## FINANCIAL SECURITY: 2021/22 Appendix F



Overall Equality Impact Assessment of proposals

#### **Equality at Stevenage Borough Council**

Stevenage Borough Council as a service provider, employer and community leader is committed to achieving equal opportunities for everyone. We want to deliver services that are fair, accessible and open to everyone who needs them.

Equality Impact Assessments (EqIAs) are an important part of the process in ensuring that our intention is translated into action. They help to ensure that decisions are made in a fair, transparent and accountable way, considering the needs and the rights of different people in the community.

Based on the protected characteristics under the Equality Act 2010, the EqIA considers the impact on the following groups when making decisions, updating policies and starting new projects:

- Age
- Disability
- Gender reassignment
- Marital status
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation.

Although non-statutory, the Council has chosen to adopt the Socio-Economic Duty and so decision-makers should use their discretion in considering the impact on people in terms of their social or economic background.

EqlAs also help the Council to demonstrate compliance with the requirements of the Public Sector Equality Duty (Section 149 of the Equality Act 2010). The Duty states that a public authority must, in the exercise of its functions, have due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is unlawful under this Act
- advance equality of opportunity between people who share a protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not.

#### **Savings Proposals 2021/22**

Prior to their consideration at Executive in December 2020, all savings proposals were reviewed to determine any potential impact on Stevenage residents in terms of their protected characteristics under the Equality Act 2010. Some of these have no public impact and so have not been subject to any further EqIA.

Where a negative, positive or disproportionate impact is likely, Assistant Directors and other appropriate managers have drafted Brief or Full EqlAs. These have been summarised over the following pages and will inform the recommendations made at Executive on 20/1/2021 and 10/2/2021. Action to further analyse or mitigate the impact on equality groups is identified where appropriate.

The following activity has taken/will take place:

December 2020 – February 2021 EqlAs finalised considering further evidence as

necessary

January and February 2021 Consideration of all completed EqlAs at Council

meetings

Saving Ref	Saving/Income proposed	Summary of potential impact	Action	Contact Officer
FS23	CSC and Customer-Focus redesign and efficiencies.	Overview Overall the proposal will not have negative impacts as we aim to maintain current service levels. Customers will still be able to access services over the telephone or access services face to face.  If the Council failed to provide non-digital means of engaging with it, that could be to the detriment of people who do not have the skills or capabilities to engage online which may overlap with many of the protected characteristics.  Age Research evidence from ONS data suggests that older people tend to be less digitally active, and potentially at risk of digital exclusion, although the picture is complex and social class / income can be a relevant factor too.  If the Council stopped providing telephone or face to face support that could be to the detriment of those older people who do not have the skills or capabilities to engage online.  Disability People with some types of disability may have difficulties using or making the most of digital technologies. These people may benefit less from enhanced digital channels.  Socio-Economic	Measure the take up of digital services by different groups and use the insight to design future services.  Ensure the customer service model supports those who cannot benefit from digital channels by providing alternatives.	Ruth Luscombe/ Greg Arends

Saving Ref	Saving/Income proposed	Summary of potential impact	Action	Contact Officer
		Low income, social class and social housing tenancy have been identified in some research as indicators of whether someone is likely to have the competence, confidence and capability to make the most of digital technologies.		
FS25	Print Room	Digital alternatives to printed documents may disproportionately impact ar rale and social class / income can be a relevant factor too.  Socio-Economic Digital alternatives to printed documents may disproportionately impact on older people tend to be less digitally active, and potentially at risk of digital exclusion, although the picture is complex and social class / income can be a relevant factor too.  Socio-Economic Digital alternatives to printed documents may disproportionately impact some socio economic groups. Low income, social class and social housing tenancy have been identified in some research as indicators of whether someone is likely to have the competence, confidence and capability to make the most of digital technologies.	Complete Full EQIA assessment.	Ruth Luscombe
		If the Council failed to provide non-digital means of engaging		

Saving Ref	Saving/Income proposed	Summary of potential impact	Action	Contact Officer
		with it, that could be to the detriment of people who do not have the skills or capabilities to engage online.		
FS43	Reduce Professional Training Budget	Overview This proposed saving involves the reduction of the professional training budget. Where possible professional qualifications would be paid for by the apprenticeship levy.  Currently no workforce information is monitored on the take up of learning and development opportunities by protected characteristic group.  However, learning and development opportunities are available and taken up by all staff regardless of their background. In response to the Covid pandemic more learning and development offers are available virtually.	Record protected characteristics data on staff completing learning and development courses	Clare Davies/ Kirsten Frew
FS44	Reduce Graduate Training Budget.	Overview This proposed saving involves the reduction of the graduate training budget. The number of employees impacted by the savings is less than 5 and therefore the protected characteristics have not identified in the EQIA for reasons of anonymity.  However, all graduates at SBC are from the National Local		Clare Davies/ Kirsten Frew

Saving Ref	Saving/Income proposed	Summary of potential impact	Action	Contact Officer
		development Government Scheme and have a full learning and programme.		
FS45	Stop taking cash payments for Car Parks, depot and CSC ATM.	Overview We know that Cash represented only 1.17% of payments collected last year and alternative means are available for all services. This saving proposes that the council stop collecting cash in order to support financial security.  We do not know who pays for car parking in cash. However there are a number of alternatives, including card for car parks and phone payments for on street parking.  Socio-Economic Those small minorities of people who may not have a bank account may be negatively impacted. Cash payments which would have been made to Customer Services can still be made via the Post Office.	Keep payment options under review in response to customer feedback	Ruth Luscombe
FS19	Combine the Residents and Star Surveys	Overview This proposal suggests combining the Town-wide Resident Survey and the Council Tenant Satisfaction Survey (STAR). There are also plans to undertake other complementary community engagement activities.  Age - Older People	Establish the revised Resident/STAR survey sampling/questionnaire approach  Develop an engagement plan incorporating both the Resident/STAR survey	Rob Gregory/ Katrina Shirley

Saving Ref	Saving/Income proposed	Summary of potential impact	Action	Contact Officer
		It will not be possible within a combined, shorter survey to ask specific additional questions to Independent Living Scheme tenants, and the number of responses from these tenants will be lower. This may be mitigated through a separate engagement activity.	and other engagement activities	
		Age - Younger People As the Resident Survey is targeted at householders, the profile of respondents is inherently older than the general resident population. By undertaking other engagement activity specifically targeted at younger people, the views of this group will be better captured.		
		Sex/Age/Ethnic Origin/Disability/Marital & Working Status		
		The surveys collect information in respect of sex, age, ethnic origin, disability, marital status and working status. This enables some analysis of the profile of tenants and residents to be undertaken and enables significant differences to be identified.		
		However, all results are subject to sampling tolerances and not all differences are statistically significant. By complementing the surveys with a range of focused engagement activities, a greater diversity of views can be captured.		
		Religion or Belief/Gender Reassignment /Sexual Orientation		

Saving Ref	Saving/Income proposed	Summary of potential impact	Action	Contact Officer
		Previous surveys have not analysed results in relation to religion, gender reassignment and sexual orientation. Plans to undertake further engagement activities will provide the opportunity to capture the views of these protected characteristic groups.		
HRA Rent & Service Charge	Rent and service charge setting for 2021/22	The aim of the rent and service charge policy is to provide a fair method of calculating rents and service charges for all the Council's tenants. It also aligns with the Council's Concessions for Fees and Charges Policy and the principle of recovering the cost of providing services.  The increase is applied to all properties; it is not possible to exempt any particular groups.  Tenants benefited from four years of rent reduction from 2016-2020, so the impact of the rent increase is mitigated partially by having to use a lower base than it would have been had there not been a mandatory rent reduction (cumulative) of 1 % per annum for four years.  Unequal/Negative Impact  Age  A proportion of tenants may see an increase in service charges in any given year. The majority of tenants who are charged for services live in flats and/or flexicare/independent living accommodation. Data indicates that the age profile of	Publish rent increase information on the website to start preparing tenants.  The rent notification letter will offer tenants the opportunity to discuss any queries they have with staff.  Make links to clear support and guidance on all of our communication platforms  Prepare staff to enable them to respond effectively and empathetically with tenants.  Consult with residents	Jaine Cresser/ Elizabeth Ddamulira

Saving Ref	Saving/Income proposed	Summary of potential impact	Action	Contact Officer
		tenants of flexicare/independent living accommodation is older than those in the general needs stock. The age profile of tenants living in general needs flats is younger than for the SBC housing stock as a whole.	throughout 2021/22 to establish the impact and put in place systems to mitigate this.	
		For people living in independent living/flexicare schemes, in addition to basic rent and service charges, those who pay for the support/emergency response services that are not eligible for Housing benefit may also see an increase in the overall payment due each week.		
		Disability  Northgate data on tenants in relation to disability was collected a number of years ago and is not up to date. However, to give some context, the data indicated that the proportion of tenants in flexicare/independent living accommodation with a disability was almost double the proportion for the whole SBC tenant population. As referred to above, most flexicare/independent living housing will be subject to service and support charges.		
		The proportion of tenants living in flat blocks declaring a disability was very similar to the proportion living in all properties; therefore a disproportionate impact on these tenants is not anticipated.		
		Socio Economic The rent increase will be applied across all tenancies prescribed by the Work and Welfare Reform Act and in line with the current Rent Standard Direction, regardless of socio-		

Saving Ref	Saving/Income proposed	Summary of potential impact	Action	Contact Officer
		economic circumstances. Those who receive services for which a service charge is made will be charged the actual cost of those services.		
		Those reliant on Housing Benefit (HB) and Universal Credit (UC) housing costs to cover their full rent and eligible service charges will not be affected by the increase in rent and service charges as their benefit award will be recalculated.		
		The COVID19 pandemic has caused unemployment and unstable employment. Residents experiencing exceptional economic hardship who are unable to work due to a duty to self-isolate are receiving a drop in earnings.		
		The policy allows for capping of service charges, subject to any legal constraints. As a means of mitigating the impact of an increase that would cause hardship, the Council may subsidise the costs.		
		Support provision for this group has been increased as part of an income recovery action plan. This includes additional staffing resources.		
HRA support charge	Increase contribution to support costs to £8 per week	Overall This applies to residents living in independent living/flexicare housing that are in receipt of housing benefit, fairer charging, universal credit (UC) or are 2003 protected (i.e. those in the service prior to the government supporting people grant funding starting in 2003). As at 20 November 2020 this affects 595 people. The remaining residents in independent living/flexicare already pay the full charge.	To ensure that the charge is explained as clearly as possible when the support charge notification is sent, there will be a FAQ sheet and details	Jaine Cresser/ Karen Long

Saving Ref	Saving/Income proposed	Summary of potential impact	Action	Contact Officer
		Positive Impact  Socio Economic Results from the STAR survey in 2018 have shown that residents identified the emergency alarm service and the supported housing officer as the 2 <sup>nd</sup> and 3rd most important priority associated with living in their property. The application of the support charge will help to ensure that the Council can continue to deliver this service.	on the website.  Review whether any elements of the independent living service should be eligible for housing benefit.	
		Negative Impact:		
		Age Residents of independent living and flexicare schemes who will have to pay the increased charge are predominantly older people. Conversely however, the costs are currently subsidised by the wider tenant population, who have a younger age profile and do not benefit from the service.		
		Disability The residents who are charged a support charge are predominantly older and disabled people as this accommodation is for people over 55 years old or for people with a disability.		
		Socio Economic The support charge is not eligible for housing benefit and could have a negative impact for those on lower incomes in terms of affordability.		

Saving Ref	Saving/Income proposed	Summary of potential impact	Action	Contact Officer
		This group of residents may also be affected by increases in Hertfordshire County Council (HCC) charges affecting the overall amount that older and disabled people can afford to pay.		
		However, the introduction of the charge is considered to be fairer than under current arrangements, whereby support charge costs are subsidised by the wider tenant population who do not benefit from the service.		
		Furthermore, the charge has been introduced on an incremental basis, to mitigate the impact, rather than applying the full amount of £19.65 per week in one 'hit'.		
		In addition, HCC have confirmed that they will be continuing with our flexicare support contract until end March 2022, which will mean that this will help offset some of the costs that we would have had to pass on to this group of residents.		
		We currently have 3 people that have made nil payment of the support charge either since the introduction of the contribution charge or since moving in. As at 20 November 2020 there are 71 people who are in arrears over £30 totalling £12,384. This is likely to increase when the new charge starts in April 2021.		

# **Full Equality Impact Assessment**

For a policy, project, service or other decision that is new, changing or under review

What is being assessed?			FS23 – Savings to Customer Service Centre and Customer Focus Service		
Lead Assessor	Ruth Luscombe			Assessment team	
Start date		End date			
When will the FalA he		April 2021			

Who may be affected by it?	Council customers (residents, businesses, voluntary organisations and other partners), Customer Service Centre and Customer Focus staff
What are the key aims of it?	<ul> <li>Protect current service levels while delivering structural savings by reducing avoidable demand and increasing self-service through digital channels.</li> <li>Improve customer awareness of digital channels and encourage take up</li> <li>Enable better value for money customer service and complaints handling provision</li> <li>Improve consistency and transparency through adopting enhanced digital case management for complaints.</li> <li>Embed insight and continuous improvement as a core part of the Customer Service model</li> </ul>

What positive measures	s are in place (if any) to	help <b>fulfil our le</b>	gislative duties to:		
Remove discrimination		Promote equal	A new website	Encourage good	Improved access
& harassment		opportunities	launched in September 2020 to	relations	channels for customers and
			meet government accessibility		staff, digital options available 24/7
			guidelines		

What sources of data / information are you using to inform your assessment?

Desk research drawing on a broad range of national (Office Of National Statistics), local survey research (STAR survey 2017, 'Big Knock' 2017), MySociety.org website as well as examples from other councils (Cambridge City Council, Sutton Council)

In assessing the potential impact on people, are there any overall comments that you would like to make?

Overall the proposal will not have negative impacts as we aim to maintain current service levels as our customers increasingly choose to adopt digital self-service channels. Customers will still be able to access services over the telephone, or where required access services face to face by booking an appointment. This proposal has been enabled by our Connected to our Customers (CTOC) programme which has delivered a new website & digital platform, as well as an online portal for housing, and enhancements to waste processes e.g. for missed collections. An EQIA has been undertaken for this programme and will be kept under review.

As technology evolves, (and is adopted by different communities differently) the ways in which people can be excluded or disadvantaged will change too. We will need to review our digital access solutions regularly to ensure changes in requirements are identified and potential solutions agreed on.

#### **Evidence and impact assessment**

Explain the potential impact and opportunities it could have for people in terms of the following characteristics, where applicable:

Age				
Positive impact	Negative impact		Unequal impact	X
Please evidence the data and	Research evidence	from ONS data suggests th	at older people te	nd to be less digitally
information you used to support this	active, and potential	ly at risk of digital exclusio	n, although the pi	cture is complex and
assessment	social class / income	can be a relevant factor to	0.	

	Older people are much less likely to use the internet than other age groups. In 2019, 47% of adults in the UK aged 75 years or over had used the internet in the last 3 months, compared to 91% of all adults.  During Housing's 2017 'Big Knock' Tenants Survey, 77% of all respondents reported having access to the internet. (This result compares to STAR survey which indicated 74% of residents using internet at home and further 9% outside of home). Of the 23% that don't have access, 76% were over 65 years old. 48% of over 75 year olds reported to having access to the internet, which is similar to the national statistics.  If the Council stopped providing telephone or face to face support that could be to the detriment of those older people who do not have the skills or capabilities to engage online; however this is not an aim of this proposal and we are retaining these more
	traditional channels.
What opportunities are	What do you still need
there to promote	to find out? Include in
equality and inclusion?	actions (last page)

Disability e.g. physical impairment, ment	al ill health, learning difficulties, long-sta	anding illness
Positive impact	Negative impact	Unequal impact X
Please evidence the data and information you used to support t assessment	his digital technologies, which may not disability. These people may benefit Disabled people are less likely to a 2019 78% of disabled adults (10 massive increase compared with 25 adult rate of 95% (ONS 2019). Although to continue using the internet after the second of the continue of	y may have difficulties using or making the most of the adapted to their needs related to their specifical tess from enhanced digital channels.  Suse the internet than people without disabilities. In million) in the UK used the internet, which is a 5% in 2016, but still significantly lower than the all ough disabled people are reported to be less likely they have first accessed it. The difference between sabled adults was greater in the older age groups.

	adults were recent in recent internet use for 98% of disabled adult internet users.  There are a number of possible, we continue future implementation approaches and, whe	ternet users. In comparison disabled and non-disables and 99% of non-disables and 99% of non-disables tools (software and hard through the CTOC programments). The Council also plans are necessary for those where	isabled adults and 54% of non-disabled son, there was only a small difference in abled adults in the 16 to 24 age group; pled adults in this age group were recent dware) available now to make that more ramme to explore their feasibility and to continue to provide assisted digital ho cannot engage digitally, more explore with these characteristics can
What opportunities are there to promote equality and inclusion?		What do you still need to find out? Include in actions (last page)	

Gender reassignm	ent				
Positive impact		Negative impact		Unequal impact	
Please evidence the data	ease evidence the data and		Our research has not identified any particular negative impacts (or differential impacts)		
information you used to support this					
assessment					
What opportunities are			What do you still need		
there to promote			to find out? Include in		
equality and inclusion?			actions (last page)		

Marriage or civil partnership	)			
Positive impact	Negative impact		Unequal impact	
Please evidence the data and	Our research has no	t identified any particular n	egative impacts (o	r differential impacts)

information you used to sup	port this		
assessment			
What opportunities are		What do you still need	
there to promote		to find out? Include in	
equality and inclusion?		actions (last page)	

Pregnancy & mate	rnity				
Positive impact		Negative impact		Unequal impact	
Please evidence the data information you used to su assessment		Our research has no	t identified any particular r	negative impacts (o	r differential impacts)
What opportunities are there to promote equality and inclusion?			What do you still need to find out? Include in actions (last page)		

Race						
Positive impact	Negative impact			Unequal impact		
Please evidence	the data and		Our research has no	t identified any particular r	negative impacts (o	r differential impacts)
information you u	nation you used to support this					
assessment						
What opportunities	es are			What do you still need		
there to promote				to find out? Include in		
equality and inclu	usion?			actions (last page)		

Religion or belief		
Positive impact	Negative impact	Unequal impact

Please evidence the data a information you used to su assessment	Our research has not identified any particular negative impacts (or differential impacts)
What opportunities are	What do you still need
there to promote	to find out? Include in
equality and inclusion?	actions (last page)

Sex				
Positive impact	Negative impact		Unequal impact	
Please evidence the data information you used to sassessment	Our research has no	t identified any particular r	negative impacts (o	r differential impacts)
What opportunities are there to promote equality and inclusion?		What do you still need to find out? Include in actions (last page)		

Sexual orientation e.g. straight, lesbian / gay, bisexual						
Positive impact		Negative impact		Unequal impact		
	Please evidence the data and information you used to support this assessment  Our research has not identified any particular negative impacts (or differential impacts assessment)					
What opportunities are			What do you still need			
there to promote			to find out? Include in			
equality and inclusion?			actions (last page)			

Socio-economic <sup>1</sup> e.g. low income, unemploy social value in procurement	homelessness, caring responsibilities, access to internet, public transport users,						
Positive impact							
Please evidence the data ar information you used to sup assessment	Low income, social class and social housing tenancy have been identified in some research as indicators of whether someone is likely to have the competence, confidence and capability to make the most of digital technologies.  People living in social housing are less likely to access the internet than people living in other housing tenures. During Housing's 2017 'Big Knock' Tenants Survey 23% of all respondents reported not having access to the internet (the same results were also received during the STAR survey).  The evidence also suggests that people on low incomes are less likely to have digital access and basic digital skills. Nationally, 17% of people earning less than £20,000 never use the internet, as opposed to 2% of people earning more than £40,000. 44% of people without basic digital skills are on lower wages or are unemployed.  People with any of the protected characteristics may be more vulnerable to poverty, and may therefore be at greater risk of digital exclusion, which may be exacerbated by inter-sectionality between their characteristics and their income.  If the Council failed to provide non-digital means of engaging with it, that could be to the detriment of people who do not have the skills or capabilities to engage online.						
What opportunities are there to promote equality and inclusion?	What do you still need to find out? Include in actions (last page)						

<sup>1</sup>Although non-statutory, the council has chosen to implement the Socio-Economic Duty and so decision-makers should use their discretion to consider the impact on people with a socio-economic disadvantage.

Other							
please feel free to cons	sider the poter	ntial impact on peopl	e in any other contexts				
Positive impact		Negative impact		Unequal impact			
Please evidence the data information you used to				or differential impacts)			
assessment							
What opportunities are			What do you still need				
there to promote			to find out? Include in				
equality and inclusion?			actions (last page)				

# What are the findings of any consultation with:

Staff?	Residents?	
Voluntary & community sector?	Partners?	
Other stakeholders?		

### **Overall conclusion & future activity**

Explain the overall findin	Explain the overall findings of the assessment and reasons for outcome (please choose one):				
1. No inequality, inclusion issues or opportunities to					
further improve have been	identified				
Negative / unequal impact, barriers to	2a. Adjustments made				
inclusion or	2b. Continue as planned	X			
improvement opportunities identified	2c. Stop and remove				

	Detail the actions that are needed as a result of this assessment and how they will help to remove discrimination &					
harassment, promote equal o	pportunities and / or encourag	ge good relations:				
Action	Will this help to remove, promote and / or encourage?	Responsible officer	Deadline	How will this be embedded as business as usual?		
Measure the take up of digital services by different groups and use the insight to design future services	Promote equal opportunities	Ruth Luscombe	From April 2021	As part of the new customer service model		
Ensure the customer service model supports those who cannot benefit from digital channels by providing alternatives.	Promote equal opportunities	Ruth Luscombe	From April 2021	As part of the new customer service model		

Approved by Assistant Director / Strategic Director: Ruth Luscombe Date: 18.11.20

What is being assessed?	FS25 – Closing the Print Room	What are		the document centre staff post and ce alternative arrangements		
Who may be affected by it?	Staff, Councillors and Customers	the key	including paperless committee meetings,			
Date of full EqIA on service area (planned or completed)	April 2021	diiiio or ic.	through Docma			
Form completed by:	Ruth Luscombe	Start date	June 2021	End date	n/a	
Form completed by.	Nutil Euscombe	Review date				

What data / information are you using to inform your assessment?	ONS Data, Housing STAR and "Big Knock" Survey data	Have any information gaps been identified along the way? If so, please specify	We need to do further analysis of the documents currently printed by the Print Service and ensure a clear alternative plan in place for each. This will be reviewed in a full EQIA.
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Explain the potential positive, negative or unequal impact on the following characteristics and how likely this is:					
Age	Unequal – Digital alternatives to printed documents may disproportionately impact on older people. Research evidence from ONS data suggests that older people tend to be less digitally active, and potentially at risk of digital		N/A		

	exclusion, although the picture is complex and social class / income can be a relevant factor too. Older people are much less likely to use the internet than other age groups. In 2019, 47% of adults in the UK aged 75 years or over had used the internet in the last 3 months, compared to 91% of all adults. During Housing's 2017 'Big Knock' Tenants Survey, 77% of all respondents reported having access to the internet. (This result compares to STAR survey which indicated 74% of residents using internet at home and further 9% outside of home). Of the 23% that don't have access, 76% were over 65 years old. 48% of over 75 year olds reported to having access to the internet, which is similar to the national statistics.		
Disability	N/A	Religion or belief	N/A
Gender reassignment	N/A	Sex	N/A
Marriage or civil partnership	N/A	Sexual orientation	N/A

Pregnancy & maternity	N/A	Socio-economic <sup>2</sup>	Unequal – Digital alternatives to printed documents may disproportionately impact some socio economic groups. Low income, social class and social housing tenancy have been identified in some research as indicators of whether someone is likely to have the competence, confidence and capability to make the most of digital technologies.  People living in social housing are less likely to access the internet than people living in other housing tenures. During Housing's 2017 'Big Knock' Tenants Survey 23% of all respondents reported not having access to the internet (the same results were also received during the STAR
			received during the STAR survey).  The evidence also suggests that people on low incomes are less likely to have digital

<sup>2</sup>Although non-statutory, the council has chosen to implement the Socio-Economic Duty and so decision-makers should use their discretion to consider the impact on people with a socio-economic disadvantage.

Other	Other	access and basic digital skills. Nationally, 17% of people earning less than £20,000 never use the internet, as opposed to 2% of people earning more than £40,000. 44% of people without basic digital skills are on lower wages or are unemployed.  People with any of the protected characteristics may be more vulnerable to poverty, and may therefore be at greater risk of digital exclusion, which may be exacerbated by intersectionality between their characteristics and their income.  If the Council failed to provide non-digital means of engaging with it, that could be to the detriment of people who do not have the skills or capabilities to engage online.
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Where there is a likely positive impact, please explain how it will help to fulfil our legislative duties to:					
Remove discrimination	Remove discrimination Promote equal Encourage good				
& harassment opportunities relations					

Action	Responsible officer	How will this be delivered and monitored?	Deadline
Full EQIA assessment	Ruth Luscombe	Project to be set up to review the impacts and alternatives to be put in place.	June 2021

Approved by Assistant Director / Strategic Director: Ruth Luscombe

Date: 18.11.20

What is being assessed?  Who may be affected by it?  Date of full EqIA on service area (planned or completed)	FS43 – Reduce Training Budget during 2021-22	What are the key aims of it?	To consider the proposed saving budget for 2021 particularly thos characteristics.	g of reducing /22 on all sta	the training Iff and
Form completed by:	Clare Davies	Start date	November 2020	End date	Ongoing
		Review date		November 2021	

What data / information are you using to inform your assessment?	Workforce Equalities Data as of November 2020	Have any information gaps been identified along the way? If so, please specify	Currently no workforce information is held on socio-economic status of the Stevenage Borough Council workforce and therefore this cannot be assessed.
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Explain the potential positive, negative or unequal impact on the following characteristics and how likely this is:				
Age	We do not hold data on employee characteristics for take up of learning and development opportunities	Race	We do not hold data on employee characteristics for take up of learning and development opportunities	
Disability	We do not hold data on employee characteristics for take up of learning and development opportunities	Religion or belief	We do not hold data on employee characteristics for take up of learning and development opportunities	

Gender reassignment	Data for this protected characteristic is incomplete for the employees impacted by the proposed savings options.	Sex	We do not hold data on employee characteristics for take up of learning and development opportunities
Marriage or civil partnership	We do not hold data on employee characteristics for take up of learning and development opportunities	Sexual orientation	We do not hold data on employee characteristics for take up of learning and development opportunities
Pregnancy & maternity	No information is held on the pregnancy and maternity status of the employees impacted by the proposed savings.	Socio-economic <sup>3</sup>	No information is held on the socio-economic status of the employees impacted by the proposed savings.
Other			

Where there is a likely po	Where there is a likely <b>positive impact</b> , please explain how it will help to <b>fulfil our legislative duties</b> to:					
Remove discrimination & harassment	Learning and development opportunities are available and taken up by all staff regardless of their background In response to the Covid pandemic more learning and development offers	Promote equal opportunities	Access to the apprenticeship levy funded courses is available to all staff	Encourage good relations		

<sup>&</sup>lt;sup>3</sup>Although non-statutory, the council has chosen to implement the Socio-Economic Duty and so decision-makers should use their discretion to consider the impact on people with a socio-economic disadvantage.

and moving to virtual platforms and this often reduces costs.		

Action	Responsible officer	How will this be delivered and monitored?	Deadline
Record protected characteristics data on staff completing learning and development courses	Clare Davies	Developing the HR System	April 2021

**Approved by Assistant Director / Strategic Director: Clare Davies** 

Date: 12.11.20

What is being assessed?	Reduced Graduate Training Budget	What are the key  To consider the potential imparators proposed saving of reducing to training budget for 2021/22 or		g of reducing	the graduate
Who may be affected by it?					
Date of full EqIA on service area (planned or completed)		aims of it?	particularly those under the protected characteristics.		orotected
Form completed by:	Clare Davies	Start date	November 2020	End date	Ongoing
		Review date		November 2021	

What data / information are you using to inform your assessment?	Workforce Equalities Data as of November 2020	Have any information gaps been identified along the way? If so, please specify	Currently no workforce information is held on socio-economic status of the Stevenage Borough Council workforce and therefore this cannot be assessed.
--	---	--	---

Explain the potential positive,	Explain the potential positive, negative or unequal impact on the following characteristics and how likely this is:					
Age	The number of employees impacted by the savings is less than 5 and therefore not identified. However, all graduates at SBC are from the National Local Government Scheme and have a full learning and	Race	The number of employees impacted by the savings is less than 5 and therefore not identified.			

Other			
Pregnancy & maternity	No information is held on the pregnancy and maternity status of the employees impacted by the proposed savings.	Socio-economic <sup>4</sup>	No information is held on the socio-economic status of the employees impacted by the proposed savings.
Marriage or civil partnership	The number of employees impacted by the savings is less than 5 and therefore not identified.	Sexual orientation	The number of employees impacted by the savings is less than 5 and therefore not identified.
Gender reassignment	Data for this protected characteristic is incomplete for the employees impacted by the proposed savings options.	Sex	The number of employees impacted by the savings is less than 5 and therefore not identified.
Disability	development programme. We also have vacant posts so they will not be disproportionately impacted.  None of the employees impacted by the proposed savings have identified as disabled and therefore no disproportionate effects are anticipated.	Religion or belief	The number of employees impacted by the savings is less than 5 and therefore not identified.

Where there is a likely positive impact, please explain how it will help to fulfil our legislative duties to:					
Remove discrimination	Continue with	Promote equal	Access to the	Encourage good	

<sup>&</sup>lt;sup>4</sup>Although non-statutory, the council has chosen to implement the Socio-Economic Duty and so decision-makers should use their discretion to consider the impact on people with a socio-economic disadvantage.

learning opportunities	F C F p	Programme Development Programme and promote other earning	opportunities	apprenticeship levy funded courses	relations	
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Action	Responsible officer	How will this be delivered and monitored?	Deadline

Approved by Assistant Director / Strategic Director: Clare Davies Date: 12.11.20

What is being assessed?	FS45 – Removal of cash collection	What are	ey as alternative payment methods are		to save money
Who may be affected by it?	Residents, Businesses, Staff, Partners	the key			
Date of full EqIA on service area (planned or completed)	N/A	diiiio or ic.			
Form completed by:	Buth Luccombo	Start date		End date	
Form completed by:	Ruth Luscombe	Review date			

What data / information are you using to inform your assessment?	Cash represented only 1.17% of payments collected last year and alternative means are available for all services.	Have any information gaps been identified along the way? If so, please specify	We do not know who pays for car parking in cash. However there are a number of alternatives available. There are health and hygiene reasons for not accepting cash during the COVID-19 pandemic – card and phone payments are available.
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Explain the potential positive, negative or unequal impact on the following characteristics and how likely this is:						
Age N/A Race N/A						
Disability	N/A	Religion or belief	N/A			
Gender reassignment	N/A	Sex	N/A			
Marriage or civil partnership	N/A	Sexual orientation	N/A			

Pregnancy & maternity	N/A	Socio-economic <sup>5</sup>	Unequal – That small minority of people who may not have a bank account may be negatively impacted. Cash payments which would have been made to Customer Services can still be made via the Post Office.
Other			

Where there is a likely positive impact, please explain how it will help to fulfil our legislative duties to:				
Remove discrimination	Promote equal	Encourage good		
& harassment	opportunities	relations		

Action	Responsible officer	How will this be delivered and monitored?	Deadline
If a negative or unequal (high or low) impact has been identified, you should assess this further in a Full EqIA	Ruth Luscombe	Keep payment options under review in response to customer feedback	April 2022

Approved by Assistant Director / Strategic Director: Ruth Luscombe Date: 12<sup>th</sup> November 2020

<sup>5</sup>Although non-statutory, the council has chosen to implement the Socio-Economic Duty and so decision-makers should use their discretion to consider the impact on people with a socio-economic disadvantage.

What is being assessed?	FS19 - Combine the Townwide Resident Survey and the Council Tenant Satisfaction Survey (known as 'STAR'), which are now undertaken every 3 years.		The Town-wide survey of resident householders seeks feedback and resident perception on a range of issues and services and supports the council's priority-setting process.  The 'STAR' survey is used across the housing sector and enables the council to		
Who may be affected by it?	affected by it?  Resident householders and council tenants		assess levels of tenant and leasehold satisfaction, to identify their priorities a		oriorities and to
Date of full EqIA on service area (planned or completed)	N/A	What are the key aims of it?	shape its services accordingly.  The proposal is to reduce the overall co		e overall cost by nd/or reducing nbers surveyed. to increase nt activities at bod level, which t and STAR taken 'in-house' levelopment leagues —
Form completed by:	Katrina Shirley	Start date Review dat	e 14.11.20 End date		

What data / information are you using to inform your assessment?	SBC Resident Survey Report 2017/18 SBC STAR Survey Report SBC Community Engagement Framework SBC Equality and Diversity Policy Housemark STAR guidance Local Government Association (LGA) guidance on benchmarking resident satisfaction data.  General Comments:  Resident/STAR survey responses:  In conducting the surveys, the views of random samples of resident householders and tenants are canvassed. In 2017/18, the surveys resulted in the following number of responses  Resident survey – 1067 (margin of error in results = +/- 3%) General Needs tenants – 483 (margin of error in results = +/- 3.75)  Returned samples are checked for differential response rates and results are weighted to correct for this, so that the reported results are broadly representative of the population of residents and tenants.  The number of responses achieved in 2017/18 met good practice standards and benchmarking requirements. Every effort will be made to achieve the same level of responses from residents and general needs tenants in 2021/22 through the combined survey, if the budget allows. It is unlikely that the same level of sheltered tenant responses can be achieved as in 2017/18 however. It should be noted that the combined total number people surveyed will be lower than in 2017/18, and the	Have any information gaps been identified along the way? If so, please specify	Detailed information on the size of sample/ breadth of survey questions that can be achieved within the revised budget.

range of issues consulted upon will be reduced (however, see comments below on addressing this and enhancing the approach through the use of other engagement channels).

Anonymised information on the protected characteristics of respondents is collected through the survey in respect of sex, age, ethnic origin, disability and working status. This enables some analysis of the profile of tenants and residents to be undertaken and enables significant differences in responses to be identified. It should be noted that all results are subject to sampling tolerances, which means that not all differences are statistically significant, particularly where the numbers within a particular protected characteristic group are relatively small.

#### SBC Community Engagement Framework

The Resident and STAR surveys are just one part of a broader approach to community engagement in Stevenage, which involves a range ways in which the council consults with and involves residents and tenants. The Community Engagement Framework includes the following aim (which aligns with Goal 3 of the Equality & Diversity Policy):

- Providing and developing creative ways to engage with our communities, ensuring equality of opportunity in having a voice, which will be achieved by:
  - Promoting and supporting processes that engage and provide representation for communities in decision making
  - Developing more creative approaches that encourage engagement from all sections of our community, using digital and neighbourhood networks
  - Providing opportunities for our protected characteristic communities to come together in exploring the needs of minority communities, groups and organisations.

In this context, in 2021/22, a co-ordinated approach will be adopted, in

which the Resident/STAR survey will be complemented by other	
engagement activities at the Cooperative Neighbourhood level. This is a	
positive step that will enable us to reach new people in different ways,	
including those from protected characteristic groups.	

Explain the <b>pot</b>	ential positive, negative or unequal impact on		·
Age	General (potential neutral impact)	Race	Potential Positive Impact
	In general terms, if the same number of		In general terms, if the same number of
	responses from residents and general needs		responses from residents and tenants can be
	tenants can be achieved as in 2017/18 within		achieved as in 2017/18, views of residents and
	the revised budget, views of differing ages		tenants from black, Asian and minority ethnic
	can continue to be canvassed and compared		backgrounds can continue to be canvassed and
	through the combined Resident/STAR survey		compared through the combined survey, to the
	to the same level of statistical accuracy.		same level of statistical accuracy.
	Older People (potential negative impact)		However, the Resident/STAR survey has
	It will not be possible within a combined,		limitations in this regard, given the generalised
	shorter survey to ask the specific additional		nature of the survey and the relatively small
	questions to Independent Living Scheme		number of responses that can be achieved
	tenants that were asked in the STAR		through the sample from people from black,
	20017/18 and the number of responses from		Asian and minority ethnic backgrounds.
	these tenants will be lower. This may be		
	mitigated through a separate engagement		By undertaking more focused engagement
	activity, but this will require internal resource.		activity with the diverse range of black, Asian
			and minority ethnic communities in Stevenage,
	Younger People (potential positive		their views and feedback can be better
	impact)		captured.
	As the Resident Survey is targeted at		
	householders, the profile of respondents is		
	inherently older than the general resident		
	population. By undertaking other engagement		

	activity specifically targeted at younger people, the views of this group will be better captured.		
Disability	Potential Positive Impact In general terms, if the same number of responses from residents and tenants can be achieved as in 2017/18, views of residents and tenants with disabilities can continue to be canvassed and compared through the combined survey, to the same level of statistical accuracy.  In addition, by undertaking complementary engagement activity specifically targeted at people with disabilities, more focused consultation with this group can be achieved.	Religion or belief	Potential Positive Impact Previous Resident and STAR surveys have not analysed results by respondents' religion or belief and because of the general nature of the surveys and the sampling approach, it is unlikely they would be particularly effective in this regard.  By undertaking more focused engagement activity with faith groups the views of people of different religion or beliefs can be better captured.
Gender reassignment	Previous Resident and STAR surveys have not analysed results by this protected characteristic and because of the general nature of the surveys and the sampling approach, it is unlikely they would be effective in this regard.  There is the potential to undertake more focused engagement activity to capture the views of this protected characteristic group.	Sex	Potential Neutral Impact In general terms, if the same number of responses from residents and tenants can be achieved as in 2017/18, views of male and female respondents can continue to be canvassed and compared through the combined Resident/STAR survey to the same level of statistical accuracy.
Marriage or civil partnership	Neutral Impact: In general terms, if the same number of responses from residents and tenants can be achieved as in 2017/18, views of people of	Sexual orientation	Potential Positive Impact: The previous Resident and STAR surveys did not analyse results in relation to this protected characteristic and more focused engagement

	different marital status can continue to be canvassed and compared through the combined Resident/STAR survey to the same level of statistical accuracy.		activity may enable views to be better captured.
Pregnancy & maternity	Neutral Impact: The Resident and STAR surveys do not analyse results in relation to this protected characteristic.	Socio- economic <sup>6</sup>	Potential Neutral Impact: In general terms, if the same number of responses from residents and tenants can be achieved as in 2017/18, views of respondents from differing socio-economic backgrounds can continue to be canvassed and compared through the combined Resident/STAR survey to the same level of statistical accuracy.
Other			

Where there is a likely pe	Where there is a likely <b>positive impact</b> , please explain how it will help to <b>fulfil our legislative duties</b> to:							
Remove discrimination	By widening the	Promote equal	The proposed	Encourage good				
& harassment	range of	opportunities	approach to widen	relations				
	engagement		the range of					
	activities, the		engagement					
	council can better		activities will					
	understand whether		increase					
	perceptions of the		opportunities for					
	town and the		people from					
	experience of		protected					
	council services		characteristic groups					
	differ amongst		to express their					
	people from		views on issues and					
	protected		services and better					

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<sup>&</sup>lt;sup>6</sup>Although non-statutory, the council has chosen to implement the Socio-Economic Duty and so decision-makers should use their discretion to consider the impact on people with a socio-economic disadvantage.

characteristic	inform cou	ncil	
groups compared to	decisions		
the wider population			

### What further work / activity is needed as a result of this assessment?

Action	Responsible officer	How will this be delivered and monitored?	Deadline
Establish the revised Resident/STAR survey sampling/questionnaire approach	Corporate Policy & Business Support Manager	C&N Service Plan	February 2021
Develop an engagement plan incorporating both the Resident/STAR survey and other engagement activities	Community Development Manager	C&N Service Plan	February 2021

Approved by Assistant Director/ Strategic Director: Rob Gregory

Date: 16/11/20

# **Full Equality Impact Assessment**

For a policy, project, service or other decision that is new, changing or under review

What is b	eing assessed?	HRA:	Rent and Servi	ce Charge 2	021/22
Lead	Jaine Cresser			Assessment team	Elizabeth Ddamulira
Assessor					
Start date	December 2020	ecember 2020 End date Jan 2022			
When will the EalA he		Jan 2022			

Who may be affected by it?	All tenants
	To increase the rent on dwellings from week commencing 5 April 2021 by 1.5%, which is an average increase of £1.46 for social rents, £2.38 for affordable rents and £1.80 for Low Start Shared Ownership homes per week (based on a 52 week year). This has been calculated using the rent formula CPI +1% in line with government policy and the Council's Rent and Service Charge Policy.
What are the key aims of it?	The Council's Rent and Service Charge Policy provides a framework for setting our rents and service charges within legislative requirements. The rent and service charge income underpins the delivery of the Housing Revenue Account Business Plan's key housing objectives to deliver effective services, to invest in its properties to ensure homes are of a modern standard and to provide new social housing to rent. The policy was revised in December 2019.
	The revisions aimed to ensure that the policy complied with the government's direction on the Rent Standard 2019 and to clarify the Council's position in relation to service charge increases and affordable rents. A further aim this year is to mitigate the impact of COVID 19 on our customers and their ability to pay rent and service charges. Key elements include:  • To increase rents on social rent and affordable rent properties by up to CPI+1% each year from 2020, for
	a period of at least five years.

- Increase the rents for all excluded properties by CPI +1%, e.g. LSSO
- Set the rent for a proportion of new build homes at affordable rents.
- Set the rent where adaptations or extensions have resulted in the property being increased in size (for example, an additional bedroom), in accordance with the formula rent as detailed in the policy.
- Further to the Welfare Reform and Work Act 2016, charge the rent payable by new tenants of existing social rent housing at the higher of the formula rent (i.e. the 'social rent rate'), or the actual rent (i.e. the 'assumed rent rate') as at 8<sup>th</sup> July 2015, with the appropriate rent increase applied in line with the current Rent Standard Direction (February 2019).
- Charge actual costs for service charges but with the provision to apply a cap, subject to any legal constraints, on affordability grounds where appropriate.
- Mitigation of COVID19 impact

What positive measures are in place (if any) to help fulfil our legislative duties to:						
Remove discrimination & harassment	Promote equa opportunities	The aim of the Rent & Service Charge Policy is to provide a fair method of calculating rents and service charges for all of our tenants. It also aligns with the council's Concessions for Fees and Charges Policy, and the principle of recovering the cost of providing services.	Encourage good relations			

What sources of data / information are you using to inform your assessment?

- Policy Statement on Rents for Social Housing, February 2019
- Direction on the Rent Standard, 2019
- Welfare Reform and Work Act 2016
- Housing and Planning Act 2016
- Rent and service charge policy agreed by Exec December 2019 and recommended to Council in January 2020

- Rent account information
- Housing System data
- Specialist Support service data

In assessing the potential impact on people, are there any overall comments that you would like to make?

Approval to increase rents by CPI + 1% for 5 years from 2020/21 required a revision of HRA Budget plans priorities. The HRA Business Plan was agreed at the December 2019 Executive Meeting.

The average rent increase for 2021/2022 is (Adjusted Limited Basic 2020) + 1.5% (General stock) and + 1.5% (LSSO stock).

When calculating rents and service charges accounts, consideration will be taken of the need to balance any increase in the combined rent and service charge with the potential financial impact on customers. This relates to 37% of homes to which a service charge applies, which are predominantly flats as well as flexicare/independent living accommodation. The Council must recover the actual cost of providing the service and service charge costs will increase with inflationary pressures and changes in usage.

The impact of the 2021/22 rent increase and service charges is

- 306 homes or 4% receive a rent and service charge reduction;
- 7,578 homes or 96% of households will receive a weekly rent and service charge increase of less than £3.50 (based on 52 weeks).
- There are only 5 properties with an increase of more than £5.00.

We had 6,799 general social rented properties, 36 affordable rent properties, 832 flexicare and independent living accommodation and 85 LSSOs as at November 2020. The setting of a proportion of new build lets at affordable rents will contribute positively to increasing the supply of new homes in Stevenage. All target groups will benefit given the need for affordable housing is common across all socio-economic and minority groups. The current low supply of new affordable housing and the high cost of the private rented sector in Stevenage have impacted adversely on those groups whose

incomes are average or below average.

This also further supports work with people who need help to live independently at home and those at risk of homelessness, through wider housing options, continued provision of support, and financial assistance for adaptations and more homelessness preventative programmes respectively.

Any groups that are potentially disadvantaged are still expected to be able to benefit from a council property set at a social rent.

Tenants benefited from four years of rent reduction from 2016-2020 so the impact of the rent increase is mitigated partially by having to use a lower base than it would have been had there not been a mandatory rent reduction (cumulative) of 1 % for the four year period.

# Evidence and impact assessment Explain the potential impact and opportunities it could have for people in terms of the following characteristics, where applicable:

	Age							
Positive impact	Negative impact	Unequal impact	The increase is applied to all properties; it is not possible to exempt any particular groups. A proportion of tenants may see an increase in service charges in any given year. The majority of tenants who are charged for services live in flats and/or flexicare/independent living accommodation.  Tenants living in flexicare/independent living housing do so because they have additional needs that require support relating to age, disability or both. The minimum age for entry into flexicare/independent living housing is 55 years and data from Northgate indicates that the proportion of					
			tenants aged 60+ in flexicare/independent living housing, is almost three					

times the proportion for all tenant housing. People living in independent living/flexicare schemes who also pay for the support/emergency response services (that are not eligible for Housing benefit) on top of rent and service charges, may see an increase in the overall payment due each week. In relation to flat blocks, the data indicates that there is a higher proportion of people aged 18-29 years in flat blocks compared with all SBC housing. The below table illustrates the age groups that have been affected by Covid19 in terms of their employment since April 2020. 30-39 40-49 50-59 Age 19 and 20-29 60 +under Furlough 26 76 55 54 28 0 Retention 30 20 18 0 4 5 Redundancy 0 6 9 4 Please evidence the data and information See section above on data sources. you used to support this assessment Ongoing consultation will take place with residents in 2021/22 to What do you still need What opportunities are establish the impact of the rent & service charge increase. Please to find out? Include in there to mitigate the impact? also refer to the mitigations outlined in the socio-economic actions (last page) section below, most of which will also apply to this protected characteristic group.

Disability						
Positive impact		Negative impact		Unequal impact	The increase is applied to all properties; it is not possible to exempt any particular groups. Northgate data on tenants in relation to disability was collected a number of years ago and is not up to date. This information	

		was also disclosed at the tenants' discretion so some tenants may not have provided it. To give some context, the data indicates that the proportion of tenants in flexicare/independent living housing declaring that they had a disability was almost double the proportion for the whole SBC tenant population.  The proportion of tenants living in flat blocks declaring a disability was very similar to the proportion living in all properties; therefore a disproportionate impact on these tenants is not anticipated.
Please evidence the data and info	mation you	See section above on data sources.
used to support this assessment		
What opportunities are there to		What do you still need to find out?
promote equality and inclusion?		Include in actions (last page)

Gender reassignment, Marriage or civil partnership, Pregnancy & maternity, Race, Religion or belief, Sex, Sexual orientation N/A							
Positive impact			ative impact		Unequal imp	pact	
Please evidence the data and i	Please evidence the data and information you						
used to support this assessmen	used to support this assessment						
What opportunities are there to			What do you still need to				
promote equality and inclusion	?			Include in actions (last pa	age)		

e.g. lo	w income, unemployed, homelessne		<b>o-economic<sup>7</sup></b> ng responsibilities, access to internet, public tr	ansport u	sers
Positive			The rent increase will be applied across all	Unequal	
impact	in	mpact	tenancies prescribed by the Work and Welfare	impact	
			Reform Act and in line with the current Rent		1

<sup>&</sup>lt;sup>7</sup>Although non-statutory, the council has chosen to implement the Socio-Economic Duty and so decision-makers should use their discretion to consider the impact on people with a socio-economic disadvantage.

Standard Direction (February 2019) regardless of circumstances. This will be applied for at least the next 4 years. Those reliant on Housing Benefit (HB) and Universal Credit (UC) Housing costs to cover their full rent and eligible service charges won't be affected by the increase in rent and service charges as their benefit award will be recalculated.

The number of bids on the new build properties let at affordable rents are similar to the number received for new build let at social rents. There is a mixture of employed and unemployed applicants. Applicants in receipt of benefits are not excluded or unfairly treated.

Those who receive services for which a service charge is made will be charged the actual cost of those services. Heating charges are exempt from HB and tenants are expected to pay this. Water charges are also exempt from HB and are set by the Water Authority. SBC collects the water charges on behalf of the Water Authority.

The COVID19 pandemic has caused unemployment and unstable employment. So for example we have 249 residents as at 16 December 2020 who are furloughed, on job retention or have been made redundant.

Residents experiencing exceptional economic hardship who are unable to work due to a duty

			to self-isolate are receiving a drop in ea	arnings.	
Please evidence the	e data and information	See section	above on data sources		
you used to suppor					
What opportunities are there to mitigate the impact and promote equality and inclusion?  The why with with with to the character of the content of the character of the content of the character	e policy allows for capping of astraints. As a means of miles hardship, the council mant increase information will start preparing tenants.  The rent notification letter (to be ants the opportunity to discurrent has increased an agree a property has a number a summary of how the weater support charges are also ependent living and flexical hese residents to ensure it arge is made up.  The policy states that the Council of the policy states that th	tigating the ital ay subsidises be published be sent out at uss any que dialso explaited of service sekly charge so included are schemes its clearly seat the rent in the rent	impact of an increase that would the costs.  If on our website early February 2021  If the end of February) will offer the tries they have with staff. It will explain in any increase in service charges. Charges they will be fully explained, has increased overall.  Image: (mainly but not exclusively for explained) separate notifications will be sent out to out how each element of the weekly as possible there will be a FAQ sheet explained as available for those who need them.  It regard to the Local Housing affordable rents are set at this level, full for those tenants who are entitled to the Local Housing explained, for example on a low wage or zero benefit can be paid.	What do you still need to find out? Include in actions (last page)	

affordability assessment is carried out prior to offer to ensure that the tenancy is sustainable.

The implementation of the policy in respect of AR will be kept under review by the Housing Development Executive Committee and should adverse impacts be identified this will inform future decision making in this regard.

Support provision for this group has been increased as part of an income recovery action plan, to ensure that tenants can pay through sustainable arrangements to maintain payments towards rent and service charges. Additional staffing resources have been secured to continue work to target and support UC cases to maximise income collection and minimise the level of arrears for this group of tenants.

We will make links to clear support and guidance on all of our communication platforms.

We will prepare staff to enable them to respond effectively and empathetically with tenants.

	pleas	e feel fr	ee to consid	Other ler the potential impact on people in any other contexts	
Positive	Negative	9	Unequal		
impact	impact		impact		
Please ev	Please evidence the data and information				
you used	to support this as	sessme	nt		
What opp	ortunities are the	re to		What do you still need to find out?	
mitigate the impact?			Include in actions (last page)		

### What are the findings of any consultation with:

	anigo or any consumation mini		
Residents?	Planned consultation with residents during 2020/21 regarding the impact of the new rent policy was postponed to 2021/22 due to COVID19. This will be the second year of increase since the rent reduction regime was introduced and consultation will enable us to establish the impact and put in place systems to mitigate this accordingly.	Staff?	
Voluntary &		Partners?	
community sector?		railliels?	
	Housing Management Advisory Board (HMAB) was consulted in November 2019 and was supportive of the policy to charge service charges at actual costs but with the provision in the policy to cap any increases if this would cause hardship.		
Other stakeholders?	In terms of affordable rents, HMAB broadly supported this policy. There are still some concerns about the affordability of such schemes and the position if tenants lost employment/were on a low wage. The rent would be covered in full for those tenants entitled to full HB/UC housing costs due to the rent being set at the LHA level. Also those in low paid employment may be entitled to partial HB/UC housing costs. Thorough affordability assessments will be carried out.		

### **Overall conclusion & future activity**

Explain the overall findin	gs of the assessment and	reasons for outcome (please choose one):
1. No inequality, inclusion issues or opportunities to further improve have been identified		
Negative / unequal	2a. Adjustments made	
impact, barriers to inclusion or improvement	2b. Continue as planned	The future viability of the HRA Business Plan will be reliant upon us being able to recover the costs of service provision where it's possible to do so.
opportunities identified		Only a proportion of new builds will be at affordable rent in line with the

revised HRA Budget plan. The proposal to offer a mix of new build rents at affordable rent levels and at social rent levels would result in additional income to the HRA over 30 years which makes a significant contribution to the sustainability of the plan and the Council's ability to build new homes and to deliver other housing priorities. There are plans to build 240 social rented and 270 affordable rented houses over the first 5 years of the revised Business Plan. The policy and the aim is for a 50/50 split, but due to the timing of delivery on schemes the weighting is slightly biased towards affordable, but it evens out over the whole 30 year plan. So far 243 new builds have been delivered by the Council and 295 are under construction. This means that there will be a total of approximately 4% of council homes at affordable rent at the end of the 5 year period. The majority of annual lettings (i.e. of new build and re-let properties) would continue to be at a social rent level and it is estimated that after 30 years the vast majority of council property rents (an estimated 88%) will be set at the social rent rate, subject to any changes in legislation or Government quidance. 2c. Stop and remove

Detail the actions that are nee harassment, promote equal o			nelp to <b>remov</b>	e discrimination &
Action	Will this help to remove, promote and / or encourage?	Responsible officer	Deadline	How will this be embedded as business as usual?
Consultation with residents to establish the impact of the rent increase	Remove discrimination and promote equal opportunities	Elizabeth Ddamulira	March 2022	Systems will be put in place to mitigate impacts

Approved by Assistant Director (Housing and Investment): Jaine Cresser

Date: 16 December 2020

# Full Equality Impact Assessment For a policy, project, service or other decision that is new, changing or under review

What is being assessed? Support Charge		ort Charge incre	ase by £2 fro	om £6 to £8	
Lead Assessor	Kelly Holland			Assessment team	Kelly Holland Karen Long
Start date	10 November 2020	End date	9 November 2021		
When will t reviewed?	he EqIA be	8 November 2021			

Who may be affected by it?	Residents living in independent living/flexicare housing that are in receipt of housing benefit, fairer charging, universal credit (UC) or 2003 protected (i.e. those in the service prior to the government supporting people grant funding starting in 2003). As at 20 November 2020 this affects 595 people. The remaining residents in independent living/flexicare already pay the full charge.
What are the key aims of it?	To contribute to the recovery of costs for providing the support/emergency response service to people living in independent living/flexicare schemes that historically have not had to pay anything towards the cost as we received housing related support funding from Hertfordshire County Council (HCC). The support/alarm service is not eligible for housing benefit, but in order to be able to continue this service to residents we needed to introduce the initial weekly contribution of £2.00 in 2018/19, £4 in 2019/20, £6 in 2020/21 and propose to increase this to £8.00 in 2021/22. The total cost of the support/alarm service will be £19.65 per week so Stevenage Borough Council will still be subsidising £11.65 per week.  This option has the support of the housing portfolio holder.

What positive measure	s are in place (if any) to	help <b>fulfil our le</b>	gislative duties to:		
Remove discrimination	This will remove	Promote equal	This also aligns to	Encourage good	
& harassment	discrimination	opportunities	the Council's aim to	relations	
	against other		be financially		
	residents that pay		sufficient and		
	the full cost for not		recover costs of		
	being in receipt of		services where		
	housing benefit or		possible.		
	fairer charging.				

What sources of data /
information are you using to
inform your assessment?

- Data of those on full/partial housing, fairer charging, universal credit or those that are protected due to supporting people implementation in 2003.
- Age profile of independent/flexicare housing tenants

# In assessing the potential impact on people, are there any overall comments that you would like to make?

We currently have 3 people that have made nil payment of the support charge either since the introduction of the contribution charge or from moving in. The majority of people do not pay through direct debit and pay through a payment card. This is not always a regular payment and historically it took a lot of effort by the Support Services team to get people to pay £6. As at 20 November 2020 we have 71 people who are in arrears over £30 totalling £12,384. This is likely to increase especially when the new charge starts in April 2021. Following the housing and investment business unit review the management of the support charge income has transferred to Income Services in line with other income collection functions.

### **Evidence and impact assessment**

Explain the potential impact and opportunities it could have for people in terms of the following characteristics, where applicable:

	Age					
Negative impact	Negative impact					
people over 55 years old of Conversely however, the o	The residents that are charged a support charge are predominantly older and disabled people as this accommodation is for people over 55 years old or for people with a disability.  Conversely however, the costs are currently subsidised by the wider tenant population, who have a younger age profile and do not benefit from the service.					
Please evidence the data		Age profile of indeper	ndent/flexicare housing re	esidents		
information you used to su assessment	information you used to support this assessment					
What opportunities are		-	What do you still need			
there to promote			to find out? Include in			
equality and inclusion?			actions (last page)			

Disability e.g. physical impairment, mental ill health, learning difficulties, long-standing illness					
Unequal impact	Unequal impact				
	The residents that are charged a support charge are predominantly older and disabled people as this accommodation is for people over 55 years old or for people with a disability.				
Please evidence the data and information you used to support this assessment  Northgate report on disability profile for independent/flexicare residents and also who population living in SBC properties.				ndent/flexicare residents and also whole	
What opportunities are		1	What do you still need	Northgate data on tenants relating to	

there to promote equality and inclusion?	to find out? Include in actions (last page)	tenants with disability was collected a number of years ago and is not up to date. This information was also disclosed at the tenant's discretion so some tenants may not have provided it. We have introduced a support services module on Northgate whereby we will be able to collate more data on disability and this will inform future EQIAs. Northgate are in the process of getting the reports set up so we are
		able to extract this information in the future.

Gender reassignment N/A					
Positive impact   Negative impact   Unequal impact					
Please evidence the da	ta and				
information you used to support this					
assessment					
What opportunities are			What do you still need		
there to promote			to find out? Include in		
equality and inclusion?			actions (last page)		

Marriage or civil partnership N/A					
Positive impact	Positive impact Unequal impact				
Please evidence the data and					
information you used to support this					
assessment					

What opportunities are	What do you still need	
there to promote	to find out? Include in	
equality and inclusion?	actions (last page)	

Pregnancy & maternity – N/A					
Positive impact		Negative impact		Unequal impact	
Please evidence the data	and				
information you used to support this					
assessment					
What opportunities are			What do you still need		
there to promote	to promote		to find out? Include in		
equality and inclusion?			actions (last page)		

Race - N/A				
Positive impact		Negative impact		Unequal impact
	ease evidence the data and ormation you used to support this			
assessment				
What opportunities are			What do you still need	
there to promote		to find out? Include in		
equality and inclusion?			actions (last page)	

	Religion or belief	– N/A
Positive impact	Negative impact	Unequal impact
Please evidence the data and		
information you used to support this		

assessment			
What opportunities are		What do you still need	
there to promote		to find out? Include in	
equality and inclusion?		actions (last page)	

Sex – N/A				
Positive impact		Negative impact		Unequal impact
Please evidence the data a information you used to su assessment	mation you used to support this			
What opportunities are there to promote equality and inclusion?			What do you still need to find out? Include in actions (last page)	

Sexual orientation – N/A e.g. straight, lesbian / gay, bisexual					
Positive impact		Negative impact		Unequal impact	
Please evidence the data	Please evidence the data and				
information you used to su	pport this				
assessment					
What opportunities are			What do you still need		
there to promote		to find out? Include in			
equality and inclusion?			actions (last page)		

### Socio-economic<sup>8</sup>

e.g. low income, unemployed, homelessness, caring responsibilities, access to internet, public transport users, social value in procurement

### **Positive Impact:**

Results from the STAR survey in 2018 have shown that residents identified the emergency alarm service and the supported housing officer as the 2<sup>nd</sup> and 3rd most important priority associated with living in their property. The application of the support charge will help to ensure that the Council can continue to deliver this service.

In January 2018 we held drop in sessions at each scheme for residents to come and discuss the charge and for us to explain what it is for. We had a lot of positive comments with the majority understanding the need to pay towards the service. Some residents recognised that housing associations had withdrawn the emergency service and scheme manager and didn't want this to happen to them. One person wanted to pay more.

HCC have confirmed that they will be continuing with our flexicare support contract until end March 2022 which will mean that this will help offset some of the costs that we would have had to pass on to this group of residents.

### **Negative Impact:**

The support charge is not eligible for housing benefit and could have a negative impact for those on lower incomes in terms of affordability. However, of 103 residents where we had to chase payment following 2018's introduction of the £2 weekly contribution only one resident said they couldn't afford it and was referred to the welfare benefit and debt advisors. We have not had any indication to suggest that residents can't afford the current charge. If anyone is struggling with money we will refer them to the welfare benefit and debt advisors for support.

This group of residents may also be affected by increases in Hertfordshire County Council (HCC) affecting the overall amount that older and disabled people can afford to pay. (We have not had notification of what the charges will be for 2021/22):

• HCC charge for some of their community based adult social care services that they used to provide for free. This has

<sup>&</sup>lt;sup>8</sup>Although non-statutory, the Council has chosen to implement the Socio-Economic Duty and so decision-makers should use their discretion to consider the impact on people with a socio-economic disadvantage.

impacted on many people over 60 in the independent living/flexicare schemes as they are in receipt of some care due to their age/medical conditions. The low care band in flexicare doubled in 2018 and this had an impact on residents being able to afford care and HCC had received a number of complaints.

However, the introduction of the charge is considered to be fairer than current arrangements, whereby support charge costs are subsidised by the wider tenant population who do not benefit from the service.

Furthermore, the charge has been introduced on an incremental basis, to mitigate the impact, rather than applying the full amount of £19.65 per week in one 'hit'.

During 2021/22, officers will also review whether any elements of the independent living service should in fact be eligible for housing benefit. This will be reflected in the charges from April 2022 due to the fees and charges timeline.

#### Communication

The support charge notification letter will go out in February 2021 to all residents living in independent living and flexicare properties.

To ensure that this is explained as clearly as possible there will be a FAQ sheet and details on the website.

HMAB will agree and /or make recommendations for the content of the letters in January 2021, with the portfolio holder signing off the final letters.

Please evidence the data and information you used to support this assessment

- Comments from drop in sessions held in January 2018.
- A copy of charges for community based care from HCC in 2018
- Spreadsheet detailing those who hadn't paid any weekly contribution since the introduction of the charge or since they moved in.

What opportunities are	We have clearly explained what	What do you still need	
there to promote	the support charge covers and	to find out? Include in	
equality and inclusion?	the reasons for charging	actions (last page)	
	The notification letters will offer		
	customers the opportunity to		
	discuss their concerns with staff		
	and get support in applying for		
	any relevant benefits.		

Other – N/A please feel free to consider the potential impact on people in any other contexts					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment					
What opportunities are there to promote equality and inclusion?			What do you still need to find out? Include in actions (last page)		

What are the findings of any consultation with:

Staff? None Resident	Results from the STAR survey in 2018 have shown that residents identified the emergency alarm service and the support housing officer as the 2 <sup>nd</sup> and 3rd most important priority associated with living in their property.  In January 2018 we held drop in sessions at each scheme for residents to come and discuss the charge and for us to explain
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		what it is for. We had a lot of positive comments with the majority understanding the need to pay towards the service.  Some residents recognised that housing associations had withdrawn the emergency service and scheme manager and didn't want it to happen to them. One person wanted to pay more.
Voluntary & community sector?	Partners?	
Other stakeholders?		

## Overall conclusion & future activity

Explain the overall findings of the assessment and reasons for outcome (please choose one):				
1. No inequality, inclusion issues or opportunities to				
further improve have been identified				
	2a. Adjustments made			
Negative / unequal impact, barriers to inclusion or improvement opportunities identified	2b. Continue as planned	The future viability of the support and alarm service in independent/flexicare living is reliant upon us being able to recover the cost of service provision where it is possible to do so.  Results from the STAR survey support the value of the service from residents by them rating the emergency alarm and supported housing officer as their 2 <sup>nd</sup> and 3 <sup>rd</sup> priority (behind the repairs to their property).		
	2c. Stop and remove			

Detail the actions that are needed as a result of this assessment and how they will help to remove discrimination & harassment, promote equal opportunities and / or encourage good relations:					
Action  Will this help to remove, promote and / or encourage?  Responsible officer Deadline				How will this be embedded as business as usual?	
Review whether any elements of the independent living service should be eligible for housing benefit	This is to ensure fair charging of service.	Karen Long	June 2021		

Approved by Assistant Director / Strategic Director: Jaine Cresser Assistant Director (Housing and Investment)
Date: 18/12/20