

EIA Record Form – note free version



Equality Impact Assessment Record Form 2012-16

Section 1 – Service Details and Summary of EIA Activity

Title of activity:	Housing Revenue Account- MTFP 2017/18 - 2021/22
Lead Officer responsible for this EIA:	Ken Davies
Telephone:	01325 405955
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 Asset Management Team Lifeline Team Housing Options Team Customer Panel</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 October 2016 of the available evidence</p> <p>A rent reduction will apply to all Council Tenancies and when taken together with increases in service charges it will see slight overall reductions for all tenants.</p> <p>(Service Charges are based on actual costs and apply to all Council tenancies). The reduction will vary dependant on services that are being received but on average there will be a 0.68p reduction.</p> <p>Affordable Rents were introduced in 2016/17 and 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 properties. Affordable rents will see an overall 1% reduction as unlike secure rents, service charges are included within an affordable rent and therefore subject to the rent</p>

	<p>reduction.</p> <p>Garage owners and leaseholders will have increased charges</p>
<p>Stage 2: Further Assessment. Target Population likely to be affected identified</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>Stage 3: Further Assessment. Individuals likely to be affected identified</p>	<ol style="list-style-type: none"> 1. The Government introduced a compulsory 1% reduction in Social and Affordable rents from April 2016 for four years through the Welfare Reform and Work Act 2016. There is no discretion in making this change. In 2017/18 all Council tenancies will therefore have an average 68p reduction in weekly rent. 2. For the 70% of tenancies in receipt of Housing Benefit this will have no impact. There will be a marginal benefit to those approximately 500 tenancies affected by the Bedroom Tax who will have to pay in the region of 9 and 18p less per week 3. 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 planned investment with potential negative consequences for all tenants 4. The service charges will see varying increases for those who receive these services. The more services someone receives the more the service charge is likely to increase. The Council are entitled to full recovery of these costs. However, the rent reduction more than compensates for any increase in service charge costs; consequently, all tenancies will see an overall reduction. 5. Affordable Rents will have an impact on those 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. Existing properties will only be converted to affordable rents when they become available to let. 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. 6. 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.

	<p>7. 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 £233m capital works investment in the stock over 30 years, and as such they have the potential to have positive impacts on tenants with protected characteristics.</p>
<p>Stage 4: Analysis of Findings</p>	<ul style="list-style-type: none"> • There are about 5,300 council tenancies that will be affected by the rent reduction. • In total 70% of tenancies receive full or partial housing benefit and their income will not be affected by the reduction • There are 500 tenancies that receive Housing Benefit and are affected by the Bedroom Tax who receive a marginal benefit. They have to pay 14% of their rent because they under occupy by one bedroom (about 400 tenancies at any one time) or 25% if they under occupy by two beds (about 100 tenancies). • Approximately 1620 who meet the full cost of the rent will benefit by on average 68p per week. • As a result of the statutory rent decrease all tenancies will see a rent reduction. The exceptions are: <ul style="list-style-type: none"> ○ 71 Leaseholders who will have varying increases depending on the level of service they receive ○ Garage rents will increase by 8p per week • It is estimated that approximately 500 properties may be converted to Affordable Rents during 2017/18 when vacant with varying increases on Social Rents <p>The Council were aware that the introduction of Affordable Rents could have affected individual decisions to apply for these types of property and that could have led to applicants having to consider properties in a different area. However since Affordable Rents conversions were introduced in April 2016 there has been no noticeable impact on demand. Also this change 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. 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 Business Plan</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 2017/18 in the context of the HRA Medium Term Financial Plan 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"> (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 Act 2016 to reduce rents alters the position over the medium and long term. Further changes introduced in the Housing and Planning Act 2016 may also have an impact but as the Government has not yet published detailed guidance and regulation it is impossible to estimate the impact. (b) The rents go towards funding the maintenance and repair of the housing stock. The HRA includes funding the improvements to the existing housing stock 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 those that need a home of their own or need a larger home (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
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 5300 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> <p>1.9% are White other</p> <p>0.6% Asian or Asian British</p> <p>0.5% Black or Black British</p> <p>57% of tenants have a long term health problem</p> <p>In 8.8% of tenants households someone is a wheel chair user</p>

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 they meet the full cost from their own resources, all will have some reduction after taking into account the rent reduction and the increase in the Service Charge.

There has been no noticeable negative impact as a result of the introduction of Affordable Rents.

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:

- 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.
- The Bedroom Tax data base contains detailed information producing a number of standard reports. This provides quantitative and qualitative data
- Reports on the impact of the Welfare Reforms
- Research to support the regeneration of Red Hall
- The Housing Strategy
- Supported Housing Strategy

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					L		<p>The overall reduction will have a slight positive impact for those who self-fund</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 detail on next page)	P					L		<p>The overall reduction will have a slight positive impact for those who self-fund</p> <p>Funding of Aids and Adaptation will positively help those with mobility and other needs. The new build programme may also include specially adapted properties</p>

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. There may be positive affects as a result of the increase in supply of housing
Marriage/ Civil Partnership			NA				nil	There are no specific disproportionate negative impacts based on marriage/ civil partnership

Section 3: Officer Assessment - continued

<p>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.</p>								
Mobility Impairment	P						L	There are no specific disproportionate negative impacts based on mobility impairment A programme of aids and adaptations to aid mobility will help people with a mobility problem to remain in their own home
Visual impairment	P						nil	There are no specific disproportionate negative impacts based on visual impairment 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
Hearing impairment	P					nil	<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					nil	<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					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>
Long Term Limiting Illness	P					L	<p>There are no specific disproportionate negative impacts</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	P					L	<p>There are no specific disproportionate negative impacts</p> <p>A programme of aids and</p>

								<p>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 with mobility issues</p>
Other - Specify	None							
Cumulative Impacts								
Change activities				Potential cumulative impacts				
Impact on tenants and applicants				<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 a result of changes to the funding criteria for receiving care and support services. Most that fall into these categories are in receipt of housing benefit and will not be affected by the changes to the rent and service charge.</p> <p>Affordable Rents have been a growing part of the housing market in Darlington since they were introduced. By the end of 2016/17 the Council are on course to have introduced about 500 affordable tenancies. There are about 400 properties provided by other providers that are affordable tenancies. The conversion of council stock to affordable rent has had no noticeable impact on demand.</p> <p>The proposed changes to rent and service charges will be a minor benefit for those who are not in receipt of Housing benefit and will have no impact on those in receipt of Housing Benefit. For those who are impacted by the Bedroom Tax this will slightly reduce the amount they need to find from their own resources.</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"> • 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 • 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>In the long term the year on year reduction of rental income will have an impact on the way the council delivers services and maintains properties as resources will be significantly reduced</p> <p>Conclusion</p> <p>Council tenants will not be directly negatively affected by the rent and service charge changes during the life of this EIA. However, in the longer term the impact of the rent reductions will inevitably have an effect on services to tenants.</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 were discussed with the Customer Panel in November 2016. The changes are essential requirements to reduce rents and recover costs within the service charges limiting the discretion that the Council has.</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 housing improvement programmes</p>	

Section 5 - Sign-off when assessment is completed

Officer Completing the Form:		
Signed	Name:	Ken Davies
	Date:	14/12/16
	Job Title:	Housing Strategy Officer
Assistant Director:		
Signed	Name:	Pauline Mitchell
	Date:	14/12/16
	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?
No negative impacts are identified as a result of the proposed changes.

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 Those affected by the will be specifically contacted the Income Management Team	Tony Martin Housing Income Team Manager	March 2017
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	Tony Martin Housing Income Team Manager	On going

	combination with Housing Management Officers identify tenants who are experiencing difficulties paying the rent		
	Advice and information is regularly provided to tenants via Hot News and this is supplemented with information leaflets and information on the Council Website	Tony Martin Housing Income Team Manager	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 household goods	Tony Martin Housing Income Team Manager	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	Veruta Barlow Housing Management Team Manager	On going
Performance Management			
Date of the next review of the EIA	December 2017		
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		