <li>○ <b>Sexual orientation: 70.55%</b> straight/heterosexual - assume large no prefer not to say or don't answer this</li> <li>○ Maternity –3% reported live births recently</li> </ul>
<p><b>2.3 Are there any groups with protected characteristics that are underrepresented in the monitoring information relative to their size of the population? <i>If so, this could indicate that the service may not be accessible to all groups or there may be some form of direct or indirect</i></b></p>	<p>The response reached some of the groups who were most like to be impacted:</p> <p>Disabled people  Women  Families with children</p> <p>However more needs to be done to reach those who are most likely to be in poverty but who were underrepresented in this consultation:</p> <p>Minority ethnic residents and  Muslim groups</p>

discrimination occurring.

**2.4 Does the project, policy or proposal have the potential to disproportionately impact on people with a protected characteristic? If so, is the impact positive or negative?**

	None	Positive	Negative	Not sure
Men or women	<input type="checkbox"/>	<input type="checkbox"/>	Women are more likely than men to be single parents (90%) (2)	<input type="checkbox"/>
People of a particular race or ethnicity (inc. refugees, asylum seekers, migrants and gypsies and travellers)	<input type="checkbox"/>	<input type="checkbox"/>	Ethnicity: Asian/ Asian British head of household and Black/ African/ Caribbean/ Black British head of household (1)	<input type="checkbox"/>
Disabled <sup>1</sup> people (consider different types of physical, learning, or mental disabilities)	<input type="checkbox"/>	<input type="checkbox"/>	Disability: Adults with limiting health conditions or who are disabled Families living with disabled children (3) Unpaid carers were 50% higher more likely to be in poverty (4)	<input type="checkbox"/>
People in particular age groups (consider in particular children, under 21s and over 65s)	<input type="checkbox"/>	<input type="checkbox"/>	Age: Children in families where no one was working Children in families with 3 or more children (1) Children under 5, especially in larger families	<input type="checkbox"/>
People who are intending to undergo, are undergoing, or have undergone a process or part of a process of gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	People may struggle with housing and (based on London data) live in deprived areas (7)	<input type="checkbox"/>
Impact due to pregnancy/ maternity	<input type="checkbox"/>	<input type="checkbox"/>	Pregnancy: earnings are impacted negatively during and after pregnancy	<input type="checkbox"/>
People of particular faiths and beliefs	<input type="checkbox"/>	<input type="checkbox"/>	Religion or belief: People who identified as "Muslim had the lowest percentage of people aged 16 to 64 years in employment; this resulted from the high percentages of people who were students or looking after home or family in this group.	<input type="checkbox"/>
People on low incomes*	<input type="checkbox"/>	<input type="checkbox"/>	This change impacts those on a lower income	<input type="checkbox"/>

<sup>1</sup> Disability discrimination is different from other types of discrimination since it includes the duty to make reasonable adjustments.

2.5	Based on your responses, should a full, detailed EIA be carried out on the project, policy, or proposal
	Yes <input checked="" type="checkbox"/>
2.6	Provide brief reasons on how you have come to this decision?
	The modelling has shown that 7,272 households will be impacted by the proposed rent and service charge increase

**If the answer in 2.5 above is “No” then sections 3 and 4 are not required to be completed.**

### SECTION 3: ASSESSING THE IMPACT

Overall assessment: The rent and service charge proposals and investment programme have mixed impacts. They enable compliance, safety, and stock quality (positive) while increasing weekly charges (negative). Mitigations are available and will be strengthened; the overall rating is Amber.

Protected group	Potential impacts	Impact (P/N)	Mitigations / reasonable adjustments	Monitoring & success measures
Age (children, younger adults, older people)	Children and larger families face higher absolute rent/charge uplifts; older residents on fixed incomes may be sensitive to service charges; young single adults may be more exposed to arrears risk.	Mixed (N short-term; P medium-term via safer, warmer homes)	Hardship pathways; DHP/Crisis & Resilience Fund; income maximisation; staged works; quiet hours; decant where essential; enhanced comms to families and older residents.	Arrears and evictions by age band; TSM satisfaction by age; complaints; decant outcomes.
Disability (incl. mental health)	Potential higher exposure to damp/mould harms; disruption from works; need for accessible comms and visits; risk of digital exclusion.	Mixed (N from disruption; P from hazard removal and adaptations)	Reasonable adjustments policy; priority repairs; accessible formats; home visits; OT input and aids & adaptations; case management for clinically vulnerable.	Track repairs timescales for priority cases; complaints citing disability; disrepair claims; adaptations KPIs.
Sex (women/men)	Women over-represented as lone parents; affordability pressures; safety and ASB concerns in communal areas.	Mostly Negative without mitigation	Targeted income advice; alignment with Children's Services; trauma-informed engagement; VAWG-sensitive repairs access.	Arrears and enforcement split by household type; repeat repair visits linked to safety concerns.
Pregnancy/maternity	Income volatility in maternity; health sensitivities re damp/mould and cold homes; appointment flexibility needed.	Mixed	Prioritise hazard remediation; flexible appointments; hardship support; signposting to wider welfare offer.	Track cases flagged as pregnancy; time-to-fix for hazards; hardship uptake.
Race/ethnicity	Over-representation in low-income cohorts; language barriers; potential trust deficit; cultural needs in engagement.	Mostly Negative without mitigation	Translated/ESOL-friendly comms; use of community/faith channels; targeted arrears prevention; equality monitoring.	Arrears, evictions, and complaints by ethnicity (where recorded); translation usage stats; TSM sentiment.
Religion or belief	Scheduling and engagement conflicts with holy days; dietary/ritual considerations during decants/works.	Neutral/Negative context-dependent	Scheduling sensitivity; faith-based outreach; culturally appropriate decant support.	Complaints referencing faith; successful engagement sessions with faith partners.

<b>Sexual orientation / Gender reassignment</b>	<b>Potential vulnerability to harassment; need for confidential, respectful case handling and safe decant options.</b>	<b>Neutral/Negative context-dependent</b>	<b>Zero-tolerance to harassment; confidential contact routes; inclusive training and customer standards.</b>	<b>ASB/harassment case outcomes; training completion; satisfaction for LGBTQ+ tenants (qualitative).</b>
<b>Marriage &amp; civil partnership (limited duty)</b>	<b>No specific impacts identified beyond affordability and service access shared with other groups.</b>	<b>Neutral</b>	<b>As per universal mitigations (income advice, comms, repairs).</b>	<b>Monitor via generic KPIs and complaints.</b>

Specific programme impacts and mitigations:

<b>Area</b>	<b>Potential equality impacts</b>	<b>Mitigations</b>	<b>Owner</b>
<b>Rent &amp; service charge uplift (4.8%)</b>	<b>Affordability pressures for low-income tenants; risk of arrears and enforcement; larger families face higher absolute £ uplift.</b>	<b>Income maximisation; DHP/Crisis &amp; Resilience Fund; early arrears triage; affordable repayment plans; clear accessible comms; targeted outreach to lone parents and disabled residents.</b>	<b>Director of Revenue &amp; Welfare Benefits</b>
<b>Damp &amp; mould compliance (Awaab's Law)</b>	<b>Health impacts felt most by children, disabled and clinically vulnerable; need for rapid response and safe decants.</b>	<b>Risk-based inspection, 14-day/7-day/24-hour response standards; £1m p.a. provision; targeted archetype programmes; decant support and priority repairs.</b>	<b>Head of Repairs &amp; Maintenance</b>
<b>Decarbonisation &amp; major works</b>	<b>Short-term disruption; access issues for disabled residents; energy cost benefits post-works (positive).</b>	<b>Scheduling with reasonable adjustments; temporary heating/ventilation; accessible communication; resident liaison.</b>	<b>Head of Repairs &amp; Maintenance</b>
<b>Regulatory improvement &amp; competence standard</b>	<b>Better service quality (positive); training time may reduce availability short-term.</b>	<b>Phased training; prioritise frontline availability; embed inclusive service standards; monitor TSM uplift.</b>	<b>Housing Leadership / HR</b>
<b>Income &amp; arrears enforcement</b>	<b>Risk of disproportionate impact where vulnerability not identified; court action can exacerbate hardship.</b>	<b>Vulnerability triage; pre-action protocol compliance; alternatives to eviction; independent advice referrals; case conferencing for complex needs.</b>	<b>Income &amp; Legal</b>

## SECTION 4: ACTION PLAN

<p><b>4.1</b></p>	<p>Complete the action plan if you need to reduce or remove the negative impacts you have identified, take steps to foster good relations or fill data gaps.</p> <p><i>Please include the action required by your team/unit, groups affected, the intended outcome of your action, resources needed, a lead person responsible for undertaking the action (inc. their department and contact details), the completion date for the action, and the relevant RAG rating: R(ed) – action not initiated, A(mber) – action initiated and in progress, G(reen) – action complete.</i></p> <p><b>NB. Add any additional rows, if required.</b></p>					
	<p><b>Action</b></p>	<p><b>Equality groups targeted</b></p>	<p><b>Intended outcome</b></p>	<p><b>Resources</b></p>	<p><b>Lead &amp; timescale</b></p>	<p><b>RAG</b></p>
<p><b>Targeted arrears prevention using UC Direct Payments, affordable plans, and proactive income maximisation (benefit checks)</b></p>	<p><b>Low-income households; lone parents; disabled residents</b></p>	<p><b>Reduce arrears growth; avoid enforcement; stabilise incomes</b></p>	<p><b>Business as usual plus targeted campaigns</b></p>	<p><b>Director of Revenue &amp; Welfare Benefits Q1–Q4 2026/27</b></p>	<p><b>Amber</b></p>	
<p><b>Implement accessible, translated rent and service charge communications and engagement (incl. Resident Board)</b></p>	<p><b>Ethnic minority groups; residents with limited English; all tenants/leaseholders</b></p>	<p><b>Improve understanding; reduce complaints; informed choices</b></p>	<p><b>Translations and plain-English review</b></p>	<p><b>Head of Housing – Q1 2026/27 and ongoing</b></p>	<p><b>Green</b></p>	
<p><b>Strengthen damp &amp; mould rapid response and decant protocol with reasonable adjustments</b></p>	<p><b>Children; disabled and clinically vulnerable; pregnant residents</b></p>	<p><b>Reduce health risks; meet statutory timelines; positive resident outcomes</b></p>	<p><b>£1m p.a. provision; dedicated liaison</b></p>	<p><b>Head of Repairs &amp; Maintenance – from Q1 2026/27</b></p>	<p><b>Amber</b></p>	
<p><b>TSM improvement plan: complaint handling, transparency, and neighbourhood standards (equality embedded)</b></p>	<p><b>All groups with focus on under-represented voices</b></p>	<p><b>Improved tenant satisfaction and reduced regulatory risk</b></p>	<p><b>Existing improvement resources; training</b></p>	<p><b>Director of Housing Q1-Q4 2026–2027</b></p>	<p><b>Amber</b></p>	

	<b>Collect and use equalities data (arrears, evictions, complaints, decants) and publish an annual equalities dashboard</b>	<b>All protected groups</b>	<b>Early identification of disproportionate impacts and targeted mitigation</b>	<b>Data engineering within HMS; analytics support</b>	<b>Housing Performance Lead – first dashboard by Q2 2026/27</b>	<b>Amber</b>
	<b>Berkshire/Thames Valley benchmarking on rent affordability and service-charge recovery</b>	<b>Low-income households</b>	<b>External parity check; informs future rent/charge decisions and mitigations</b>	<b>Officer time; regional networks</b>	<b>Director of Revenue &amp; Welfare Benefits – by Q3 2026/27</b>	<b>Green</b>

**SECTION 5: DECISION, MONITORING AND REVIEW**

EQIA decision rating:

Amber – proceed with mitigating actions.

Monitoring and review:

Quarterly to Housing DMT;

Bi-annual update to Resident Board; incorporate KPIs into TSM and Cabinet performance reporting.

Annual EQIA refresh to accompany the HRA update

**SECTION 6: SIGN-OFFS**

Author	Lisa Keating – Director of Housing
Equalities Lead	[Name], [Title]
Finance	Mark Hak-Sanders – Director of Financial Management & Strategy
Legal	HB Law – Sarah Wilson / Sukdave Ghuman

## Appendix A

### Equality Impact Assessment Decision Rating Guide

**PLEASE SEE PAGE 1 FOR THE RATING OF THIS PROPOSAL**

<b>Decision</b>	<b>Action</b>	<b>Risk</b>
As a result of performing the EIA, there is a risk that a disproportionately negative impact (direct, indirect, unintentional, or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. It is not clear if mitigating actions are possible.	<b>Further advice should be taken</b>	<b>Red</b> 
As a result of performing the EIA, there is a risk that a disproportionately negative impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing mitigating actions.	<b>Proceed pending agreement of mitigating action</b>	<b>Amber</b> 
As a result of performing the EIA, the proposal does not appear to have any disproportionate negative impact on people who share a protected characteristics or anticipated impacts will be either positive or neutral.	<b>Proceed</b>	<b>Green:</b> 