

EIA Record Form – note free version



## Equality Impact Assessment Record Form 2012-16

### Section 1 – Service Details and Summary of EIA Activity

|   |  |
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| <b>Title of activity:</b>   | Housing Revenue Account- MTFP 2016/17 - 2020/21  |
| <b>Lead Officer responsible for this EIA:</b>   | Ken Davies   |
| <b>Telephone:</b>   | 01325 405955   |
| <b>Service Group:</b>   | Neighbourhood Services and Resources   |
| <b>Service or Team:</b>   | Housing and Building Services  |
| <b>Assistant Director accountable for this EIA</b>  | Pauline Mitchell   |
| <b>Who else will be involved in carrying out the EIA:</b>                                     | <p>Money Advice Team<br/>         Income Management Team<br/>         Housing Management Team<br/>         Customer Liaison - Asset Management Tenant<br/>         Customer Engagement Team<br/>         Lifeline Team<br/>         Housing Options Team<br/>         Customer Panel</p>   |
| <b>Stage</b>  | <b>Summary of position</b>   |
| <b>Stage 1: Initial Officer Assessment. Whole Population likely to be affected identified</b> | <p>A desk top analysis was conducted in October 2015 of the available evidence</p> <p>The report was presented to Cabinet in December 2015 and updated following consultation in January 2016.</p> <p>The rent change will apply to all Council Tenancies and it may have an impact on decisions made by those who consider applying for a Council Housing</p> <p>The introduction of Affordable Rents will be limited to properties that become empty in certain areas and therefore there will only be an impact on those sections of the population who may want to apply to rent those</p> |

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|   | <p>properties.</p> <p>Service Charges are based on actual costs and apply to all Council tenancies. The Council is entitled to recover administrative costs on certain items contained within the service charge and this additional cost mainly affects Council properties with additional services such as cleaning, lifeline, warden charges and grounds maintenance. In combination with the rent decrease most tenants will be charged a lower amount than last year. Those living in Sheltered Housing, Good Neighbour schemes and Extra Care will be charged an overall increase of between 2 and 3%. Garage owners and leaseholders will also have an increased charge</p> <p>There are also 337 properties that should have been charged for pavement crossings and hard standings that will be charged £3.60 per week from April 2016</p>   |
| <p><b>Stage 2: Further Assessment. Target Population likely to be affected identified</b></p> | <p>Council Tenants and applicants for properties converted to Affordable Rents. Those renting garages and leaseholders who pay service charges will also be affected.</p>   |
| <p><b>Stage 3: Further Assessment. Individuals likely to be affected identified</b></p>       | <ol style="list-style-type: none"> <li>1. The Government are introducing a compulsory 1% reduction in Social and Affordable rents from April 2016 through the Welfare Reform and Work Bill 2015. There is no discretion in making this change. A reduction of 1% has also been introduced for the following three years. All Council tenants will therefore have an average 77p reduction in weekly rent.</li> <li>2. For the 3,680 tenancies in receipt of Housing Benefit this will have no impact. There will be a very small benefit to those 518 tenancies affected by the Bedroom Tax who will have to pay in the region of 10 and 30 pence less per week</li> <li>3. Of the 337 properties where a hard stand and pavement crossing charge is being introduced 70% are in receipt of Housing Benefit</li> <li>4. In the coming year the loss of income will not have a direct impact on day to day services but will have an impact on longer term investment with potential negative consequences for all tenants</li> <li>5. The introduction of administration charges within the service charges will see varying increases in the service charge above increases in actual costs. A 10% administrative fee will be levied but the extent of the impact will depend on the type and number of services that each property receives. Taking together with the rent decrease most tenants will still pay less than they did last year. Those living in sheltered housing will have a small increase of between 2% and 3%. Garage owners will see a 66 pence per week increase while Leaseholders will have varying increases depending on the number and types of services.</li> <li>6. The introduction of Affordable Rents will have an impact on those</li> </ol> |

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|   | <p>who successfully apply for properties with this type of rent. All new properties will be let at Affordable rents as a requirement of the funding received in the Affordable Homes Programme while existing properties will only be converted to Affordable Rents when they become available. This is also part of the Affordable Homes Programme. An affordable Rent is 80% of a market rent and therefore higher than a Social Rent. The level of increase between rents will vary based on local market conditions. They are introduced as part of an agreement with the Homes and Communities Agency that allow the difference between the rents to be used for funding new housing</p> <ol style="list-style-type: none"> <li>7. Not all areas are suitable for the introduction of Affordable Rents and neither are some types of property in particular locations. The introduction of Affordable Rents will be localised and affect different groups of people. Some of them may have protected characteristics.</li> <li>8. Some people who need rehousing will benefit from new council housing that will continue to be developed. There are wider benefits to the local economy, the 30 year Business Plan commits to £254 million investment in the stock over 30 years, and as such they have the potential to have positive impacts on tenants with protected characteristics.</li> </ol>   |
| <p><b>Stage 4: Analysis of Findings</b></p> | <ul style="list-style-type: none"> <li>• There are about 5,300 council tenancies that will be affected by the rent reduction.</li> <li>• In total 69% of tenancies receive full or partial housing benefit and their income will not be affected by the reduction</li> <li>• There are 518 tenancies that receive Housing Benefit and are affected by the Bedroom Tax receive a marginal benefit. They will have to pay 14% of their rent because they under occupy by one bedroom (414 tenancies) or 25% if they under occupy by two beds (104 tenancies).</li> <li>• Approximately 1620 meet the full cost of the rent will benefit by on average 77 pence per week.</li> <li>• The addition of a 10% service charge will have varying impacts ranging from 17 pence to £2.74 depending on the level of services being provided. As a result of the rent decrease most tenancies will see a rent reduction. The exceptions are: <ul style="list-style-type: none"> <li>○ Sheltered Housing, good Neighbour schemes and Extra Care who will see between a 2 and 3% overall increase. 81% of tenants in this category are in receipt of Housing Benefit and therefore not affected.</li> <li>○ 71 Leaseholders who will have varying increases depending on the level of service they receive</li> <li>○ Garage rents will increase by 66 pence per week</li> </ul> </li> <li>• Of the 337 tenancies affected by the introduction of a charge for</li> </ul> |

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|   | <p>pavement crossings and hard standings 246 are in receipt of Housing Benefit and will not be affected while 91 will have to pay an additional cost of £3.60</p> <ul style="list-style-type: none"> <li>• A total of 235 tenancies are likely to be negatively affected (144+91) 4% of current tenancies</li> <li>• It is estimated that approximately 500 properties may be converted to Affordable Rents during the first year with varying increases on Social Rents</li> </ul> <p>The Council is aware that the introduction of Affordable Rents could affect individual decisions to apply for these types of property and that may lead applicants having to consider properties in a different area however this is balanced by the additional income generated to develop much needed new housing.</p> <p>There are positive effects contained within the Housing Business Plan. 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 flue bills making Council housing more affordable. The improvements in the stock have a general accumulative impact:</p> <ul style="list-style-type: none"> <li>• There are more properties that have been adapted to meet the needs of people who are disabled</li> <li>• Some new properties will specifically address the needs of older people and people with disabilities</li> <li>• Energy efficiency measures reduce the overall cost of running a home and there are implied benefits for people with protected characteristics</li> </ul> |
| <b>Stage 5: Sign-Off</b>                      | <p>Ken Davies</p> <p>Pauline Mitchell</p>  |
| <b>Stage 6: Reporting and Action Planning</b> | <p>The actions will fit into the monitoring processes established for the Housing Strategy</p>   |

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| <b>Details of the activity (main purpose and aims)</b>   |
| <p>Consider proposals for the revenue budget, rent levels and service charges for the Council’s Housing Revenue Account (HRA) for the financial year 2016/17 in the context of the HRA Medium Term Financial Plan to 2020/21 and the 30 year business plan. The report therefore considers the level of rent 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"> <li>(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 proposals contained in the Welfare Reform and Work Bill to reduce rents and this alters the position over the medium and long term.</li> <li>(b) The rents go towards funding the 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 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 their need a home of their own or need a larger home</li> <li>(c) The impact on the Council’s HRA is that by year 4 we will be losing rental income of approximately £2.5m every year. This will have consequences on the long term plan and actions are therefore being taken to mitigate this including a thorough evaluation of priorities for expenditure and income</li> </ul> |
| <b>Who will be affected by the activity? (groups and numbers)</b>  |
| <b>Whole population</b>  |
| There are approximately 1600 people on the waiting list for Council Housing plus 5300 Council Tenants  |
| <b>Target population</b>   |
| <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> <p>1.9% are White other</p> <p>0.6% Asian or Asian British</p> <p>0.5% Black or Black British</p>   |

57% of tenants have a long term health problem

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

2134 Tenants are in receipt full Housing Benefit and 1546 are in receipt of partial Housing benefit. This is about 70% of all tenants. Of these 518 are affected by the Bedroom Tax.

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

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

81% of tenants living in Sheltered Housing, Good Neighbour Schemes and Extra Care are in receipt of Housing Benefit

### **Individuals**

3680 tenancies will not be affected because they are in receipt of Housing Benefit. There will be a reduction in the cost of Housing Benefit to the Government

Of the 1560 tenancies where there is no housing benefit only 144 tenancies will have a rent increase with the remainder having some reduction after taking into account the rent reduction and the increase in the Service Charge due to the introduction of a administrative charges

337 tenancies will see and increase as a result of the charge for pavement crossings and hard standings. Of these 246 tenancies will be in receipt of Housing Benefit and will not be affected and 91 will meet the full cost.

The rent increase will have a negative impact on 235 tenancies and a identified negative impact on 144 people with protected characteristics, almost entirely older people

There may be some negative impact as a result of the introduction of Affordable Rents but this will depend on property types and area.

### **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 Welfare Reforms
- Research to support the regeneration of Redhall
- The Housing strategy 2012-17

- Supported housing Strategy 2012-17
- A survey has been conducted in December 2015 to gauge the impact of the changes on those with protected characteristic who would have to pay an increase in housing costs

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                       |                  |          | N              |                           | M |     | <p>There are specific negative impacts based on age as a result of the introduction of administrative costs. This will affect 144 tenancies</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 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 uses of energy</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 very small proportion of disabled people who live in Sheltered Housing,   |

|                                |   |  |    |  |  |  |     |  |
|--------------------------------|---|--|----|--|--|--|-----|--|
| detail on next page)           |   |  |    |  |  |  |     | Good Neighbour schemes and Extra Care could be affected by the introduction of an administrative charge however available information suggests that they are all in receipt of Housing Benefit<br><br>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 |  |  |  | nil | There are no specific disproportionate negative impacts based on age Religion  |
| Sexual Orientation             |   |  | NA |  |  |  | nil | There are no specific disproportionate negative impacts based on sexual orientation  |
| Pregnancy or maternity         | P |  |    |  |  |  | nil | There are no specific disproportionate negative impacts based on pregnancy or maternity.<br><br>There may be positive affects as a result of the increase in supply of housing   |
| Marriage/<br>Civil Partnership |   |  | NA |  |  |  | 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.**



|                            |  |  |  |  |  |  |  |   |
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| <b>Mobility Impairment</b> |  |  |  |  |  |  |  | <p>A very small proportion of disabled people who live in Sheltered Housing ,Good Neighbour schemes and Extra Care could be affected by the introduction of an administrative charge however available information suggests that they are all in receipt of Housing Benefit</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> |
| <b>Visual impairment</b>   |  |  |  |  |  |  |  | <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 with Adult Social care</p>  |
| <b>Hearing impairment</b>  |  |  |  |  |  |  |  | <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>  |
| <b>Learning Disability</b> |  |  |  |  |  |  |  | <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</p>   |

|                                   |          |          |  |  |  |          |   |
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|                                   |          |          |  |  |  |          | find suitable housing   |
| <b>Mental Health</b>              | <b>P</b> |          |  |  |  | nil      | <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>   |
| <b>Long Term Limiting Illness</b> |          | <b>N</b> |  |  |  | <b>L</b> | <p>A very small proportion of disabled people who live in Sheltered Housing ,Good Neighbour schemes and Extra Care could be affected by the introduction of an administrative charge however available information suggests that they are all in receipt of Housing Benefit</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>   |
| <b>Multiple Impairments</b>       |          | <b>N</b> |  |  |  | <b>L</b> | <p>A very small proportion of disabled people who live in Sheltered Housing ,Good Neighbour schemes and Extra Care could be affected by the introduction of an administrative charge however available information suggests that they are all in receipt of Housing Benefit</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> <p>Will result in more properties being made available for people</p> |

|                           |      |  |  |   |  |  |  |                      |
|---------------------------|------|--|--|---|--|--|--|----------------------|
|                           |      |  |  |   |  |  |  | with mobility issues |
| <b>Other - Specify</b>    | None |  |  |   |  |  |  |                      |
| <b>Cumulative Impacts</b> |      |  |  |   |  |  |  |                      |
| <b>Change activities</b>  |      |  |  | <b>Potential cumulative impacts</b>   |  |  |  |                      |
|                           |      |  |  | <p><b>Impact on tenants and applicants</b></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 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 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. There are also proposals for changes to Tax Credits and the removal of the family premium from Housing Benefit which may have negative consequences.</p> <p>The proposed changes to rent and service charges will be a minor benefit for the vast majority of those who are not in receipt of Housing benefit and will have no impact on those in receipt of Housing Benefit</p> <p>There are negative impacts for 144 older people living in specialist accommodation as a result of a modest increase in the costs by 2 or 3%. A survey was conducted in December 2015. It targeted people with protected characteristics who would not be protected from an overall increase in housing costs. This group would be worst affected by the proposed change. There was a 25% response rate. Just under half (48%) said that they expected cost to go up, that they could afford the increase and they thought that their property was good value for money. In contrast 17% thought the properties were too expensive, that rents should decrease or that they would have difficulties meeting the cost of the</p> |  |  |  |                      |

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|  | <p>increase.</p> <p>Affordable Rents have been a growing part of the housing market in Darlington since they were introduced. There are about 400 properties provided by other providers. The conversion of council stock to Affordable Rent will reduce housing choices for some groups in some areas but choice will still be available across Darlington.</p> <p>There are positive impacts particularly for older people and disabled as a result of the accumulative impact of maintaining and modernising of the council stock:</p> <ul style="list-style-type: none"> <li>• More homes will be energy efficient will help those who need to use more energy for health and disability reasons to reduce costs</li> <li>• Increased availability of stock will help a number of protected characteristics as it will provide more housing choice and specifically older people and disabled</li> </ul> <p><b>Conclusion</b></p> <p>The vast majority of Council tenants will not be affected by the rent and service charge changes with many paying slightly less. 235 tenancies will be negatively affected but the survey identified that a significant proportion of those with protected characteristic would have few problems managing the increase.</p> |
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Section 4: Engagement Decision

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| <b>Is engagement with affected people with Protected Characteristics required, now or during the further development of the activity?</b>   | <b>No</b> |
| <b>If YES, proceed to the next section.</b>   |           |
| <b>If NO, briefly summarise below the reasons why you have reached this conclusion.</b>   |           |
| <p>The proposed changes were discussed with the Housing Executive as well as the Customer Panel at a special meeting in January 2016 and a survey was conducted in December 2015 as noted above</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 an increase. Engagement will not provide additional insight into the impacts on protected characteristics. Some of these groups are more likely to be positively affected as a result of the</p> |           |

Section 5 - Sign-off when assessment is completed

| Officer Completing the Form: |                   |   |
|------------------------------|-------------------|---|
| Signed                       | <b>Name:</b>      | Ken Davies  |
|                              | <b>Date:</b>      | 15/01/16  |
|                              | <b>Job Title:</b> | Housing Strategy Officer                          |
| Assistant Director:          |                   |   |
| Signed                       | <b>Name:</b>      | Pauline Mitchell                                  |
|                              | <b>Date:</b>      | 15/01/16  |
|                              | <b>Service:</b>   | 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? |   |
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| 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 specifically affect one group of people, with a protected characteristic                            | Everyone will be notified in writing of the increase and given information on what to do to seek advice and support<br><br>Those affected by the will be specifically contacted the Income Management Team   | Hazel Neasham<br>Head of Housing | March 2016             |
| 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 combination with the Housing Officers identify tenants who are experiencing difficulties paying the rent | Hazel Neasham<br>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<br>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  | Hazel Neasham<br>Head of Housing | On going               |
| The impact of Affordable Rents may have an impact on Housing choices   | The impact will be carefully be monitored to identify any negative impacts   | Hazel Neasham<br>Head of Housing | On going               |

| <b>Performance Management</b>                          |   |
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| <b>Date of the next review of the EIA</b>              | December 2016                               |
| <b>How often will the EIA action plan be reviewed?</b> | Annually with the setting of the HRA budget |
| <b>Who will carry out this review?</b>                 | Housing and Building Services               |