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

Recharge Policy

Equality Impact Assessment (EqIA) Form

[Add timeframe e.g. October 2025-2026]

Date created	October 2025
Approved by	Cabinet
Owner	Head of Service
Version	1
Author	Simon Kiff (head of Housing Operations)
Business Unit and Team	Housing and Neighbourhoods

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:

Stevenage BOROUGH COUNCIL

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

Title:	**Recharge policy**
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 - The policy explicitly excludes recharges in cases of domestic abuse or hate crime, which helps protect vulnerable tenants.
Promote equal opportunities?	Yes - Support measures such as payment plans, waiving charges, and vulnerability assessments promote fairness.
Encourage good relations?	Yes - The policy includes consultation with residents and support for those in hardship, helping build trust.

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

Or if you answered 'No' to all of the questions and decide that your activity doesn't need an EqIA 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.

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

Name of assessor:	n/a	Decision approved by:
Role:	n/a	Role: Assistant Director
Date:	n/a	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?	**Recharge Policy 2025-2027**				
Lead Assessor	Simon Kiff			Assessment team	Equalities Lead – Charlotte Bott
Start date	20/10/2025	End date			
When will the EqIA be reviewed? (Typically every 2 years)	Every 2 years				

Who may be affected by the proposed project?	• Existing tenants and leaseholders • Former tenants • Vulnerable groups (e.g., people with disabilities, older people) • Low-income households • Staff responsible for recharge charge administration • Individuals with limited English or digital access
What are the key aims of the proposed project?	This policy sets out Stevenage Borough Council's approach to recharging costs to residents. It aims to ensure that the process is implemented in a manner that is transparent, fair, legally compliant, and financially sustainable for the Council. The policy aligns with relevant human rights legislation, supporting the right to adequate housing and a fair standard of living. No adverse equality impacts have been identified at this stage. The current review seeks to ensure that the policy reflects best practice and is consistent with the approaches adopted by comparable local authorities and housing providers. The overarching objective is

	to enable the Council to recover appropriate costs in a fair and transparent way, while protecting public funds and promoting responsible tenancy management. It is anticipated that the policy will also act as a deterrent against damage and neglect, encouraging residents to maintain their properties in accordance with the terms of their tenancy, licence, or lease agreements. The Council intends to consult with residents prior to implementation to ensure the policy is informed by resident feedback and is applied in a fair and equitable manner.

What **positive measures** are in place (if any) to help **fulfil our legislative duties** to:					
Remove discrimination & harassment	The policy clearly outlines the responsibilities of residents and the Council, reducing scope for bias or arbitrary decisions. Cases of criminal damage related to domestic abuse or hate crime are exempt from recharges, reducing the risk of re-victimisation.	Promote equal opportunities	Residents experiencing vulnerability or financial hardship are supported through flexible payment options and referrals to support services. Each case is assessed individually to ensure fairness.	Encourage good relations	Clear communication and fair enforcement of recharge responsibilities will help build trust between residents and the Council. The planned resident consultation will further promote transparency and shared understanding.

What sources of data / information are you using to inform your assessment?	Welfare/debt advice service usage Consultation feedback (planned) Benchmarking with other social landlords

In assessing the potential impact on people, are there any overall comments that you would like to make?	The EqIA confirms that, while the Recharge Policy is expected to have a broadly neutral or positive impact, it is essential to monitor for any unintended disadvantages, particularly for vulnerable or low-income residents. Provisions such as financial hardship assessments and flexible repayment options will help ensure compliance with the Equality Act 2010 and the Council's Public Sector Equality Duty.

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 policy encourages the responsible upkeep of properties, which may benefit older residents living in shared or communal areas by ensuring a safe and well-maintained environment.	Negative impact	Older residents may be more likely to experience fixed incomes or mobility limitations, which could make them more vulnerable to the financial or practical consequences of a recharge.	Unequal impact	
Please evidence the data and information you	National research (e.g., from Age UK and Shelter) highlights that older adults may be disproportionately affected by housing-related costs and are more likely to require additional support in understanding policies or accessing financial assistance.				

used to support this assessment			
What opportunities are there to promote equality and inclusion?	Partnership working with support services or advocacy groups to assist older residents in understanding their responsibilities and accessing help where needed. Ensuring that front-line staff are trained to identify and respond to the specific needs of older residents, including recognising when recharges may cause hardship.	What do you still need to find out? Include in actions (last page)	Whether current communication methods are fully accessible to older residents, including those with sensory impairments or digital exclusion.

Disability e.g., physical impairment, mental ill health, learning difficulties, long-standing illness					
Positive impact	The Recharge Policy supports equitable treatment by including clear provisions to assess financial hardship and vulnerability. This ensures that individuals with disabilities, who may face additional living costs or barriers in maintaining their homes, are treated fairly and not disproportionately penalised. Flexibility in payment arrangements allows	Negative impact	Residents with disabilities may be at increased risk of economic hardship. Many may be reliant on fixed incomes or disability-related benefits, which may not fully cover rising living costs. Additionally, individuals with disabilities often incur higher household utility expenses due to the need for medical equipment, specialised heating	Unequal impact	There is potential for unequal impact if the policy is not applied with consideration for disability-related needs. Without proactive identification and support, residents with mental ill health, learning difficulties, or cognitive impairments may struggle to engage with communications or

<table>
<tr><td></td><td>a more person-centred approach to managing recharges.</td><td></td><td colspan="2">needs, or mobility aids. Applying standard recharges without flexibility may exacerbate financial pressure and negatively impact health and wellbeing.</td><td></td><td>understand recharge processes, increasing the risk of avoidable charges or enforcement action.</td></tr>
<tr><td>Please evidence the data and information you used to support this assessment</td><td colspan="6"></td></tr>
<tr><td>What opportunities are there to promote equality and inclusion?</td><td colspan="3">Provide accessible communications (e.g., Easy Read, large print, audio, translated materials) for residents with sensory impairments or learning difficulties.

Work closely with support workers, social care professionals and carers to ensure residents with disabilities understand their responsibilities and are supported through the recharge process.

Promote early identification of disability and vulnerability through tenancy reviews or support assessments to enable tailored interventions.

Offer flexible repayment plans tailored to individual financial circumstances and consider waiving charges where there is clear evidence of hardship due to disability-related factors.</td><td>What do you still need to find out? Include in actions (last page)</td><td colspan="2">The effectiveness of internal systems in flagging and recording vulnerability and disability data for proactive support</td></tr>
</table>

	Ensure front-line staff are trained to identify disability-related needs and make appropriate referrals for support. Downsizing support is provided for those who are unable to manage their larger homes due to mobility or disability.		

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?	Ensure that all communications and interactions with residents are inclusive, respectful, and sensitive to gender identity. Continue to promote inclusive language and training for staff on LGBTQ+ awareness, including gender identity. Monitor customer complaints and recharge disputes for any trends or feedback related to gender identity, and ensure appropriate escalation or support where needed.	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	No specific positive or negative impacts have been identified in relation to marital or civil partnership status under this policy				
What opportunities are there to promote equality and inclusion?		What do you still need to find out? Include in actions (last page)			

Pregnancy & Maternity					
Positive impact	None specifically identified at this stage.	Negative impact	Residents on maternity leave or during pregnancy may face financial pressure due to reduced income or increased living costs. Recharges applied during this period may exacerbate financial strain or increase stress, particularly for single-parent households.	Unequal impact	
Please evidence the data and information you used to support this assessment	While there is no current internal data suggesting that residents in this group are disproportionately impacted, national research indicates that pregnant people and new parents—especially single parents—are more vulnerable to financial hardship. DWP statistics also show increased reliance on benefits during and after pregnancy.				
What opportunities are there to promote equality and inclusion?	Apply financial hardship	What do you still need to find out? Include in actions (last page)			

	assessments consistently, and consider maternity or pregnancy-related circumstances when determining payment arrangements or waiving charges. Signpost to external support services and financial wellbeing resources for new or expectant parents.		

Race					
Positive impact	The policy is designed to be applied consistently across all ethnic backgrounds, supporting equitable treatment of all residents.	Negative impact	Language or cultural barriers may make it more difficult for some residents to fully understand their tenancy responsibilities or the recharge process, particularly if English is not their first language. This could lead to miscommunication or failure to respond appropriately to recharge notices.	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 recorded data or complaints suggesting that religion or belief has influenced the application of recharges. The policy applies uniformly and does not make distinctions based on faith or belief systems.				
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 from local complaints, service data, or resident feedback to suggest that recharges have a disproportionate effect based on sex.				
What opportunities are there to promote equality and inclusion?	Ensure inclusive practice is maintained in all policy implementation and communications.	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 local or national evidence suggesting that sexual orientation impacts the way in which recharge policies are applied or experienced.		
What opportunities are there to promote equality and inclusion?	Maintain inclusive communication and engagement across all customer touchpoints. Ensure staff are trained in LGBTQ+ awareness and anti-discrimination practices.	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	The Recharge Policy includes built-in flexibility for those experiencing financial hardship, including payment plans, income and expenditure assessments, and referral to support services. These measures aim to mitigate potential negative impacts	Negative impact	There is potential for the policy to disproportionately affect residents on low incomes or experiencing financial difficulty, particularly where unexpected recharges cause additional hardship.	Unequal impact	Yes. People in lower socio-economic groups may have less capacity to absorb unexpected financial costs, and may already face a range of compounding challenges (e.g., debt, food or fuel poverty, digital exclusion).
Please evidence the					

[1]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.

data and information you used to support this assessment			
What opportunities are there to promote equality and inclusion?	Signpost all potentially affected residents to SBC's Welfare Advice and Debt Team or external partners such as Citizens Advice. Ensure that recharge letters clearly communicate the availability of financial support, repayment plans, and appeal processes. Apply flexibility on a case-by-case basis and maintain oversight through robust vulnerability and hardship assessments.	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	The policy promotes accountability and encourages property care, which may improve neighbourhood quality and reduce antisocial behaviour	Negative impact	Without accessible communication and active engagement, some residents (e.g., with language barriers or literacy needs) may misunderstand their obligations and be at	Unequal impact	

			greater risk of incurring charges.		

Please evidence the data and information you used to support this assessment	Internal data from tenancy management, income recovery, and feedback from frontline staff. Local observations from the Housing and Income Services teams.

What opportunities are there to promote equality and inclusion?	The policy states that the Council will assess individual circumstances before applying charges, including offering financial assessments, payment plans, and support referrals. Ensure key information is available in accessible formats (e.g., Easy Read, large print, translated versions, and through verbal explanation if required).	What do you still need to find out? Include in actions (last page)	

Consultation Findings

Document any feedback gained from the following groups of people:

Staff?	Highlighted the need for translated and accessible policy documents. Support for transparent, consistent application of charges, and use of the policy to deter property misuse.	Residents?	A formal 6-week statutory consultation is planned. Feedback will inform final amendments to the policy before implementation.

Voluntary & community sector?		Partners?	
Other stakeholders?	The draft policy will be presented at the executive housing working group prior to Cabinet approval, allowing for Member and stakeholder input on financial and equality impacts.		

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	This EqIA has found that the Recharge Policy is fair, legally compliant, and aligned with best practice. While there is a potential for negative or unequal impacts, particularly for financially vulnerable or disabled residents, these can be mitigated through planned support measures. Ongoing monitoring and consultation will ensure the policy continues to meet the needs of all resident groups. The long-term sustainability of the Housing Revenue Account (HRA) depends on SBC being able to recover reasonable costs. This policy supports that goal while remaining sensitive to the needs of residents
	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?
To make sure we have a robust recharge policy, and fit for purpose support services so the relevant support and guidance can be given to those residents effected	Remove discrimination and barriers and promote equal opportunities and fairness	tbc	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: Kerry Clifford

Date: 20th October 2025

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