



Equality Impact Assessment

Question	Response
1. Name of policy/funding activity/event being assessed	Tenancy Management Policy
2. Summary of aims and objectives of the policy/funding activity/event	The purpose of this policy is to outline the circumstances in which changes to a tenancy may happen and any possession action which could be taken, why this could happen and the tenancy support which will be offered.
3. Who is affected by the policy/funding activity/event?	Council tenants Tenancy Services, Housing Options and Revenue teams
4. Has there been any consultation with, or input from, customers/service users or other stakeholders? If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please complete the consultation table below.	Yes. In person workshops were held with tenants (one in Grantham and one in Stamford). Overall they thought the policies were explained well and made some recommendations of minor changes, which have been incorporated.
5. What are the arrangements for monitoring and reviewing the actual impact of the policy/funding activity/event?	The policy will be reviewed in a year from approval.

Protected Characteristic	Is there a potential for positive or negative impact?	Please explain and give examples of any evidence/data used	Action to address negative impact e.g. adjustment to the policy <i>(The Action Log below should be completed to provide further detail)</i>
Age	Positive	This policy governs the effective management of tenancies, which is to safeguard all tenants and especially more vulnerable residents, which includes older people. Older people are more likely to have health conditions impairing eye sight and hearing, which can have implications on being able to read any letters or notices or hearing telephone calls in relation to tenancy management; possession action and eviction. The implications of the policy will not differentiate people of any other age.	This is mitigated by a housing officer meeting the tenant in person either via a home visit or office interview. Information and documentation is also available in different formats, eg. large print and braille.
Disability	Positive	This policy governs the effective management of	This is mitigated by a housing officer meeting the tenant in



		tenancies, which is to safeguard all tenants and especially more vulnerable residents, which includes people with disabilities. Due to someone's disabilities, whether this is a physical, mental or learning disability, this could affect their ability to receive and understand communication from the Council in relation to tenancy management, possession action and eviction.	person either via a home visit or office interview. Information and documentation is also available in different formats, eg. large print and braille.
Gender Reassignment	N/A	This protected characteristic is not affected by this policy and the implementation of it.	
Marriage and Civil Partnership	N/A	This protected characteristic is not affected by this policy and the implementation of it.	
Pregnancy and Maternity	N/A	This protected characteristic is not affected by this policy and the implementation of it.	
Race	Positive	Some tenants of a different nationality do not speak, read or write English as their first language and may face difficulties in reporting tenancy issues.	To mitigate this, reports can be made by relatives/advocates for tenants and officers will use translation and interpretation services, where needed. Officers will see a tenant in person where there is extensive tenancy management issues, eg. anti-social behaviour or large rent arrears to explain possession preventative measures and explain possession action (with the use of an interpreter where required) before possession action is sought.
Religion or Belief	N/A	This protected characteristic is not affected by this policy and the implementation of it.	
Sex	N/A	This protected characteristic is not affected by this policy and the implementation of it.	
Sexual Orientation	N/A	This protected characteristic is not affected by this policy	



		and the implementation of it.	
Other Factors requiring consideration			
Socio-Economic Impacts	Negative	Tenants on a low income are more likely to face re-possession action due to rent arrears.	To mitigate this negative impact, the policy sets out the tenancy support available prior to any possession action commencing. This is explained to tenants in writing and in person.
Carers (those who provide unpaid care to a family member, friend or partner)	N/A		

Consultation

Negative impacts identified will require the responsible officer to consult with the affected group/s to determine all practicable and proportionate mitigations. Add more rows as required.		
Group/Organisation	Date	Response
Sample of SKDC tenants	March 2023	Minor amendments to the policy recommended.

Proposed Mitigation: Action Log

To be completed when barriers, negative impact or discrimination are found as part of this process – to show actions taken to remove or mitigate. Any mitigations identified throughout the EIA process should be meaningful and timely. Add more rows as required.				
Negative Impact	Action	Timeline	Outcome	Status
Tenants on a low income are more likely to face re-possession action due to rent arrears.	To mitigate this negative impact, the policy sets out the tenancy support available prior to any possession action commencing. This is explained to tenants in writing and in person.	Currently happens	Already part of operational procedures	Completed

Evaluation Decision

Once consultation and practicable and proportionate mitigation has been put in place, the responsible officer should evaluate whether any negative impact remains and, if so, provide justification for any decision to proceed.	
Question	Explanation / justification



Is it possible the proposed policy or activity or change in policy or activity could discriminate or unfairly disadvantage people?	N/A	
Final Decision	Tick	Include any explanation/justification required
1. No barriers identified, therefore activity will proceed	✓	Any possible negative impacts are already being mitigated.
2. Stop the policy or practice because the data shows bias towards one or more groups		
3. Adapt or change the policy in a way that will eliminate the bias		
4. Barriers and impact identified , however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the policy or practice (e.g. 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		

Did you consult with an Equality Ally prior to carrying out this assessment? Yes

Sign off

Name and job title of person completing this EIA	Celia Bown, Senior Housing Policy and Strategy Officer
Officer Responsible for implementing the policy/function etc	Andre Ford-Hamilton, Tenancy Services Manager
Date Completed	24/08/2022 originally and revised 10/08/2023
Line Manager	Jodie Archer, Head of Housing Services
Date Agreed (by line manager)	
Date of Review (if required)	

Completed EIAs should be included as an appendix to the relevant report going to a Cabinet, Committee or Council meeting and a copy sent to equalities@southkesteven.gov.uk.

Completed EIAs will be published along with the relevant report through Modern.Gov before any decision is made and also on the Council's website.