

Estimated time taken to complete: 2 hours*

*Please note that this should be a working document and should be actively reviewed throughout the lifetime of the project/policy/service change



Rent Setting and Service Charge Policy 2025/27

Equality Impact Assessment (EqIA) Form

Date created	August 2025
Approved by	Assistant Director Housing & Neighbourhoods
Owner	Head of Hosuing Operations
Version	1
Author	Simon Kiff/Elizabeth Ddamulira
Business Unit and Team	Head of Housing Operations/Income Services Manager

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.

First things first:

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

Title:	Review of rent setting policy with implementation of Rent Flexibility	
Please answer Yes or No to the following questions:		
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	

Where a positive impact is likely, will this help to:	
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.

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

Name of assessor: n/a

Role: n/a

Date: n/a

Decision approved by:

Role: Assistant Director

Date:

Equality Impact Assessment Form

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

What is being assessed?		Review of rent setting policy with implementation of Rent Flexibility		
Lead Assessor	Simon Kiff		Assessment team Elizabeth Ddamulira Keith Reynoldson	
Start date	22/07/2025	End date		
When will the EqIA be reviewed? (Typically every 2 years)		Every 2 years		

Who may be affected by the proposed project?	<ul style="list-style-type: none"> Existing tenants and leaseholders Prospective tenants Vulnerable groups (e.g., people with disabilities, older people) Low-income households Staff responsible for rent/service charge administration
What are the key aims of the proposed project?	<p>This policy outlines how rents and service charges are calculated and set for tenants and leaseholders. It ensures transparency, fairness, legal compliance, and financial viability for the council while maintaining affordability for residents. The policy is compliant with human rights legislation. It supports the right to housing and a fair standard of living, with no adverse impacts identified.</p> <p>To review and make relevant changes to the current rent setting policy and 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 review of the policy is to make sure that the council are working in line with the current rent standard due to the original rent standard implemented in 2020/21 was set for a 5 year period.</p> <p>The Council is proposing to consult with tenants re the amended policy and re the introduction of rent flexibility for all newly let properties, both general needs and independent living and the acceptable tolerance levels that would apply.</p>
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What positive measures are in place (if any) to help fulfil our legislative duties to:					
Remove discrimination & harassment		Promote equal 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?	<p>Rent Standard and Guidance</p> <p>The Direction on the Rent Standard 2025</p> <p>Rent account information</p> <p>Housing System data (NEC)</p> <p>Supported housing service data</p> <p>Social Housing Act 2023</p> <p>Demographic profiles of current residents</p> <p>Income levels and benefit dependency</p>
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	<p>Ethnic background and age distribution</p> <p>Disability status</p> <p>Analysis of arrears and affordability trends by protected characteristics</p>
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<p>In assessing the potential impact on people, are there any overall comments that you would like to make?</p>	<p>This EqIA confirms that, while the Rent and Service Charge Setting Policy has a broadly neutral or positive impact, steps should be taken to mitigate any unintended disadvantages for vulnerable or low-income residents. The policy will be monitored and reviewed regularly to ensure compliance with the Equality Act 2010.</p> <p>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.</p> <p>Any groups that are potentially disadvantaged are still expected to be able to benefit from a council property set at a social rent and receive benefit support to cover affordable rent properties.</p>
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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	Rent Flexibility - The increase would be applied to all newly let properties; whilst the Government Policy allows for an rent flexibility increase of 10% on supported accommodation,	Negative impact	Rent Flexibility - 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	Unequal impact	Rent Flexibility - 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

	<p>tolerance levels will be identified through public consultation.</p> <p>Rent setting policy - Transparent charges support budgeting and planning</p>		<p>older people and disabled people, who may 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). However, the levels of rent will still be inline with the LHA rate. The rent charge is means tested and residents may be entitled to either Housing Benefit or Universal Credit to cover the increased charge. Financial advice can be given from our Welfare Advice and Debt team or through our partnership with the CA.</p>		<p>can decide whether it is affordable to them.</p>
<p>Please evidence the data and information you used to support this assessment</p>	<p>See page 5 & 6</p>				
<p>What opportunities are there to promote equality and inclusion?</p>	<p>To agree rent setting policy and to introduce rent flexibility, a period of consultation must take place with tenants for a period of no less than 4 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	Supports equitable treatment	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) However, the levels of rent will still be in line with the LHA rate. The rent charge is means tested and residents may be entitled to either Housing Benefit or Universal Credit to cover the increased charge. Financial advice can be given from our Welfare Advice and Debt team or through our partnership with the CA to support maximising of income and support with external factors.	Unequal impact	
Please evidence the data and information you used to support this assessment	Page 3 and 4				

What opportunities are there to promote equality and inclusion?	To introduce rent flexibility, a period of statutory consultation must take place with tenants for a period of no less than 6 weeks.	What do you still need to find out? Include in actions (last page)	
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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)		

Marriage or Civil Partnership					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment	Rent flexibility - 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)	
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Pregnancy & Maternity					
Positive impact		Negative impact	May increase pressure during maternity leave or reduced income periods	Unequal impact	
Please evidence the data and information you used to support this assessment	Rent flexibility - 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?	The rent charge is means tested and residents may be entitled to either Housing Benefit or Universal Credit to cover the increased charge. Financial advice can be given from our Welfare Advice and Debt team or through our partnership with the CA to support maximising of income and support with external factors.		What do you still need to find out? Include in actions (last page)		

Race

Positive impact	Consistent application regardless of ethnicity	Negative impact	Language barriers may affect understanding of charges	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?	Offer translated materials and interpretation services		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?	Continue inclusive engagement		What do you still need to find out? Include in actions (last page)		

Sex					
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?	Inclusive practice maintained	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	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?	Inclusive practice maintained	What do you still need to find out? Include in actions (last page)			

Socio-economic ¹ e.g., low income, unemployed, homelessness, caring responsibilities, access to internet, public transport users, social value in procurement					
Positive impact		Negative impact	Rent flexibility - Rent and Service Charge increase	Unequal impact	

¹Although 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.

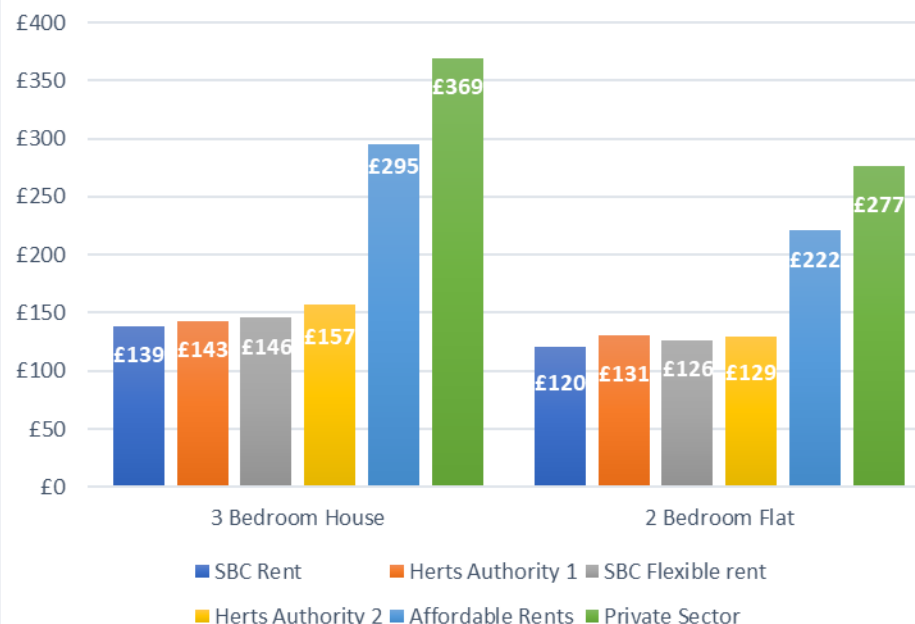
			<p>could negatively affect residents in a lower socio-economic standing as they may already have financial challenges.</p> <p>However, the levels of rent will still be in line with the LHA rate. The rent charge is means tested and residents may be entitled to either Housing Benefit or Universal Credit to cover the increased charge.</p>		
Please evidence the data and information you used to support this assessment	<p>Housing Management systems reports on those in rent and service charge arrears and those supported. At the end of Q1 2025 36% 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.</p>				
What opportunities are there to promote equality and inclusion?	<p>Identify and support those who are struggling utilising various support streams such as downsizing for those who are under occupying. Financial advice can be given from our Welfare Advice and Debt team or through our partnership with the CA to support maximising of income and support with external factors.</p>	<p>What do you still need to find out? Include in actions (last page)</p>			

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	<p>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.</p> <p>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;</p>				

Flexible Rent Comparisons



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.

What opportunities are there to promote equality and inclusion?

The policy states that the Council will have regard to the Local Housing Allowance when setting affordable rents. If affordable rents are set at this level, HB/ UC housing cost will cover the rent in full

What do you still need to find out? Include in actions (last page)

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

	<p>for those tenants who are entitled to the maximum amount of housing benefit. Setting at the Local Housing Allowance will also benefit tenants who are, for example on a low wage or zero-hour contracts and where partial housing benefit can be paid.</p> <p>For those moving into Affordable Rent (AR) properties a comprehensive affordability assessment is carried out prior to offer to ensure that the tenancy is sustainable.</p> <p>The implementation of the policy in respect of Affordable Rent will be kept under review by the Housing Development Working Group and should adverse impacts be identified this will inform future decision making in this regard.</p>		put in place systems to mitigate this accordingly
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Consultation Findings

Document any feedback gained from the following groups of people:

Staff?	<ul style="list-style-type: none"> Need for translation and accessible formats 	Residents?	A statutory consultation of 6 weeks will need to be undertaken before SBC can
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	<ul style="list-style-type: none"> General support for transparency and fairness 		<p>introduce rent flexibility and implement new rent setting policy.</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 impact of the rent & service charge increase and put in place systems to mitigate this accordingly.</p>
Voluntary & community sector?		Partners?	
Other stakeholders?	The report will go through the Council's pre-budget scrutiny meetings before being presented to the Full Council		

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	<p>This EQIA has found that the Rent and Service Charge Setting Policy is fair and legally compliant. Potential negative impacts are manageable with appropriate support and communication. The policy will be reviewed annually to ensure it continues to meet the needs of all residents.</p> <p>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.</p>

	2c. Stop and remove	
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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?
To make sure we have a robust income service, and fit for purpose support services so the relevant support and guidance can be given to those tenants effected	Remove discrimination and promote equal opportunities.	Elizabeth Ddamulira	TBC	Current practice is to assess cases or groups that are experiencing challenges and putting in place processes and systems to mitigate impacts.

Approved by Assistant Director / Strategic Director:

Date:

Please send this EqIA to equalities@stevenage.gov.uk for critical friend feedback and for final submittance with the associated project.