

# EIA001234 Commercial Rent Reviews & Service Charge Refresh

## About your EIA

Reference Number:	EIA001234
Subject of EIA:	Commercial Rent Reviews & Service Charge Refresh
Description:	Income generation from commercial portfolio rent reviews and revised service charges.
In support of:	["Amended function","Amended policy","Amended/refreshed strategy "]
Reviewing Frequency:	Every two years
First review date:	01/12/2027

## Directorate, Division & Service Area

Directorates:	["Place, Prosperity and Sustainability"]
Division:	Investment & Valuation
Service Area:	Investment & Valuation

## Budget Savings

Related to budget savings?:	415
Budget proposal reference number:	415

## Officers

Responsible Officer Email:	Louise.O'Neill@birmingham.gov.uk
Accountable Officer Email:	David.M.Harris@birmingham.gov.uk

## Data Sources

Data sources:	["Internal property & finance data "]
Data sources Details:	Internal property & finance data

## Initial Assessment

Impact Age:	Maybe
Impact Disability:	Maybe
Impact Sex:	Maybe
Impact Gender Reassignment:	No
Impact Marriage and Civil Partnerships:	No
Impact Pregnancy and Maternity:	No
Impact Race:	Maybe
Impact Religion or Beliefs:	Maybe
Impact Sexual Orientation:	No
Impact Care Experience:	

## Initial Assessment Summary

Initial Assessment Summary:	<p>This proposal relates to the review of commercial rents and refresh of service charges for Birmingham City Council (BCC) properties. These activities are financial in nature and are undertaken in accordance with the Royal Institution of Chartered Surveyors (RICS) legislation, BCC's Financial Regulations, Standing Orders, and governance arrangements. All transactions are managed by qualified professionals, including chartered surveyors and CIPFA accountants, and are applied equitably and consistently, without direct reference to protected characteristics. Having reviewed the activity in the context of the nine statutory protected characteristics and care experience, the initial assessment has found no direct negative impacts. The letting of commercial assets, rent reviews, and service charge management are conducted on a fair and impartial financial basis. There is no requirement for tenants to be assessed based on protected characteristics, and all individuals involved are of legal adult age, with legal representation where required. However, for the purposes of the full Equality Impact Assessment, it is acknowledged that while the process itself is neutral, indirect or disproportionate impacts may arise for certain groups. These do not invalidate the approach but should be noted and mitigated where appropriate. For example:</p> <ul style="list-style-type: none"> <li>• Age: Older tenants may be more vulnerable to cost increases or less adaptable to changes in tenancy terms.</li> <li>• Disability: Tenants with disabilities may face barriers if service changes affect accessibility or affordability.</li> <li>• Sex: Women-owned businesses, particularly in sectors such as retail or personal care, may be more sensitive to financial changes.</li> <li>• Race: Minority-owned businesses may be disproportionately affected if they occupy lower-cost units or have less financial resilience.</li> <li>• Religion or Belief: Religious organisations or places of worship may be impacted by changes to service charges.</li> <li>• Care Experience: Individuals who have experienced care may be disproportionately affected by rent increases or service charge changes if they are tenants or operate small businesses in council-owned commercial properties. For other protected characteristics—gender reassignment, marriage and civil partnership, pregnancy and maternity, sexual</li> </ul>
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	orientation,—no direct impacts are expected. Nonetheless, BCC officers undertaking these activities are expected to be fully aware of equality considerations and apply due diligence to ensure fair and inclusive outcomes.
Is a full EIA Required?:	Yes

## Protected Characteristic – Age

Impact Age:	Yes
Age Group Impacted:	["20-29 years", "50-59 years", "60-69 years", "70-79 years", "80-89 years"]
Age Impact Details:	The proposal may disproportionately affect older tenants (aged 50+) who operate small businesses or community services from council owned commercial properties. These individuals may have lower financial resilience, be less able to adapt to digital or administrative changes in property management, and may face barriers in accessing financial support. Younger tenants (e.g. under 30) may also be impacted if they are new entrepreneurs or start-ups with limited capital, making them more vulnerable to rent increases or service charge adjustments. Age related impacts may also intersect with disability, care responsibilities, or socio-economic status.
Age Impact Mitigation:	- Provide clear, accessible communication about changes - Signpost to business support services, financial advice, and hardship schemes if issues raised.

## Protected Characteristic – Disability

Impact Disability:	Yes
Disability Impact Details:	Tenants with disabilities may face barriers if service changes affect accessibility or affordability.
Disability Impact Mitigation:	- Provide clear, accessible communication about any changes to rent or service charges. - Signpost tenants to relevant business support services, financial advice, hardship schemes, and accessibility resources where appropriate.

## Protected Characteristic – Sex

Impact Sex:	Yes
Sex Groups Impacted:	["Female"]
Sex Impact Details:	The proposal may have a disproportionate impact on women owned businesses, particularly those operating in sectors such as retail, care, or personal services, which often occupy smaller commercial units and operate on tighter margins. These businesses may be more sensitive to increases in rent or service charges. Men may be more represented in higher margin or larger commercial operations, potentially experiencing less financial strain. Additionally, women may face greater barriers to accessing financial support or investment, compounding the impact of increased costs.
Sex Impact Mitigation:	- Provide clear communication about changes to rent or service charges. - Signpost to business support services, financial advice, to help mitigate affordability challenges

## Protected Characteristic – Gender Reassignment

Impact Gender Reassignment:	No
Gender Reassignment Impact Details:	There is no evidence to suggest that individuals undergoing or having undergone gender reassignment would be disproportionately affected by the review of commercial rents or service charges. These financial transactions are applied uniformly and do not involve personal characteristics or identity disclosures. The process does not require or consider gender identity, and therefore no mitigating actions are necessary.
Gender Reassignment Impact Mitigation:	

## Protected Characteristic – Marriage and Civil Partnership

Impact Marriage and Civil Partnership:	No
Marriage and Civil Partnership Groups Impacted:	
Marriage and Civil Partnership Impact Details:	The proposal does not differentiate between individuals based on marital or civil partnership status. Commercial tenancy arrangements and financial reviews are conducted with businesses or legal entities, not on the basis of personal relationships. As such, there is no foreseeable impact and no need for mitigation.
Marriage and Civil Partnership Impact Mitigation:	

## Protected Characteristic – Pregnancy and Maternity

Impact Pregnancy and Maternity:	No
Pregnancy and Maternity Impact Details:	No
Pregnancy and Maternity Impact Mitigation:	

## Protected Characteristic – Ethnicity and Race

Impact Ethnicity and Race:	Yes
Ethnicity and Race Groups Impacted:	

Ethnicity and Race Impact Details:	The proposal may disproportionately affect tenants from minority ethnic backgrounds who operate small businesses or community organisations in council-owned commercial properties. These groups may: <ul style="list-style-type: none"> <li>• Be overrepresented in lower-cost units or sectors with tighter profit margins (e.g. retail, food, personal services).</li> <li>• Face systemic barriers to accessing financial support, credit, or business advice.</li> <li>• Experience language barriers or reduced access to information about changes in tenancy terms or service charges.</li> </ul>
Ethnicity and Race Impact Mitigation:	- Provide translated materials and culturally appropriate communication where needed. - Signpost to business support services, financial advice, to help mitigate affordability challenges

## Protected Characteristic – Religion

Impact Religion:	Yes
Religion Groups Impacted:	["Christian", "Buddhist", "Hindu", "Jewish", "Sikh", "Muslim"]
Religion Impact Details:	The proposal may affect religious organisations or faith-based groups that lease council owned commercial properties for worship, community outreach, or education. These groups often operate on limited budgets and rely on donations or grants, making them more vulnerable to rent increases or service charge adjustments.
Religion Impact Mitigation:	- Provide clear, accessible communication about changes, with sensitivity to the operational nature of faith-based activities. - Signpost to business support services, financial advice, to help mitigate affordability challenges

## Protected Characteristic – Sexual Orientation

Impact Sexual Orientation:	No
Sexual Orientation Groups Impacted:	
Sexual Orientation Impact Details:	Sexual orientation is not a factor in the determination or application of commercial rents or service charges. The process is financial and regulatory in nature, and does not involve personal profiling or identity-based decision-making. Therefore, no direct or indirect impacts are anticipated, and no mitigating actions are required.
Sexual Orientation Impact Mitigation:	

## Protected Characteristic – Care Experience

Impact Care Experience:	Yes
Care Experience Impact Details:	

Care Experience Impact Mitigation:	- Provide clear, accessible communication about tenancy changes and financial obligations. - Signpost to business support services, financial advice, and hardship schemes, to ensure care-experienced individuals are aware of and can access available support.
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## Other

Any other risks or impacts:	No
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## Full Assessment Summary

Full Assessment Summary:	<p>This Equality Impact Assessment has reviewed the proposal to undertake commercial rent reviews and refresh service charges across Birmingham City Council's property portfolio. These activities are property financial transactions carried out on behalf of the Council and are governed by:</p> <ul style="list-style-type: none"> <li>• The Royal Institution of Chartered Surveyors (RICS) legislation and code of conduct</li> <li>• BCC's Financial Regulations, Standing Orders, and governance arrangements</li> <li>• Due diligence by qualified professionals, including chartered surveyors and CIPFA accountants</li> </ul> <p>As such, the process is applied equitably and consistently, without direct reference to protected characteristics. There is no requirement for tenants to be assessed based on personal characteristics, and all transactions are undertaken with individuals of legal adult age, with legal representation where required. While the process itself is neutral, the full assessment has identified potential indirect or disproportionate impacts on certain groups, including:</p> <ul style="list-style-type: none"> <li>• Older and younger tenants (age)</li> <li>• Tenants with disabilities</li> <li>• Women owned businesses</li> <li>• Minority ethnic business owners</li> <li>• Faith based organisations</li> <li>• Care experienced individuals</li> </ul> <p>These impacts relate primarily to financial vulnerability, accessibility, and systemic barriers in accessing support. However, they do not invalidate the approach, and appropriate mitigations have been identified, including:</p> <ul style="list-style-type: none"> <li>• Clear, accessible communication</li> <li>• Signposting to business support, financial advice, hardship schemes, and accessibility resources</li> <li>• Monitoring of demographic impacts and engagement with corporate initiatives to support inclusion</li> </ul> <p>The evidence supports the method in the proposal and sets out legitimate, relevant, and proportional actions. The proposal will proceed, with mitigations in place to ensure fair and inclusive outcomes.</p>
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## Monitoring

Monitoring Details:	To ensure that identified mitigations are effective and inclusive, BCC officers involved in commercial rent reviews and service charge refreshes will continue to engage with tenants on a case-by-case basis. Officers will be expected to apply professional judgement with due regard to equality considerations, and to respond appropriately to any issues raised. Where relevant, tenants will be signposted to support services, including financial advice, accessibility resources, and hardship schemes. This approach aligns with the Council's wider inclusion strategies and ensures that any disproportionate impacts are addressed through practical, responsive measures.
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