



Equality Impact Assessment

Temporary Accommodation Rent Arrears Policy and Procedure (draft)



Simple Guide and tips

An Equality Impact Assessment (EIA) will help you analyse your policies and practices to make sure they do not discriminate or disadvantage people. However, EIAs also will help to improve or promote equality, access, participation in public life and good relations.

Your EIA should be started during the early stages of your project. Early consideration of equality matters will ensure that your policy, service or function will evolve in line with consideration of equality matters. However, not everything we do will have equality implications, only policies and practices that are relevant to equality need to be put in focus. If you decide after an initial assessment that a policy or practice is not relevant to equality then you should make a note of this. When completing a full EIA make certain the assessment is proportionate to the matters at hand. An EIA is not an end in itself – it is simply a way of ensuring and showing that due regard has been paid to our equality duty.

Where final decisions are made by councillors, in order to show that due regard has been given to the three aims of the equality duty at the time the decision is made, your assessment will need to be included within the report for Committee. The significance of your policy or practice to equality matters may help you make this decision.

All equality impact assessments are based around four core questions. There may well be others that contribute to the assessment, but the core ones remain throughout.

1. **What is the purpose of the policy?**
2. **How is it seeking to achieve this?**
3. **Who benefits and how? (and who, therefore, doesn't and why?)**
4. **What are any 'associated aims' attached to the policy?**



Stage 1 EIA tracking	
Title of EIA	Temporary Accommodation Rent Arrears Policy and Procedure
Lead Officer	Annette Snell
Division	Housing & Community
Diversity, Equity & Inclusion Group - Review Date	
Publication Date <i>(if applicable)</i>	19 November 2025
EIA Review Date <i>(if applicable)</i>	When the policy and procedure is next updated or amended.



Stage 2 Details of service, policy or function to be assessed and the potential impact on people with a protected characteristic.

Provide an overview of the policy, service or other function being introduced or reviewed.

Please include the aim or purpose of the policy, service or function etc., any context, changes proposed and the desired outcome. You will need to start to think about the equality implications and whether there is potential for impact on residents, service users and staff (as applicable) with one or more of the protected characteristics.

The purpose of the Rent Arrears Policy and Procedure is to set out how Epsom & Ewell Borough Council manages rental income, rent arrears, and possession proceedings for non-secure tenants and licensees living in interim and temporary accommodation provided or managed by the Council.

The policy should be read in conjunction with the [Pre-Action Protocol for Possession Claims for Social Landlords](#).

The policy and procedure focuses first on sustaining tenancies and licences through arrears prevention, early intervention, advice, support, and the maximisation of income to prevent, minimise or manage debt.

Where a tenant or licensee has accrued rent arrears, every effort will be made to ensure that the payments are brought up to date, or affordable repayment plans agreed, so that they can remain in the property.

This policy will set out when appropriate legal action will be taken to minimise arrears increasing and to seek possession of the property. Eviction will only be pursued as a last resort where all other methods of resolution have been unsuccessful and after all requirements of the Pre-Action Protocol have been met.



Stage 3 Relevant information, data, consultation and engagement activities

List all data (including source) and other information relevant to the full equality impact assessment

The Temporary Accommodation Rent Arrears Policy and Procedure applies to non-secure tenants and licensees living in interim and temporary accommodation provided or managed by the Council. As at 30/09/2025 there were approximately 154 homeless households in such temporary accommodation, made up of the following:

Nightly Paid Accommodation (NPA)	117
EEBC owned TA	10
Defoe Court	14
Private Sector Leased (PSL)	13

NB: A further 125 homeless households live temporary accommodation provided by housing associations. This policy and procedure does not apply to these households.

The rental income collected for the financial year 2024/25 was £1,184,730.78.

88.5% of households in temporary accommodation provided or managed by the Council, are in receipt of full or partial Housing Benefit, and 11.5% are responsible for paying the full rent themselves.

Data Analysis

A data comparison has been undertaken to compare the protected characteristic of households in temporary accommodation provided or managed by the Council with the Borough Profile data for Epsom & Ewell.

Age

The age profile of households in temporary accommodation provided or managed by the Council is outlined below:-

16 - 24: = 11.6%
 25 - 34: = 25.4%
 35 - 49: = 40.6%
 50 - 64: = 18.8%
 65+: = 3.6%

NB: This information relates to the lead applicant's age only.



The Borough Profile age range is recorded differently with 61.8% aged between 16-64, 15.4% aged 65-84, and 2.6% aged 85 or over.

Household composition in relation to marriage and civil partnership, sex, and pregnancy and maternity

Of the households in temporary accommodation provided or managed by the Council:-

- 19.6% are single person households with no dependent children. Of these 66% are male and 44% are female.
- 71% households have dependent children.
- 49.3% are single parents and 21.7% are couples with dependent children.
- Of the single parent households, 13.3% are male and 86.77% are female.
- 9.42% are couples or households with more than one adult household member, but no dependent children.
- 2.9% of households are pregnant.

Borough Profile data

- 34.1% households include dependent children. Of these 15.4% have only one parent in the household.
- 24.3% of households live alone

Disability

Data on the prevalence of disabilities among households in temporary accommodation are recorded but not able to be extracted from Housing ICT system for these purposes. However given that health and disability are factors conferring priority status under the homelessness legislation, we are more likely to have households in temporary accommodation with this protected characteristic.

Borough Profile data on disability

12.8% have a disability under Equality Act.

Gender Reassignment

Data on the gender identity distribution of households in temporary accommodation are recorded but not able to be extracted from the Housing ICT system for these purposes.

Borough Profile data gender reassignment

- 99.62% gender identity is the same as sex identified at birth.
- 0.10% trans women, 0.09% trans men, 0.06% all other gender identities



Sexual Orientation

Data on the sexual orientation of households in temporary accommodation are not recorded the Housing ICT system.

Borough Profile data on sexual orientation

90.9% Straight / Heterosexual (90.7% Surrey). 1.1% Gay or Lesbian (1.2% Surrey). 0.9% Bisexual (1.1% Surrey). 0.2% Other sexual orientation (0.3% Surrey). As a % of aged 16 and over.

Race

In the Equality Act 2010, race can mean ethnic or national origins, which may or may not be the same as a person's current nationality.

The race, ethnic or national origins profile of households in temporary accommodation provided or managed by the Council is outlined in the table below.

	EEBC TA households	Borough Profile for Epsom & Ewell	Surrey
Arab	No information recorded	0.9%	0.4%
Asian	13.1%	11.4%	7.7%
Black	7.9%	1.9%	1.7%
Mixed	7.9%	4.4%	3.4%
White British	57.2%	69.4%	76.6%
White non-British	8.8%	9.9%	8.8%
Other ethnic groups	5.7%	1.9%	1.2%

Borough Profile data

6.9% of residents do not have English as the main language.

Religion or Belief

Data on the religion or beliefs of households in temporary accommodation are not recorded on the Housing ICT system for these purposes.

Borough Profile data religion or belief



	0.7% Buddhist (0.6% Surrey). 48.1% Christian (50.1% Surrey). 3.6% Hindu (2.0% Surrey). 0.3% Jewish (0.3% Surrey). 4.9% Muslim (3.2% Surrey). 0.3% Sikh (0.6% Surrey). 0.4% Other religion (0.5% Surrey). 35.7% No religious belief (36.6% Surrey).
Specify all engagement activities undertaken	Given the small number of households (154) affected by this policy and procedure no engagement activities have been undertaken.

Stage 4 Impact on residents, service users and staff with protected characteristics

Undertake a full analysis which details all positive and negative impact arising from the policy, service or other function. If there will be no impact, make this clear by completing the relevant box. Please ensure that you evidence your conclusions with reference to the appropriate source.

Protected Characteristic	Potential Positive Impact	Potential Negative Impact	No Impact
Age	<p>People of all ages may fall into rent arrears, however young people under 35 are more likely to get into rent arrears, particularly if they are inexperienced in managing a tenancy/license.</p> <p>The proposed policy and procedure are expected to have a positive impact on tenants and licensees, particularly those who may be vulnerable or have protected characteristics.</p> <p>Its core aim is to support the sustainability of tenancies and licences through proactive arrears prevention, early intervention, advice, support, and the maximisation of income. These measures are designed to prevent, reduce, or manage debt effectively and equitably to ensure the tenant and license does not get evicted.</p> <p>If a tenant or licensee has a protected characteristic that may impact their ability to manage rent payments, Housing Services will take these specific needs into account when addressing arrears. This includes considering whether a tailored approach is required for arrears enforcement action and providing appropriate advice and support as needed.</p>		

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	Where a support need is identified this will be recorded on the Housing ICT management system so that reasonable adjustments can be made to communications and the support required.		
<i>Disability</i>	<p>Nationally people with a disability are more likely to be in debt.</p> <p>We recognise that people with disabilities are more likely to face unemployment due to accessibility barriers or limitations imposed by their disability. This can cause financial hardship and difficulty managing debt. Living with a disability often also comes with extra expenses, such as adaptive equipment, medical care, or personal assistance. These costs can further strain finances and make debt repayment more challenging.</p> <p>The policy will have a positive impact on vulnerable or disabled tenants and licensees because it outlines how the Council will provide a wide range of advice and support.</p> <p>Its core aim is to support the sustainability of tenancies and licences through proactive arrears prevention, early intervention, advice, support, and the maximisation of income. These measures are designed to prevent, reduce, or manage debt effectively and equitably to ensure the tenant and license does not get evicted</p> <p>If a tenant or licensee has a protected characteristic that may impact their ability to manage rent payments, Housing Services will take these specific needs into account when addressing arrears. This includes considering whether a tailored approach is required for arrears enforcement action and providing appropriate advice and support as needed.</p> <p>Where a support need is identified this will be recorded on the Housing ICT management system so that reasonable adjustments can be made to communications and the support required.</p> <p>Where a tenant or licensee is known to have a disability, literacy challenge, or language support need, Housing Services will take reasonable steps to ensure communications are accessible and comprehensible. In such</p>		

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	<p>cases, alongside sending rent arrears letters or notices, staff will also make telephone contact with the tenant or licensee to explain their content and, where necessary, use translation and interpreting services or provide the information in alternative formats.</p> <p>As required under the Pre-Action Protocol, where a tenant or licensee is particularly vulnerable, the Council will consider at an early stage whether or not the tenant or licensee has the mental capacity to defend possession proceedings and the extent to which CPR 21 applies; whether or not any issues arise under the Equality Act 2010; and whether or not there is a need for a community care assessment in accordance with the Care Act 2014.</p>		
<i>Gender Reassignment</i>			We do not think this protected characteristic is disproportionately impacted by the Temporary Accommodation Rent Arrears Policy and Procedure.
<i>Pregnancy and Maternity</i>	<p>Pregnancy and dependent children are factors conferring priority status under the homelessness legislation, and therefore we are more likely to have households in temporary accommodation with this protected characteristic.</p> <p>The proposed policy and procedure are expected to have a positive impact on tenants and licensees, particularly those who may be vulnerable or have protected characteristics.</p> <p>Its core aim is to support the sustainability of tenancies and licences through proactive arrears prevention, early intervention, advice, support, and the maximisation of income. These measures are designed to prevent, reduce, or manage debt effectively and equitably to ensure the tenant and license does not get evicted.</p> <p>If a tenant or licensee has a protected characteristic that may impact their ability to manage rent payments, Housing Services will take these specific needs into account when addressing arrears. This includes considering whether a tailored approach is required for arrears enforcement action and providing appropriate advice and support as needed.</p> <p>Where a support need is identified this will be recorded on the Housing ICT management system so that reasonable</p>		

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	adjustments can be made to communications and the support required.		
<i>Race</i>	<p>The policy and procedure will positively impact those who have English as an additional language who may have difficulty understanding information about their rent or arrears, because it outlines how the Council will provide a wide range of advice and support.</p> <p>Its core aim is to support the sustainability of tenancies and licences through proactive arrears prevention, early intervention, advice, support, and the maximisation of income. These measures are designed to prevent, reduce, or manage debt effectively and equitably to ensure the tenant and license does not get evicted</p> <p>If a tenant or licensee has a protected characteristic that may impact their ability to manage rent payments, Housing Services will take these specific needs into account when addressing arrears. This includes considering whether a tailored approach is required for arrears enforcement action and providing appropriate advice and support as needed.</p> <p>If a support need is identified this will be recorded on the Housing ICT management system so that reasonable adjustments can be made to communications and the support required.</p> <p>Where a tenant or licensee is known to have a disability, literacy challenge, or language support need, Housing Services will take reasonable steps to ensure communications are accessible and comprehensible. In such cases, alongside sending rent arrears letters or notices, staff will also make telephone contact with the tenant or licensee to explain their content and, where necessary, use translation and interpreting services or provide the information in alternative formats.</p>		
<i>Religion and Belief</i>			We do not think this protected characteristic is disproportionately impacted by the Temporary Accommodation Rent Arrears Policy and Procedure.
<i>Sex</i>	People of all sexes may fall into rent arrears, however lone parent households are at a higher risk of homelessness, and these are more likely to be headed by women, and therefore		

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	<p>we are more likely to have households in temporary accommodation with this protected characteristic.</p> <p>The proposed policy and procedure are expected to have a positive impact on tenants and licensees, particularly those who may be vulnerable or have protected characteristics.</p> <p>Its core aim is to support the sustainability of tenancies and licences through proactive arrears prevention, early intervention, advice, support, and the maximisation of income. These measures are designed to prevent, reduce, or manage debt effectively and equitably to ensure the tenant and license does not get evicted.</p> <p>If a tenant or licensee has a protected characteristic that may impact their ability to manage rent payments, Housing Services will take these specific needs into account when addressing arrears. This includes considering whether a tailored approach is required for arrears enforcement action and providing appropriate advice and support as needed.</p> <p>Where a support need is identified this will be recorded on the Housing ICT management system so that reasonable adjustments can be made to communications and the support required.</p>		
<i>Sexual Orientation</i>			We do not think this protected characteristic is disproportionately impacted by the Temporary Accommodation Rent Arrears Policy and Procedure.
<i>Marriage and Civil Partnerships</i>			We do not think this protected characteristic is disproportionately impacted by the Temporary Accommodation Rent Arrears Policy and Procedure. However all letters, rent statements or notices will be sent separately to each named tenant or licensee to ensure both partners are aware.
Stage 5 Decision			
Specify the full details of your decision.	The proposed policy and procedure are expected to have a positive impact on tenants and licensees, particularly those who may be vulnerable or have protected characteristics.		



Include any changes made to the proposal, steps taken to eliminate or minimise any negative impact(s), any additional mechanisms put in place to meet the needs of particular groups or to help foster good relations etc.

Its core aim is to support the sustainability of tenancies and licences through proactive arrears prevention, early intervention, advice, support, and the maximisation of income. These measures are designed to prevent, reduce, or manage debt effectively and equitably to ensure the tenant and license does not get evicted.

If a tenant or licensee has a protected characteristic that may impact their ability to manage rent payments, Housing Services will take these specific needs into account when addressing arrears. This includes considering whether a tailored approach is required for arrears enforcement and providing appropriate advice and support as needed.

Where a tenant or licensee is known to have a disability, literacy challenge, or language support need, Housing Services will take reasonable steps to ensure communications are accessible and comprehensible. In such cases, alongside sending rent arrears letters or notices, staff will also make telephone contact with the tenant or licensee to explain their content and, where necessary, use translation and interpreting services or provide the information in alternative formats.

All letters, rent statements or notices will be sent separately to each named tenant or licensee.

If a support need is identified, either known in advance or discovered during contact, this will be recorded on the Housing ICT management system to guide future communications. This means reasonable adjustments can be offered when communicating/engaging with tenants and licensees about rent arrears, and ensure the right support is in place for those that require it.

As required under the Pre-Action Protocol, where a tenant or licensee is particularly vulnerable, the Council will consider at an early stage whether or not the tenant or licensee has the mental capacity to defend possession proceedings and the extent to which CPR 21 applies; whether or not any issues arise under the Equality Act 2010; and whether or not there is a need for a community care assessment in accordance with the Care Act 2014.

Any potential negative impact will be mitigated by these actions.

Stage 6 EIA – Action Plan

Please specify any action that will be taken to support implementation of your decision

Issue Identified	Action required	Implementation Date	Responsible Officer
None	None required	N/A	N/A



Stage 7 EIA Sign Off

EIA needs to be signed off by Head of Service.

If an EIA is going to be submitted with a proposal to a committee/corporate project board for decision making, the EIA needs to be approved by Head of Service and Strategic Management Team first.

Head of Service: Rod Brown	Date:
Strategic Management Team: (where applicable)	Date:
Name of Committee: Community & Wellbeing (where applicable)	Date: 19 November 2025