

Equality Analysis Form / EqIA

By completing this form you will provide evidence of how your service is meeting Stroud District Council's General Equality duty:

The Equality Act 2010 states that:

*A public authority must, in the exercise of its functions, have **due regard** to the need to –*

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by the Equality Act 2010;*
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.*

The protected characteristics are listed in Question 9

Stroud District Equality data can be found at:

<https://inform.gloucestershire.gov.uk/equality-and-diversity/>

Please see Appendix 1 for a good example of a completed EIA.

[Guidance available on the HUB](#)

1. Persons responsible for this assessment:

Name(s): Andy Kefford	Telephone: 01453 754317
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Service: Housing	Date of Assessment: 02/12/2024

2. Name of the policy, service, strategy, procedure or function:

Depooling of service charges from rents

Is this new or an existing one? New

3. Briefly describe its aims and objectives

The Council currently provide a number of services to tenants that are delivered in addition to the standard services that are ordinarily covered by the rental charge paid. The aim of "depooling" is to separate the cost of services from the rent that is paid. This means tenants will have two charges, one for rent and the other for the services they receive. This process is so that tenants can see clearly what services they receive and the cost for providing them so that they can hold the service to account and expect higher standards and value for money.

4. Are there external considerations? (Legislation / government directive, etc) Yes.

Section 18 (1) of the 1985 Landlord and Tenant Act defines a service charge as 'an amount payable by a tenant of a dwelling as part of or in addition to the rent: (a) Which is payable directly, or indirectly, for services, repairs, maintenance, improvements or insurance or the landlord's costs of management; and (b) The whole or part of which varies or may vary according to the relevant costs. (c) The costs of the services, repairs, maintenance, improvements, insurance, and management must be reasonable'.

Part of the Social Housing Regulation Act 2023 mentions that providers of social housing must be more transparent. The de-pooling of service charges should aim to ensure that the information regarding the individual cost the tenant is required to contribute towards the service delivered to them is both transparent and accountable

5. Who is intended to benefit from it and in what way?

All tenants are intended to benefit from the depooling process as this is widely considered as best practice in the social housing sector. Our independent living tenants already have their service charges depooled so implementing this process across all our tenants will be fairer and more consistent. Currently rents subsidise the cost of delivering service charges, by implementing service charges tenants will only pay for the services that they receive.

6. What outcomes are expected?

The benefits of depooling include:

- Transparency: We will be able to show tenants a clear breakdown of what they are paying for rent and what they are paying for services, this gives transparency and clarity to our tenants
- Fairness: Charges can be allocated on a proportionate basis ensuring tenants pay for services that they benefit from
- Choice: By providing tenants with a breakdown of the services they are provided, we will be able to consult and offer an informed choice about what services they want or don't want the Council to deliver moving forward.
- Improved Services: With tenants given a breakdown of charges and more choice about what services they want to receive, we can improve service delivery in areas that matter to tenants
- Consistency: Independent living tenants and leaseholders are charged for services. Introducing service charges for all gives greater fairness and consistency across all our tenures
- Ability to deliver services: The current projected HRA spend against income collection means that difficult decisions will need to be made. The Council may not be able to continue to deliver all of the services that we do currently unless there is sufficient revenue to pay for them.

7. What evidence has been used for this assessment?: (eg Research, previous consultations, Inform (MAIDEN); Google assessments carried out by other Authorities)

An external consultant was appointed during 2022/23 to gather information and to support with the depooling process, using research and experience to support. Data has been taken from internal systems to ensure that proposed charges are fair and represent value for money. Tenant profiling data has been gathered to understand the possible impact on tenants.

8. Has any consultation been carried out? See list of possible consultees

Yes, the concept of depooling has been presented to Housing Committee on various occasions including, April 2019, March 2023, September 2024. During September 2024, Housing Committee approved undertaking a process of consultation with residents. From 23 September to 20 October over 4000 tenants were written to explaining the concept of depooling and seeking views. A dedicated webpage with FAQs, online survey, paper survey and consultations events were held. We received 398 responses from tenants in response to the survey and those views have been considered as part of the proposals to implement depooling. Consultation with senior staff and SLT has also been carried out.

9. Could a particular group be affected differently in either a negative or positive way?

(Negative – it could disadvantage and therefore potentially not meet the General Equality duty;

Positive – it could benefit and help meet the General Equality duty;

Neutral – neither positive nor negative impact / Not sure)

Protected Group	Type of impact, reason and any evidence (from Q7 & 8)
Age	Our independent living accommodation, which is accommodation for adults over the age of 55, already have their rents depooled from their rent. The decision to depool all properties will ensure fairness across all tenants or all ages as they will both have the same type of rental charge and service charge, albeit different rents and service costs.
Disability	Neutral
Gender Re-assignment	Neutral
Pregnancy & Maternity	Neutral
Race	Neutral
Religion – Belief	Neutral
Sex	Neutral
Sexual Orientation	Neutral
Marriage & Civil Partnerships (part (a) of duty only)	Neutral
Rural considerations: le Access to services; transport;	Neutral

education; employment; broadband;	
Generally	The impact of this policy on tenants is considered to be minimal. This process provides fairness, transparency and consistency across our social rent homes. Where a tenant, whether in a protected group or not, have any financial difficulties as a result of this change, the proposal puts in place measures to mitigate that impact and ensure that there is support available to those in need.

10. If you have identified a negative impact in question 9, what actions have you undertaken or do you plan to undertake to lessen or negate this impact?


Please transfer any actions to your Service Action plan on Excelsis.

Action(s):	Lead officer	Resource	Timescale

Declaration

I/We are satisfied that an Impact Assessment has been carried out on this policy, service, strategy, procedure or function * (delete those which do not apply) and where a negative impact has been identified, actions have been developed to lessen or negate this impact.

We understand that the Equality Impact Assessment is required by the District Council and that we take responsibility for the completion and quality of this assessment

Completed by: Andy Kefford	Date: 02/12/2024
Role: Strategic Head of Housing	
Countersigned by Head of Service/Director: 	Date: 02/12/2024

Date for Review: Please forward an electronic copy to policy@stroud.gov.uk