



Equality Impact Assessment (EQIA) – “Council Housing Recharge Policy”

Stage	Title	Purpose
1	Preliminary Assessment	Initial assessment of possible impact.
2	Equality Risk Assessment	Scoring to assess the level of risk.
3	Equality Impact Assessment – Addressing Impact	Level of detail depends on risk assessment scoring but any removal or reduction in service must go through Stage 3.
4	Sign Off	Approval and decision-making details.
5	Implementation	Action Plan to implement and minimise impact.

Stage 1 – Preliminary Assessment

Question	Response/Consideration
1.1 Decision being assessed	Council Housing Recharge Policy
1.2 Lead Officer	Chris Stratford, Interim Director of Housing
1.3 What are the aims or function of the service or policy?	<p>A Council Housing Recharge Policy has been designed for Council staff to follow to collect the charges for items that are not the Council's responsibility to provide, or charges that are incurred by the Council because the tenant or leaseholder has breached the terms and conditions of their tenancy or lease agreement.</p> <p>The aims of this Policy are to provide clarity on the Council's approach to recharges. The Council seeks to adopt a consistent, fair and transparent approach to recharging tenants and leaseholder for repairs and maintenance that are not the responsibility of the Council, or costs incurred to address any breaches of the terms and conditions of the tenancy. The aims of this Recharge Policy outlines the Council's approach to:</p> <ul style="list-style-type: none"> a) ensure that recharges are dealt with transparently and efficiently b) recover the cost of recharging from current, former tenants and leaseholders c) ensure that associated costs are pursued from those tenants and leaseholders who cause damage to their property or any common parts through misuse, neglect, vandalism or accidental damage d) maximise income by the recovery of debts in relation to rechargeable items.
1.4 Which policies relate to the delivery of this service?	<p>Castle Point Borough Council Data Retention Policy, Castle Point Borough Council Privacy Notice, Council Housing Anti-Social Behaviour Policy, Council Housing Contract Management Policy, Council Housing Damp Mould and Condensation Policy, Council Housing Domestic Abuse Policy, Council Housing Electrical Safety Policy, Council Housing Fire Safety Policy, Council Housing Gaining Access Policy, Council Housing Gas Safety Policy, Council Housing Hate Crime Policy, Council Housing Income Recovery Policy, Council Housing Lettings Policy, Council Housing Lift Safety Policy, Council Housing Mutual Exchange Procedure, Council Housing Neighbourhood Management Policy, Council Housing Recharge Procedure, Council Housing Repairs and Maintenance Policy, Council Housing Service Charge Policy (under development), Council Housing Section 20 Consultation Process (under development),</p>

Question	Response/Consideration
	Council Housing Tenancy Management Policy, Council Housing Tenancy Sustainment Procedure, Council Housing Voids Policy, Council Housing Write On and Write Off Process.
1.5 Who are the main audience, users or customers who will be affected?	All Council tenants, leaseholders, and Council employees.
1.6 Will removing, reducing or changing this service/policy lead to members of the community being treated less favourably and so contribute to inequality?	No, the Policy has been written in such a way as to address any inequality. Unfortunately, there is insufficient data available at Castle Point to fully look at the inequalities. From previous experience data available to the Policy Officer, the Council can make the assumption that people with cognitive decline, people with school age children, people whose children are known to Social Services, and people with poor mental health are more likely to incur recharges. A recommendation in the action plan is that this data is collected in 2025-2027 and this EQIA is reviewed. However, within the procedure the Council has built in a review process before any recharges are raised to make sure any vulnerabilities are being addressed and supported.

Equality Aims – consider how the decision meets the three Equality Aims listed in the Equality Act.

Aim	How does the proposal / policy / service meet the equality aim?
To eliminate unlawful discrimination, harassment and victimisation	The Policy aims to eliminate discrimination, and the Council will do this by making sure the Council takes into account the needs of people that live in the homes it owns to make sure all tenants and leaseholders are treated fairly and equally.
To advance equality of opportunity between people who share a protected characteristic and those who do not	The Policy aims to provide equality of opportunity by making reasonable adjustments and referring for support to outside agencies where this would prove helpful.

To foster good relations between those who share a protected characteristic and those who do not	The Policy has not been written to foster good relations; it's a Policy written for the recovery of recharges and increase the income for the Housing Service.
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Stage 2 – Equality Risk Assessment - Protected Characteristic Groups

Place an 'X' in against either 'positive impact', 'negative impact', 'no impact' for each protected characteristic group

2.1 Assess the Equality Risk

	Age	Disability	Gender	Race	Sexual Orientation	Religion	Gender Reassignment	Marriage/Civil Partnerships	Pregnancy/ Maternity
Positive impact									
Negative impact	X	X							X
No impact			X	X	X	X	X	X	

2.2 Conclusion – if there is 'No Impact' for all of the protected characteristics then stages 3 – 5 do not have to be completed

To conclude, the Council Housing Recharges Policy should not affect any particular protected group more than the general population. Mitigations have been put into place to help address the inequalities identified, and the recommendations in section 5 of this document are that these are reviewed as part of the policy review process to make sure they are fully addressing the inequalities.

Stage 3 – Equality Impact Assessment – Addressing Impact

Question	Response/Consideration
3.1 What is the reason for the proposed decision/change?	All tenants with a potential recharge will be referred for a Tenancy Audit to establish whether there are any issues behind the front door, if any specific needs are identified these will be addressed by the Neighbourhood Management Officer by referring to partnership agencies and charitable organisations.
3.2 What consultation activity has been undertaken or is planned?	The Housing Service plans to consult with its engaged residents once the Engagement Strategy has been developed further by TPAS. This will be fed into the policy review process.
3.3 Service Users – What methods are used to monitor the characteristics of service-users with protected characteristics?	Customer profiling information should be captured for all tenants, and once this is collected and held within the new Housing Management System MRI1 it will be possible for the Council to interrogate the system to see what protected characteristics of tenants are affected by recharges. Only once this data is collected will it be possible to complete a comprehensive EQIA.
3.4 Referring to Stage 2, which ‘protected characteristic’ group(s) are most likely to be affected by this change? Describe any negative impacts identified in more detail.	<p>Age - People with school age children, and elderly people are more likely to be affected by recharges.</p> <p>Disability – With some disabilities, particularly those with physical impairments are likely to struggle more with maintaining their home and garden, as per the terms and conditions of their tenancy. People with cognitive decline are likely to need more help in sustaining their tenancy and again may be at greater risk of recharges caused by missed appointments and being unable to function with everyday activities.</p>
Outline ways in which negative or positive impacts will be addressed?	The Council will review all recharges before they are applied to check for any protected characteristics to make sure reasonable adjustments have been made.

3.5 If the decision involves a service/policy being reduced/removed will this lead to missed opportunities to promote equality of opportunity?	N/a
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3.6 What outcome does this assessment suggest we take? Select one option and action to be taken

Option	Outcome	Tick Selected Option	Explanation
1	Continue with proposed changes No discrimination or adverse impact identified	<input type="checkbox"/>	
2	Continue with proposed changes Suitable adjustments to lessen the impact identified	<input checked="" type="checkbox"/>	This new policy helps the Council effectively manage tenancies and leases, and mitigates the risk of voids and response repairs budget being overspent.
3	Continue despite adverse impact or missed opportunities to promote equality	<input type="checkbox"/>	
4	Stop and rethink Actual or potential discrimination identified	<input type="checkbox"/>	

What plans are in place to monitor the actual impact of the proposal?	The Policy must be reviewed after one year and once the Council has accurate data including customer profiling information that can be triangulated.
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Stage 4 – Sign-off

	Details
Director/Assistant Director approved by:	Chris Stratford, Interim Director of Housing
Date:	
Member Approval (Date and Title of Committee):	Portfolio Holder for Health, Wellbeing and Housing
Committee Decision:	n/a

Stage 5 – Implementation

5.1 Referring to **Stages 1 (preliminary assessment)**, **Stage 2 (equality risk assessment)** and **Stage 3 (equality impact assessment)** please list what tasks/actions you will take to minimise the impact of this change.

Task	Outcome	Lead	Resources	Deadline
Customer profiling details to be captured on the new housing system	This will allow the analysis to take place to see what the protected characteristics are of those residents with recharges.	Michael Lerpiniere	Customer profiling form, Neighbourhood Housing Officers (NHOs) to collect the data.	September 2026
EQIA to be reviewed when customer profiling information can be	Updated EQIA based on facts not assumptions.	Interim Housing Policy Officer	Arrears data	January 2027

Task	Outcome	Lead	Resources	Deadline
interrogated to support the EQIA.				
A customer friendly version of the Policy to be placed on the website	A summary document Policy on a Page to be placed on the Castle Point website.	Rebecca Outram and Hannah McInally	Web Editor	March 2026