

## **LBHF Equality Impact Analysis Tool**

### **Conducting an Equality Impact Analysis**

An EqIA 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 has been updated to reflect the new public sector equality duty (PSED). 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 this Act;**
- 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 the three tenets of the Equality Duty.

## 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 Equality Officer for support.
6. Further advice and guidance can be accessed from the separate guidance document (link), as well as from the Opportunities Manager: [PEIA@lbhf.gov.uk](mailto:PEIA@lbhf.gov.uk) or ext 3430

## LBHF Equality Impact Analysis Tool

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	XX / XX
Name and details of policy, strategy, function, project, activity, or programme	<p><b>Title of EIA:</b> Housing Revenue Account Financial Strategy and Rent Increase 2013/14</p> <p><b>Short summary:</b> This report sets out the budget strategy for the Housing Revenue Account (HRA) from 2013/14 to 2017/18 with detailed revenue estimates and the proposed rental and other charge increases. The strategic financial objectives of the HRA are set out, including the need to further develop an approach to asset management to allow for investment needs to be met and to ensure a sustainable HRA. Also included are proposals for efficiency savings and budget growth in line with the HRA MTFs Transformation programme.</p> <p>It should be noted that whilst as in previous years rent restructuring is being followed for properties with 3 or fewer bedrooms, it is proposed to raise rents for properties with 4 or more bedrooms<sup>1</sup> by marginally more than the rent restructuring formulae under a revised rents policy. This approach has been used elsewhere by other Local Authorities, for example Wandsworth. When arriving at the proposed increase the impact of two options was considered:</p> <ol style="list-style-type: none"> <li>1. <b>Option 1</b> – Rent restructuring for all dwellings – this uses the standard Government rent restructuring formulae generally employed in H&amp;F since 2001</li> <li>2. <b>Option 2</b> - Rent restructuring for all dwellings with the exception of 4 bedroom and above dwellings which have been modelled using the new proposed rent policy as set out in the report with a 5 year convergence period and a 7.5% cap</li> </ol> <p>Further details of the two options are given in section 7 of the accompanying HRA Financial Strategy and Rent Increase Report.</p> <p>The government also plans to introduce other changes to benefits in April 2013 and these will also impact on some tenants. It is not possible to include the impacts on all groups of Options 1 and 2, and potential central government changes within this EIA as these will vary from household to household. It can be said that where an increase in rent takes the household over the governments planned benefit cap per week, there will be an impact but it will depend on what benefits those households receive. Likewise where a household is under occupying they will already be impacted by the governments introduction of size criteria for housing benefit, again the increase in rent will result in an additional impact but this will depend on the benefits and other income received. The council is not in control of any potential changes outside its decision making remit, therefore this EIA deals only with Options 1 and 2, using the</p>

<sup>1</sup> LBHF currently has 889 properties with 4 or more bedrooms, this represents 7% of the stock.

	<p>data that is available and the other elements of the budget.</p> <p>There are no impacts on existing staff as a result of this project, although two more staff will be recruited if Cabinet agrees to the growth approved as part of the budget in Appendix 4 of the accompanying HRA Financial Strategy and Rent Increase Report.</p>
<b>Lead Officer</b>	<p>Name: Kathleen Corbett  Position: Finance and Resources Director, Housing and Regeneration  Email: <a href="mailto:kathleen.corbett@lbhf.gov.uk">kathleen.corbett@lbhf.gov.uk</a>  Telephone No: 020 8753 3031</p>
<b>Date of completion of final EIA</b>	<b>XX / XX / XX</b>

<b>Section 02</b>	<b>Scoping of Full EIA</b>																																													
<b>Plan for completion</b>	<p>Timing: Sept 2012 to Jan 2013  Resources: Officer time, and see section 03 for data resources</p>																																													
<b>Analyse the impact of the policy, strategy, function, project, activity, or programme</b>	<p>The principal impact of the report arises from the application of the rent increase, the impact of the two options considered are set out below:</p> <p><b>Option 1</b>  Option 1, applying the normal rent restructuring formula to all dwellings will affect all tenants (12,620 tenancies) in all bedroom size properties as set out below:</p> <table border="1"> <thead> <tr> <th>Range of increase</th> <th>0 bed</th> <th>1 bed</th> <th>2 bed</th> <th>3 bed</th> <th>4 bed</th> <th>5 bed</th> <th>6 bed</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Less than £3</td> <td></td> <td></td> <td></td> <td>1</td> <td></td> <td></td> <td></td> <td>1</td> </tr> <tr> <td>£3 to £5</td> <td>612</td> <td>3,910</td> <td>3198</td> <td>779</td> <td>6</td> <td>1</td> <td></td> <td>8,506</td> </tr> <tr> <td>£5.01 to £7</td> <td>1</td> <td>500</td> <td>1,038</td> <td>1,691</td> <td>793</td> <td>77</td> <td>12</td> <td>4,112</td> </tr> <tr> <td><b>Grand total</b></td> <td>613</td> <td>4,411</td> <td>4,236</td> <td>2,471</td> <td>799</td> <td>78</td> <td>12</td> <td><b>12,619</b></td> </tr> </tbody> </table> <p><b>Option 2</b>  889 properties will be affected by Option 2 if it is adopted by Cabinet. Option 2 will increase rent on 4 bed+ properties by more than the rent increase in Option 1. Of these 889 properties 772 tenants in these properties will have to pay an increase of more than the maximum £7 per week increase which would arise if option 1 was</p>	Range of increase	0 bed	1 bed	2 bed	3 bed	4 bed	5 bed	6 bed	Total	Less than £3				1				1	£3 to £5	612	3,910	3198	779	6	1		8,506	£5.01 to £7	1	500	1,038	1,691	793	77	12	4,112	<b>Grand total</b>	613	4,411	4,236	2,471	799	78	12	<b>12,619</b>
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adopted.: The impact on all 889 properties is set out below:

Range of increase	4 bed	5 bed	6 bed	Total
Less than £3		1		1
£3 to £5	8	10		18
£5.01 to £7	90	6	2	98
£7.01- £9	420	3		423
£9.01-£11	280	51	8	339
£11.01-£13	1	7	2	10
<b>Grand total</b>	799	78	12	<b>889</b>

Options 1 and 2 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.

#### **Options 1 and 2: overall analysis for households on full HB**

For Options 1 and 2, households on full HB will not be affected by the rent increase because it is within the HB Benefit Rent payment. The impact on these households will be **neutral** in such cases. 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, if the council were to implement a rent increase or not. 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 Options 1 and 2, to all protected groups and is not included in the analysis below because (as stated) it applies to all protected groups.

Protected characteristic	Analysis	Impact: Positive, Negative, Neutral
Age	<b>Option 1</b> 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 5,028 tenancies of which 293 tenancies are in 4 bedroom or larger properties. It cannot be clearly determined from the data in section 03 if many of these households are under or over occupied, which might otherwise indicate whether	Unknown, likely negative

		<p>tenants had children to look after or not. 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. It is not possible to mitigate the effects of this 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 debt as well as to build up reserves.</p> <p>.</p> <p>Tenants of all age groups on partial HB will be impacted and this group totals 2,665 tenancies of which 436 tenancies are in 4 bedroom or larger properties. 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 the majority 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. It is not possible to mitigate the effects of this 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 debt as well as to build up reserves.</p> <p>The council will have two extra officers to help those unable to afford the rent increase. It is likely that this will be of more relevance to those on partial HB than those on full HB (see further above) and those not on HB and who are working full time.</p> <p><b>Option 2</b></p> <p>Tenants who are not in receipt of HB and in a larger property are likely to be impacted by the larger increase in rent. This will affect a total of 293 tenancies. Again, it is not clear if these are under or over occupied and so it is not possible to draw further conclusions from that data. 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. It is not possible to mitigate the effects of this 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 debt as well as to build up reserves.</p> <p>Tenants of all age groups on partial HB in larger properties total 436 tenancies, of which 306 are under occupying which may mean that they do not have children to support. Those in this group are likely to be of working age, in part-time or low paid work. It is likely that the higher increase in rent will be negative</p>	<p>Negative</p> <p>Neutral</p> <p>Unknown, likely negative</p>
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		<p>for this group, as this is a higher than usual increase and depending on the benefits they receive and ability to increase income, they may need to move to a more affordable property. This will depend on a case by case basis and it is not possible to mitigate the effects of this 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 debt as well as to build up reserves.</p>	Negative
		<p>The Council will have two housing officers on hand to help tenants with moving, in order to lessen the effects of the move and over time, the impacts of the changes which may include having to move to more affordable accommodation, should lessen.</p>	Neutral
	Disability	<p><b>Option 1</b>  Disabled tenants not in receipt of HB will be impacted by the increase. Those in this group are likely to be in full-time work but exact numbers are not known. Therefore, it is not possible to determine the impact, although it is likely that paying more rent will be a negative impact. It is not possible to mitigate the effects of this 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 debt as well as to build up reserves.</p> <p>Disabled tenants on partial HB will be impacted and the size of this group is not known. 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 the majority 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. It is not possible to mitigate the effects of this 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 debt as well as to build up reserves.</p> <p>Households on full HB where the claimant or partner is in receipt of a disability benefit/allowance/award, total 586. Of these, 249 are under occupied by 1 or more beds, and 70 are overcrowded by 1 or more beds, with 105 meeting the DWP size criteria. This could indicate that this group could not have children but the data does not account for whether the household requires the room for an overnight carer and as such, conclusions cannot be drawn from it. As given further above, households on full HB will not be affected by the rent increase because it is within the HB Benefit Rent payment. The impact on these</p>	<p>Unknown, likely negative</p> <p>Unknown, likely negative</p> <p>Neutral Unknown, likely negative</p>

	<p>households will be neutral in such cases. There will be a shortfall if those households are under occupying, i.e. they have more bedrooms than they need, if the council were to implement a rent increase or not. For disabled people who need the room for a 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>The council will have two extra officers to help those disabled tenants unable to afford the rent increase. It is likely that this will be of more relevance to those on partial HB than those on full HB (see further above) and those not on HB and who are working full time.</p>	Neutral
	<p><b>Option 2</b> Disabled tenants who are not in receipt of HB and in a larger property are likely to be impacted by the larger increase in rent. This will affect a total of 293 tenancies which will include disabled and non-disabled households. Disability data is not available for these tenancies and it is not known if they have dependents. Therefore, it is not possible to determine the impact, although it is likely that paying more rent will be a negative impact. It is not possible to mitigate the effects of this 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 debt as well as to build up reserves.</p>	Negative
	<p>Disabled tenants on partial HB in larger properties will be impacted by the larger increase in rent if adopted. This will affect total 436 tenancies which will include disabled and non-disabled households. Disability data is also not available for these tenancies and it is not known if they have dependents. However, those in this group are likely to be of working age, in part-time or low paid work. It is likely that the higher increase in rent will be negative for disabled people in this group, as this is a higher than usual increase and depending on the benefits they receive and ability to increase income, they may need to move to a more affordable property. This will be more complex for disabled people than for non-disabled people. This will depend on a case by case basis and it is not possible for the council to mitigate for this and treat disabled people more favourably by exempting them from the higher rent 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 debt as well as to build up reserves.</p>	Negative



		<p>Households on full HB where the claimant or partner is in receipt of a disability benefit/allowance/award, total 586. Of these, 249 are under occupied by 1 or more beds, and 70 are overcrowded by 1 or more beds, with 105 meeting the DWP size criteria. This could indicate that this group could not have children but the data does not account for whether the household requires the room for an overnight carer and as such, conclusions cannot be drawn from it. As given further above, households on full HB will not be affected by the higher rent increase because it is within the HB Benefit Rent payment. The impact on these households will be neutral in such cases. There will be a shortfall if those households are under occupying, i.e. they have more bedrooms than they need, if the council were to implement a rent increase or not. This could be more likely if the council implements Option 2, which is a high rent increase on larger properties. For disabled people who need the room for a 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 disabled tenants on partial and full HB, the Council will have two housing officers on hand to help tenants with moving, in order to lessen the effects of the move and over time, the impacts of the changes which may include having to move to more affordable accommodation, should lessen.</p>	<p>Negative</p> <p>Neutral</p>
	Gender reassignment	<p><b>Options 1 and 2</b></p> <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 less for Option 1 than for Option 2 but both will be negative. People with this characteristic may find having to move more difficult than those without, as they may be accepted by their neighbours in their current location and they may find settling in a new location difficult. They may also be close to the gender reassignment clinic at Charing Cross and be negatively impacted by having to move away from it.</p> <p>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 debt as well as to build up reserves. However, the Council will have two housing officers on hand to help people with this protected characteristic with moving, in order to lessen the effects of the</p>	<p>Negative</p> <p>Neutral</p>

	move and over time, the impacts of the move should lessen.	
Marriage and Civil Partnership	<b>Options 1 and 2</b> 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	N/A
Pregnancy and maternity	<b>Options 1 and 2</b> 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 full, partial HB or no HB) will be negatively affected by the change. The impact will be less for Option 1 than for Option 2 but both will be negative. Women with this characteristic may find having to move more difficult than other women as they will be about to, or will just have given birth. They are also likely to be negatively impacted by having to move away from their GP and the hospital where they have a birth plan in place, or where they are being seen by a midwife after the birth of their baby.  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 debt as well as to build up reserves. However, the Council will have two housing officers on hand to help people with this protected characteristic with moving, in order to lessen the effects of the move and over time, the impacts of the move should lessen.	Negative  Neutral
Race	The available data in section 03 does not give a breakdown by ethnicity of those on no, partial, or full HB. However, that section does give 2001 census data which identifies some notable differences between those in council properties and the borough population, which include the following:  White British: renting from the council is 15,444 or 49.09% of the group as a whole that rents from the council White British: comprised 58.0% of the borough population Therefore, White British is under represented in the council's rented population in comparison to the borough population Black Caribbean: renting from the council is 3,494 or 11.11% Black Caribbean: comprised 5.2% of the borough population Therefore, Black Caribbean is over represented in the council's rented population compared to the borough population.	

		<p>Following the same method, the following groups are over and under represented in the council's rented population as compared to the borough profile:</p> <p>Black Caribbean; White Irish; Black African; Other Black; Pakistani; Bangladeshi; Other Asian; Mixed White and Black Caribbean; and Mixed White and Black African are all over-represented White British; Other White; Indian; Chinese; and Mixed White and Asian are all under represented.</p> <p><b>Options 1 and 2</b> Households on HB from the over-represented groups identified above, are proportionately more likely to be over-crowded than those race groups that are under-represented as above and this may mean that they have larger numbers of children to care for. There is no data available on those with this protected characteristic as tenants of LBHF properties. However, it is likely that those of any race 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. The impact will be less for Option 1 than for Option 2 but both will be negative. It is likely that that impacts will be felt more by Black Caribbean; White Irish; Black African; Other Black; Pakistani; Bangladeshi; Other Asian; Mixed White and Black Caribbean; and Mixed White and Black African households than by White British; Other White; Indian; Chinese; and Mixed White and Asian households, in line with their presence in the statistics.</p> <p>It is not possible to mitigate the effects of this disruption as the Council cannot afford to top up the outstanding rent payable, and it would be unlawful to exempt one religious group from the extra cost per week. The report sets out the difficult financial situation and the need to reduce debt as well as to build up reserves. However, the Council will have two housing officers on hand to help people with this protected characteristic with moving, in order to lessen the effects of the move and over time, the impacts of the move should lessen.</p>	Negative
	Religion/belief (including non-belief)	<p><b>Options 1 and 2</b> There is no data available on those with this protected characteristic as our tenants. However, it is likely that those of any religion of belief group who are unable to pay the increase in rent (whether on full, partial HB or no HB) will be</p>	Neutral

		<p>negatively affected by the change. The impact will be less for Option 1 than for Option 2 but both will be negative. People with this characteristic may find having to move more difficult than those without, as they may be active in their local place of worship</p> <p>It is not possible to mitigate the effects of this disruption as the Council cannot afford to top up the outstanding rent payable, and it would be unlawful to exempt one religious group from the extra cost per week. The report sets out the difficult financial situation and the need to reduce debt as well as to build up reserves. However, the Council will have two housing officers on hand to help people with this protected characteristic with moving, in order to lessen the effects of the move and over time, the impacts of the move should lessen.</p>	<p>Negative</p> <p>Neutral</p>
	Sex	<p><b>Options 1 and 2</b></p> <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. The impact will be less for Option 1 than for Option 2 but both will be negative.</p> <p>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 debt as well as to build up reserves. However, the Council will have two housing officers on hand to help people with this protected characteristic with moving, in order to lessen the effects of the move and over time, the impacts of the move should lessen.</p>	<p>Negative</p> <p>Neutral</p>
	Sexual Orientation	<p><b>Options 1 and 2</b></p> <p>There is no data available on those with this protected characteristic as our tenants. 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. Lesbian women and gay men, or bisexual may find a move more difficult than others if they are settled in their area and accepted by their neighbours in their current location and they may find settling in a new location difficult. The impact will be less for Option 1 than for Option 2 but both will be negative.</p> <p>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 debt as well as to build up reserves.</p>	<p>Negative</p> <p>Neutral</p>

	However, the Council will have two housing officers on hand to help people with this protected characteristic with moving, in order to lessen the effects of the move and over time, the impacts of the move should lessen.	
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**Options 1 and 2: other groups**

It is likely that foster carers will be impacted by the changes to size criteria, and that foster carers who are tenants on full or partial HB in 4bed+ properties will be negatively impacted by the increase in rent under Option 2. Foster carers will have one or more of the above protected characteristics and will be impacted as analysed above but are included here as a group because their circumstances will be complex and will vary. For example, it may appear that foster carers are under occupied but they may be about to take care of a child so they will need the bedroom that shows as being spare.

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 debt as well as to build up reserves. However, the Council will have two housing officers on hand to help people with this protected characteristic with moving, in order to lessen the effects of the move and over time, the impacts of the move should lessen.

**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

Will it affect Human Rights, as defined by the Human Rights Act 1998?

**Options 1 and 2**

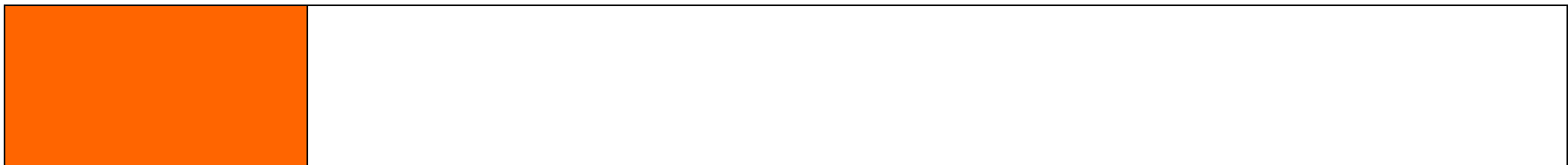
Yes

This may affect Article 8: Right to respect for family life, which may impact be relevant to foster carers and to families 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.

Will it affect Children’s Rights, as defined by the UNCRC (1992)?

**Options 1 and 2**

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 debt as well as to build up reserves. However, the Council will have two housing officers on hand to help people with this protected characteristic with moving, in order to lessen the effects of the move and over time, the impacts of the move should lessen.



<b>Section 03</b>	<b>Analysis of relevant data</b> 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.																																											
<b>Documents and data reviewed</b>	<p><b>Option 1<sup>2</sup></b> <b>Rent Options 13/14 with increases (in £ and %) by DWP bed criteria and number of tenancies</b></p> <p style="background-color: #808040; color: black; padding: 5px;"><b>Current Rent policy - rent restructuring with 3 year convergence to target on all dwellings for all on full Housing Benefit</b></p> <p style="background-color: black; color: white; padding: 5px;"><b>Range of increases (£) in rent by number of tenancies and DWP bed criteria</b></p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th rowspan="2">Range of Increase (£)</th> <th colspan="4">Household Status Desc. by DWP bed criteria</th> </tr> <tr> <th>Not under occupied</th> <th>Under-occupied by 1 bed</th> <th>Under-occupied by 2 + beds</th> <th>Grand Total</th> </tr> </thead> <tbody> <tr> <td>£3 to £5</td> <td>1</td> <td></td> <td></td> <td>1</td> </tr> <tr> <td>£5.01 to £7</td> <td>43</td> <td>25</td> <td>80</td> <td>148</td> </tr> <tr> <td><b>Grand Total</b></td> <td><b>44</b></td> <td><b>25</b></td> <td><b>80</b></td> <td><b>149</b></td> </tr> </tbody> </table> <p style="background-color: black; color: white; padding: 5px;"><b>Range of increases (%) in rent by number of tenancies and DWP bed criteria</b></p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th rowspan="2">Range of Increase (%)</th> <th colspan="4">Household Status Desc. by DWP bed criteria</th> </tr> <tr> <th>Not under occupied</th> <th>Under-occupied by 1 bed</th> <th>Under-occupied by 2 + beds</th> <th>Grand Total</th> </tr> </thead> <tbody> <tr> <td>3% to 5%</td> <td>44</td> <td>25</td> <td>80</td> <td>149</td> </tr> <tr> <td><b>Grand Total</b></td> <td><b>44</b></td> <td><b>25</b></td> <td><b>80</b></td> <td><b>149</b></td> </tr> </tbody> </table>	Range of Increase (£)	Household Status Desc. by DWP bed criteria				Not under occupied	Under-occupied by 1 bed	Under-occupied by 2 + beds	Grand Total	£3 to £5	1			1	£5.01 to £7	43	25	80	148	<b>Grand Total</b>	<b>44</b>	<b>25</b>	<b>80</b>	<b>149</b>	Range of Increase (%)	Household Status Desc. by DWP bed criteria				Not under occupied	Under-occupied by 1 bed	Under-occupied by 2 + beds	Grand Total	3% to 5%	44	25	80	149	<b>Grand Total</b>	<b>44</b>	<b>25</b>	<b>80</b>	<b>149</b>
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<sup>2</sup> Excludes voids  
LBHF EqIA Tool

**Current Rent policy - rent restructuring with 3 year convergence to target on all dwellings for all on Partial Housing Benefit**

**Range of increases (£) in rent by number of tenancies and DWP bed criteria**

Range of Increase (£)	Household Status Desc. by DWP bed criteria				Total
	cannot determine	Not under occupied	Under-occupied by 1 bed	Under-occupied by 2 + beds	
£3 to £5		1			1
£5.01 to £7	3	126	82	224	435
<b>Grand Total</b>	<b>3</b>	<b>127</b>	<b>82</b>	<b>224</b>	<b>436</b>

**Range of increases (%) in rent by number of tenancies and DWP bed criteria**

Range of Increase (%)	Household Status Desc. by DWP bed criteria				Total
	cannot determine	Not under occupied	Under-occupied by 1 bed	Under-occupied by 2 + beds	
3% to 5%	2	114	71	191	378
5.01% to 7%	1	13	11	33	58
<b>Grand Total</b>	<b>3</b>	<b>127</b>	<b>82</b>	<b>224</b>	<b>436</b>

**Current Rent policy - rent restructuring with 3 year convergence to target on all dwellings for all not in receipt of Housing Benefit**

**Range of increases (£) in rent by number of tenancies and DWP bed criteria**

Range of Increase (£)	Household Status Desc. by DWP bed criteria				Total
	cannot determine	Not under occupied	Under-occupied by 1 bed	Under-occupied by 2 + beds	
£3 to £5	1				1
£5.01 to £7	254	23	9	6	292
<b>Grand Total</b>	<b>255</b>	<b>23</b>	<b>9</b>	<b>6</b>	<b>293</b>

**Range of increases (%) in rent by number of tenancies and DWP bed criteria**

Range of Increase (%)	Household Status Desc. by DWP bed criteria				Total
	cannot determine	Not under occupied	Under-occupied by 1 bed	Under-occupied by 2 + beds	
3% to 5%	239	21	8	6	274
5.01% to 7%	16	2	1		19
<b>Grand Total</b>	<b>255</b>	<b>23</b>	<b>9</b>	<b>6</b>	<b>293</b>

**Option 2**

**Rent Options 13/14 with increases (in £ and %) by DWP bed criteria and number of tenancies**

New rent policy, rent restructuring with 3 year convergence to target on all dwellings, except 4 bed plus modelled with 5 year convergence to new rent policy target with 7.5% cap on increases for all those on Full Housing Benefit

**Range of increases (£) in rent by number of tenancies and DWP bed criteria**

Range of Increase (£)	Household Status Desc. by DWP bed criteria			
	Not underoccupied	Under-occupied by 1 bed	Under-occupied by 2 + beds	Total
£3 to £5		1	3	4
£5.01 to £7	14	6	15	35
£7.01 to £9	19	10	39	68
£9.01 to £11	8	8	22	38
£11.01 to £13	3		1	4
<b>Grand Total</b>	<b>44</b>	<b>25</b>	<b>80</b>	<b>149</b>

**Range of increases (%) in rent by number of tenancies and DWP bed criteria**

Range of Increase (%)	Household Status Desc. by DWP bed criteria			
	Not under	Under-occupied	Under-occupied by 2 +	Total



	occupied	by 1 bed	beds	
Less than 3%			2	2
3% to 5%	8	3	10	21
5.01% to 7%	24	14	44	82
7.01% to 9%	12	8	24	44
<b>Grand Total</b>	<b>44</b>	<b>25</b>	<b>80</b>	<b>149</b>

**New rent policy, rent restructuring with 3 year convergence to target on all dwellings, except 4 bed plus modelled with 5 year convergence to new rent policy target with 7.5% cap on increases for all those on Partial Housing Benefit**

**Range of increases (£) in rent by number of tenancies and DWP bed criteria**

Range of Increase (£)	Household Status Desc. by DWP bed criteria				Total
	cannot determine	Not under occupied	Under-occupied by 1 bed	Under-occupied by 2 + beds	
Less than £3		1			1
£3 to £5		7	1	1	9
£5.01 to £7	1	10	6	16	33
£7.01 to £9	1	59	50	109	219
£9.01 to £11	1	47	24	98	170
£11.01 to £13		3	1		4
<b>Grand Total</b>	<b>3</b>	<b>127</b>	<b>82</b>	<b>224</b>	<b>436</b>

**Range of increases (%) in rent by number of tenancies and DWP bed criteria**

Range of Increase (%)	Household Status Desc. by DWP bed criteria				Total
	cannot determine	Not under occupied	Under-occupied by 1 bed	Under-occupied by 2 + beds	
Less than 3%		6	1		7
3% to 5%	1	9	3	14	27
5.01% to 7%		13	21	25	59
7.01% to 9%	2	99	57	185	343
<b>Grand Total</b>	<b>3</b>	<b>127</b>	<b>82</b>	<b>224</b>	<b>436</b>

**New rent policy, rent restructuring with 3 year convergence to target on all dwellings, except 4 bed plus**

modelled with 5 year convergence to new rent policy target with 7.5% cap on increases for all those with No Housing Benefit

**Range of increases (£) in rent by number of tenancies and DWP bed criteria**

Range of Increase (£)	Household Status Desc. by DWP bed criteria				Total
	cannot determine	Not under occupied	Under-occupied by 1 bed	Under-occupied by 2 + beds	
£3 to £5	4				4
£5.01 to £7	26	5		1	32
£7.01 to £9	108	12	6	5	131
£9.01 to £11	115	6	3		124
£11.01 to £13	2				2
<b>Grand Total</b>	<b>255</b>	<b>23</b>	<b>9</b>	<b>6</b>	<b>293</b>

**Range of increases (%) in rent by number of tenancies and DWP bed criteria**

Range of Increase (%)	Household Status Desc. by DWP bed criteria				Total
	cannot determine	Not under occupied	Under-occupied by 1 bed	Under-occupied by 2 + beds	
Less than 3%	1				1
3% to 5%	22	5		1	28
5.01% to 7%	49	5	3	3	60
7.01% to 9%	183	13	6	2	204
<b>Grand Total</b>	<b>255</b>	<b>23</b>	<b>9</b>	<b>6</b>	<b>293</b>

**Other equality information**

Because the council does not have further equality information, we have used information from other relevant council sources to supplement this and to fill the gaps so far as that is possible.

**Disability**

- **Tenants receiving HB** - status according to the DWP size criteria - where claimant or partner is in receipt of a disability benefit/allowance/award (updated 01/11/2012)

Count of Property Reference	Receiving HB		Grand Total
	Y	In receipt of benefit/allowance/award	
Household Status Desc. by DWP bed criteria	None	Yes	
Severely Overcrowded (by 2+ beds)	14	10	24
Overcrowded (by 1 bed)	34	12	46
Meets DWP bed criteria	87	18	105
Under-occupied by 1 bed	93	21	114
Under-occupied by 2 + beds	240	57	297
Grand Total	468	118	586

**Race**

For tenure and ethnicity, *Table TT013 THEME ON ETHNICITY data from the 2001* is the best available data. The relevant sub-sections from that data is given here:

	ALL PEOPLE	White			Mixed				Asian or Asian British			
		British	Irish	Other White	White and Black Caribbean	White and Black African	White and Asian	Other Mixed	Indian	Pakistani	Bangladeshi	Other Asian
TENURE												
Rented from council	31,459	15,444	2,021	2,116	881	297	219	414	229	386	451	404

	ALL PEOPLE	Black or Black British			Chinese or Other Ethnic Group	
		Black Caribbean	Black African	Other Black	Chinese	Other Ethnic Group
TENURE						
Rented from council	31,459	3,494	3,552	766	126	659

Other data from the 2001 census is also used in this EIA for determining impacts on race, such as the borough's

	<p>population data from that same census in order to draw comparison between the TT013 from the same release and the borough as a whole:</p> <p>In 2001, 22.2% of the population of Hammersmith &amp; Fulham belonged to ethnic groups other than White People of White British ethnicity comprised 58.0% of the Borough population in 2001. A further 15.0% were classified as 'Other White' 4.8% were of White Irish ethnicity</p> <p>The largest ethnicity minority group in the Borough is the Black population, accounting for 11.1% of the total, or 18,393 people.</p> <p>The Black grouping comprises people of Black Caribbean ethnicity (5.2%, or 8,533 people), Black African ethnicity (4.9%, or 8,070 people) and 'Other Black' ethnicities (1.1%, or 1,790 people).</p> <p>People of various Asian ethnicities are the next largest ethnic minority grouping in the Borough. The main ethnic groups are Indian (1.7%), Pakistani (1.0%), Bangladeshi (0.6%) and 'Other Asian' (1.1%). A further 0.8% of the Borough population are Chinese.</p> <p>A total of 6,306 people (3.8%) are of mixed ethnicity. They included 2,011 people who were of Mixed White and Black Caribbean ethnicity (1.2%), 1,032 people of Mixed white and Black African ethnicity (0.6%) and 1,651 people of Mixed White and Asian ethnicity (1.0%).</p> <p>From: <a href="http://www.lbhf.gov.uk/Images/Part2_pages1-13_tcm21-20262.pdf">http://www.lbhf.gov.uk/Images/Part2_pages1-13_tcm21-20262.pdf</a></p>
<b>New research</b>	(No new research undertaken)

<b>Section 04</b>	<b>Consultation</b>
<b>Consultation</b>	(No consultation undertaken)
<b>Analysis of consultation outcomes</b>	N/A

<b>Section 05</b>	<b>Analysis of impact and outcomes</b>
<b>Analysis</b>	<p><b>Options 1 and 2</b></p> <p>This section sets out the likelihood of Options 1 and 2 contributing to, having no effect on, or adversely impacting, the three tenets of the PSED in light of the analysis in section 02. For all groups below, it will be the case that Option 2 is more negative than Option 1</p>

**Age**

The analysis shows that there is no discrimination, harassment or victimisation associated with these changes. It also shows that the changes do not advance equality of opportunity between age groups, as younger age groups are more likely to be impacted as set out in the analysis above. Potentially, these changes may not help to foster good relations between different age groups. It is not possible for the council to mitigate the effects by subsidising the extra amount payable as the council needs to reduce its debt and build its reserves (as at set out in the report). However, the Council will have two housing officers on hand to help families with moving, in order to lessen the effects of the move and over time, the impacts of the changes which may include having to move, should lessen

**Disability**

Because of the data limitations which include the fact it is not known if a carer is required which may skew the bedroom data, plus the number of unknowns in non-disabled households is reasonably high, it is not possible to conclude the likely impact on equality of opportunity or good relations between disabled and non-disabled households arising from general increase in rent which may result in disabled households being unable to find the remaining balance payable. However, it is more likely that disabled people will be more negatively impacted than non-disabled people as they are less likely to be in work and more likely to be in receipt of benefits than others. They are also likely to find it more difficult to find a property that is suitable for their needs, for example if they have a mobility or sensory impairment. The increase in rent will not result in discrimination, harassment, or victimisation.

Where disabled households are unable to pay the remaining balance, these households will be offered help to move to a more suitable property. Disabled households that are in over-crowded in 4-bed+ properties are unlikely to receive a larger property. Disabled households that are unable to pay the average increase in rent will be offered support to find a more suitable property that they can afford. The impact of these changes will be negative on these households as disabled people will have to change GP surgeries and find a new hospital if they are currently located near to one for a medical need, and there will be disruption arising from having to move home. They may also have to find a new carer.

The council could choose to treat disabled households more favourably than non-disabled households and fund the difference for these households. However, the financial situation is such that it is not possible to mitigate the effects of this change in rent policy as the council cannot afford to top up the outstanding rent payable. As set out in the report, the council needs to build up its reserves and to reduce its debt. However, the council will have two housing officers on hand to help disabled people with moving, in order to lessen the effects of the move and over time, changes which may include having to move to more affordable accommodation, should lessen, albeit the council recognises that the disruption for disabled people will be more acute than for non-disabled people.

**Gender Reassignment, Sex, Sexual Orientation**

The proposal will not advance equality of opportunity and having to move as a result may impact more negatively on

those with the protected characteristic of gender reassignment and sexual orientation than on others as given above. It is not likely to advance equality of opportunity between men and women, or to hinder it. The proposal will not result in unlawful discrimination, harassment, victimisation by the council on any of these groups, nor will it help to foster good relations, or to hinder them.

#### **Pregnancy and maternity**

The proposal is likely to have an adverse impact on pregnant women and those who have just given birth. The proposal will not result in unlawful discrimination, harassment, victimisation by the council on this group nor will it help to foster good relations, or to hinder them. The proposal will not advance equality of opportunity for this group and may hinder it.

#### **Race**

The proposal is not likely to advance equality of opportunity between race groups, or to hinder it. The proposal will not result in unlawful discrimination, harassment, victimisation by the council on any race groups, nor will it help to foster good relations, or to hinder them.

#### **Religion and Belief**

The proposal will not advance equality of opportunity and having to move as a result may impact more negatively on those who attend a regular place of worship than on others as given above. It is not likely to advance equality of opportunity between men and women, or to hinder it. The proposal will not result in unlawful discrimination, harassment, victimisation by the council on any of these groups, nor will it help to foster good relations, or to hinder them.

#### **Foster Carers**

It is likely that foster carers will be impacted by the changes to size criteria, and that foster carers who are tenants on full or partial HB in 4bed+ properties will be negatively impacted by the increase in rent under Option 2. Foster carers will have one or more of the above protected characteristics and will be impacted as analysed above but are included here as a group because their circumstances will be complex and will vary. For example, it may appear that foster carers are under occupied but they may be about to take care of a child so they will need the bedroom that shows as being spare.

It is not possible for the council to mitigate the effects by subsidising the extra amount payable as the council needs to reduce its debt and build its reserves (as at set out in the report). However, the Council will have two housing officers on hand to help families with moving, in order to lessen the effects of the move and over time, the impacts of the changes which may include having to move, should lessen

#### **Human Rights, Children's Rights**

Foster carers, and people from all protected groups may also consider that their rights under Article 8 are being

interfered with. However, this is a qualified right and can be interfered with if the public body considers that it is a proportionate means of achieving a legitimate aim (see 'overall assessment' below). 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 for the council to mitigate the effects by subsidising the extra amount payable as the council needs to reduce its debt and build its reserves (as at set out in the report). However, the Council will have two housing officers on hand to help families with moving, in order to lessen the effects of the move and over time, the impacts of the changes which may include having to move, should lessen.

**Overall Assessment**

Overall, there will be some negative impacts as identified in this document. However, these do not unlawfully discriminate and the council considers the reduction of debt and the need to increase its reserves to be a legitimate aim. As part of reaching this aim, the council considers that increasing the rent for larger properties, which are proportionately far less expensive than smaller properties, is a legitimate way of helping to reaching this aim.

<b>Section 06</b>	<b>Reducing any adverse impacts and recommendations</b>
<b>Outcome of Analysis</b>	<p>The council will direct those affected to the two new officers for support and assistance and in cases of particular difficulty, support with the changes will be tailored with all the facts of each case taken into account.</p> <p>Disability: the addition of two officers to advise those impacted will support disabled people          Pregnancy and maternity: the addition of two officers to advise those impacted will support pregnant women          Foster carers: the addition of two officers to advise those impacted will support pregnant women</p>

<b>Section 07</b>	<b>Action Plan</b>					
<b>Action Plan</b>	Summary of actions identified actions as a result of equality impact analysis:					
	Issue identified	Action (s) to be taken	When	Lead officer	Expected outcome	Date added to business/service plan
	Tenants from all groups may not be able to afford the extra rent	Two officers to be employed to help these tenants with their finances and options	March 2013	Jo Rowlands	Tenants have support and information and are able to find a property more suitable to their	Feb 2013: if proposals are agreed by Cabinet

					needs if they cannot afford the extra rent	
	Disabled households	Two officers to be employed to help these tenants with their finances and options. Disabled people's needs e.g. accessibility to be taken into account as part of this advice	March 2013	Jo Rowlands	Disabled tenants have support and information and are able to find a property more suitable to their needs if they cannot afford the extra rent	Feb 2013: if proposals are agreed by Cabinet
	Pregnancy and maternity (households with this group)	Two officers to be employed to help these tenants with their finances and options. The needs of women who are pregnant to be taken into account	March 2013	Jo Rowlands	Pregnant women have support and information and are able to find a property more suitable to their needs if they cannot afford the extra rent	Feb 2013: if proposals are agreed by Cabinet
	Foster Carers	Two officers to be employed to help these tenants with their finances and options. The needs of foster carers to be taken into account				



<b>Section 08</b>	<b>Agreement, publication and monitoring</b>
<b>Chief Officers' sign-off</b>	Name: Mel Barrett Position: Director of Housing and Regeneration Email: <a href="mailto:melbourne.barrett@lbhf.gov.uk">melbourne.barrett@lbhf.gov.uk</a> Telephone No: 020 8753 4228
<b>Key Decision Report (if relevant)</b>	Date of report to Cabinet/Cabinet Member: 11/02/13 Key equalities issues have been included: Yes
<b>Opportunities Manager (where involved)</b>	Name: Carly Fry Position: Opportunities Manager Date advice / guidance given: 02 January 2013 Email: <a href="mailto:PEIA@lbhf.gov.uk">PEIA@lbhf.gov.uk</a> Telephone No: 020 8753 3430