

# Equality Impact Assessment

## Recharge Policy

- **Background**

An Equality Impact Assessment is an improvement tool. It will assist you in ensuring that you have thought about the needs and impacts of your service/policy/function in relation to the protected characteristics. It enables a systematic approach to identifying and recording gaps and actions.

- **Legislation- Equality Duty**

As a local authority that provides services to the public, Melton Borough Council has a legal responsibility to ensure that we can demonstrate having paid due regard to the need to:

- ✓ Eliminate discrimination, harassment, victimisation.
- ✓ Advance Equality of Opportunity
- ✓ Foster good relations

**For the following protected characteristics:**

- ✓ Age
- ✓ Disability
- ✓ Gender reassignment
- ✓ Marriage and civil partnership
- ✓ Pregnancy and maternity
- ✓ Race
- ✓ Religion and belief
- ✓ Sex (Gender)
- ✓ Sexual orientation

**What is prohibited?**

- ✓ Direct Discrimination
- ✓ Indirect Discrimination
- ✓ Harassment
- ✓ Victimisation
- ✓ Discrimination by association
- ✓ Discrimination by perception
- ✓ Pregnancy and maternity discrimination
- ✓ Discrimination arising from disability
- ✓ Failing to make reasonable adjustments

**Please complete steps 1-9**

● **Step 1 – Introductory information**

No.	Item	Details
1.1	Title of the policy	HRA Recharge Policy
1.2	Lead officer and others undertaking this assessment	Chris Flannery
1.3	Date EIA started	5 <sup>th</sup> December 2023
1.4	Date EIA completed	8 <sup>th</sup> December 2023

● **Step 2 – Overview of policy/function being assessed**

No.	Item	Details
2.1	Outline – What is the purpose of this policy?	To set out clearly the obligations of both Melton Borough Council (MBC) and its tenants and leaseholders in respect of appropriately recharging for repairs and other work.
2.2	What specific group(s) is the policy designed to affect / impact and what is the intended change or outcome for them?	This policy will impact on the customers that we provide housing services to and the officers who implement them. It will provide both with better guidance and understanding of how we manage recharges in our homes for our customers and staff. Having a policy will also allow us to be clear with our customers on their expectations and allows us to defend our position if challenged.
2.3	Which groups have been consulted as part of the creation or review of the policy?	Staff who will implement the policy, senior management who are responsible for the service and the portfolio holder.  Wider consultation is not required at present due to the representation within the current group. Any concerns raised will be looked at on an individual basis.

● **Step 3 – What we already know and where there are gaps**

No.	Item	Details
3.1	List any existing information/data you have/monitor about different diverse groups in relation to this policy. Such as in relation to age, disability, gender reassignment, marriage and civil partnership, pregnancy & maternity, race, religion or belief, sex, sexual orientation etc.	<p>The Council acknowledges that it has gaps in terms of data on tenants and leaseholders and their protected characteristics. Increasing the Council's knowledge of its service users is identified as part of the Corporate Plan. However, a significant proportion of tenancies are created on basis of vulnerability (disability, old age for example) as there are barriers to accessing the housing market for this sector of the community.</p> <p>Tenant data has been identified as a gap in the housing service and potential risk, so has been added to the housing risk register.</p> <p>Any information that is provided by the tenant or leaseholder is kept within the Northgate data base and is given purely by the tenants' or leaseholders' permission.</p>
3.2	What does this information / data tell you about diverse groups? If you do not hold or have access to any data or information on diverse groups, what do you need to begin collating / monitoring <i>(please list)</i>	<p>As above we will look to collect this information on our customer to ensure that we hold relevant and up to date information on our customers to be able to shape our services around them.</p> <p>We can also look to increase this data when we carry out our engagement sessions or consultations with customers. This will be reviewed as set out above (3.1).</p>

● **Step 4 – Do we need to seek the views of others? If so, who?**

No.	Item	Details
4.1	Considering the answers given in Step 2, do you need to consult with specific groups to identify needs / issues?  If not explain why.	<p>Currently there is no need to go out to a wider consultation The reason being is that we are currently in a position where we have a lack of operation policies at MBC for our customers and staff to work with, and to be a successful and functioning Tenancy Services Team this needs to be implemented as a matter of urgency.</p> <p>As the data that we hold on our tenants is improved, we will give consideration to updating this policy. At present, it is not felt that any one group may be at detriment from the implementation of this policy.</p> <p>This policy aims to set a standard approach for recharging but does recognise that there may be the need to deviate from this. Where recharges are required and other factors apply, for example disabilities and sensitive situations, there is the flexibility for the management team to vary the standard approach. Consultation will take place with individual residents where this applies.</p>

● **Step 5 – Assessing the impact**

Table 5.1

Protected Characteristic	Positive / Negative Impact and Explanation
Age	This policy will have a limited impact on this characteristic.  The policy is deliberately flexible to take account of certain tenants individual circumstances.
Disability <ul style="list-style-type: none"> <li>• Physical</li> <li>• Visual</li> <li>• Hearing</li> <li>• Learning Disabilities</li> <li>• Mental Health</li> </ul>	The main impact of this policy on this characteristic will be mental health, this will be in terms of the financial impact of recharges. Recharging tenants with particular vulnerabilities may cause distress, which is why discretion and flexibility have been built in.
Gender Reassignment (Transgender)	There is no evidence that this plan will have an impact on any specific gender reassignment / transgender group
Race	There is no evidence that this plan will have an impact on any specific race.
Religion or Belief (Includes no belief)	There is no evidence that this plan will have an impact on any specific religion or belief
Sex (Gender)	There is no evidence that this plan will have an impact on any specific sex (gender)
Sexual Orientation	There is no evidence that this plan will have an impact on any specific sexual orientation
Other protected groups <ul style="list-style-type: none"> <li>• Pregnancy &amp; maternity</li> <li>• Marriage &amp; civil partnership</li> </ul>	There is no evidence that this plan will have an impact on any specific protected groups
Other socially excluded groups <ul style="list-style-type: none"> <li>• Carers</li> <li>• Low literacy</li> <li>• Priority neighbourhoods</li> <li>• Health inequalities</li> <li>• Rural isolation</li> <li>• Asylum seeker and refugee communities</li> <li>• Current and ex-armed HM forces personnel (Veterans)</li> </ul>	There is no evidence that this plan will have an impact on any specific socially excluded groups and will be available via different formats for them be able to access, such as on MBC's website.  It is recognised that this policy will impact on socio economic groups that are faced with financial challenges. The policy has been written to allow discretion in certain circumstances and to provide debt advice.

No.	Item	Details
5.2	Where potential barriers and negative impacts have been identified, and/or barriers or impacts are unknown, please outline how you propose to minimise all negative impact or discrimination.	We will aim to complete the gaps in our data on our tenants. As we collect that data, any negative impacts will be reassessed and the policy updated.
5.3	Summarise your findings and give an overview as to whether the policy will meet the Council's responsibilities in relation to equality and diversity	This policy has been developed to help clarify the council's stance recharging its tenants. The policy has been written in such a way as the standard approach can be varied depending on a tenants individual circumstances.

● **Step 6- Monitoring, evaluation, review**

No.	Item	Details
6.1	Are there processes in place to review the findings of this assessment and make appropriate changes?  How will you monitor potential barriers and any positive/negative impact?	Any findings from the review will be introduced into this plan and we will review how we can make changes to it and to this plan if needed.  When additional data has been collected and we are able to profile our customers, this will be factored in to the review of the policy and impact assessment.
6.2	How will the recommendations of this assessment be built into wider planning and review processes?  For example, policy reviews, annual plans and use of performance management systems	The policy has a built-in review of every 3 years or: <ul style="list-style-type: none"> <li>• Following information/ suggestions that the policy is not effective.</li> <li>• To reflect any service enhancements; and/ or,</li> <li>• Following the introduction of any relevant new legislation, regulations, or guidelines.</li> </ul>

● **Step 7- Action Plan**

Table 7.1

Ref. No.	Action	Responsible Officer	Target Date
1.1	Once approved, ensure future yearly review is booked in	Housing Asset Manager	01.02.2024
1.2	Publish on internal and external internet sites	Housing Asset Manager	01.02.2024

Ref. No.	Action	Responsible Officer	Target Date
1.3	Provide training to team that will implement this plan	Housing Asset Manager	01.03.2024
1.4	To commit to a more inclusive review process with customers in 2023	Housing Asset Manager	01.04.2024
1.5	Collect additional data to allow profiling of customers.	Tenancy Services Manager	01.04.2025

- **Step 8 - Who needs to know about the outcomes of this assessment and how will they be informed?**

Table 8.1

	Who needs to know	How will they be informed <i>(We have a legal duty to publish EIAs)</i>
Employees	Yes	Team meetings, circulation of this plan, specific actions included in their personal development plan
Service Users	Yes	Website, newsletter
Partners & Stakeholders	Yes	Contractors will need to be informed of any changes to standards
Others	N/a	

No.	Item	Details
8.2	To ensure ease of access, what other communication needs / concerns are there?	None

- **Step 9 – Please forward your completed assessment to [checkandchallenge@melton.gov.uk](mailto:checkandchallenge@melton.gov.uk) for scrutiny and approval**
- **Step 10 - Conclusion (to be completed and signed by the Service Head) following internal scrutiny by the Check & Challenge group**

I agree *(Please delete as appropriate)*

If disagree, state action/s required, reasons and details of who is to carry them out

Signed: 

Date: 18/12/2023

Name: Laura Swift

***Once approved, notify the person who completed the EIA to arrange for publishing on the council's website***