

Equality Analysis Form

Delivering for Croydon

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1. Introduction

1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

2. Proposed change

Directorate	Housing
Title of proposed change	HRA Rent Setting 2023-24
Name of Officer carrying out Equality Analysis	Orlagh Guarnori

2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

To ensure continued investment in the management, maintenance and development of council housing stock to ensure the needs of existing and potential tenants are met, and to provide enhanced support for families and communities experiencing hardship the proposal is to increase the HRA rents in line with the government directive by 7% for 2023/24

The rent increase is required to enable the Council to meet its requirements to continue to invest in the housing stock and to set a balanced budget for 2023/24 that reflects Croydon's HRA business plan and takes into account the Mayor's priorities. The report provides an overview of the impact on tenants of protected characteristic groups by increasing the rent level to 7%.

3. Impact of the proposed change

Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

3.1 Deciding whether the potential impact is positive or negative

Table 1 – Positive/Negative impact

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	<p>The positive impacts listed below will impact more 30-50 y/o residents than any other age group</p> <p>People will benefit from the overall investment in council housing</p> <p>The cost rise to tenants is a relatively modest one and follows four years of rent reductions for tenants. The rise will</p>	<p>The negative impacts listed below will impact more 30-50 y/o residents than any other age group</p> <p>The increase will place an additional financial burden on tenants although an increase in benefits will cover the rent increase.</p>	<p>Council tenants can be broken down into the following age groups:</p> <p>20-29: 4%</p> <p>30-39: 14%</p> <p>40-49: 19%</p> <p>50-59: 25%</p> <p>60-69: 18%</p> <p>70-79: 11%</p> <p>80-89: 6%</p>

	enable the council to improve and provide range of services to tenants.	<p>68% of our existing tenants are in receipt of financial help with housing costs i.e., Housing Benefit or Universal Credit and therefore will be less likely to be negatively impacted by the 7% increase.</p> <p>32% of our existing tenants are not in receipt of financial help with housing costs and therefore, will need to pay the increased service charges and rent from their existing resources.</p> <p>Tenants unable to pay the increased rent and service charges may increase bad debt and debt arrears.</p>	<p>90-99: 1%</p> <p>30-59 y/o tenants constitute 44% of Council tenants (more than any other two age groups combined)</p>
Disability	<p>People will benefit from the overall investment in council housing.</p> <p>Eligible tenants will benefit from the provision of disabled adaptations (major and minor) to existing council housing resourced through the 7% increase to rent and service charges.</p> <p>Disability payments to parents of disabled children are not affected.</p>	<p>Due to a lack of data, the Council cannot confirm that the 7% increase to rent and service charges will not negatively impact tenants identifying as having a disability specifically.</p>	<p>14.1% of Croydon residents identified as having a disability in 2011.</p> <p>The Council does not collect disability data on Council tenants. Data collection on protected characteristics of Council tenants will be improved from May 2023 due to the implementation of the NEC Housing system.</p> <p>The Council will proactively target the 32% of tenants not in receipt of Housing Benefit who the Council anticipates may be negatively impacted by the 7% increase to rent and service charges.</p> <p>The Council will do this through engagement with tenants to understand how the Council can support protected characteristic groups.</p>
Sex	The positive impact listed below will impact more residents identifying as female than those identifying as male.	The negative impact listed below will impact more residents identifying as female than those identifying as male.	<p>The gender of Council tenants is as follows:</p> <p>Female: 67%</p>

	<p>People will benefit from the overall investment in council housing.</p>	<p>The increase will place an additional financial burden on tenants although an increase in benefits will cover the rent increase.</p> <p>68% of our existing tenants are in receipt of financial help with housing costs i.e., Housing Benefit or Universal Credit and therefore will be less likely to be negatively impacted by the 7% increase.</p> <p>32% of our existing tenants are not in receipt of financial help with housing costs and therefore, will need to pay the increased service charges and rent from their existing resources.</p> <p>Tenants unable to pay the increased rent and service charges may increase bad debt and debt arrears.</p>	<p>Male: 33%</p>
<p>Gender identity</p>	<p>People will benefit from the overall investment in council housing.</p>	<p>The increase will place an additional financial burden on tenants although an increase in benefits will cover the rent increase.</p> <p>68% of our existing tenants are in receipt of financial help with housing costs i.e., Housing Benefit or Universal Credit and therefore will be less likely to be negatively impacted by the 7% increase.</p> <p>32% of our existing tenants are not in receipt of financial help with housing costs and therefore, will need to pay the increased service charges and rent from their existing resources.</p>	<p>The Council does not collect data on the gender identity of Council tenants. Data collection on protected characteristics of Council tenants will be improved from May 2023 due to the implementation of the NEC Housing system.</p> <p>The Council will proactively target the 32% of tenants not in receipt of Housing Benefit who the Council anticipates may be negatively impacted by the 7% increase to rent and service charges.</p> <p>The Council will do this through engagement with tenants to understand how the Council can support protected characteristic groups.</p>

		Tenants unable to pay the increased rent and service charges may increase bad debt and debt arrears.	
Marriage or Civil Partnership	<p>People will benefit from the overall investment in council housing.</p> <p>There is not expected to be any particular negative impact on this specific group.</p>	<p>The increase will place an additional financial burden on tenants although an increase in benefits will cover the rent increase.</p> <p>68% of our existing tenants are in receipt of financial help with housing costs i.e., Housing Benefit or Universal Credit and therefore will be less likely to be negatively impacted by the 7% increase.</p> <p>32% of our existing tenants are not in receipt of financial help with housing costs and therefore, will need to pay the increased service charges and rent from their existing resources.</p> <p>Tenants unable to pay the increased rent and service charges may increase bad debt and debt arrears.</p>	<p>The Council does not collect data on the marriage or civil partnership status of tenants. Data collection on protected characteristics of Council tenants will be improved from May 2023 due to the implementation of the NEC Housing system.</p> <p>The Council will proactively target the 32% of tenants not in receipt of Housing Benefit who the Council anticipates may be negatively impacted by the 7% increase to rent and service charges.</p> <p>The Council will do this through engagement with tenants to understand how the Council can support protected characteristic groups.</p>
Religion or belief	<p>People will benefit from the overall investment in council housing.</p> <p>Developing and supporting staff to provide great customer service will ensure appropriate and sensitive services are delivered to the religious or belief requirements of tenants.</p>	<p>The increase will place an additional financial burden on tenants although an increase in benefits will cover the rent increase.</p> <p>68% of our existing tenants are in receipt of financial help with housing costs i.e., Housing Benefit or Universal Credit and therefore will be less likely to be negatively impacted by the 7% increase.</p> <p>32% of our existing tenants are not in receipt of financial help with housing costs and therefore, will need to pay</p>	<p>The Council does not collect data on the religion or belief of Council tenants. Data collection on protected characteristics of Council tenants will be improved from May 2023 due to the implementation of the NEC Housing system.</p> <p>The Council will proactively target the 32% of tenants not in receipt of Housing Benefit who the Council anticipates may be negatively impacted by the 7% increase to rent and service charges.</p> <p>The Council will do this through engagement with tenants to understand</p>

		<p>the increased service charges and rent from their existing resources.</p> <p>Tenants unable to pay the increased rent and service charges may increase bad debt and debt arrears.</p>	<p>how the Council can support protected characteristic groups.</p>
Race	<p>The positive impacts listed below will impact more residents identifying as Black or White than those identifying as other ethnic groups.</p> <p>People will benefit from the overall investment in council housing.</p> <p>Communication about the increase in rents and charges will be made for whom English is not their first language.</p>	<p>The negative impacts listed below will impact more residents identifying as Black or White than those identifying as other ethnic groups.</p> <p>68% of our existing tenants are in receipt of financial help with housing costs i.e., Housing Benefit or Universal Credit and therefore will be less likely to be negatively impacted by the 7% increase.</p> <p>32% of our existing tenants are not in receipt of financial help with housing costs and therefore, will need to pay the increased service charges and rent from their existing resources.</p> <p>Tenants unable to pay the increased rent and service charges may increase bad debt and debt arrears</p>	<p>Council tenants can be broken down into the following ethnicity groups:</p> <p>Asian: 9% Black: 37% White: 47% Mixed: 4% Other: 3%</p>
Sexual Orientation	<p>People will benefit from the overall investment in council housing.</p>	<p>68% of our existing tenants are in receipt of financial help with housing costs i.e., Housing Benefit or Universal Credit and therefore will be less likely to be negatively impacted by the 7% increase.</p> <p>32% of our existing tenants are not in receipt of financial help with housing costs and therefore, will need to pay the increased service charges and rent from their existing resources.</p>	<p>The Council does not collect data on the sexual orientation of tenants. Data collection on protected characteristics of Council tenants will be improved from May 2023 due to the implementation of the NEC Housing system.</p> <p>The Council will proactively target the 32% of tenants not in receipt of Housing Benefit who the Council anticipates may be negatively impacted by the 7% increase to rent and service charges.</p>

		Tenants unable to pay the increased rent and service charges may increase bad debt and debt arrears	The Council will do this through engagement with tenants to understand how the Council can support protected characteristic groups.
Pregnancy or Maternity	People will benefit from the overall investment in council housing and in particular better quality and additional family housing	<p>68% of our existing tenants are in receipt of financial help with housing costs i.e., Housing Benefit or Universal Credit and therefore will be less likely to be negatively impacted by the 7% increase.</p> <p>32% of our existing tenants are not in receipt of financial help with housing costs and therefore, will need to pay the increased service charges and rent from their existing resources.</p> <p>Tenants unable to pay the increased rent and service charges may increase bad debt and debt arrears</p>	<p>The Council does not collect data on the pregnancy or maternity status of tenants.</p> <p>Data collection on protected characteristics of Council tenants will be improved from May 2023 due to the implementation of the NEC Housing system.</p> <p>The Council will proactively target the 32% of tenants not in receipt of Housing Benefit who the Council anticipates may be negatively impacted by the 7% increase to rent and service charges.</p> <p>The Council will do this through engagement with tenants to understand how the Council can support protected characteristic groups.</p>

Important note: You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

3.2 Additional information needed to determine impact of proposed change

Table 2 – Additional information needed to determine impact of proposed change

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:

Additional information needed and or Consultation Findings	Information source	Date for completion

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

Severity of Impact	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	Likelihood of Impact			

Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

Table 3 – Impact scores

<p>Column 1</p> <p>PROTECTED GROUP</p>	<p>Column 2</p> <p>LIKELIHOOD OF IMPACT SCORE</p> <p>Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>Column 3</p> <p>SEVERITY OF IMPACT SCORE</p> <p>Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>Column 4</p> <p>EQUALITY IMPACT SCORE</p> <p>Calculate the equality impact score for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.</p> <p>Equality impact score = likelihood of impact score x severity of impact score.</p>
Age	3	2	6
Disability	2	2	4
Gender	3	2	6
Gender reassignment	2	2	4
Marriage / Civil Partnership	2	2	4
Race	3	2	6
Religion or belief	2	2	4
Sexual Orientation	2	2	4
Pregnancy or Maternity	2	2	4

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4. Statutory duties

4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups	x	<input type="checkbox"/>
Eliminating unlawful discrimination, harassment and victimisation	x	<input type="checkbox"/>
Fostering good relations between people who belong to protected characteristic groups		<input type="checkbox"/>

Important note: If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

5. Action Plan to mitigate negative impacts of proposed change

Important note: Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

Table 4 – Action Plan to mitigate negative impacts

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	Due to a lack of data, the Council cannot confirm that the 7% increase to rent and service charges will not negatively impact tenants identifying as having a disability specifically.	Negative impact on all tenants will be mitigated through the actions below: We will communicate with all tenants to explain any significant changes affecting them and what we are	Interim Director of Tenancy Services, Housing Resident Engagement & Allocations	2023 – ongoing

	<p>However, the proposed change is not expected to have a negative impact.</p> <p>The Council will make sure that any negative impacts due to the information regarding the proposed change not being accessible is mitigated.</p>	<p>investing in.</p> <p>We will publish clear information on rent which helps tenants to manage their own finances;</p> <ul style="list-style-type: none"> • Signpost tenants to a relevant benefit agency to help ensure they are maximising their income to meet their living costs; • Take action to raise the awareness of accessing a range of welfare benefits; and • Provide the opportunity to access direct support in checking they are in receipt of the welfare benefits they are entitled to claim. • Signpost tenants to debt management advice and organisations <p>We will gather data on:</p> <ul style="list-style-type: none"> • Debt specific for each of the types of tenants to better inform future policies • Specific characteristics of tenants to better inform future policies <p>We will increase engagement with engage tenants through existing</p>		
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		<p>groups and seek involvement of minority groups through these channels</p> <p>We will support tenants to access non means tested grants and support</p> <p>We will offer translation of communication into alternative languages.</p>		
Race	<p>The negative impacts listed below will impact more residents identifying as Black or White than those identifying as other ethnic groups.</p> <p>There is a risk that those for whom English is not their first language are not made fully aware of changes. The Council will make sure that any negative impacts due to the information regarding the proposed change not being accessible is mitigated.</p> <p>32% of our existing tenants are not in receipt of financial help with housing costs and therefore, will need to pay the increased service charges and rent from their existing</p>	<p>We will offer translation of communication into alternative languages.</p> <p>The Council will consider barriers to accessing information regarding the 7% increase and the financial support available likely to be faced by tenants identifying as Black.</p> <p>Negative impact on all tenants will be mitigated through the actions below:</p> <p>We will publish clear information on rent which helps tenants to manage their own finances;</p> <ul style="list-style-type: none"> • Signpost tenants to a relevant benefit agency to help ensure they are maximising their income to 	Interim Director of Tenancy Services, Housing Resident Engagement & Allocations	2023 – ongoing

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	<p>resources. Existing resources may be more limited due to the cost-of-living crisis.</p>	<p>meet their living costs;</p> <ul style="list-style-type: none"> • Take action to raise the awareness of accessing a range of welfare benefits; and • Provide the opportunity to access direct support in checking they are in receipt of the welfare benefits they are entitled to claim. • Signpost tenants to debt management advice and organisations <p>We will gather data on:</p> <ul style="list-style-type: none"> • Debt specific for each of the types of tenants to better inform future policies • Specific characteristics of tenants to better inform future policies <p>We will increase engagement with engage tenants through existing groups and seek involvement of minority groups through these channels</p> <p>We will support tenants to access non means tested grants and support</p>		
Sex	<p>More residents identifying as female will be negatively impacted than those identifying as male.</p>	<p>The Council will consider barriers to accessing information regarding the</p>	<p>Interim Director of Tenancy Services,</p>	<p>2023 – ongoing</p>

	<p>32% of our existing tenants are not in receipt of financial help with housing costs and therefore, will need to pay the increased service charges and rent from their existing resources. Existing resources may be more limited due to the cost-of-living crisis.</p>	<p>7% increase and the financial support available likely to be faced by tenants identifying as female.</p> <p>We will publish clear information on rent which helps tenants to manage their own finances.</p> <ul style="list-style-type: none"> • Signpost tenants to a relevant benefit agency to help ensure they are maximising their income to meet their living costs; • Take action to raise the awareness of accessing a range of welfare benefits; and • Provide the opportunity to access direct support in checking they are in receipt of the welfare benefits they are entitled to claim. • Signpost tenants to debt management advice and organisations <p>We will gather data on:</p> <ul style="list-style-type: none"> • Debt specific for each of the types of tenants to better inform future policies • Specific characteristics of tenants to better inform future policies 	<p>Housing Resident Engagement & Allocations</p>	
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		<p>We will increase engagement with engage tenants through existing groups and seek involvement of minority groups through these channels</p> <p>We will support tenants to access non means tested grants and support</p>		
Gender identity	<p>Due to a lack of data, the Council cannot confirm that the 7% increase to rent and service charges will not negatively impact tenants based on their gender identity. However, the proposed change is not expected to have a negative impact.</p> <p>32% of our existing tenants are not in receipt of financial help with housing costs and therefore, will need to pay the increased service charges and rent from their existing resources. Existing resources may be more limited due to the cost-of-living crisis.</p>	<p>Negative impact on all tenants will be mitigated through the actions below: We will publish clear information on rent which helps tenants to manage their own finances;</p> <ul style="list-style-type: none"> • Signpost tenants to a relevant benefit agency to help ensure they are maximising their income to meet their living costs; • Take action to raise the awareness of accessing a range of welfare benefits; and • Provide the opportunity to access direct support in checking they are in receipt of the welfare benefits they are entitled to claim. • Signpost tenants to debt management advice and organisations 	Interim Director of Tenancy Services, Housing Resident Engagement & Allocations	2023 – ongoing

		<p>We will gather data on:</p> <ul style="list-style-type: none"> • Debt specific for each of the types of tenants to better inform future policies • Specific characteristics of tenants to better inform future policies <p>We will increase engagement with engage tenants through existing groups and seek involvement of minority groups through these channels</p> <p>We will support tenants to access non means tested grants and support</p>		
Sexual orientation	<p>Due to a lack of data, the Council cannot confirm that the 7% increase to rent and service charges will not negatively impact tenants based on their sexual orientation.</p> <p>However, the proposed change is not expected to have a negative impact.</p> <p>32% of our existing tenants are not in receipt of financial help with</p>	<p>Negative impact on all tenants will be mitigated through the actions below:</p> <p>We will publish clear information on rent which helps tenants to manage their own finances;</p>	Interim Director of Tenancy Services, Housing Resident Engagement & Allocations	2023 – ongoing

	<p>housing costs and therefore, will need to pay the increased service charges and rent from their existing resources. Existing resources may be more limited due to the cost-of-living crisis.</p>	<ul style="list-style-type: none"> • Signpost tenants to a relevant benefit agency to help ensure they are maximising their income to meet their living costs; • Take action to raise the awareness of accessing a range of welfare benefits; and • Provide the opportunity to access direct support in checking they are in receipt of the welfare benefits they are entitled to claim. • Signpost tenants to debt management advice and organisations <p>We will gather data on:</p> <ul style="list-style-type: none"> • Debt specific for each of the types of tenants to better inform future policies • Specific characteristics of tenants to better inform future policies <p>We will offer translation of communication into alternative languages.</p> <p>We will increase engagement with engage tenants through existing groups and seek involvement of</p>		
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		<p>minority groups through these channels</p> <p>We will support tenants to access non means tested grants and support</p>		
Age	<p>The negative impacts listed in Table 1 will impact more 30-50 y/o residents than any other age group</p> <p>32% of our existing tenants are not in receipt of financial help with housing costs and therefore, will need to pay the increased service charges and rent from their existing resources. Existing resources may be more limited due to the cost-of-living crisis.</p>	<p>We will publish clear information on rent which helps tenants to manage their own finances;</p> <ul style="list-style-type: none"> • Signpost tenants to a relevant benefit agency to help ensure they are maximising their income to meet their living costs; • Take action to raise the awareness of accessing a range of welfare benefits; and • Provide the opportunity to access direct support in checking they are in receipt of the welfare benefits they are entitled to claim. • Signpost tenants to debt management advice and organisations <p>We will gather data on:</p> <ul style="list-style-type: none"> • Debt specific for each of the types of tenants to better inform future policies 	Interim Director of Tenancy Services, Housing Resident Engagement & Allocations	2023 – ongoing

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		<ul style="list-style-type: none"> • Specific characteristics of tenants to better inform future policies <p>We will offer translation of communication into alternative languages.</p> <p>We will increase engagement with engage tenants through existing groups and seek involvement of minority groups through these channels</p> <p>We will support tenants to access non means tested grants and support</p>		
Religion or belief	<p>Due to a lack of data, the Council cannot confirm that the 7% increase to rent and service charges will not negatively impact tenants based on their religion or belief. However, the proposed change is not expected to have a negative impact.</p> <p>32% of our existing tenants are not in receipt of financial help with housing costs and therefore, will need to pay the increased service charges and rent from their existing resources. Existing resources may</p>	<p>Negative impact on all tenants will be mitigated through the actions below:</p> <p>We will publish clear information on rent which helps tenants to manage their own finances;</p> <ul style="list-style-type: none"> • Signpost tenants to a relevant benefit agency to help ensure they are maximising their income to meet their living costs; • Take action to raise the awareness of accessing a range of welfare benefits; and 	Interim Director of Tenancy Services, Housing Resident Engagement & Allocations	2023 – ongoing

	<p>be more limited due to the cost-of-living crisis.</p>	<ul style="list-style-type: none"> • Provide the opportunity to access direct support in checking they are in receipt of the welfare benefits they are entitled to claim. • Signpost tenants to debt management advice and organisations <p>We will gather data on:</p> <ul style="list-style-type: none"> • Debt specific for each of the types of tenants to better inform future policies • Specific characteristics of tenants to better inform future policies <p>We will offer translation of communication into alternative languages.</p> <p>We will increase engagement with engage tenants through existing groups and seek involvement of minority groups through these channels</p> <p>We will support tenants to access non means tested grants and support</p>		
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<p>Pregnancy or maternity</p>	<p>Due to a lack of data, the Council cannot confirm that the 7% increase to rent and service charges will not negatively impact tenants identified within this group.</p> <p>However, the proposed change is not expected to have a negative impact.</p> <p>32% of our existing tenants are not in receipt of financial help with housing costs and therefore, will need to pay the increased service charges and rent from their existing resources. Existing resources may be more limited due to the cost-of-living crisis.</p>	<p>Negative impact on all tenants will be mitigated through the actions below:</p> <p>We will publish clear information on rent which helps tenants to manage their own finances;</p> <ul style="list-style-type: none"> • Signpost tenants to a relevant benefit agency to help ensure they are maximising their income to meet their living costs; • Take action to raise the awareness of accessing a range of welfare benefits; and • Provide the opportunity to access direct support in checking they are in receipt of the welfare benefits they are entitled to claim. • Signpost tenants to debt management advice and organisations <p>We will gather data on:</p> <ul style="list-style-type: none"> • Debt specific for each of the types of tenants to better inform future policies • Specific characteristics of tenants to better inform future policies <p>We will offer translation of</p>	<p>Interim Director of Tenancy Services, Housing Resident Engagement & Allocations</p>	<p>2023 – ongoing</p>
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		<p>communication into alternative languages.</p> <p>We will increase engagement with engage tenants through existing groups and seek involvement of minority groups through these channels</p> <p>We will support tenants to access non means tested grants and support</p>		
Marriage/civil partnership	<p>Due to a lack of data, the Council cannot confirm that the 7% increase to rent and service charges will not negatively impact tenants based on marriage or civil partnership status.</p> <p>However, the proposed change is not expected to have a negative impact.</p> <p>32% of our existing tenants are not in receipt of financial help with housing costs and therefore, will need to pay the increased service charges and rent from their existing resources. Existing resources may be more limited due to the cost-of-living crisis.</p>	<p>Negative impact on all tenants will be mitigated through the actions below:</p> <p>We will publish clear information on rent which helps tenants to manage their own finances;</p> <ul style="list-style-type: none"> • Signpost tenants to a relevant benefit agency to help ensure they are maximising their income to meet their living costs; • Take action to raise the awareness of accessing a range of welfare benefits; and • Provide the opportunity to access direct support in checking they are in receipt of the welfare benefits they are entitled to claim. 	Interim Director of Tenancy Services, Housing Resident Engagement & Allocations	2023 – ongoing

		<ul style="list-style-type: none"> • Signpost tenants to debt management advice and organisations <p>We will gather data on:</p> <ul style="list-style-type: none"> • Debt specific for each of the types of tenants to better inform future policies • Specific characteristics of tenants to better inform future policies <p>We will offer translation of communication into alternative languages.</p> <p>We will increase engagement with engage tenants through existing groups and seek involvement of minority groups through these channels</p>		
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6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter **X** in column 3 (**Conclusion**) alongside the relevant statement to show your conclusion.

Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision	X

Equality Analysis

Adjust the proposed change	<p>We will take steps to lessen the impact of the proposed change should it adversely impact the Council’s ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</p> <p>The Council’s data indicates that the proposed change will have an impact on certain protected characteristic groups (age, gender, ethnicity). Mitigating actions are in place to reduce the likelihood of a negative impact on these groups. Plans are also in place to improve our protected characteristic groups to more accurately assess negative impacts on other groups. The analysis of the data has provided us with confidence that no intentional discrimination of the protected characteristics groups. The mitigation outlines above and our engagement intentions during the 2023 year will support the council to ensure that we continue to adhere to this.</p>	X
Continue the proposed change	<p>We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.</p>	
Stop or amend the proposed change	<p>Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.</p>	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: Date:

7. Sign-Off

Equality Analysis

Officers that must approve this decision	
Equalities Lead	Name: Denise McCausland Date: 12 January 2023 Position: Equalities Programme Manager
Director	Name: Date: Position: