Appendix 2

Equality Impact Assessment (EQIA) – Council Housing Tenancy Fraud 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 Tenancy Fraud Policy
1.2 Lead Officer	Chris Stratford, Interim Director of Housing
1.3 What are the aims or function of the service or policy?	Affordable housing is a limited resource and housing fraud is a recognised threat to the provision of housing to those in genuine need, including older people and the vulnerable. Therefore, housing fraud must be a concern to all Council staff and elected Members. The purpose of this Policy is to set out specific responsibilities in respect of the prevention of housing fraud. The impact of housing fraud can extend well beyond the direct financial loss to the Council as it can also negatively affect the communities in which it is found (such as anti-social behaviour), staff morale, the Council's reputation, and the Council's ability to maintain existing homes and to build new ones. The aims of the policy are to: a) provide details of the potential impact of tenancy fraud. b) outline how the Council will prevent and detect tenancy fraud. c) explain how tenancy fraud can be reported and how the Council will respond to reports. d) outline what action the Council will take against those who commit tenancy fraud. e) raise awareness amongst staff and members of the public about tenancy fraud, what it means and how to report it. f) improve the monitoring and effectiveness of reporting and improve the quality of data.

Question	Response/Consideration
1.4 Which policies relate to the delivery of this service?	Castle Point Borough Council Data Protection Policy Castle Point Borough Council Housing Allocations Policy Council Housing Anti-Social Behaviour Policy Council Housing Electric Safety Policy Council Housing Fire Safety Policy Council Housing Gaining Access Policy Council Housing Gas Safety Policy Council Housing Income Recovery Policy Council Housing Lift Safety Policy Council Housing Maintenance and Repairs Policy Council Housing Mutual Exchange Procedure Council Housing Neighbourhood Management Policy Council Housing Neighbourhood Management Procedure Council Housing Tenancy Audit Procedure Council Housing Tenancy Fraud Procedure Council Housing Tenancy Management Policy Repairs Handbook

1.5 Who are the main audience, users or customers who will be affected?	All Council tenants and leaseholders
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.

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 by having a Policy that takes into account the protected characteristics and ensures that measures to prevent and detect fraud – such as unannounced home visits and data matching - do not unfairly discriminate disadvantaged groups with protected characteristics.
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 to social housing. Recovering homes from fraudsters increases the availability of housing for those in genuine need.
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. The Policy has been written to prevent and tackle tenancy fraud.

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	X		X		
No impact			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, tenancy fraud is more likely to affect older or younger residents, those who are disabled and other residents with a vulnerability or those who have caring responsibilities (whilst not a protected characteristic) who may be more susceptible to being victims of "key selling" or unauthorised occupancy scams. Those tenants from the LGBTQ+ community may be more prone to investigations due to bias.

Stage 3 – Equality Impact Assessment – Addressing Impact

Question	Response/Consideration
3.1 What is the reason for the proposed decision/change?	n/a
3.2 What consultation activity has been undertaken or is planned?	The Council consulted with Southend-on-Sea City Council Counter Fraud and Investigation Team, the Neighbourhood Management Team, the Housing Options Team and the Maintenance Team at Castle Point Borough Council. It looked at working practices in the Housing Options Team and reviewed resident feedback and complaints regarding allocation and subletting. The Council intends to do some analysis after the Policy has been live for 12 months to see whether the service is affecting any of the protected groups detrimentally.
3.3 Service Users – What methods are used to monitor the characteristics of service-users with protected characteristics?	The Council has procured a new IT system. When a new potential fraud case is entered, the Council will collect and monitor the characteristics of its tenants and leaseholders for the alleged fraudster.
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.	Age – Protecting older or younger residents who may be more susceptible to being victims of "key selling" or unauthorised occupancy scams. Disability – Disabled individuals may be more vulnerable to being targeted by criminals, or may due to medical appointments find without notice spot checks challenging. Race – People who do not speak English as their first language, or people who have cultural practices, that take them away from their home for prolonged periods of time, may find the tenancy fraud checks more challenging. Sexual orientation – LGBTQ+ individuals might face specific challenges related to bias, including potential referrals being made to cause harassment. Carers – People with caring responsibilities may find complying with the tenancy fraud initiatives more challenging, particularly if their caring responsibilities sometimes mean they sleep away from their home. In addition, the Council will include consideration of carer responsibilities in verification and allocation.

Question	Response/Consideration
Outline ways in which negative or positive impacts will be addressed?	Ensuring that home visits and interviews are accessible; and appropriate time is allowed for people attending the front door, or making reasonable adjustments like providing documents in large print or using plain language. Protecting older or younger residents who may be more susceptible to being victims of "key selling" or unauthorised occupancy scams. The Council will take care to proactively identify any vulnerabilities of tenants to ensure they receive support during investigations. The Council will consider the impact on carer responsibilities when verifying household composition to avoid wrongly penalising legitimate live-in care arrangements.
3.5 If the decision involves a service/policy being reduced/removed will this lead to missed opportunities to promote equality of opportunity?	The Policy documents how the Council will provide a Tenancy Fraud Service that makes a positive contribution to equality by making sure social housing that is in short supply, is allocated to, and is occupied by those who are most in need, and who have a legal right to occupy the Council homes.

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**	☐	
2	**Continue with proposed changes** **Suitable adjustments to lessen the impact identified**	☒	Reasonable adjustments are contained within the procedure document that demonstrate that the Council will treat all tenants fairly.
3	**Continue despite adverse impact or missed opportunities to promote equality**	☐	
4	**Stop and rethink** **Actual or potential discrimination identified**	☐	

What plans are in place to monitor the actual impact of the proposal?	The Council intends to review the Policy and impact upon any of the protected characteristic groups identified in this EQIA after 12 months of the Council Housing Tenancy Fraud Policy going live.

Stage 4 – Sign-off

	Details
Director/Assistant Director approved by:	Director - Place and Community 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
Publish how people can report any suspected Tenancy Fraud	More suspected cases reported	Rebecca Outram	Web page and Content	July 2026
Summary of policy on a page	Clear user friendly Policy	Rebecca Outram	Web page and document	July 2026
E & D training	Raise awareness of protected characteristics and unconscious bias, bias and how this may affect certain groups	Michael Lerpiniere	Training	July 2026
Tenancy Fraud Awareness Training	Delivered for all customer facing Housing Service staff including operatives	Shaun Dutton (SECC)	Training material, room	September 2026
Briefing session on policy once gone live	All staff familiar with the policy and the duty placed upon them	Rebecca Outram	Approved Policy	July 2026