



Equality Impact Assessment Record Form 2012-16

Section 1 – Service Details and Summary of EIA Activity

Title of activity:	Housing Revenue Account- MTFP 2015/16 - 2019/20
Lead Officer responsible for this EIA:	Ken Davies
Telephone:	01325 388435
Service Group:	Neighbourhood Services and Resources
Service or Team:	Housing and Building Services
Assistant Director accountable for this EIA	Pauline Mitchell
Who else will be involved in carrying out the EIA:	<p>Money Advice Team Income Management Team Housing Management Team Customer Liaison-Asset Management Team Tenant Empowerment Team Lifeline Team Housing Options Team</p>

Stage	Summary of position
Stage 1: Initial Officer Assessment. Whole Population likely to be affected identified	<p>A desk top analysis was conducted in December 2014 of the available evidence The report is due to be presented to Cabinet in February 2015 The change will apply to all Council tenancies and it may have an impact on decisions made by those who consider applying for Council Housing</p>
Stage 2: Further Assessment. Target Population likely to be affected identified	Council Tenants

<p>Stage 3: Further Assessment. Individuals likely to be affected identified</p>	<ol style="list-style-type: none"> 1. The proposed rent increase provides additional income to support expenditure on Council Housing. All Council tenancies will benefit from the repairs and maintenance programme. Some people who need rehousing will benefit from new Council Housing. There are wider benefits to the local economy, the 30 year Business Plan commits to £101.7 million investment in the stock over the first 10 years, and as such they have the potential to have positive impacts on tenants with protected characteristics. 2. Those likely to experience a negative impact are Council tenants who are not in receipt of Housing Benefit and therefore will have to meet the cost of the increase from their income-29% of Council tenancies: <ul style="list-style-type: none"> • These are mostly working age tenants who are in employment • Less than 1% are from a BME group • A small number have a disabled person in the family 3. Council tenants who are affected by the Bedroom Tax (510) will be negatively affected. They will have to pay a proportion of the rent increase from their income: <ul style="list-style-type: none"> • 440 tenants have children under the age of 16 • 136 are in receipt of disability benefit • Less than 1% fall into a BME group <p>8 tenants are affected by the Benefit Cap and will also have to pay part or all from their income. All of these are families have children and most are in receipt of disability payments</p>
<p>Stage 4: Analysis of Findings</p>	<ul style="list-style-type: none"> • There are about 5,400 Council tenancies that will be affected by the proposals contained in the report. • In total 71% of tenancies receive full or partial housing benefit. About 3300 of these tenancies will not be affected by the rent increase. • There are 510 tenancies that receive Housing Benefit and are affected by the Bedroom Tax. They will lose the equivalent of either 14% of their rent because they under occupy by one bedroom (410 tenancies) or 25% if they under occupy by two beds (100 tenancies). • Approximately 1560 do not receive Housing Benefit and will meet the full cost. <p>Tenants affected by the Bedroom Tax maybe eligible for Discretionary Housing Payments which will make up for the loss of Housing Benefit. These include people who are disabled and live in adapted properties and people who need an overnight carer. During 2013/14, 788 tenancies received Discretionary Housing Payments (DHP) as a result of the Bedroom Tax. This covered most of those affected and also indicates that there is a significant turnover of tenants affected by the Bedroom Tax.</p> <p>The Council is aware of all the tenants who are affected by the Bedroom Tax and have contacted all of them. Detailed discussions have taken place with tenants concerning their financial position and the options that they have for addressing the loss of income. During this process protected characteristics were identified and specific impacts were discussed. For example, people with a physical disability living in adapted properties were identified. Moving to another property may not be a viable option so alternative solutions were also explored. Those with health and</p>

	<p>support problems were also identified to understand their needs and the consequences of the loss of income. They have access to their local Housing Officer and the Money Advice service. Where there are difficulties with rent payment the Income Management team will become involved. There is therefore very detailed knowledge of the issues faced by this group of tenants.</p> <p>Through the Housing Management, Income Management services and other specialist services there is also detailed knowledge of the issues facing tenants as individuals and as communities. It is clear that tenants who have to pay the cost of the rent increase themselves will experience a loss of disposable income. Most that fall into this category are of working age. For a smaller number who are already experiencing financial problems the impact will be more serious.</p> <p>There are positive effects. The funding generated through the rents has a number of direct benefits. The planned programme of work will benefit tenants by improving housing conditions, regenerating council estates and by building new Council houses that will help meet current and future needs. A significant amount of energy efficiency work is planned that should see significant reductions in fuel bills making Council housing more affordable. The improvements in the stock have a general accumulative impact:</p> <ul style="list-style-type: none"> • There are more properties that have been adapted to meet the needs of people who are disabled • Some new properties will specifically address the needs of older people and people with disabilities • Energy efficiency measures reduce the overall cost of running a home and there are implied benefits for people with protected characteristics
Stage 5: Sign-Off	<p>Ken Davies</p> <p>Pauline Mitchell</p>
Stage 6: Reporting and Action Planning	<p>The actions will fit into the monitoring processes established for the Housing Strategy</p>

Details of the activity (main purpose and aims)
<p>Consider proposals for the revenue budget, rent levels and service charges for the Council’s Housing Revenue Account (HRA) for the financial year 2015/16 in the context of the HRA Medium Term Financial Plan to 2019/20 and the 30 year business plan. The report therefore considers the level of rent increase and the level of expenditure. It also seeks approval of the Medium Term Financial Plan and the updated 30 year Business Plan</p> <p>The HRA is a ring-fenced self-funding budget exclusively for use on Council housing.</p> <ul style="list-style-type: none"> (a) The key decision regarding the HRA is the balance between rent levels and investment in the housing stock. Changes to the HRA financial regime have increased flexibility in how finances can be managed generally although restrictions remain in place on borrowing. The report recommends the continuation of past practice to increase rents in line with the maximum allowed by government for the purpose of calculating housing benefit payments, this is to ensure sufficient funds for investment in the housing stock. There is no longer a requirement to do this however and members can chose a smaller rent increase with a corresponding reduction in capital investment. The proposed rent increase is an average 3.43% giving an average rent of £72.94. 3300 tenancies will have the increase covered by Housing Benefit and a further 510 will have the increase partially covered due to the effect of the Bedroom Tax. (b) The rents are used to fund the management, maintenance and repair of the housing stock. This includes an expanding energy efficiency programme that should see the reduction in energy bills for tenants and therefore reducing total housing costs. This is particularly important for those who need additional heating because they are house bound or are disabled and for families with small children. The HRA includes funding for the regeneration of estates and the funding of new Council housing. These activities help to better meet housing needs. This includes increased availability of properties for people with disabilities and older people. It also provides more housing choice for those who are pregnant and need a home of their own or need a larger home (c) The rent loss due to a stoppage of rent convergence would be approximately £245K per annum if fully implemented in 2015/16 or £237K if the phasing continues. By continuing with the phasing we will protect properties, particularly larger family homes and those in rural locations, from having significant increases in one year. Without this a small number of properties will have increases totalling £2-4 per week and in one instance the increase would total £6.10. Whilst it is fair and equitable for rents to be charged on a common basis it is considered reasonable to continue to phase in the remaining increases over time in line with previous practice.
Who will be affected by the activity? (groups and numbers)
Whole population
There are approximately 1600 people on the waiting list for Council Housing plus 5400 Council Tenants
Target population
<p>43.3% of tenants are Male and 56.7 Female</p> <p>About 48% of tenants are 60 or over</p> <p>96% of Tenants are White British</p> <p>1% are Gypsy or Traveller</p>

1.9% are White other

0.6% Asian or Asian British

0.5% Black or Black British

57% of tenants have a long term health problem

In 8.8% of tenants households someone is a wheel chair user

2208 Tenants are in receipt full Housing Benefit and 1616 are in receipt of partial Housing benefit. This is about 71% of all tenants. Of these 510 are affected by the Bedroom Tax:

410 are under occupying by 1 bedroom and see their housing benefit reduced by 14%

100 are under occupying by 2 or more bedrooms and see their rent reduced by 25%

Individuals

3300 tenancies will be protected from the rent increase because they are in receipt of Housing Benefit.

510 Tenancies are currently affect by the Bedroom Tax and they will therefore have to meet part of the rent increase from their own income

1560 tenancies will have to meet the full cost of the rent increase

Although the rent increase will have a negative impact on those who will pay the charge there is no specifically disproportionate impact on any group of protected characteristics

What data, research and other evidence or information is available which is relevant to the EIA?

The council retains detailed information on each Council tenancy that it can draw on. This can provide quantitative data, for example, who is on Housing Benefit, are they affected by the Bedroom Tax, do they receive DHP:

- The Bedroom Tax data base- contains detailed information producing a number of standard reports. This provides quantitative and qualitative data
- Orchard Housing Management Information system containing detailed information on tenancies including family composition ,most protected characteristics, benefits and other information. This provides quantitative and qualitative data
- Lifeline system contains information on those living in properties linked to Lifeline. This includes mainly disabled and older people and is in addition to the information contained on Orchard. This provides quantitative and qualitative data.
- Reports on the impact of the Bedroom Tax
- Research to support the regeneration of Redhall
- The Housing Strategy 2012-17
- Supported Housing Strategy 2012-17

Section 3: Officer Assessment

Use this table to record your views on potential impact on Protected Characteristics. As the activity and the assessment develop your views may change – record them here.

It is important to be searching and honest about this – many Council activities are planned to be of positive benefit to identified target groups but can often have the potential for inadvertent effects on other groups.

Protected Characteristics	Potential Impact			Potential level of impact			Summary of Impact
	Positive/Negative/Not Applicable						
Age	P				M		<p>There are no specific disproportionate negative impacts based on age</p> <p>There are some positive impacts in terms of the increase in availability of properties for older people as a result of the new build programme</p> <p>There is an implied positive impact for older people and the very young in the increased energy efficiency measures. Older and very young people are more likely to be affected by cold and therefore likely to be higher users of energy</p> <p>There are no specific impacts related to age</p> <p>34% (1860) of all tenants are 65 or over. None of these tenants will be affected by the Bedroom Tax.</p>
Race			NA			nil	There are no specific disproportionate negative impacts based race
Sex			NA			nil	There are no specific disproportionate negative impacts based sex
Gender Reassignment			NA			nil	There are no specific disproportionate negative impacts based Gender Reassignment
Disability (summary of		N			L		A proportion of disabled people who live in adapted properties may face a specific

detail on next page)								negative impact as described in Stage 4 above but these are targeted to apply for Discretionary Housing Payments. Funding of Aids and Adaptation will positively help those with mobility and other needs. The new build programme may also include specially adapted properties
Religion or belief			NA			L	nil	There are no specific disproportionate negative impacts based on Religion or belief
Sexual Orientation			NA			L	nil	There are no specific disproportionate negative impacts based on sexual orientation
Pregnancy or maternity	P					L		There are no specific disproportionate negative impacts based on pregnancy or maternity. There may be positive affects as a result of the increase in supply of housing
Marriage/ Civil Partnership			NA			L	nil	There are no specific disproportionate negative impacts based on marriage/ civil partnership

Section 3: Officer Assessment - continued

The Council must have due regard to disabled people’s impairments when making decisions about ‘activities’. This list is provided only as a starting point to assist officers with the assessment process. It is important to remember that people with similar impairments may in reality experience completely different impacts. Consider the potential impacts and summarise in the Disability section on the previous page. Officers should consider how the ‘activity’ may affect a disabled person.

Mobility Impairment		N				L		A proportion of disabled people who live in adapted properties may face a specific negative impact as described in Stage 4 above but these are targeted to apply for Discretionary Housing Payments A programme of aids and adaptations to aid mobility will help people with a mobility problem to remain in their own home
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Visual impairment	P					L	<p>There are no specific disproportionate negative impacts based on visual impairment</p> <p>A programme of aids and adaptations to aid mobility will help people with a mobility problem to remain in their own home. This work is carried out following an assessment within Adult Social Care</p>
Hearing impairment	P					L	<p>There are no specific disproportionate negative impacts based on hearing impairment</p> <p>A programme of aids and adaptations to aid mobility will help people with a mobility problem to remain in their own home</p>
Learning Disability	P					L	<p>There are no specific disproportionate negative impacts based on Learning Disability</p> <p>Will help to increase the range of housing choices available increasing the opportunities to find suitable housing</p>
Mental Health	P					L	<p>There are no specific disproportionate negative impacts based on Mental Health</p> <p>Will help to increase the range of housing choices available increasing the opportunities to find suitable housing</p>
Long Term Limiting Illness		N				L	<p>A proportion of disabled people who live in adapted properties may face a specific negative impact as described in Stage 4 above</p> <p>A programme of aids and adaptations to aid mobility will help people with a mobility problem to remain in their own home</p>
Multiple Impairments		N				L	<p>A proportion of disabled people who live in adapted properties may face a specific negative impact as described in Stage 4</p>

								above A programme of aids and adaptations to aid mobility will help people with a mobility problem to remain in their own home Will result in more properties being made available for people with mobility issues
Other - Specify	None							

Cumulative Impacts	
Change activities	Potential cumulative impacts
	<p>Impact on tenants and applicants</p> <p>Council tenants are being affected by a number of changes in national and local policy:</p> <p>The Welfare Reforms are changing the eligibility criteria for benefits and the way benefits are paid. This is reducing the overall benefit bill. There are particular impacts for those who are in receipt of disability benefits. This affects people who are disabled; have a long term limiting illness and people who have multiple impairments. They are also being affected by the reduction in Council Tax support. There may also be other additional impacts as changes to the funding criteria for receiving care and support services change. Most who fall into this category are in receipt of housing benefit and will not be affected but for those who are impacted by the Bedroom Tax this will add additional financial pressure and may lead to difficult decisions being made about moving to other accommodation.</p> <p>For tenants who receive no help with paying the rent there will be a small loss of disposable income. However, there is no evidence that any protected characteristic is disproportionately affected</p> <p>There are positive impacts particularly for older people and disabled as a result of the accumulative impact of maintaining and modernising the council's housing stock:</p> <p>More homes will be energy efficient and this will help those who need to use more energy for health and disability reasons to reduce costs</p>

	<p>Increased availability of stock will help a number of protected characteristics as it will provide more housing choice and specifically older people and disabled</p> <p>Conclusion</p> <p>A very larger proportion of Council tenants will not be affected by the rent increase. Those that are most likely to be worst affected are those who are affected by the Bedroom Tax. Some of those have protected characteristics and may experience negative accumulative impacts as described above. Other tenants who will not be eligible for housing benefit may also be affected negatively but there is no evidence people with protected characteristics are disproportionately negatively impacted. There is some evidence of an accumulative positive impact as a result of expenditure on the stock</p>
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Section 4: Engagement Decision

Is engagement with affected people with Protected Characteristics required, now or during the further development of the activity?	No
If YES, proceed to the next section.	
If NO, briefly summarise below the reasons why you have reached this conclusion.	
<p>The proposed changes have been discussed with the Tenants Board at a special meeting on 9 December 2014 and they have decided to support the changes</p> <p>There is a considerable amount of qualitative and quantitative information available concerning the financial circumstances of council tenants and there is more detailed information available for those who are likely to be the most affected by any increase. This information provides a clear picture of the likely impacts both positive and negative of a rent increase. Engagement will not provide additional insight into the impacts on protected characteristics. Some groups of protected characteristics who could be affected are likely to be protected by DHP. These groups are more likely to experience positively affected as a result of the housing improvement programmes</p>	

Section 5 - Sign-off when assessment is completed

Officer Completing the Form:		
Signed	Name:	Ken Davies
	Date:	22-12-14
	Job Title:	Housing Strategy Officer
Assistant Director:		
Signed	Name:	Pauline Mitchell
	Date:	22-12-14
	Service:	Assistant Director- Housing and Building Services

Section 6 – Reporting of Findings and Recommendations to Decision Makers

Based on the EIA findings, the report may consider the options in the table below, but the report must contain a clear statement of the impacts so that decision-makers can understand the effects of the decision that is being recommended.

What does the review of the information show?	
b)	Negative impact identified – recommend continuing with the activity; clearly specify the people affected and the impacts, and providing reasons and supporting evidence for the decision to continue

Section 7 – Action Plan and Performance Management

What is the negative impact?	Actions required to reduce/eliminate the negative impact (if applicable)	Who will lead on action	Target completion date
Negative impacts have been specifically identified for people affected by the Bedroom Tax	<p>Everyone will be notified in writing of the increase and given information on what to do to seek advice and support</p> <p>Those affected by the Bedroom Tax will be specifically contacted by the Income Management Team</p>	Hazel Neasham Head of Housing	March 2015
Some tenants will experience an accumulative impact as a result of the Welfare Reforms and other financial pressures	The Housing Service has introduced a dedicated money advice service to address these issues. They are able to target those who are affected by the Welfare Reforms and in partnership with Income Management Officers, target tenants who are experiencing difficulties paying the rent	Hazel Neasham Head of Housing	On going
	Advice and information is regularly provided to tenants via Hot News and this is supplemented with information leaflets and information on the Council Website	Hazel Neasham Head of Housing	On going
	Work is on-going with the Credit Union to provide tenants with an affordable alternative to “payday” and “door step” loans. The Council’s Website also provides a link to Smarterbuys for the purchase of white goods and furniture at reasonable rates.	Hazel Neasham Head of Housing	On going

Performance Management	
Date of the next review of the EIA	December 2015
How often will the EIA action plan be reviewed?	Annually with the setting of the HRA budget
Who will carry out this review?	Housing and Building Services