



## Introduction of Rent Flexibility

# Equality Impact Assessment (EqIA) Form

December 2024 – December 2025

<b>Date created</b>	November 2024
<b>Approved by</b>	Cabinet
<b>Owner</b>	Assistant Director for Housing and Neighbourhoods
<b>Version</b>	1
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<b>Business Unit and Team</b>	Housing and Neighbourhoods, Housing Management

Please [click this link](#) to find the EqIA guidance toolkit for support in completing the following form.

For translations, braille or large print versions of this document please email [equalities@stevenage.gov.uk](mailto:equalities@stevenage.gov.uk).

**First things first:**

**Does this policy, project, service, or other decision need an EqIA?**

<b>Title:</b>	<b>Introduction of Rent Flexibility</b>	
<b>Please answer Yes or No to the following questions:</b>		
Does it affect staff, service users or the wider community?		Yes
Has it been identified as being important to particular groups of people?		Yes
Does it or could it potentially affect different groups of people differently (unequal)?		Yes
Does it relate to an area where there are known inequalities or exclusion issues?		Yes
Will it have an impact on how other organisations operate?		No
Is there potential for it to cause controversy or affect the council's reputation as a public service provider?		Yes

<b>Where a positive impact is likely, will this help to:</b>	
Remove discrimination and harassment?	Yes
Promote equal opportunities?	Yes
Encourage good relations?	Yes

**If you answered 'Yes' to one or more of the above questions you should carry out an EqlA.**

Or if you answered 'No' to all of the questions and decide that your activity doesn't need an EqlA you must explain below why it has no relevance to equality and diversity.

You should reference the information you used to support your decision below and seek approval from your Assistant Director before confirming this by sending this page to [equalities@stevenage.gov.uk](mailto:equalities@stevenage.gov.uk).

I determine that no EqlA is needed to inform the decision on the .

Name of assessor: n/a

Decision approved by: n/a

Role: n/a

Role: Assistant Director n/a

Date: n/a

Date: n/a

# Equality Impact Assessment Form

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

<b>What is being assessed?</b>		<b>Introduction of Rent Flexibility</b>			
Lead Assessor	Kerry Clifford			Assessment team	Keith Reynoldson
Start date	TBD	End date			
When will the EqIA be reviewed? (Typically every 2 years)		If post consultation, SBC decides to introduce rent flexibility, a full EQIA will take place to support a change to the Rent and Service Charge Policy			

Who may be affected by the proposed project?	New and transferring tenants
What are the key aims of the proposed project?	<p>To consider the introduction of 'rent flexibility', which is provided for within the rent standard and allows providers of social housing to set rents at up to 5% above formula rent (10% for supported housing).</p> <p>The Council is proposing to consult with tenants to introduce rent flexibility for all newly let properties, both general needs and independent living and the acceptable tolerance levels that would apply.</p> <p>Rent flexibility will provide the Council with additional income to underpin the delivery of the Housing Revenue Account Business Plan's key housing objectives which is to deliver effective services, to invest in its properties to ensure homes are decent and safe and to provide new social housing</p>

What **positive measures** are in place (if any) to help **fulfil our legislative duties** to:

Remove discrimination & harassment		Promote equal opportunities		Encourage good relations	
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What sources of data / information are you using to inform your assessment?	<ul style="list-style-type: none"> <li>• Policy Statement on Rents for Social Housing, February 2019, updated 2022</li> <li>• Rent account information</li> <li>• Housing System data (NEC)</li> <li>• Supported housing service data</li> </ul>
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In assessing the potential impact on people, are there any overall comments that you would like to make?	The Policy statement on rents for social housing recognises that registered social providers should have some discretion over the rent set for individual properties, to take account of local factors, in consultation with tenants.
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## 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	The increase would be applied to all newly let properties; whilst the	Negative impact	Residents may be experiencing economic hardship as a result of the current economic environment, and increases in energy, food and fuel costs in particular. This may have a greater impact on older people and disabled people, who may	Unequal impact	The increase would be applied to all newly let properties; properties would be advertised at the new rent level at the point of letting, therefore prospective tenants can decide whether it is affordable to them.

	<p>Government Policy allows for an rent flexibility increase of 10% on supported accommodation, tolerance levels will be identified through public consultation.</p>		<p>have additional needs for heating and to run particular equipment and may also have lower income / be reliant on pensions and/or benefits (which have been increased in line with inflation).</p>		
<p>Please evidence the data and information you used to support this assessment</p>	<p>See page 5</p>				
<p>What opportunities are there to promote equality and inclusion?</p>	<p>To introduce rent flexibility, a period of statutory consultation must take place with tenants for a period of no less than 6 weeks.</p>	<p>What do you still need to find out? Include in actions (last page)</p>			

Disability e.g., physical impairment, mental ill health, learning difficulties, long-standing illness					
Positive impact		Negative impact	Residents may be experiencing exceptional economic hardship as a result of the cost of living crisis, and increases in energy, food and fuel costs in particular. This may have a greater impact on people with a disability, who may have additional needs for heating and to run particular equipment, and may also have lower income / be reliant on benefits (which have been increased in line with inflation) The Welfare Advice and Debt team will provide to support to ensure that this group attracts maximum income to through benefits	Unequal impact	The increase would be applied to all newly let properties; properties would be advertised at the new rent level at the point of letting, therefore prospective tenants can decide whether it is affordable to them.
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)		

Gender Reassignment					
Positive impact		Negative impact		Unequal impact	

Please evidence the data and information you used to support this assessment	There is no evidence to suggest any specific impacts on customers within any of these protected characteristic groups.		
What opportunities are there to promote equality and inclusion?		What do you still need to find out? Include in actions (last page)	

<b>Marriage or Civil Partnership</b>					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	A cohabiting couple, including those married or in a civil partnership, who both are in employment, with or without children, may find it easier to meet increased costs than a single person household or single parent with children.				
What opportunities are there to promote equality and inclusion?		What do you still need to find out? Include in actions (last page)			

<b>Pregnancy &amp; Maternity</b>					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	Those who are pregnant or on maternity leave may be impacted to a greater degree by this change if they need to move to larger accommodation as a result on lacking a bedroom, however rent is advertised before the tenancy starts and tenants are aware of what they will be expected to pay when bidding on suitable properties.				

What opportunities are there to promote equality and inclusion?		What do you still need to find out? Include in actions (last page)	
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Race					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	There is no evidence to suggest any specific impacts on customers within any of these protected characteristic groups.				
What opportunities are there to promote equality and inclusion?		What do you still need to find out? Include in actions (last page)			

Religion or Belief					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	There is no evidence to suggest any specific impacts on customers within any of these protected characteristic groups.				
What opportunities are there to promote equality and inclusion?		What do you still need to find out? Include in actions (last page)			



<b>Sex</b>					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	There is no evidence to suggest any specific impacts on customers within any of these protected characteristic groups.				
What opportunities are there to promote equality and inclusion?			What do you still need to find out? Include in actions (last page)		

<b>Sexual Orientation e.g., straight, lesbian / gay, bisexual</b>					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	There is no evidence to suggest any specific impacts on customers within any of these protected characteristic groups.				
What opportunities are there to promote equality and inclusion?			What do you still need to find out? Include in actions (last page)		

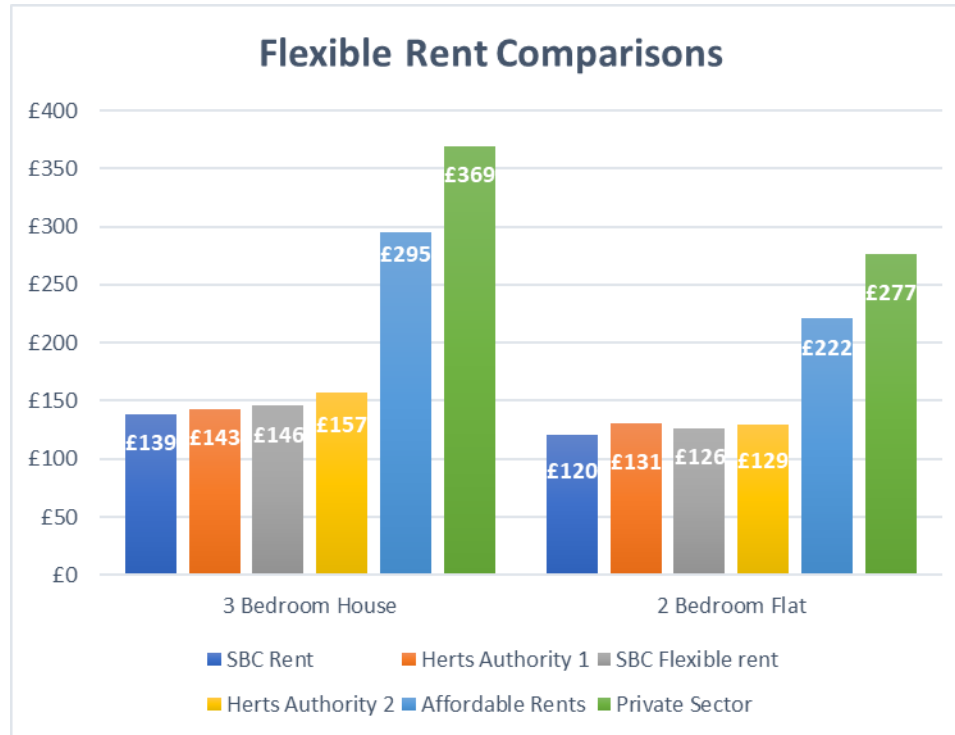
<b>Socio-economic<sup>1</sup></b>
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<sup>1</sup>Although non-statutory, the council has chosen to implement the Socio-Economic Duty and so decision-makers should use their discretion to consider the impact on people with a socio-economic disadvantage.

e.g., low income, unemployed, homelessness, caring responsibilities, access to internet, public transport users, social value in procurement				
Positive impact		Negative impact	Rent and Service Charge increase could negatively affect residents in a lower socio-economic standing as they may already have financial challenges.	Unequal impact
Please evidence the data and information you used to support this assessment	Housing Management systems reports on those in rent and service charge arrears and those supported. At the end of Q2 2024 35% were in rent arrears. Transferring tenants should not have any former tenant arrears and the new rent would be advertised at bidding stage, therefore the prospective tenant would be aware of the rent level before accepting a property.			
What opportunities are there to promote equality and inclusion?	Identify and support those who are struggling utilising various support streams such as downsizing for those who are under occupying.	What do you still need to find out? Include in actions (last page)		

Additional Considerations				
Please outline any other 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	If rent flexibility is implemented, all properties will be advertised at the new rent levels, and Income Recovery staff will work with any new tenants who may be impacted by this change to ensure that they are claiming all of the financial assistance to which they may be entitled. Also, the authority has Welfare and Debt Advice Officers and continues to fund Citizen's Advice (CA), who will also support tenants in ensuring they are aware of wrap around support that may be available, including debt management advice, discretionary housing payments, household support fund and Community Chest.			

Average rents will still be below the Local Housing Allowance and significantly less than affordable or market rents. To explore the option of rent flexibility, a review of the Council rents compared to other local providers and the private sector has been conducted. The comparison is illustrated in the graph below, which shows where the Council's flexible rents would be for two types of properties (a 3 Bed House and a 2 Bed Flat) compared to two other local housing providers in Hertfordshire, as well as the rates charged for affordable rents and rent in the private sector, as depicted below;



The calculations are based on rent levels for 2024/25 and demonstrate that proposed rent flexibility levels are broadly comparable with other local providers of social housing and significantly below affordable rents or what tenants would be expected to pay in the private rented sector. It should be noted that approximately 60% of households are in receipt of Universal Credit or Housing Benefit. Based on void trends and the time required for consultation, the MTFS has forecasted 50% of additional income in the first year, representing approximately £50K extra income, and £100K in each subsequent year to invest in services and ensure homes are decent and safe.

<p>What opportunities are there to promote equality and inclusion?</p>		<p>What do you still need to find out? Include in actions (last page)</p>	<p>Staff in the Income Services and Finance team will closely monitor, through day-to-day income management and tenant account management, to establish the impact of the rent flexibility increases and put in place systems to mitigate this accordingly.</p>
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## Consultation Findings

Document any feedback gained from the following groups of people:

<p>Staff?</p>	<p>N/A</p>	<p>Residents?</p>	<p>A statutory consultation of 6 weeks will need to be undertaken before SBC can introduce rent flexibility. A full EQIA will be undertaken if there is a change to the Rent and Service Charge Policy arising from the decision to introduce rent flexibility.</p>
<p>Voluntary &amp; community sector?</p>	<p>N/A</p>	<p>Partners?</p>	<p>N/A</p>
<p>Other stakeholders?</p>	<p>The report will go through the Council's pre-budget scrutiny meetings before being presented to the Full Council in January.</p>		

## 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		
Negative / unequal impact, barriers to inclusion or improvement opportunities identified	2a. Adjustments made	
	2b. Continue as planned	The future viability of the HRA Business Plan is reliant upon SBC being able to maximise income collection, recover arrears and the costs of service provision where it's possible to do so.
	2c. Stop and remove	

Detail the <b>actions that are needed</b> as a result of this assessment and how they will help to <b>remove discrimination &amp; harassment, promote equal opportunities</b> and / or <b>encourage good relations</b> :				
Action	Will this help to remove, promote and / or encourage?	Responsible officer	Deadline	How will this be embedded as business as usual?
Monitor through day to day income management and tenant account management to establish to establish the impact of the rent increase challenges relating to affordability and provide tenants with support accordingly	Remove discrimination and promote equal opportunities. Put in place systems to mitigate this accordingly	Elizabeth Ddamulira	Oct 2026	Current practice is to assess cases or groups that are experiencing challenges and putting in place processes and systems to mitigate impacts.

**To be Approved by Cabinet (December 2024)**

**Date: 11/12/2024**

Please send this EqIA to [equalities@stevenage.gov.uk](mailto:equalities@stevenage.gov.uk) for critical friend feedback and for final submittance with the associated project.