

General Equality Impact Assessment (EIA) Form

Support:

An [EIA toolkit](#), [workshop content](#), and guidance for completing an [Equality Impact Assessment \(EIA\) form](#) are available on the [EIA page](#) of the [EDI Internal Hub](#). Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact the Equality, Diversity, and Inclusion (EDI) team by emailing Equalities@Brighton-Hove.gov.uk. If your request is urgent, please mention this in the subject line of your email so we can support as required.

Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Team. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the 'activity' you are assessing.

Process:

- Once fully completed, submit your EIA to the Equalities team by emailing the Equalities inbox and copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), any other relevant service colleagues to enable EIA communication, tracking and saving.
- Your EIA will be reviewed, discussed, and then approved by the assigned EDI Officer and after seeking additional approval as appropriate for your EIA.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the [EIA toolkit](#) for more information.

Name of activity or proposal being assessed:	Reviewing Local Housing Allowance rates in council-owned and long-term leased Temporary Accommodation
Directorate:	Homes and Adult Social Care
Service:	
Team:	
Is this a new or existing activity?	New
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	No

2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Harry Williams - Director of Housing People Services
Accountable Manager:	Aaron Burns- Head of Temporary & Supported Accommodation
Additional stakeholders collaborating or contributing to this assessment:	

3. About the activity

Briefly describe the purpose of the activity being assessed:

The council is proposing to review rents across identified temporary accommodation (TA) properties, which are council owned and on a long lease (more than 10 years and 1 day) to ensure financial sustainability, better alignment with current market and subsidy levels, and to maximise Housing Benefit (HB) recovery and rent alignment. This supports the council's ability to continue meeting statutory homelessness duties and maintain the TA portfolio at a viable level.

We have identified 282 properties that current fit the above brief and have estimated 80% of these properties receive Housing Benefit.

What are the desired outcomes of the activity?

To increase income recoverable through Housing Benefit where eligible.
 To ensure rent levels are applied consistently and transparently across TA.
 To limit financial impact on residents through proportionate mitigation.
 To safeguard services for vulnerable households by reducing budget pressures.

Which key groups of people do you think are likely to be affected by the activity?

The **primary determinant of impact is whether a household receives Housing Benefit (HB).**

- **Households on full or partial HB:**
Will not experience an increase in their net rent liability because HB will be in line with the reviewed rent.
- **Households not receiving HB:**
May experience an increase in their weekly rent and therefore represent the group most likely to require support.

4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

Current engagement has focused on:

- Internal consultation with Housing, Finance, Welfare and Legal teams.
- Review of equalities issues raised in other boroughs' EIAs, all of which highlight HB vs non-HB as the key impact split.
- Discussions with front-line staff and case managers.
- Assessment of potential mitigations for those not currently receiving HB.

Future engagement:

- Residents will receive formal notice of rent changes in clear, accessible language, with signposting to support services including income maximisation, benefit take-up and hardship assistance.
- Households not currently in receipt of HB will be encouraged to undergo benefits checks to establish eligibility for full or partial support.
- Any household concerned about affordability will be able to contact the council for advice and assessment.

5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity?
Consider all possible intersections.

(State Yes, No, Not Applicable as appropriate)

Age	YES
Disability and inclusive adjustments, coverage under equality act and not	YES
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	YES
Religion, Belief, Spirituality, Faith, or Atheism	NO
Sex	YES
Gender (including non-binary and Intersex people)	YES
Gender Reassignment	YES
Sexual Orientation	YES
Marriage and Civil Partnership	YES
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	YES
Armed Forces Personnel, their families, and Veterans	YES
Expatriates, Migrants, Asylum Seekers, and Refugees	YES
Carers	YES
Looked after children, Care Leavers, Care and fostering experienced people	YES

Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	YES
Socio-economic Disadvantage	YES
Homelessness and associated risk and vulnerability	YES
Human Rights	YES
Another relevant group (please specify here and add additional rows as needed)	<p>Yes, including:</p> <ul style="list-style-type: none"> • Ex-offenders and people with unrelated convictions • Lone parents • People experiencing homelessness

Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy, numeracy and /or digital barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

If you answered “NO” to any of the above, how will you gather this data to enable improved monitoring of impact for this activity?

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

Data is collected as part of a household’s application for help with homelessness or to join the housing register.

The implementation of the interim measure will be overseen by a panel of relevant service managers, who will oversee letting decisions to ensure consistency, fairness and transparency. The panel will consider and review the application of the rent policy on a case-by-case basis, with clear criteria and records maintained for audit purposes.

6. Impacts

Advisory Note:

- **Impact:**

- Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
- These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean:** Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
 - In each protected characteristic or group, in answer to the question ‘If “YES”, what are the positive and negative disproportionate impacts?’, describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
 - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.
 - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
 - **Consider a wide range (including but not limited to):**
 - [Population and population groups](#)
 - [Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council](#)
 - [Census](#) and [local intelligence data](#)
 - Service specific data
 - Community consultations
 - Insights from customer feedback including complaints and survey results
 - Lived experiences and qualitative data
 - [Joint Strategic Needs Assessment \(JSNA\) data](#)
 - [Health Inequalities data](#)
 - Good practice research
 - National data and reports relevant to the service
 - Workforce, leaver, and recruitment data, surveys, insights
 - Feedback from internal ‘staff as residents’ consultations
 - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
 - Insights, gaps, and data analyses on ‘who’ the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
 - Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#).

6.1 Age

<p>Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: older people, people who may be housebound, those under 16, young adults, with other intersections.</p>	<p>YES</p>
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Citywide data shows Brighton & Hove has a relatively young age profile (72% working age; 14% children; 14% older people)

Working-age adults under 35 are subject to the Shared Accommodation Rate (SAR), which restricts their HB to the single room rate regardless of the size of property they are in. A rent review to LHA standard rates could leave under 35s with a larger gap between rent charged and HB received than older households. Within this, there are exemptions (former rough sleepers, those have spent 3 months in a resettlement hostel) that may partially mitigate impact for younger people in TA.

Care leavers aged 18-24 are particularly exposed to this risk: unlike other young adults who may be able to draw on family financial support to bridge any shortfall, care leavers leave local authority care without that safety net. The resettlement hostel exemption is unlikely to apply to most care leaver, who typically transition directly into independent or supported accommodation rather than via a qualifying hostel, meaning they have no route to exemption from the SAR and no cushion against the gap between their capped HB and reviewed rent.

Older adults face different pressures, those approaching pension age may be on fixed incomes with limited capacity to absorb any shortfall.

Mitigations:

- Ensure that leaving care team and housing officers review and create a shared protocol to identify care leavers in TA and have their SAR position flagged and ensure support is offered.
- Review all under 35 identified individuals in TA placements and identify those subject to SAR
- Ensure SAR exemptions are actively identified and applied at the point of placement
- Review alternative benefits such as pension credits for older adults
- Review alternative awards and benefits for those under 35, eg: Discretionary Payment

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability, considering our anticipatory duty?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Brighton & Hove has a high proportion of disabled residents (19%)

Disabled people are overrepresented in TA, as reported nationally and locally, but protected characteristic status is not the determinant of impact. Rent increases are covered by HB for eligible households, so disabled residents receiving HB experience no disproportionate impact. However, disabled people are disproportionately likely to be on low income, out of work, or reliant on benefit income and are therefore overrepresented in TA population relative to the general population.

What [inclusive adjustments](#) are you making for diverse disabled people impacted? For example: those who are housebound due to disability or disabling circumstances, D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

- Proactive benefit take-up support for disabled residents not currently receiving HB.
- Accessible communications (plain English, formats available on request).
- Signposting to additional welfare support and discretionary funds.
- Welfare rights assessment at the point of TA placement should check for unclaimed disability related entitlements (PIP, carers allowance, etc), that would increase overall household income.

6.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	NO
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

26% of Brighton & Hove residents are Black or Racially Minoritised.

HB entitlement does not vary by race or ethnicity. For those not in receipt of HB their personal circumstances will be reviewed as in all cases. However, Black and Racially minoritised individuals may face compounding barriers that indirectly affect their ability to respond to and manage a rent increase. These include higher rates of digital exclusion, which may limit access to online benefit claim portals; language barriers that reduce the ability to understand correspondence about rent changes, entitlements and support routes; and a historic low rates of benefit take up within some communities, which may reflect distrust or unfamiliarity with statutory support systems.

Mitigation:

- Review local TA demographic data post review
- Ensure communication regarding rent change and benefit entitlement and support routes are available to relevant and accessible language
- Housing officers should take a proactive outreach approach for residents identified as having a language barrier or limited digital access
- Council should work with community and voluntary sector organisations with established relationships with Black and Racially Minoritised communities to ensure information about the rent charge and support routes reaches residents through trusted channels.

6.4 Religion, Belief, Spirituality, Faith, or Atheism:

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

<p>Religion/belief is not collected for TA households, though baseline city data shows 55% of residents have no religion, with Christians the next largest group (31%)</p> <p>There is no mechanism through which religion or belief affects rent liability, HB eligibility, or exposure to risk.</p>

6.5 Sex:

Does your analysis indicate a disproportionate impact relating to Sex	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

<p>The city has an even sex split (51% women / 49% men)</p> <p>HB entitlement does not directly differentiate by Sex. However, a woman constitutes a significant greater share of the HB caseload and of TA households, particularly as lone parents and domestic abuse survivors. Lone parents are entitled to HB based on household (family) size, not single adult rates.</p> <p>Mitigation:</p> <ul style="list-style-type: none"> Monitor the proportion for women, and specifically lone parents, accruing rent arrears post review
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6.6 Gender and Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Identity (including non-binary and intersex people)?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Does your analysis indicate a disproportionate impact relating to Gender Reassignment ?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

<p>Local data shows 5% of adults identify as trans, non-binary or intersex.</p> <p>HB entitlement does not directly differentiate by gender identity. Some trans residents may face</p>

additional barriers to accessing support services or may not disclose their circumstances limiting access to welfare assistance. Trans and non-binary residents may have lower trust in statutory services due to experiences of discrimination, which can affect their willingness to engage early with financial support processes.

Mitigation:

- Ensure housing and support staff can identify and support Trans, non-binary and Intersex residents without requiring disclosure as a condition of assistance.

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation ?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Brighton & Hove has a high LGBTQ+ population (28%)

Sexual orientation does not influence HB eligibility or rent liability, and therefore no disproportionate impact is expected. LGBTQ+ young residents are overrepresented in youth homelessness and TA populations, meaning the under 35/SAR risk is relevant.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Marital status does not influence rent calculation or HB entitlement. No pathway for differential impact.

6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Pregnant people and new parents are frequently in priority need groups for homelessness, but the rent review affects them no differently than other groups. HB fully protects eligible households; non-HB households may access affordability assessments.

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

There is no mechanism through which military status affects rent review exposure.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

20% of residents were born outside the UK.
Some migrants are excluded from public funds; this can affect HB eligibility.
Where this results in cost exposure, the cause is immigration eligibility, not discrimination within the rent review policy.

Mitigation:

- Where this does occur, we would have to look at the individual circumstances of the household. There is a balance between Government restrictions and supporting the household. In cases where the household is placed by social services under an SLA we will want to speak to those departments as part of the one council approach.
- Communication strategies must include translated materials and culturally accessible outreach for migrants with limited English.

6.12 [Carers](#):

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Unpaid carers are disproportionately likely to be on low incomes or out of paid employment due to caring responsibilities, making them likely to be represented in the TA population and more likely financial exposed to a rent review. Younger carers aged 18-25, face additional effects of the SAR restriction, as their caring role does not constitute a qualifying exemption. Where a carer first language is not English, the barriers identified under race and ethnicity such as; digital exclusion, language barriers, lower benefit take up, apply with equal force and may be compounded by time and capacity constraints.

Mitigations:

- Housing officers should try and identify unpaid carer at the point of TA placement and flag them for welfare rights support
- Young carers subject to the SAR should be identified and considered for extra support
- Communication to carers should be done in formats that are accessible

6.13 Looked after children, Care Leavers, Care and fostering experienced people:

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections). Also consider our [Corporate Parenting Responsibility](#) in connection to your activity.

NO

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Care leavers may be overrepresented in TA, but HB protection applies equally. No rent review specific disadvantage identified.

Care leavers aged 18-24 are particularly exposed to this risk: unlike other young adults who may be able to draw on family financial support to bridge any shortfall, care leavers leave local authority care without that safety net. The resettlement hostel exemption is unlikely to apply to most care leaver, who typically transition directly into independent or supported accommodation rather than via a qualifying hostel, meaning they have no route to exemption from the SAR and no cushion against the gap between their capped HB and reviewed rent.

Mitigation

- Ensure that leaving care team and housing officers review and create a shared protocol to identify care leavers in TA and have their SAR position flagged and ensure support is offered.

6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

All TA households are by definition experiencing or at risk of homelessness. The distinction remains HB vs non HB; homelessness status does not independently alter impact.

6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

<p>Domestic abuse survivors placed in TA, directly from a refuge may have disrupted benefit claims and delayed HB entitlement created a period of vulnerability.</p> <p>Mitigation:</p> <ul style="list-style-type: none"> • Support domestic abuse survivors place in TA receive referral to specialist welfare rights • Housing to work with officers who work with survivors and support them to work with benefit officers to complete processes. • Housing officers to be flagged trauma informed courses and knowledge by officers who undertake survivor support work.
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6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Households not in receipt of HB, often due to income thresholds, savings, immigration status, or administrative delays, may face higher weekly rent.
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Mitigations:

- HB take up checks
- Income maximisation advice
- Discretionary Housing Payments / hardship funds
- Case by case affordability assessments
- Support to resolve HB processing issues or identify entitlements

6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?

NO

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Rent review does not interfere with Article 8 rights (home/family life) because households will not be required to move and support is available to prevent affordability related breaches.

6.18 Cumulative, multiple intersectional, and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.
- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
 - People being housebound due to disabilities or disabling circumstances
 - Environmental barriers or mobility barriers impacting those with sight loss, D/deafness, sensory requirements, neurodivergence, various complex disabilities
 - People experiencing homelessness
 - People on a low income and people living in the most deprived areas
 - People facing literacy, numeracy and/or digital barriers
 - Lone parents
 - People with experience of or living with addiction and/ or a substance use disorder (SUD)
 - Sex workers
 - Ex-offenders and people with unrelated convictions
 - People who have experienced female genital mutilation (FGM)
 - People who have experienced human trafficking or modern slavery

Although the rent review does not create disproportionate impacts for any protected group, some residents may experience wider cumulative or intersectional vulnerabilities that exist independently of this

policy. These vulnerabilities do not arise from the rent review itself but may shape how easily households can navigate financial or administrative processes associated with it.

Individuals who belong to more than one minoritised or disadvantaged group, for example disabled residents, racially minoritised residents, LGBTQ+ people, lone parents, migrants with language barriers, or people with experiences of trauma, may already face systemic inequalities or barriers accessing support. Where such households are not currently in receipt of Housing Benefit, these broader factors may impact how they engage with benefit maximisation, advice services or affordability assessments.

To ensure this does not create indirect disadvantage, the council will continue to offer:

- proactive HB take up checks
- accessible formats and translations
- support for residents with digital, literacy or cognitive barriers
- Case by case hardship assessments
- referrals to welfare, health and community support services

In addition, the council recognises that intersectional disadvantage may mean some households require longer or repeated support windows, not only initial outreach. Residents facing multiple barriers may take more time to respond, provide documentation, or engage consistently with support services. The council will therefore ensure that follow- up contact, benefit checks and hardship support remain available beyond the initial communication period, with flexible timelines and ongoing engagement where needed.

7. Action planning

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

Action 1 – Ensure all non-HB households receive targeted, proactive support

Specific: Provide tailored intervention to the 20% of households not receiving full HB (cash payers, partial HB, HB pending).

Measurable: Make direct contact with 100% of these households; complete a benefit/affordability review with at least 90%.

Achievable: Using existing Housing Income, Welfare Support, and TA resources.

Relevant: Addresses the only households at financial risk.

Timebound: Within 12 weeks of rent review notification.

Activities:

- Write to all affected households explaining the change and available support.
- Send direct text messages inviting residents to a personal advice session.
- Offer 1:1 appointments (phone or in person) to review income, HB eligibility, and affordability.
- Prioritise residents waiting for HB decisions to prevent interim hardship.

- Record outcomes and follow up all unresolved cases.
- Extending support windows for households facing intersectional barriers, recognising that some may require repeated contact or longer engagement periods before completing assessments

Action 2 – Maximise HB and welfare entitlement for households currently paying rent themselves

Specific: Ensure all 7% non-HB cash payers and 4% partial HB households receive a full benefits check.

Measurable: Attempt HB claims for every resident identified as potentially eligible; track claim submissions and outcomes.

Achievable: Delivered by Welfare Support, supported by TA teams.

Relevant: Directly reduces financial exposure from the rent review.

Timebound: Claims initiated within 4 weeks of contact; follow up until resolved.

Activities:

- Assist with HB cost applications.
- Provide specialist support for residents with language, literacy or digital barriers.
- Use data matching and DWP liaison to unblock delayed claims.
- Offer signposting for income maximisation (e.g., disability benefits, childcare support, Council Tax Reduction).

Action 3 – Provide hardship support for households unable to mitigate costs immediately

Specific: Ensure no household in the 20% group experiences financial detriment during the transition.

Measurable: Assess every case requesting assistance; provide temporary support where affordability is demonstrated.

Achievable: Uses existing hardship, DHP, and discretionary assistance mechanisms.

Relevant: Prevents disproportionate impact for vulnerable households.

Timebound: Available from Day 1 of rent review; reviewed after 6 months.

Activities:

- Provide short term hardship support during HB assessment delays.
- Conduct affordability reviews for those unable to increase income (e.g., disability, caring roles).
- Refer residents to external financial and debt advice providers.

Action 4 – Strengthen equalities data to improve monitoring and PSED compliance

• **Specific:** Improve completeness and quality of equalities data for TA and income- related cohorts.

• **Measurable:** Increase disclosure rates across core protected characteristics; reduce “unknown” fields year- on- year.

• **Achievable:** Through updated data collection processes, improved consent- based explanations, and staff training.

• **Relevant:** Ensures ongoing compliance with the Public Sector Equality Duty and allows for more precise monitoring of impacts.

• **Timebound:** New processes implemented within six months, with annual review.

Activities include:

- Updating data collection for TA, Income and Welfare teams
- Embedding equalities prompts within routine contact and review processes

- Strengthening processes for recording intersecting vulnerabilities (e.g. disability + language barrier + caring role)
- Quarterly review of data gaps and targeted follow- up with under- represented groups

Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate’s Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate’s EDI Business Partner.

- Housing Service Plan
- Temporary Accommodation Operations Plan
- Rent Review Project Implementation Plan
- Welfare & Income Maximisation Work Programme
- Directorate FIAP (mandatory)
- Directorate EIA Tracker

The Directorate EDI Business Partner and Business Improvement Manager will support integration and monitoring.

8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark ‘X’ for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	
Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.	X

If your decision is to “Proceed with caution”, please provide a reasoning for this:

The assessment identifies some risks from the proposed review of TA rents to LHA rates, primarily households sharing the protected characteristics of age and social economic disadvantage. The proposal is assessed as proceed with caution.

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

The Equality Impact Assessment concludes that the proposed rent review for council owned temporary accommodation has no unavoidable disproportionate impact when mitigations are applied. . The analysis shows that eligibility for Housing Benefit (HB) is the primary determinant of financial impact rather than any characteristic such as age, disability, sex, race, or family status.

Approximately 80% of households receive full HB and will therefore experience no increase in their net rent. The remaining 20% of households (7% paying full rent, 4% receiving partial HB, and 9% waiting for HB assessment) may experience temporary or partial financial pressure. These impacts are financial rather than equalities based, and do not arise from the policy itself.

To ensure no household is adversely affected, the Council will implement targeted mitigation, including:

- A proactive outreach campaign to all households not receiving full HB, offering individual benefits checks and tailored advice.
- Support for HB applications and income maximisation to reduce exposure for cash paying or partially eligible households.
- Availability of hardship assistance, Discretionary Housing Payments and case by case affordability assessments where required.
- Accessible communication methods, including translated materials and support for residents with digital, literacy or disability related barriers.
- Ongoing quarterly monitoring of arrears, HB outcomes and equalities data to ensure early intervention if emerging issues arise.

With these mitigations in place, the rent review does not create disproportionate or discriminatory impacts.

9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Harry Williams - Director of Housing People Services	13/04/2026
Accountable Manager:	Aaron Burns - Head of Temporary & Supported Accommodation	13/04/2026

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

EDI Officer to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Officer has considered the equalities impact to provide approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service, Business Improvement Manager, [Equalities inbox](#), any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing. Budget and Staffing EIAs secure approval via different templates.

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:	Chris Brown	01-04-26
EDI Manager:		

Notes and recommendations from EDI Business Partner reviewing this assessment:

Notes and recommendations (if any) from EDI Manager reviewing this assessment: