

Appendix 2 - H&F Equality Impact Analysis Tool



Conducting an Equality Impact Analysis

An EIA is an improvement process which helps to determine whether our policies, practices, or new proposals will impact on, or affect different groups or communities. It enables officers to assess whether the impacts are positive, negative, or unlikely to have a significant impact on each of the protected characteristic groups.

The tool is informed by the [public sector equality duty](#) which came into force in April 2011. The duty highlights three areas in which public bodies must show compliance. It states that a public authority must, in the exercise of its functions, have due regard to the need to:

- 1. Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited under the Equality Act 2010**
- 2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it**
- 3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it**

Whilst working on your Equality Impact Assessment, you must analyse your proposal against these three tenets.

General points

1. In the case of matters such as service closures or reductions, considerable thought will need to be given to any potential equality impacts. Case law has established that due regard cannot be demonstrated after the decision has been taken. Your EIA should be considered at the outset and throughout the development of your proposal, it should demonstrably inform the decision, and be made available when the decision is recommended.
2. Wherever appropriate, the outcome of the EIA should be summarised in the Cabinet/Cabinet Member report and equalities issues dealt with and cross referenced as appropriate within the report.
3. Equalities duties are fertile ground for litigation and a failure to deal with them properly can result in considerable delay, expense, and reputational damage.
4. Where dealing with obvious equalities issues e.g., changing services to disabled people/children, take care not to lose sight of other less obvious issues for other protected groups.
5. If you already know that your decision is likely to be of high relevance to equality and/or be of high public interest, you should contact the Strategy & Communities team for support.

Further advice and guidance can be accessed online and on the intranet:

<https://www.gov.uk/government/publications/public-sector-equality-duty>

<https://officesharedservice.sharepoint.com/sites/Governance/SitePages/Reports.aspx>

H&F Equality Impact Analysis Tool

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	22/23 Proposed changes take effect from Q3
Name and details of policy, strategy, function, project, activity, or programme	<p>Title of EIA: Introduction of planned rent and service charge increases in 22/3</p> <p>Short summary: This report sets out the proposed plan for the introduction of a second increase to Council tenants' rents and a move to full cost recovery of charges for services for both tenants and leaseholders.</p> <p>Planned changes:</p> <ul style="list-style-type: none"> • A supplementary rent increase of 4.1% from 14th November 2022 is proposed (this is equivalent to 1.6% if this was implemented from April 2022). Therefore, the total rent that will be paid by tenants in 2022/23 will only increase by 3.1% compared to total rent paid in 2021/22. This is equal to the September 2021 inflation figure and a full percentage point below the limit of 4.1%, balancing the reality of increasing costs with protecting household budgets. These proposals will mean that the rent increase for tenants in LBHF for 2022/23 will be lower than all but one other London Borough (based on information available from 26 Boroughs). • A shift to full cost recovery for services paid for through charges for all tenants and leaseholders from the same time. • For tenants, the new service charges will apply from 14th November 2022. For leaseholders, the charges will apply in line with the differing system for charging and collecting that runs on a year in arrears basis with charges for 21/22 only being confirmed and collected for from September 22. <p>A second in-year rent increase is an unprecedented step, and the charge remodelling addresses a failure to recover over £5m of costs annually. These changes are necessary; to balance the HRA taking into account further increasing inflation, eliminate dependency on falling reserves; protect both day to day service delivery and delivery of major improvement programmes and because deference to cost modelling for charged for services that was established in 2012 puts the Council at both financial and legal risk.</p> <p>The HRA Business Plan allows for the on-going investment in services which directly support residents in living healthy and independent lives. In particular, the provision for aids and adaptations to tenanted accommodation.</p>

Wider context of these planned changes:

Whilst the plan is focused on looking at the direct impact of the changes on tenants and leaseholders that will be most affected, equality impact is considered within the wider context of how housing and cost of living challenges are impacting across the borough.

General affordability of rents and charges:

- Council tenants enjoy the very lowest cost rents that are genuinely affordable. Housing benefit and universal credit will cover these costs for residents who are eligible for them including the planned increases in both rents and charges. Just over 50% of Council tenants are in receipt of these benefits.
- Residents in much higher cost private sector housing on benefits (where the cap for what is catered for is exceeded) and lower incomes will be much more challenged. In London, which temporarily fell out of favour with renters earlier on in the pandemic, the average asking rent to hit a record £2,193 a month – up 14.3%, or £274, on a year ago.
- Leaseholders are property owners, many of whom have benefited from a substantial discount under the right to buy system. As properties have changed hands a significant proportion are now rented out privately. These homeowners and landlords will be accustomed to paying for a range of costs for the maintenance and upkeep of their properties and should understand that leasehold charges will vary and may increase more in particular years. Most leaseholders have in fact enjoyed a substantial subsidy on charges that has been catered for through HRA reserves that have largely been accrued through the rental income provided by tenants.

Protection through access to benefits:

The Government's programme of Welfare Reform will impact on some tenants in terms of affecting their ability to pay rent (that includes provision for service charges). All new benefit claims are subject to Universal Credit and all existing claims are currently subject to a migration process to Universal Credit that is anticipated to be completed by December 2023.

- the overall benefit cap restricts the total value of packages of benefits to tenants, and the increase in rent will result in an additional impact but this will depend on the level of benefits and other income received; where tenants qualify for all or most of their rent and service charges they will not be directly impacted
- direct payment of benefits to social housing tenants as part of Universal Credit may result in an increase in rent arrears, and again the increase in rent will result in an additional impact

The Council is not in control of any potential changes outside its decision-making remit, therefore this EIA deals with analysing the equalities impact on tenants resulting from the rent and tenant service charges increase and how this impact can be managed within this wider context.

There are no impacts on existing staff because of this project.

Understanding of who will be most affected:

For most tenants and leaseholders, the planned increases to rents and charges will be modest. However, for tenants that are just about managing or already having difficulty covering essential living costs and are not protected through benefits even small amounts will be detrimental.

For a significant minority, the increases will be significantly more (see appendix 1). This will mainly be associated with property size; some tenants have been identified that were not brought into the charging system and because of an improved costing based that more accurately allocates costs by estate or block.

Tenants on low incomes that are just outside of eligibility for benefits that will cater for the increased costs will be most impacted. These residents will mostly be living in relative poverty and may well be experiencing absolute poverty. They will already be struggling to make ends meet and any increase, but particularly one of the higher levels, will be a hammer blow to deal with on top of the increase in energy and food costs and wider inflationary pressures. Some will have tipped into the highly stressful position of having to make the most difficult of choices to survive. There will be a level of debt, vulnerability to high-cost credit including loan sharks and recourse to various survival tactics including off the system working that comes with exploitation. Children and young people from families in this situation are likely to be significantly impacted with the stress, shame and fear associated with living on the breadline significantly impacting on their health, well-being, and life chances. Some parents may decide that they would be better off staying on or moving onto benefits than staying in low paid work, a survival tactic for the here and now that may lead to an entrenched poverty trap.

Leaseholders that just about managed to secure the finances to buy and meet mortgage payments may also be significantly affected, particularly those that have become unemployed or have had to take lower paid work. Some may have started to fall behind with mortgage payments, a situation that will increase with continuing rises in interest rates. Some may even be on a trajectory for losing their homes with the unethical prospect of their mortgage costs being far lower than housing costs following homelessness.

Who will be negatively impacted:

The challenges of lower income living relate to **all resident groups and all protected equalities characteristics**.

However, based on available information we understand there will be an increased level of impact from these charges in relation to.

- Age (linked to those only on state pensions and where access to additional benefits does not cover the increases)
- Disabilities (linked to barriers to employment, particularly higher paid employment, and costs to manage disabilities that are not covered through access to associated specific benefits)
- Gender reassignment due to high levels of discrimination in the workplace and associated impact on employment and income levels
- Race associated with the strong relationship between lower incomes and poverty and many minorities' groups
- Pregnancy and maternity associated with disruption to earning potential and childcare costs that are not covered by employee benefits or government provisions

Generally, levels of need and key protected characteristics will be higher across tenants than the wider borough population as there is a strong relationship with priority needs that qualify for statutory assistance with housing and allocations.

There have been 13 rent arrears related eviction proceedings since 2019 – the profile by age, ethnicity and gender has been requested. The small number reflects the strong approach to prevention and support of this most serious consequence of rent arrears.

Overview of support that will be provided

H&F have good money and debt advice provisions for tenants that are proactively promoted at the first sign of rent arrears. This includes the ability to agree a Discretionary Housing Payment (DHP) and/or debt management plan.

Increasing demand for DHP payments this year means that the allocated government funding of £583k is rapidly

moving toward being fully committed. This funding has been reduced at a time of greater need. As a result, additional funding will need to be secured through local provisions and/or appeal to Government to cater for tenants that need direct financial assistance to deal with the increases.

The existing range of flexible payment plans to help leaseholders that are challenged to pay charges and deal with increases will cater for the support that is required. This includes the ability to spread increases over an agreed time period. Homelessness prevention support will continue to be provided for any leaseholders that are at risk of losing their homes due to mortgage arrears.

The specific provisions noted will need to be enhanced to cater for the significantly increased level of support that is needed.

The approach will be targeted at those that are most challenged to manage the increases whilst paying for essentials. It will be two-fold.

– to provide here and now support - including options for mitigating the impact of the changes and wider provisions to respond to rent and service charge affordability

- to provide advice and resources to help resolve a resident's experiencing an acute cost of living crisis whereby their disposable house-hold income is insufficient to provide for essentials

There is a rapidly developing corporate strategy and service offer to help residents at the sharpest end of the cost-of-living crisis, but it is not yet fully formed. The wider support offer will need to be part of the plan for managing adverse impact.

The project management team are now in the process setting out plans for dealing with the anticipated volume of queries, level of case work and in particular, demand for DHP support that will be required to manage the impact and our commitment to managing it.

Messaging and communications will be key.

We will communicate the rent and charge increases within the context of a strong messages that support is available for those that need it. The key messages will include:

- 'Please talk to us if you are struggling, if you cannot make ends meet, we care and we are here to help you'
- 'We can offer practical ways for you to manage these rent and charge increases'
- 'We can also help you with a range of wider range of services and support around debt, food, fuel bills and taking

	care of yourself and your children’
Lead Officer	Name: Martin Calleja Position: Rent and Charges Project Manager Email: martin.calleja@bhf.gov.uk Telephone No: 07375057705
Date of completion of final EIA	15 th August 2022

Section 02	Scoping of Full EIA
Plan for completion	<p>Timing: Design and costing of support solutions plan for the project is 31.8.22 Support solutions to be put online in tandem with planned date for notices of changes 17.10.22 Resources: the main additional resources that will need to be catered for is.</p> <ul style="list-style-type: none"> • the additional level of DHP support to tenants • case work for households that cannot meet essential weekly living costs
Analyse the impact of the policy, strategy, function, project, activity, or programme	<p>The principal impact of the report arises from.</p> <p>the application of the second rent increase to all tenants (11,890 tenancies) which will mean an average total impact of £3 per week or £156 per week</p> <p>the application of full cost recovery to all tenants and leaseholders (4,300 leasehold agreements) that will mean an average increase of £5 per week for tenants or £260 per year and £4 for leaseholders or £208 per year. However, a significant minority of tenants and leaseholders will need to deal with a much more significant increase associated with levels of undercharging and the legitimate additional costs associated with particular estates and blocks (see appendix 1).</p> <p>Detailed profiling on the increases is set out in Appendix 1. As noted, support will be targeted at those who have notice of the biggest increases including tenants not protected by associated increases to benefits.</p>

The rent and charge increases will affect tenants on full, partial or no Housing Benefit ('HB') in different ways and information regarding the numbers affected and the new amounts that tenants would be required to pay is included in section 03 of this EIA. Equality data is not available across all protected groups for full, partial or no HB. The information that the council does have, is included at section 03, and used where applicable in the analysis further below.

Households on full HB will not be affected by the rent or charge increase because it is within the HB rent payment. The impact on these households' disposable income will be **neutral** in such cases, although the increase may be a disincentive to stay in or take up work.

There will be a shortfall if those households are under occupying, i.e., they have more bedrooms than they need or if a household is impacted by the benefit cap, regardless of whether the Council were to implement a rent increase. This applies to all protected groups (although some disabled people may have different circumstances if a room is required for their carer, see below) and as such would result in a **negative** impact. For the avoidance of doubt, this analysis applies to all protected groups and is not included in the analysis for this reason.

Several general mitigating actions are in place to enable tenants to manage the impact of the rent and charge increase. In addition to the availability of Housing Benefit to meet the increase, these include the provision of Discretionary Housing Payments (DHP) to assist tenants in managing any arrears; incentive payments to tenants willing to downsize; the availability of housing occupancy officers to support tenants in progressing moves to smaller properties and in minimising the need for evictions; and the supply of smaller properties within the housing stock to enable moves to more appropriately sized accommodation.

As noted, there is an urgent need to review DHP payment provisions that will not be able to cater for the targeted support that will be needed for tenants.

For leaseholders, a range of flexible payment plans, including the option of spreading charges and increases over time are available.

Counsel have advised that we cannot vary rents or charges or provide a direct subsidy e.g., a cap on charge increases or a targeted reduction based on a particular characteristic. This would open us up for a successful challenge to provide it across the piece. It would also be a blunt approach that would reduce badly needed income and lack sensitivity to where there is greatest impact.

	Protected characteristic	Analysis	Impact:
	Age	<p>Tenants of all age groups not in receipt of HB will be impacted by the increase. Those in this group are likely to be in full-time work. This will impact a total of 6,941 tenancies. Age data is not available for these tenancies, therefore, it is not possible to determine the impact, although it is likely that paying more rent will be a negative impact. The Council has put in place mitigating actions, and these include the provision of DHP, assisting tenants in moving to smaller properties including incentive payments to under occupying tenants who downsize and managing down any arrears. The report sets out the challenging financial situation and the need to reduce spend as well as increase rents to fund the financial plan.</p> <p>Tenants of all age groups on partial HB will be impacted and this group totals 1,843 tenancies. Those in this group are likely to be of working age, in part-time or low paid work. It is likely that the increase in rent and charges will be negative for most of this group unless they are able to increase their income, but this will depend on the exact benefits that they (and their partners, if they have a partner) receive. The Council has put in place mitigating actions, and these include the provision of DHP, assisting tenants in moving to smaller properties including incentive payments to under occupying tenants who downsize and managing down any arrears. The report sets out the challenging financial situation and the need to reduce spend as well as increase rents to fund the financial plan.</p> <p>Tenants of all age groups on full HB will be impacted and this group totals 3,019 tenancies. Those in this group are likely to be of working age, in part-time or low paid work. It is likely that the increase in rent will be neutral for this group, but this will depend on the exact benefits that they (and their partners, if they have a partner) receive. The Council has put in place mitigating actions, and these include the provision of DHP, assisting tenants in moving to smaller properties including incentive payments to under occupying tenants who downsize and managing down any arrears. The report sets out the challenging financial situation and the need to reduce spend as well as increase rents to fund the financial plan.</p> <p>Older tenants on a minimum state pension and are whom not eligible for additional benefits that will cover the increases will be adversely affected. The</p>	Overall negative

		<p>impact of poverty and making choices to reduce fuel and food costs are even more significant in later life. Age Concern UK have documented a precedence of emotional barriers to sorting out and managing finances in later life. The impact of the notice of the increases of mental health and well-being should not be underestimated.</p>	
	Disability	<p>The employment rate for disabled people in London stands at 46.5% most of whom will be in receipt of Housing Benefit. Disabled tenants not in receipt of HB will be impacted by the increase.</p> <p>Those in this group are likely to be in full-time work; exact numbers are not known including understanding of income levels are not known. Those on lower income levels may not qualify for any specific disability related benefits to cover costs associated with their disability so rent and charge increases will impact adversely</p> <p>Disabled tenants on partial HB where the claimant or partner is in receipt of a disability benefit/allowance/award/carer premium will be impacted and those in this group are likely to be of working age, in part-time or low paid work. It is likely that the increase in rent will be negative for most of this group unless they are able to increase their income, but this will depend on the exact benefits that they (and their partners, if they have a partner) receive.</p> <p>The Council plans to mitigate against the impact by providing DHP in the event of difficulties experienced in allocating a suitable alternative property; enabling moves through providing incentive payments of up to £2,000 per room given up; and making available smaller properties to accommodate any required moves. Officers are updating records of the number of disabled tenants that are residing in Council dwellings so that targeted support can continue to be provided. The report sets out the challenging financial situation and the need to reduce spend as well as increase rents to fund the financial plan.</p> <p>The impact upon households on full HB where the claimant or partner is in receipt of a disability benefit/allowance/award/carer premium will be neutral, unless the increase in rent takes them above the overall benefit cap. There will be a shortfall if those households are of working age and under occupying, i.e.,</p>	Overall negative

		<p>they have more bedrooms than they need; if their package of benefits is reduced by the overall benefit cap resulting in a shortfall in meeting the weekly rent required; or because of the impact of direct payments, if the council were to implement a rent increase or not. For disabled people who need an extra room for a personal assistant / carer, an increase where they cannot meet the shortfall would result in a negative impact, but it is not possible to be precise about this.</p> <p>For all disabled tenants, the Council will have housing officers on hand to help tenants with moving, to lessen the effects of any move.</p> <p>The Council has undertaken to interview under-occupying tenants as part of providing a package of support to enable tenants to downsize. Although it is not possible to determine the impact exactly, it is likely that paying more rent will be a negative impact. In addition, consideration should be given to those tenants with an adaptation to their dwelling or where they need to be near health services. Again, it is not possible to ascertain the exact number of such cases.</p> <p>The Council plans to mitigate against the impact by providing DHP in the event of difficulties experienced in allocating a suitable alternative property; enabling moves through providing incentive payments of up to £2,000 per room given up; and making available smaller properties including sheltered accommodation (which may be closer to health services) to accommodate any required moves. Additionally, Disabled Facilities Grant (DFG) could in some cases be applied for by tenants requiring an adaptation to their dwelling, with the cost of any adaptation potentially being funded directly from the Housing Revenue Account where DFG funding bids are unsuccessful. Officers are updating records of the number of disabled tenants that are residing in Council dwellings and are being impacted by overall benefit cap so that targeted support can be provided. The Council has made available DHP for those that meet the award criteria. The report sets out the challenging financial situation and the need to reduce spend as well as increase rents to fund the financial plan.</p>	
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	Gender reassignment	<p>There is no data available on those with this protected characteristic as our tenants. However, it is likely that those who have transitioned, or who are transitioning, and who are unable to pay the increase in rent (whether on full, partial HB or no HB) will be negatively affected by the change. The impact will be greater for those in larger properties but for all tenants the impact will be negative.</p> <p>The Council can mitigate the effects of this disruption through the provision of DHP. The Council has housing officers on hand to help people with this protected characteristic with moving, to lessen the effects of the move.</p> <p>National and global research all point to transgender workers facing discrimination, despite the fact it is unlawful. Trans people have high levels of unemployment and self-employment. For those who are employed, incomes are well below the average.</p> <p>https://www.unison.org.uk/content/uploads/2015/05/TowebTransgender-workers-rights.pdf</p>	Overall negative

	Marriage and Civil Partnership	The Council is not offering a service in a different way to married people or to civil partners and so this protected characteristic is not applicable to this analysis.	
	Pregnancy and maternity	<p>There is no data available on those with this protected characteristic. However, it is likely that women who are pregnant or who are on maternity leave, and who are unable to pay the increase in rent (whether on partial HB or no HB) will be negatively affected by the change.</p> <p>Pregnancy, maternity, and childcare beyond will impact on earning potential for many women and could bring them into a challenged income position.</p> <p>The Council can mitigate the effects of this disruption through the provision of DHP, which, if necessary, can cover the period pending a move. The Council will have housing officers on hand to help people with this protected characteristic with moving, to lessen the effects of the move.</p>	Overall negative
	Race	<p>The available data in section 03 does not give a breakdown by ethnicity of those on no, partial, or full HB. A recent review of the race profile of one of the Council's housing estates shows little variance with the race profile of the borough.</p> <p>The relationship between race, ethnicity and incomes is complex but broadly minority groups are significantly more likely to be unemployed, on lower incomes and living in poverty. They are more likely to be the sharp end of the cost-of-living crisis and therefore affected by even smaller increases if they are not covered by benefits</p> <p>It is not possible to mitigate the effects of this potential disruption as it would be unlawful to exempt one racial group from the extra cost per week. The Council has housing officers on hand to help people with this protected characteristic with moving, to lessen the effects of the move.</p>	Overall negative
	Religion/belief (including non-belief)	There is limited data available on those with this protected characteristic as our tenants. Very few residents have chosen to share their religious belief details, less than 10% across the housing stock.	Likely negative

		<p>However, it is likely that those of any religion or belief group who are unable to pay the increase in rent (whether on full, partial HB or no HB) will be negatively affected by the change.</p> <p>It is not possible to mitigate the effects of this disruption as it would be unlawful to exempt one religious' group from the extra cost per week.</p>	
	Sex	<p>There is no data available on men and women as our tenants. However, it is likely that men and women who are unable to pay the increase in rent (whether on full, partial HB or no HB) will be negatively affected by the change.</p> <p>Further lower income challenges are more likely to be associated with single parent households the majority of whom are mothers - particularly where there are several children and/or they are in younger age range making access to full time work a challenge.</p> <p>In certain cases, such as those involving domestic violence, the Council will mitigate the effects of this disruption via the provision of DHP on a case-by-case basis. It is expected that the impact of the rent increase will be greater for women than men. Further, where tenants are under-occupying, support will be available through incentive payments of up to £2,000 per room given up and the supply of smaller properties. The Council has two housing officers on hand to help people with this protected characteristic with moving.</p>	Overall negative
	Sexual Orientation	<p>National data around sexuality and income is only emerging and there is no local</p> <p>Although very limited data is available there is no disproportionate impact identified. Equality and Human Rights Commission guidance on this protected characteristic is to collect data where relevant. Sexuality is not relevant to most of housing services except for tackling harassment.</p> <p>However, it is likely that those of any sexual orientation who are unable to pay the increase in rent (whether on full, partial HB or no HB) will be negatively affected by the change.</p> <p>It is not possible to mitigate the effects of this disruption as it would be unlawful to exempt one group with a particular sexual orientation from another from the extra cost per week. The Council will have housing officers on hand to help</p>	Likely neutral

	<p>people with this protected characteristic with moving.</p>
	<p>Human Rights or Children’s Rights If your decision has the potential to affect Human Rights or Children’s Rights, please contact your Equality Lead for advice</p> <p>Will it affect Human Rights, as defined by the Human Rights Act 1998? Yes This may affect Article 8: Right to respect for family life, which may be relevant to families and foster carers with children, as well as to those who are under occupying and who are impacted by the increase in rent and the change in size criteria. However, this is a qualified right and can be interfered with if the Council considers that it is a proportionate means of achieving a legitimate aim.</p> <p>Will it affect Children’s Rights, as defined by the UNCRC (1992)? Yes. For children who are fostered or looked after, this may affect the right to live in a family environment or alternative care. It is not possible to mitigate the effects of this disruption as the Council cannot afford to top up the outstanding rent payable. The report sets out the difficult financial situation and the need to reduce spending as well as increase the rents. However, the Council will have housing officers on hand to help people with this protected characteristic with moving if necessary.</p>

Section 03	Analysis of relevant data Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.
Documents and data reviewed	There is limited data on needs, income, poverty and inequalities of tenants and leaseholders across the Council’s estates
New research	The above should be addressed including consideration of a Joint Strategic Needs Assessment of estates-based needs.

Section 04	Consultation
Consultation	<p>Consultation for these changes is limited to the provision of information and notice. Management of the HRA budget generally and specifically with regards to rent setting and management of the charged for service portfolio has not been co-produced with tenants and leaseholders to date. During the summer consultations on some specific elements of the later area have been facilitated e.g., considering options for concierge services in specific blocks and are feeding into the charge review process. A commitment to address the need for greater co-production of financial management of the HRA will be a part of the communications for these changes but the financial imperative means we cannot consult of the decision.</p> <p>Established HRA and Leaseholder engagement forums will be consulted with of the changes in early September within the above noted context</p>
Analysis of consultation outcomes	To follow the above noted key events

Section 05	Analysis of impact and outcomes
Analysis	<p>What has your consultation (if undertaken) and analysis of data shown? You will need to make an informed assessment about the actual or likely impact that the policy, proposal, or service will have on each of the protected characteristic groups by using the information you have gathered. The weight given to each protected characteristic should be proportionate to the relevant policy (see guidance).</p>

Section 06	Reducing any adverse impacts and recommendations
Outcome of Analysis	<p>Include any specific actions you have identified that will remove or mitigate the risk of adverse impacts and / or unlawful discrimination. This should provide the outcome for LBHF, and the overall outcome.</p>

Section 07**Action Plan****Action Plan**

Note: You will only need to use this section if you have identified actions as a result of your analysis

Issue identified	Action (s) to be taken	When	Lead officer and department	Expected outcome	Date added to business/service plan
<p>Affordability of service charge increases for leaseholders who tip into struggling to meet essential living costs including those related to their disability</p> <p>Wider group of leaseholders in this position due to wider cost of living pressures and/or changes to employment position</p>	<p>Market and if required enhance existing payment plan options. Target households in arrears with charges.</p> <p>Provide wider cost of living and homelessness prevention support</p>	To be on-line for 17 th October 2022	<p>Stephen Fitzgerald, Senior Service Charge Accountant (Leaseholders - Finance)</p> <p>Martin Calleja, Rent and Charges Project Manager, Economy</p>	<p>Negative Impact alleviated</p> <p>Viable household budget and support to pay for essentials is facilitated to avoid absolute poverty and/or home repossession</p>	This work is within the project plan for these changes
Affordability of rent and service charge increases not protected by associated increases in benefits who tip into struggling to meet essential living costs	Market and enhance existing support and rent account management options. Target households in arrears with charges.	To be on-line for 17 th October 2022	Paul Hayward Head of Rental Income	Negative Impact alleviated	As above

	including those related to their disability. Wider group of tenants in this position due to wider cost of living pressures and/or changes to employment position	Urgently review DHP provisions Provide wider cost of living and homelessness prevention support		Sukvinder Kalsi Director of Finance and Martin Calleja, Rent and Charges Project Manager, Economy	Viable household budget and support to pay for essentials is facilitated to avoid absolute poverty and/or arrears related eviction	
	Tenants and leaseholders particularly older people that are anxious and stressed about the notified changes	As above Housing and Estate managers to use intelligence of households to undertake targeted home visits	To be on-line for 17 th October 2022		TBC	As above

Section 08	Agreement, publication, and monitoring
Senior Managers' sign-off	Name: Mark Meehan Position: Chief Housing Officer Email: Mark.Meehan@lbhf.gov.uk Telephone No: Considered at relevant DMT: Housing DMT 15.8.22
Key Decision Report (If relevant)	Date of report to Cabinet/Cllr Umeh, Lead Member Housing and Homelessness : 10.10.22 Key equalities issues have been included: Yes
Equalities Advice (where involved)	N/A

Appendix 1

To note:

Range of increases following proposed second rent (£) increase:

Range of increases (£pw)	No of Bedrooms							Total
	0	1	2	3	4	5	6	
Less than £1	39	198	114	55	23	0	1	430
Between £2 and £3	358	964	344	36	0	0	0	1,702
Between £3 and £4	159	2,336	3,115	1,136	27	0	0	6,773
Between £4 and £5	2	687	404	1,069	398	20	1	2,581
Between £5 and £6	0	15	19	76	322	54	9	495
Between £6 and £7	0	0	5	0	5	2	3	15
£9 or above	0	0	0	0	4	0	0	4
Total	558	4,200	4,001	2,372	779	76	14	12,000

Note:

- the "£9 or above" increases apply to a small number of homes where the rent is much higher (c£300-£350 pw). This has resulted from tenancies which commenced some years ago when the Conservation Administration implemented a different rent policy to the one we follow now.
- Validation and management work is taking place across all outlier high increase variations (across rent and charges increases)

Variation in service charge increases – tenants

- Validation work on the highest increases is taking place.
- Higher increases reflect a combination of factors including; higher levels of historical under charging, property size and estates and blocks with high cost service elements e.g. concierge, large areas of grounds

Bin Name	Both	Curr Only	New Only	Total
£20-£21	44		1	45
£19-£20	20			20
£18-£19	112		1	113
£17-£18	52		2	54
£16-£17	23		1	24
£15-£16	155			155
£14-£15	58			58
£13-£14	197			197
£12-£13	131			131
£11-£12	348		1	349
£10-£11	280			280
£9-£10	403		3	406
£8-£9	459		12	471
£7-£8	615		115	730
£6-£7	782		158	940
£5-£6	897		36	933
£4-£5	1,035		3	1,038
£3-£4	1,038		6	1,044
£2-£3	1,260		23	1,283
£1-£2	1,108		96	1,204
£0-£1	771		573	1,344
	1			1
£-1-£0	217	24		241
£-2-£-1	145	12		157
£-3-£-2	23	1		24
£-4-£-3	23	2		25
£-5-£-4	12			12
£-6-£-5	3			3
Total	10,213	43	1,031	11,287

Variation in service charge increases – leaseholders

Bin Name	Both	Curr Only	New Only	Total
£20-£21	6			6
£19-£20	5			5
£18-£19	5			5
£17-£18	4			4
£16-£17	9			9
£15-£16	3		2	5
£14-£15	3		1	4
£13-£14	3			3
£12-£13	7			7
£11-£12	4			4
£10-£11	91			91
£9-£10	32			32
£8-£9	59			59
£7-£8	139			139
£6-£7	212		1	213
£5-£6	206		2	208
£4-£5	372		1	373
£3-£4	590			590
£2-£3	658		2	660
£1-£2	745		2	747
£0-£1	1,001		30	1,031
£-1-£0	236	3		239
£-2-£-1	34	1		35
£-3-£-2	27			27
£-4-£-3	7			7
£-5-£-4	6			6
£-6-£-5	2			2
Total	4,466	4	41	4,511