



Housing Income and Arrears Recovery Policy 2026/28

# Equality Impact Assessment (EqIA) Form

|                               |                                              |
|-------------------------------|----------------------------------------------|
| <b>Date created</b>           | July 2026                                    |
| <b>Approved by</b>            | Cabinet                                      |
| <b>Owner</b>                  | Simon Kiff, Head of Housing Operations       |
| <b>Version</b>                | 1                                            |
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| <b>Business Unit and Team</b> | 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](mailto:equalities@stevenage.gov.uk).

**First things first:**

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

|                                                                                                                 |                                                    |  |
|-----------------------------------------------------------------------------------------------------------------|----------------------------------------------------|--|
| <b>Title:</b>                                                                                                   | Housing Income and Arrears Recovery Policy 2026/27 |  |
| <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                                                |  |

|                                                              |     |
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| <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).

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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

|                                                            |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                 |                                   |         |
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| <b>What is being assessed?</b>                             |            | <p>The impact of new Housing Income and Arrears Recovery Policy 2026-28 is being assessed. All policies and procedures within the Income Services Team are being reviewed and part of this process is rewriting some policies. The Housing Income Management and Arrears Recovery Policy replaces the previous Housing Income Policy.</p> <p>The new policy will be the overarching policy informing collection of rent, service charges, other housing related charges and debt recovery activities within the housing and neighbourhood area. The outcomes will be across a range of key indicators such as meeting service standard, customer satisfaction, performance, tenancy sustainment and any innovative approaches.</p> <p>The impact of the new policy on current and former tenants will be assessed in the following document using the information that is available so far. This will also be on-going because there several changes such as Universal credit, further welfare reform changes and the general economic climate ahead with anticipated impacts which will require regularly assessment as and when they occur.</p> |                 |                                   |         |
| Lead Assessor                                              | Simon Kiff |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Assessment team | Elizabeth Ddamulira<br>Simon Kiff |         |
| Start date                                                 | July 26    | End date                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                 |                                   | July 26 |
| When will the EqIA be reviewed? (Typically, every 2 years) | July 28    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                 |                                   |         |

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| Who may be affected by the proposed project? | <ul style="list-style-type: none"> <li>Existing tenants and leaseholders</li> <li>Prospective tenants</li> <li>Vulnerable groups (e.g., people with disabilities, older people)</li> <li>Low-income households</li> </ul> |
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|                                                | <ul style="list-style-type: none"> <li>• Staff responsible for rent/service charge administration</li> <li>• This will also affect Council staff and Councillors, stakeholders and partners e.g. CA and East Herts Benefits Services.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| What are the key aims of the proposed project? | <p>The Council is committed to ensuring that all its policies, including the Housing Income Management and Arrears Recovery Policy, promote equality, prevent discrimination, and foster inclusive service delivery. The Equality Impact Assessment (EQIA) process helps identify and address any potential adverse impacts the policy may have on individuals or groups with protected characteristics under the Equality Act 2010.</p> <p>Ensure compliance with the Equality Act 2010, housing and landlord/tenant legislation, consumer standards from the Regulator of Social Housing, etc.</p> <p>The policy aims to ensure the Council manages housing income (rent, service charges) in a fair, transparent, consistent and effective manner; to maintain financial viability of the HRA; to support tenants to sustain tenancies and manage debt; to intervene early to prevent arrears; and to use enforcement only when required</p> <p>This EQIA applies to all aspects of the Housing Income Management and Arrears Policy, including income collection, arrears recovery, tenant support, enforcement actions, and communication strategies.</p> |

| What <b>positive measures</b> are in place (if any) to help <b>fulfil our legislative duties</b> to: |                                                                                                                                                                                                                                                                               |                             |                                                                 |                          |                                                                                                                               |
|------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-----------------------------------------------------------------|--------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| Remove discrimination & harassment                                                                   | <p>Embedding of the Equality and diversity policy in the day-to-day operations, processes, business systems and procedures. Mitigations are already incorporated into the policy and related procedures.</p> <p>All members of staff within the housing and neighbourhood</p> | Promote equal opportunities | Same as measures taken to remove discriminations and harassment | Encourage good relations | The Policy and application of measures taken to remove discriminations and harassment will by default promote good relations. |

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|  | <p>services have a responsibility to be aware of what constitutes harassment and discrimination and to take positive steps to discourage and challenge both.</p> <p>We provide a <i>more holistic</i> housing income management service through our internal support services and links with local Agencies and groups for a diverse range of tenants and service users.</p> <p>Investigation of complaints of discrimination and harassment are dealt with promptly, seriously fairly and sensitively with due regard.</p> <p>Where required the service is tailored to ensure accessibility</p> |  |  |  |  |
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|  | <p>and delivery that meets customer needs.</p> <p>Pre tenancy interviews to identify support needs and to put a support plan in place for the first year of the tenancy.</p> <p>Flexibility in the level of support provided at sign-up i.e. dependent on the needs of the tenant(s).</p> <p>Tenancy sign up meetings at tenancy commencement administration to improve tenants' understanding of their rights and responsibilities.</p> <p>Calling all new tenants within the first 4 weeks of their tenancy to address any concerns that they may have.</p> |  |  |  |  |
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What sources of data / information are you using to inform your assessment?

The following data, information, and consultations have been or will be used to inform the Equality Impact Assessment (EQIA):

- Internal Policy Documents: The new Income Management & Recovery Policy (provided).
- Tenant Data: Demographic and household data including age bands, disability status, ethnicity, household composition, tenancy type, income levels, and digital access, as supplied by the Housing & Neighbourhood Business Unit.
- Arrears and Recovery Data: Information on arrears by tenant characteristics (where available), enforcement actions (e.g., visits, notices, court actions, evictions), write-offs, and former tenant debts.
- Consultation Feedback: Input from tenants and resident engagement panels during policy development (referenced in section 7).
- Local Strategic Documents: The Council's corporate plan ("Making Stevenage Even Better 2024-2027") and the Stevenage Tenancy Strategy, which outline equality, inclusion objectives, and housing priorities.
- External Partner Data: Information from local advice agencies, welfare benefit take-up statistics, and digital inclusion data for the borough.
- Relevant Legislation: The Welfare Reform and Work Act 2016, Housing and Planning Act 2016, and the Social Housing Act 2023.
- Rent and Service Charge Policy: Agreed by the Executive in October 2025.
- Customer Feedback and Complaints: Insights from residents regarding their experiences and concerns.
- Housing System Data: Information from the Housing System (NEC), including rent account details and supported housing service data.
- Demographic Profiles: Data on income levels, benefit dependency, ethnic background, age distribution, and disability status.
- Arrears and Affordability Trends: Analysis of arrears and affordability by protected characteristics.
- Disparity Identification: Review of demographic and service usage data to identify any disproportionate effects on specific groups, including those defined by protected characteristics, socio-economic status, and digital exclusion.

This comprehensive evidence base allows for a thorough assessment of the potential impacts of the policy on different groups, including those with protected characteristics, and helps identify any necessary mitigating actions.

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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 HRA Housing Income Management and Recovery 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 assessment of this policy needs and will continue over a year as it is anticipated that the actual impact is likely to change particularly due to the changing influences on the customers' incomes, changing legislation and any indirect discrimination that may affect our customers in one way or another. It is difficult to determine how these changes might affect future implementation of the HRA Housing Income Management and Recovery.</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 | <p>The Policy is inclusive of all people whatever their age and will have a positive effect as it seeks to provide an inclusive service to all customers wherever and whoever they are.</p> <p>The policy provides a framework that</p> | Negative impact | <p>Older tenants may be more likely to be digitally excluded (less confident with online payments, direct debits, digital communication) and the "flexible payment methods" emphasis may inadvertently assume digital access.</p> <p>Younger tenants may have lower income, more</p> | Unequal impact |  |

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|  | <p>ensures that all customers receive an excellent service regardless their age.</p> <p>Early intervention and support (e.g., at sign-up, within first 4–6 weeks) may particularly benefit younger and new tenants who may lack experience of tenancy management or budgeting.</p> <p>Tailored support for tenants with low literacy/numeracy, non-English speakers, digital exclusion (which may also apply to older tenants)</p> <p>Encouraging flexible payment options and configurable payment frequencies may assist older people on fixed incomes (e.g.,</p> |  | <p>variable work/benefit status, and thus be at higher risk of arrears; the policy's "rent first" approach may impose pressure.</p> <p>There is a risk that enforcement measures (if applied) may disproportionately affect younger or older tenants depending on tenancy types or payment patterns.</p> |  |  |
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|                                                                              | <p>pensioners) to manage payments.</p> <p>Prioritising support over enforcement can help sustain tenancies for older tenants, avoiding the disruption and risk of eviction.</p>                                                                                                                                                                                                                                                                                |                                                                       |  |  |  |
| Please evidence the data and information you used to support this assessment | See page 7                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                       |  |  |  |
| What opportunities are there to promote equality and inclusion?              | <p>Ensure non-digital payment and communication options remain widely available; staff monitor for signs of digital exclusion and offer alternative formats (paper, face-to-face) and assistance.</p> <p>Track arrears and enforcement outcomes by age band to monitor whether younger or older tenants are disproportionately represented.</p> <p>Proactively target financial inclusion support and budgeting advice for both younger and older tenants.</p> | What do you still need to find out?<br>Include in actions (last page) |  |  |  |

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|  | Consider specific outreach to older tenants (e.g., via sheltered housing teams) to ensure understanding of policy and payment responsibilities. |  |  |
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| Disability e.g., physical impairment, mental ill health, learning difficulties, long-standing illness |                                                                                                                                                                                                                                                                                                               |                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                |  |
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| Positive impact                                                                                       | <p>The policy explicitly recognises vulnerable tenants and includes a multi-agency approach for tenants with additional support needs which should assist tenants with disabilities.</p> <p>Tailored support and reasonable adjustments should help tenants with disabilities to access services, payment</p> | Negative impact | <p>Tenants with disabilities may have more complex financial situations (e.g., additional care costs, benefit changes) – the standard “rent first” and “monitor weekly” approach might not sufficiently allow for those complexities.</p> <p>Payment methods may assume stable income/benefit flows; disability-related benefit volatility may make arrears more likely.</p> <p>Enforcement actions may inadvertently impact disabled tenants who may be unable to respond quickly to missed payments or communications.</p> | Unequal impact |  |

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|                                                                                     | <p>schemes, budgeting advice.</p> <p>Early contact and supportive approach may prevent debt escalation which may disproportionately affect disabled tenants (who may face additional cost burdens, benefit complexity).</p> <p>Transparent communication in plain English helps accessibility</p>                                                                                                                                                                                                                                                                                                                                                                                                                        |  |  |  |  |
| <p>Please evidence the data and information you used to support this assessment</p> | <p>The main issues affecting disabled people in relation to housing management and maintenance are:</p> <ul style="list-style-type: none"> <li>· Lack of understanding of needs</li> <li>· Access to information</li> <li>· Understanding of rights and responsibilities</li> <li>· Understanding of enforcement processes</li> <li>· Access time – carers</li> <li>· Tenant Participation barriers</li> </ul> <p>Social, behavioural, health and mental challenges could create barriers for accessing the services available or attendance at officer or events organised. This may also cause a problem if the tenants fail to understand that there are available participation opportunities and what they are.</p> |  |  |  |  |

|                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                    |  |
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|                                                                 | <p>Language could create a barrier if there is no provision for those with hearing and visual requirements however has;</p> <ol style="list-style-type: none"> <li>1. Commitment to Accessibility: The Council ensures that communication is available in a variety of formats to cater to individuals with specific needs, including those with hearing or visual impairments, emphasizing inclusivity for traditionally "hard to reach" groups.</li> <li>2. Provision for Language Support: Our Customer Service Centre provides documents in alternative formats and languages upon request and can arrange for telephone or in-person interpreters through Language Line, which supports the 28 most common languages.</li> <li>3. Availability and Limitations: While the Council does not stock documents in alternative languages due to low demand, we are committed to meeting customer needs and plan to review the service as requests increase.</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                    |  |
| What opportunities are there to promote equality and inclusion? | <ul style="list-style-type: none"> <li>• Staff Training on Disability-Related Vulnerabilities: Ensure that Income Services staff are trained to recognize disabilities and related vulnerabilities, enabling them to activate appropriate support pathways early on.</li> <li>• Triggers for Disability-Related Income Reviews: Implement specific triggers to review cases where tenants have disability-related income overlaps (e.g., DDA benefits), before proceeding with enforcement actions.</li> <li>• Monitor for Disproportionate Outcomes: Regularly monitor arrears, payment arrangements, and enforcement actions for tenants with disabilities to identify and address any disproportionate impacts.</li> <li>• Tailored Payment Plans: Offer flexible payment plans designed specifically for tenants with disabilities, incorporating support from Adult Social Care, Housing Support, or relevant advisory services where needed.</li> <li>• Housebound Tenants Support: Ensure Housing and Neighbourhood Services staff proactively reach out to housebound and vulnerable tenants to offer assistance and check on their well-being.</li> <li>• Pre-Tenancy Assessments &amp; Care Plans: Conduct comprehensive pre-tenancy assessments by the supported housing team, ensuring that care packages are tailored to meet the specific needs of each resident.</li> </ul> | What do you still need to find out? Include in actions (last page) |  |

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|  | <ul style="list-style-type: none"> <li>Vulnerability Checks Before Legal Action: Carry out vulnerability checks with tenants prior to any legal action being initiated. Additionally, ensure that different staff members across various service levels conduct thorough checks to prevent the eviction of vulnerable tenants.</li> </ul> |  |  |
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| Gender Reassignment |                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                |  |
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| Positive impact     | <p>The policy aims to provide a prompt, flexible, supportive and personalised service.</p> <p>The policy uses general inclusive language (“tenants or residents”) and seeks to tailor support rather than assume a “one-size fits all” – this is positive for trans or non-binary tenants.</p> <p>The multi-agency approach to vulnerability and targeted support means that those facing discrimination or additional barriers (e.g., trans people) should have</p> | Negative impact | <p>There may be unconscious bias or lack of awareness among staff about issues faced by trans/non-binary tenants (e.g., increased risk of income instability, harassment). The policy does not currently mention gender reassignment explicitly – this may reduce visibility of the need to address specific barriers faced by this group.</p> <p>Digital and communication methods may fail to recognise preferred names or pronouns, potentially causing</p> | Unequal impact |  |

|                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                    |                                   |  |  |
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|                                                                              | recourse to assistance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                    | distress and reducing engagement. |  |  |
| Please evidence the data and information you used to support this assessment | <p>Residents in this group can suffer harassment, bullying and victimisation and it can be difficult to prove this or take effective action to resolve it.</p> <p>There is no evidence to suggest any specific impacts on customers within any of these protected characteristic groups. However, if an issue did arise, we have procedures in place to deal with this.</p> <ol style="list-style-type: none"> <li>1. The <b>Equality, Diversity and Inclusion (EDI) Strategy</b> (2022-2026) outlines the Council's plan to advance equality, diversity, and inclusion within its services and workforce over the next four years, emphasizing collaboration with local communities, groups, and staff.</li> <li>2. The <b>Housing Income Management and Arrears Recovery Policy</b> aligns with the EDI Strategy, ensuring that arrears recovery procedures are carried out in a fair and inclusive manner.</li> <li>3. Tenants can access support and guidance from the <b>Income Services Team</b>, including senior staff and managers, to assist with any income-related issues.</li> </ol> |                                                                    |                                   |  |  |
| What opportunities are there to promote equality and inclusion?              | <p>Provide staff training on gender identity issues and awareness of additional barriers faced by trans/non-binary tenants.</p> <p>Ensure that data collection systems allow for self-identified gender and preferred name/pronouns, so that communications are respectful and inclusive.</p> <p>Monitor any difference in arrears or enforcement outcomes for tenants who identify as</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | What do you still need to find out? Include in actions (last page) |                                   |  |  |

|  |                                                                      |  |  |
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|  | trans/non-binary (where legally permitted and with confidentiality). |  |  |
|--|----------------------------------------------------------------------|--|--|

| Marriage or Civil Partnership                                                |                                                                                                                                                                                                                                                                                              |                 |  |                |  |
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| Positive impact                                                              | <p>The policy does not differentiate between married/unmarried tenants in its approach; it focuses on household income and tenancy responsibilities. This helps ensure consistent treatment.</p> <p>Support services (benefit, budgeting) may assist couples as households.</p>              | Negative impact |  | Unequal impact |  |
| Please evidence the data and information you used to support this assessment | <p>Residents who are married should not experience any effects of this policy.</p> <p>Residents who are in a civil partnership may experience harassment which is covered in the section above for Gender Reassignment on page 15 as the same strategy, policy and procedure apply here.</p> |                 |  |                |  |

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| What opportunities are there to promote equality and inclusion? | Ensure household assessments recognise joint tenancies and shared income/expenditure. | What do you still need to find out? Include in actions (last page) |  |
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| Pregnancy & Maternity                                                        |                                                                                                                                                                                                                                                                                                                                                                                        |                 |                                                                                                                                                                                                                                                                                                                        |                |  |
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| Positive impact                                                              | <p>Tenants who are pregnant or have recently given birth may face increased costs and reduced income; the policy's emphasis on early engagement and sign-up support may help address this.</p> <p>Flexible payment methods and tailored support can assist those on maternity leave or transitioning in/out of benefits.</p>                                                           | Negative impact | <p>The "rent first" payment prioritisation may put pressure on households with new babies where income may drop (maternity leave) and costs rise.</p> <p>Tenants may find it harder to engage in follow-up contacts (within 4-6 weeks) if they are dealing with birth, caring responsibilities or mobility issues.</p> | Unequal impact |  |
| Please evidence the data and information you used to support this assessment | <p>There is no evidence to suggest any specific impacts on customers within any of these protected characteristic groups. However, the following issues were identified:</p> <ul style="list-style-type: none"> <li>• Barriers to involvement – childcare costs</li> <li>• Understanding of rights and responsibilities – separated, young women.</li> <li>• Communications</li> </ul> |                 |                                                                                                                                                                                                                                                                                                                        |                |  |

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|                                                                 | Although there are no specific issues affecting this group. We do have temporary accommodation units where there are a number of young single mothers who are given help and support to manage their lives and look after their children. A transparent and supportive policy can ensure that they receive consistent support at what is often a difficult time in their lives.                                                                                           |                                                                    |  |
| What opportunities are there to promote equality and inclusion? | <p>Ensure that sign-up and early engagement procedures specifically recognise tenants who are pregnant or on maternity leave; allow additional flexibility in arrangements.</p> <p>Provide proactive outreach to households expecting a baby or with new infants, perhaps via housing/neighbourhood teams, to offer budgeting/benefit advice early.</p> <p>Monitor for any disproportionate arrears or enforcement outcomes among tenants during the maternity period</p> | What do you still need to find out? Include in actions (last page) |  |

| Race            |                                                                                     |                 |                                                                                                                         |                |  |
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| Positive impact | The policy aims to provide a prompt, flexible, supportive and personalised service. | Negative impact | Some ethnic minority tenants may have lower average incomes, larger household sizes, or higher risk of benefit/systems- | Unequal impact |  |

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|                                                                              |                                                                                                                        |                                                                    | <p>knowledge gaps – they may therefore be more vulnerable to arrears.</p> <p>Cultural or language barriers may reduce engagement with early contact, payment arrangements or debt advice.</p> <p>Digital exclusion may overlap with race/ethnicity groups (older migrants, limited English).</p> <p>If enforcement isn't carefully managed, there is a risk of disproportionate impact on minority ethnic groups</p> |  |  |
| 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?              | Have awareness training for staff on racial differences in household.                                                  | What do you still need to find out? Include in actions (last page) |                                                                                                                                                                                                                                                                                                                                                                                                                      |  |  |

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|  | <p>Ensure translation/interpreter services and culturally appropriate communications are available.</p> <p>Work with local community organisations representing minority ethnic groups to ensure awareness of policy and support services.</p> <p>Monitor arrears, payment plans and enforcement outcomes by ethnicity (and nationality where data allows) to detect any disparity.</p> <p>Ensure that the payment options and early-intervention communications do not assume English-first language or full digital access.</p> |  |  |
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| Religion or Belief |                                                                                    |                 |  |                |  |
|--------------------|------------------------------------------------------------------------------------|-----------------|--|----------------|--|
| Positive impact    | The policy aims to provide a prompt, flexible, supportive and personalised service | 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?              | <p>Have awareness training for staff on cultural and religious differences in household finances, payment patterns and willingness to engage.</p> <p>Offer flexible payment dates with regard to religious holidays or festivals (when income may be lower).</p> <p>Consult with faith-based community groups to ensure the policy is culturally sensitive and communication channels appropriate</p> | What do you still need to find out? Include in actions (last page) |  |

| Sex                                      |                                                                                                                        |                 |  |                |  |
|------------------------------------------|------------------------------------------------------------------------------------------------------------------------|-----------------|--|----------------|--|
| Positive impact                          | The policy aims to provide a prompt, flexible, supportive and personalised service                                     | Negative impact |  | Unequal impact |  |
| Please evidence the data and information | There is no evidence to suggest any specific impacts on customers within any of these protected characteristic groups. |                 |  |                |  |

|                                                                 |  |                                                                    |  |
|-----------------------------------------------------------------|--|--------------------------------------------------------------------|--|
| 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) |  |

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

| Socio-economic <sup>1</sup><br>e.g., low income, unemployed, homelessness, caring responsibilities, access to internet, public transport users, social value in procurement |                                    |                 |                                                                                                       |                |  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|-----------------|-------------------------------------------------------------------------------------------------------|----------------|--|
| Positive impact                                                                                                                                                             | The policy's emphasis on financial | Negative impact | Tenants on very low incomes may still struggle to prioritise rent payments ("rent first" approach) if | Unequal impact |  |

<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.

|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  |                                                                                                                                                                                                                                                                                                                                                                                     |  |  |
|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
|  | <p>inclusion, tailored support, benefit maximisation, and digital inclusion can help tenants from lower income households, precarious work or digital-poor households.</p> <p>Flexible payment options and early intervention help reduce the risk of arrears for financially vulnerable tenants.</p> <p>Pre tenancy assessment and support.</p> <p>Referrals for debt advice</p> <p>Referrals for specialist support</p> <p>The service also uses various tools to support existing tenants and new tenants,</p> |  | <p>competing financial obligations (e.g., childcare, health costs) are severe.</p> <p>Digital payment/communication channels may disadvantage tenants without good internet access, or confidence using technology.</p> <p>Tenants with irregular income (zero-hours contracts, self-employed) may find weekly monitoring and strict payment expectations challenging.</p> <p>.</p> |  |  |
|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|

|                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                       |  |  |  |
|------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|--|--|--|
|                                                                              | making links with support sections and officers                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                       |  |  |  |
| Please evidence the data and information you used to support this assessment | <p>Northgate reports on those in rent and service charge arrears and those supported. At the end of Q2 2024 35% were in rent arrears.</p> <p>It is suspected that there is a good number of customers who are likely to be affected by social –economic challenges but have not come forward for support of assistance.</p> <p>We have a dedicated debt and advice worker who works closely with tenants to deal with their debt and prevent homelessness</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. We will ensure that this advice offer is continued.</p> <p>ensure staff actively identify digital exclusion during sign-up and early contact.</p> <p>Consider exceptions or additional flexibility for tenants with very low income or irregular income patterns – e.g., longer payment plan options, adjusted frequency.</p> <p>Monitor arrears and enforcement by socio-economic category (e.g., benefit claimants vs. non-</p> | What do you still need to find out?<br>Include in actions (last page) |  |  |  |

|  |                                                                                                                                                                               |  |  |
|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
|  | benefit) to identify any disproportionate trends.<br><br>Embed digital skills training or referral to local digital inclusion programmes as part of the tenant support offer. |  |  |
|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|

| 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 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                    |  |                |
| What opportunities are there to promote equality and inclusion?              | The policy has the potential to advance equality of opportunity and promote fair treatment for tenants, by emphasising early intervention, tailored support, flexible payment options, financial inclusion, plain language communications and a supportive rather than purely enforcement-led approach. The risk of adverse impact exists primarily in the areas of digital exclusion, irregular income, language/communication barriers, and specific vulnerabilities (age, disability, minority ethnicity, gender identity, | What do you still need to find out? Include in actions (last page) |  |                |

|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  |  |
|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
|  | <p>pregnancy/maternity, caring responsibilities) that might make some tenants less able to engage with the policy as currently drafted.</p> <p>However, many of these risks are mitigated within the policy via tailored support clauses, multi-agency working, and flexible payment arrangements. To ensure the policy meets legislation requirement, the Council needs actively to monitor outcomes disaggregated by relevant characteristics (where data allows), ensure staff training, and adapt procedures where any disparity emerges.</p> <p>It is vital that this EQIA is treated as a live document and is revisited as the policy is implemented, data emerges, and practice develops. The Council should publicise summary results of monitoring (transparently but anonymised) to support accountability and build tenant trust.</p> |  |  |
|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|

## Consultation Findings

Document any feedback gained from the following groups of people:

|        |     |            |                                                                                                                                                                                                                                |
|--------|-----|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Staff? | N/A | Residents? | 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 Policy and put in place systems to mitigate this accordingly. |
|--------|-----|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|                               |     |           |     |
|-------------------------------|-----|-----------|-----|
| Voluntary & community sector? | N/A | Partners? | N/A |
| Other stakeholders?           |     |           |     |

## Overall Conclusion & Future Activity

| Explain the <b>overall findings</b> of the assessment and <b>reasons for outcome (please choose one)</b> : |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------------------------------------------------------------------------------------------------|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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 | <p>The Policy aims to promote and encourage inclusion by providing a service that is prompt, flexible, supportive and personalised.</p> <p>The policy has the potential to advance equality of opportunity and promote fair treatment for tenants, by emphasising early intervention, tailored support, flexible payment options, financial inclusion, plain language communications and a supportive rather than purely enforcement-led approach. The risk of adverse impact exists primarily in the areas of digital exclusion, irregular income, language/communication barriers, and specific vulnerabilities (age, disability, minority ethnicity, gender identity, pregnancy/maternity, caring responsibilities) that might make some tenants less able to engage with the policy as currently drafted.</p> <p>However, many of these risks are mitigated within the policy via tailored support clauses, multi-agency working, and flexible payment arrangements. To ensure the policy meets legislation requirement, the Council needs actively to monitor outcomes disaggregated by relevant characteristics (where data allows), ensure staff training, and adapt procedures where any disparity emerges.</p> |

|  |                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  |                         | It is vital that this EQIA is treated as a live document and is revisited as the policy is implemented, data emerges, and practice develops. The Council should publicise summary results of monitoring (transparently but anonymised) to support accountability and build tenant trust.                                                                                                                                                                                                                                                                                                                        |
|  | 2b. Continue as planned | <ul style="list-style-type: none"> <li>• Consultation with service users.</li> <li>• tailored support for vulnerable tenants, accessible communication options, and flexible repayment plans.</li> <li>• Consultation with staff in team meetings, supervisions, appraisals, regular communication and continual professional development</li> <li>• Learning from compliments, complaints and comments.</li> <li>• Applying Good Practice</li> </ul> <p>Recommendations from the action plan will be included in the overall service improvement plan and performance will be monitored on a regular basis</p> |
|  | 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?                                                                                                |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|---------------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------|
| Monitor through day-to-day income management and tenant account management to establish to establish the impact of the policy and provide tenants with support accordingly | Remove discrimination and promote equal opportunities.<br>Put in place systems to mitigate this accordingly | Elizabeth Ddamulira | Nov 2026 | Current practice is to assess cases or groups that are experiencing challenges and putting in place processes and systems to mitigate impacts. |
| On-going training and awareness for staff on equality, diversity and social inclusion.                                                                                     | General Equality and diversity                                                                              | Elizabeth Ddamulira | Nov 2026 | April 26 but reviewed each quarter                                                                                                             |

|                                                                                                                                                                                                                                                                                         |                                                              |                     |          |                                      |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|---------------------|----------|--------------------------------------|
|                                                                                                                                                                                                                                                                                         |                                                              |                     |          |                                      |
| Maintain and where possible improve upon working arrangements with community groups as conduits for information and meaningful participation between the Council, tenants and the wider community. We have a new Consultation and Engagement gateway system which further promote this. | General equality and diversity as well as Community cohesion | Elizabeth Ddamulira | Nov 2026 | April 2026 but reviewed each quarter |

**Approved by Director / Strategic Director: Kerry Clifford**

**Date: 11/09/2026**

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