

## 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	2015/16
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 2015/16</p> <p><b>Short summary:</b> This report is concerned with:</p> <ul style="list-style-type: none"> <li>• management of the Housing Revenue Account (HRA) post HRA reform;</li> <li>• the HRA Financial Strategy and the Financial Business Plan including the approach to asset management and borrowing, where the Administration is proposing lower rent increases than proposed hitherto, together with a reduced reliance on the sale of expensive void properties, balanced by an increase in borrowing;</li> <li>• the proposed increase policy for dwelling rents having regard to national government guidance for council rents and the maintenance requirements of the housing stock owned by the borough, and the proposed approach to other fees and charges within the HRA;</li> <li>• the HRA Medium Term Financial Strategy (MTFS) for the five years from 2015/16 to 2019/20, and the HRA Revenue Budget for the year 2015/16</li> </ul> <p>It should be noted that as part of the Spending Round 2013, Government made a pledge on 26<sup>th</sup> June 2013 that social rents will increase by a maximum of the Consumer Prices Index (CPI) plus 1% a year from 2015/16 to 2024/25. This is however not a statutory requirement and Councils are able to deviate from this policy if they have a sound reason to do so. The Council is proposing to increase dwelling rents by CPI+1% with each tenant who does not yet pay target (formula) rent paying an additional £1 per week.</p> <p>The rationale for applying this increase relates to the implementation of HRA reform on 28th March 2012, whereby the complex system of annual transfer payments between central and local government was replaced by a system of “self financing” where local authorities have to manage their housing assets to ensure their HRA stock can be supported and maintained from their HRA income. The financial settlement left the Council with £218m of debt, the rationale for which was based on the assumption that all dwelling rents within the stock had converged with the formula rent by 2016. In reality, only around 10% of rents are at the formula rent level necessary to sustain a viable HRA. Therefore, despite significant efficiencies having been made through the HRA MTFS, a rent increase of CPI plus 1% would result in the Council’s housing stock falling into disrepair and the Council would then be at risk of not</p>

	<p>being able to effectively fulfil its obligations as a local housing authority.</p> <p>Applying a rent increase of CPI plus 1% per annum with an additional £1 per annum for tenants who pay less than target rent would enable both the full investment required to maintain and improve the condition of tenants homes (as per the Council's HRA asset management strategy) and the repayment of all debt due to mature before the end of the 40 year term of the business plan whilst simultaneously increasing the level of the Council's reserves to protect against risk and unexpected events. Tenants were consulted on and accepted the proposed new rent policy at the Tenant and Resident Forum meetings held on 23rd October 2014.</p> <p>It should also be noted that the Government's programme of Welfare Reform and the response of individual households to the programme may impact on the Council's ability to collect rental income and will therefore result in increased bad debt charges in the HRA. In particular, direct payments of benefits to social housing tenants as part of Universal Credit are expected to result in an increase in rent arrears.</p> <p>The Council is not in control of any potential changes outside its decision making remit, therefore this EIA deals only with analysing the equalities impact on tenants resulting from the rent increase, specifically the additional £1 per week for tenants for whom their current rent is not yet at target.</p> <p>There are no impacts on existing staff as a result of this project.</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>	10/12/14

<b>Section 02</b>	<b>Scoping of Full EIA</b>
<b>Plan for completion</b>	<p>Timing: Sept 2014 to Dec 2014  Resources: Officer time, and see section 03 for data resources</p>

Analyse the impact of the policy, strategy, function, project, activity, or programme

The principal impact of the report arises from the application of the weekly rent increase to all tenants (12,286 tenancies), the impact of which is set out below for each bedroom size (note that this table sets out the range of increases in rent only, and excludes increases relating to tenant service charges):

**Range of increases in rent (excluding tenant service charges) (£) by number of dwellings and bedroom size**

Range of Increase (£)	Dwellings by number of bedrooms							Total
	Studio	1	2	3	4	5	6	
Less than £1	2	9	6	8	78	3	-	<b>106</b>
Between £1 and £2	26	27	-	2	28	3	-	<b>86</b>
Between £2.01 and £3	489	1,982	697	107	35	2	-	<b>3,312</b>
Between £3.01 and £4	66	2,288	3,393	2,040	234	2	-	<b>8,023</b>
Between £4.01 and £5	-	-	11	264	407	65	12	<b>759</b>
<b>Total</b>	<b>583</b>	<b>4,306</b>	<b>4,107</b>	<b>2,421</b>	<b>782</b>	<b>75</b>	<b>12</b>	<b>12,286</b>

The rent increase 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 increase because it is within the HB 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, 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 below because it applies to all protected groups.

The rent increase will affect tenants across all wards according to the distribution of dwellings by bedroom size set out in the table below:

**HRA Budgeted (2015/16) Dwellings by Ward and Bedroom Size**

Ward	HRA Dwellings by Bed Size							All Dwellings
	Studio	1	2	3	4	5	6	
Addison	11	278	260	105	19	1	-	674
Askew	28	343	251	137	24	14	3	800
Avonmore And Brook Green	18	261	234	87	19	1	-	620
College Park & Old Oak	1	90	113	113	69	-	-	386
Fulham Broadway	37	372	224	185	18	4	4	844
Fulham Reach	24	276	216	219	82	2	-	819
Hammersmith Broadway	39	440	306	102	36	3	2	928
Munster	13	105	118	108	42	7	-	393
North End	29	397	393	183	46	3	-	1,051
Palace Riverside	9	217	52	68	12	4	1	363
Parsons Green And Walham	18	166	116	82	26	4	-	412
Ravenscourt Park	32	100	83	56	19	2	-	292
Sands End	45	235	393	177	41	15	-	906
Shepherds Bush Green	173	413	357	86	15	6	1	1,051
Town	49	287	334	157	35	6	1	869
Wormholt & White City	57	326	657	556	279	3	-	1,878
<b>All Wards</b>	<b>583</b>	<b>4,306</b>	<b>4,107</b>	<b>2,421</b>	<b>782</b>	<b>75</b>	<b>12</b>	<b>12,286</b>

A number of general mitigating actions are in place to enable tenants to manage the impact of the rent 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 specialist housing 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.

Protected characteristic	Analysis	Impact: Positive, Negative, Neutral
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 5,246 tenancies of which 4,768 are due to be impacted by a higher rent increase of an additional £1 per week due to their current rent level not having yet reached the target formula rent. It can be clearly determined from the data in section 03 that of the 4,768 tenancies not in receipt of HB, 1,618 of them are under-occupied. Additionally, 1,003 tenancies are over-crowded. Age data is not available for these tenancies, though under / over occupation data can indicate whether tenants have children to look after. 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 difficult financial situation and the need to build up reserves.</p> <p>Tenants of all age groups on partial HB will be impacted and this group totals 2,880 tenancies of which 2,731 are due to be impacted by a higher rent increase of an additional £1 per week. Of the total tenancies on partial HB, 937 are under-occupying, with a further 499 tenancies being over-crowded. Those in this group are likely to be 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</p>	<p>Unknown, likely negative</p> <p>Negative</p>

	<p>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 and managing down any arrears. The report sets out the difficult financial situation and the need to build up reserves.</p> <p>Tenants of all age groups on full HB will be impacted and this group totals 4,160 tenancies of which 3,983 are due to be impacted by a higher rent increase of an additional £1 per week. Of the total tenancies on full HB, 712 are under-occupying, and 671 tenancies are overcrowded. 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 some 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 and managing down any arrears. The report sets out the difficult financial situation and the need to build up reserves.</p> <p>The Council plans to employ a further five extra officers, together with additional support from the London Plus Credit Union, to assist tenants with their finances and options, ensuring that tenants have support and information to sustain tenancies and are able to find a property more suitable to their needs should they be unable to afford rent increases in their current home. Over time, the impacts of the changes which may include having to move to more affordable accommodation, should lessen. 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>There will be a positive impact on tenants of all age groups as a result of the Council's plans to invest in repairs and maintenance works to provide all tenants with warm, safe, accessible homes. The Council will ensure that where the works being carried out are deemed disruptive (for example in the case of lift replacement), tenants will be supported and provided with alternative accommodation.</p>	Neutral
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	Disability	<p>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. However, 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 in close proximity to an hospital. Again, it is not possible to ascertain the exact number of such cases. 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 hospitals) 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. A total of 50 disabled tenants have been identified as residing in Council dwellings, of which 47 are due to receive a higher rent increase of an additional £1 per week. Of these 47, 5 are being impacted by the bedroom tax. 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. 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. The report sets out the difficult financial situation and the need to build up reserves.</p> <p>Disabled tenants on partial HB where the claimant or partner is in receipt of a disability benefit/allowance/award/carers premium, will be impacted and the size of this group is 412, of which 129 tenancies are impacted by the bedroom tax. A total of 389 tenancies are impacted by a rent increase of an additional £1 per week and 123 tenancies have been identified as being impacted by both the bedroom tax and the rent increase of an additional £1 per week. Those in this</p>	<p>Unknown, likely negative</p> <p>Unknown, likely negative</p>
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		<p>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. 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. Of the 123 tenancies, 9 are currently in receipt of DHP support from the Council. The report sets out the difficult financial situation and the need to build up reserves.</p>	
		<p>Households on full HB where the claimant or partner is in receipt of a disability benefit/allowance/award/carer premium, total 1,137, of which 28 tenancies are impacted by the bedroom tax. A total of 1,097 tenancies are impacted by a rent increase of an additional £1 per week and 27 tenancies have been identified as being impacted by both the bedroom tax and the rent increase of an additional £1 per week. Of the 1,097, 148 are under occupied by 1 or more beds, and 160 are overcrowded by 1 or more beds, with 789 meeting the DWP size criteria. This could indicate that some of this group may 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. Households on full HB may be affected by the rent increase because of the changes under Welfare Reform as outlined in section 1. The impact on these households will be negative in such cases. There will be a shortfall if those households are of working age and under occupying, i.e. 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 as a result of the impact of direct payments, whether the Council were to implement a rent increase or not. For disabled people who need an extra 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. 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. Of the 27 tenancies, 22 are currently in receipt of DHP support from the Council. The report sets out the difficult financial situation and the need to build up reserves.</p>	<p>Neutral Unknown, likely negative</p> <p>Neutral</p>

		<p>For all disabled tenants, the Council will have 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>There will be a positive impact on tenants with disabilities as a result of the Council's plans to invest in repairs and maintenance works to provide all tenants with warm, safe, accessible homes. The Council will ensure that where the works being carried out are deemed disruptive (for example in the case of lift replacement), tenants will be supported and provided with alternative accommodation.</p>	
	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 impacted by the rent increase which includes an additional £1 per week but for all tenants the impact 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>The Council is able to mitigate the effects of this disruption through the provision of DHP. The report sets out the difficult financial situation and the need to build up reserves and improve the stock. However, the Council has 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>
	Marriage and Civil Partnership	<p>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.</p>	N/A

	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 full, partial HB or no HB) will be negatively affected by the change. The impact will be less for those tenants whose rents are already at the target formula rent but the impact for all tenants 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.</p> <p>The Council is able to mitigate the effects of this disruption through the provision of DHP, which if necessary can cover the period pending a move. The report sets out the difficult financial situation and the need to build up reserves. However, the Council will have 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
	Race	<p>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 2011 census data which identifies some notable differences between those in council properties and the borough population, which include the following:</p> <p>White British: renting from the council is approximately 35% of the group as a whole that rents from the Council  White British: comprised 44.97% of the borough population  Therefore, White British is under-represented in the Council's rented population in comparison to the borough population</p> <p>Black Caribbean: renting from the council is approximately 10% of the group as a whole that rents from the Council  Black Caribbean: comprised 3.87% of the borough population  Therefore, Black Caribbean is over-represented in the Council's rented population compared to the borough population.</p> <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>	Neutral

		<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>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 tenants not being impacted by the additional £1 per week rent increase but for all properties the impact will be negative. It is likely 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 it would be unlawful to exempt one racial group from the extra cost per week. The report sets out the difficult financial situation and the need to build up reserves. However, the Council has 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>
	Religion/belief (including non-belief)	<p>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 negatively affected by the change. The impact will be less for those not affected by the additional £1 per week rent increase but the impact on all tenants 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>Negative</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. The report sets out the difficult financial situation and the need to build up reserves. However, the Council will have 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>	Neutral
	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. The impact will be less for those not affected by the additional £1 per week rent increase but the impact on all tenants will be negative.</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 report sets out the difficult financial situation and the need to build up reserves. However, the Council has 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>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 those not affected by the additional £1 per week rent increase but the impact on all tenants will be negative.</p> <p>It is not possible to mitigate the effects of this disruption as unlawful to exempt one group with a particular sexual orientation from another from the extra cost per week. The report sets out the difficult financial situation and the need to</p>	Negative

	<p>build up reserves. However, the Council will have 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>	Neutral
<p><b>Human Rights or Children's Rights</b>          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 with children, as well as to those who are under occupying and who are impacted by the increase in rent. 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 debt as well as to build up reserves. However, the Council will have 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>		

<b>Section 03</b>	<p><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.</p>				
<b>Documents and data reviewed</b>	<p><b>Rent Increase for tenants affected by the additional £1 per week rent increase</b>  <b>Tenants on Full Housing Benefit by under-occupancy status</b></p>				
	<b>Range of Increase (£)</b>	<b>Under-occupying</b>	<b>Over-crowded</b>	<b>All other tenancies</b>	<b>All tenancies</b>
	Between £2.01 and £3				

	61	258	815	1,134
Between £3.01 and £4	542	395	1,740	2,677
Between £4.01 and £5	109	18	45	172
<b>Total</b>	<b>712</b>	<b>671</b>	<b>2,600</b>	<b>3,983</b>

Range of Increase (£)	Under-occupying	Over-crowded	All other tenancies	All tenancies
Between 2.01% and 3%	213	58	582	853
Between 3.01% and 4%	499	613	2,018	3,130
<b>Total</b>	<b>712</b>	<b>671</b>	<b>2,600</b>	<b>3,983</b>

**Rent Increase for tenants affected by the additional £1 per week rent increase  
Tenants on Partial Housing Benefit by under-occupancy status**

Range of Increase (£)	Under-occupying	Over-crowded	All other tenancies	All tenancies
Between £2.01 and £3	53	144	320	517
Between £3.01 and £4	720	317	923	1,960
Between £4.01 and £5	164	38	52	254



<b>Total</b>	<b>937</b>	<b>499</b>	<b>1,295</b>	<b>2,731</b>
<b>Range of Increase (£)</b>	<b>Under-occupying</b>	<b>Over-crowded</b>	<b>All other tenancies</b>	<b>All tenancies</b>
Between 2.01% and 3%	314	81	304	699
Between 3.01% and 4%	623	418	991	2,032
<b>Total</b>	<b>937</b>	<b>499</b>	<b>1,295</b>	<b>2,731</b>

**Rent Increase for tenants affected by the additional £1 per week rent increase  
Tenants on No Housing Benefit by under-occupancy status**

<b>Range of Increase (£)</b>	<b>Under-occupying</b>	<b>Over-crowded</b>	<b>All other tenancies</b>	<b>All tenancies</b>
Between £2.01 and £3	140	400	684	1,224
Between £3.01 and £4	1,266	559	1,432	3,257
Between £4.01 and £5	212	44	31	287
<b>Total</b>	<b>1,618</b>	<b>1,003</b>	<b>2,147</b>	<b>4,768</b>

Range of Increase (£)	Under-occupying	Over-crowded	All other tenancies	All tenancies
Between 2.01% and 3%	434	98	314	846
Between 3.01% and 4%	1,184	905	1,833	3,922
<b>Total</b>	<b>1,618</b>	<b>1,003</b>	<b>2,147</b>	<b>4,768</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 a rent increase including an additional £1 per week in receipt of benefit/allowance/award/carer premium by DWP property size criteria, by age and by Housing Benefit									
Age Group	Aged 61 or more				Aged under 61				All Ages
DWP Category	Full HB	No HB	Partial HB	All Tenants	Full HB	No HB	Partial HB	All Tenants	All Tenants
Meets DWP bed criteria	227	8	59	294	562	22	90	674	968
Overcrowded (by 1 bed)	18	1	9	28	125	6	32	163	191
Severely Overcrowded (by 2+ beds)	3	0	3	6	14	0	11	25	31
Under-occupied by 1 bed	63	4	38	105	20	4	107	131	236
Under-occupied by 2 + beds	58	1	24	83	7	1	16	24	107
<b>All DWP Categories</b>	<b>369</b>	<b>14</b>	<b>133</b>	<b>516</b>	<b>728</b>	<b>33</b>	<b>256</b>	<b>1,017</b>	<b>1,533</b>

**All tenants in receipt of benefit/allowance/award/carers premium  
by DWP property size criteria, by age and by Housing Benefit**

<b>Age Group</b>	<b>Aged 61 or more</b>				<b>Aged under 61</b>				<b>All Ages</b>
<b>DWP Category</b>	<b>Full HB</b>	<b>No HB</b>	<b>Partial HB</b>	<b>All Tenants</b>	<b>Full HB</b>	<b>No HB</b>	<b>Partial HB</b>	<b>All Tenants</b>	<b>All Tenants</b>
Meets DWP bed criteria	232	8	61	301	585	22	96	703	1004
Overcrowded (by 1 bed)	18	1	10	29	133	6	35	174	203
Severely Overcrowded (by 2+ beds)	3	0	3	6	16	0	11	27	33
Under-occupied by 1 bed	63	5	38	106	20	5	109	134	240
Under-occupied by 2 + beds	59	1	29	89	8	2	20	30	119
<b>All DWP Categories</b>	<b>375</b>	<b>15</b>	<b>141</b>	<b>531</b>	<b>762</b>	<b>35</b>	<b>271</b>	<b>1,068</b>	<b>1,599</b>

**Race**

Tenure and ethnicity data from the Census 2011 – based on all household members

<b>Tenure</b>	<b>All categories: Tenure</b>	<b>Social rented: Rented from council (Local Authority)</b>
<b>All categories: Ethnic group</b>	<b>180,652</b>	<b>27,606</b>
<b>White: Total</b>	<b>123,101</b>	<b>13,227</b>
White: English/Welsh/Scottish/Northern Irish/British	81,246	9,778
White: Irish	6,220	1,238

White: Gypsy or Irish Traveller	211	72
White: Other White	35,424	2,139
<b>Mixed/multiple ethnic group: Total</b>	<b>9,930</b>	<b>2,168</b>
Mixed/multiple ethnic group: White and Black Caribbean	2,732	982
Mixed/multiple ethnic group: White and Black African	1,478	389
Mixed/multiple ethnic group: White and Asian	2,615	247
Mixed/multiple ethnic group: Other Mixed	3,105	550
<b>Asian/Asian British: Total</b>	<b>16,376</b>	<b>2,109</b>
Asian/Asian British: Indian	3,407	179
Asian/Asian British: Pakistani	1,602	277
Asian/Asian British: Bangladeshi	1,047	397
Asian/Asian British: Chinese	3,046	124
Asian/Asian British: Other Asian	7,274	1,132
<b>Black/African/Caribbean/Black British: Total</b>	<b>21,221</b>	<b>8,038</b>
Black/African/Caribbean/Black British: African	10,424	3,871
Black/African/Caribbean/Black British: Caribbean	6,997	2,756
Black/African/Caribbean/Black British: Other Black	3,800	1,411
<b>Other ethnic group: Total</b>	<b>10,024</b>	<b>2,064</b>
Other ethnic group: Arab	5,202	1,060
Other ethnic group: Any other ethnic group	4,822	1,004

Table reference: DC4203EW from NOMIS website

Data from the 2011 census has been used in this EIA for determining impacts on race, such as the borough's population data, in order to draw comparisons between Council tenants and the borough as a whole:

In 2011, 31.86% of the population of Hammersmith & Fulham belonged to ethnic groups other than White.

People of White British ethnicity comprised 44.97% of the Borough population in 2011.

A further 19.61% were classified as 'Other White'

3.44% were of White Irish ethnicity

The largest ethnicity minority group in the Borough is the Black population, accounting for 11.75% of the total, or 21,221 people.

The Black grouping comprises people of Black Caribbean ethnicity (3.87%, or 6,997 people), Black African ethnicity (5.77%, or 10,424 people) and 'Other Black' ethnicities (2.10%, or 3,800 people).

People of various Asian ethnicities are the next largest ethnic minority grouping in the Borough. The main ethnic groups are Indian (1.89%), Pakistani (0.89%), Bangladeshi (0.58%) and 'Other Asian' (4.03%). A further 1.69% of the Borough population are Chinese.

A total of 9,930 people (5.50%) are of mixed ethnicity.

They included 2,732 people who were of Mixed White and Black Caribbean ethnicity (1.51%), 1,478 people of Mixed white and

	Black African ethnicity (0.82%) and 2,615 people of Mixed White and Asian ethnicity (1.45%). From: <a href="http://www.lbhf.gov.uk/Images/2011%20Census%20report_LBHF%20briefing_tcm21-177945.pdf">http://www.lbhf.gov.uk/Images/2011%20Census%20report_LBHF%20briefing_tcm21-177945.pdf</a>
<b>New research</b>	(No new research undertaken)

<b>Section 04</b>	<b>Consultation</b>
<b>Consultation</b>	Consultation has taken place on the new rent policy with tenants and residents via the Tenants & Residents Associations Forums held on 23 <sup>rd</sup> October 2014.
<b>Analysis of consultation outcomes</b>	<p>Two options were considered by the Tenants and Residents Association Forum meeting on 23<sup>rd</sup> October 2014. These proposed different balances of planned repairs and rent increases.</p> <p>The first option considered a proposal to carry out the same level of repairs over the next four years as in the financial plan approved in February 2014. This would mean the council spent approximately £185 million on planned repairs to council homes in that time. This would require a rent increase based on CPI plus 1% plus an additional £1 increase for tenants who are currently paying less than the target formula rent.</p> <p>The second option proposed far fewer repairs over the next four years. Planned repairs would be cut right back and future lift replacements, decoration of communal areas would have to be dramatically reduced. This would require a rent increase based on CPI plus 1% only.</p> <p>Tenants were in overall support of Option 1 at their 23<sup>rd</sup> October 2014 meeting, as this would enable significantly more repairs and maintenance to be undertaken, which they felt justified the higher rent increase.</p>

<b>Section 05</b>	<b>Analysis of impact and outcomes</b>
<b>Analysis</b>	<p>This section sets out the likelihood of the rent increase of an additional £1 per week contributing to, having no effect on, or adversely impacting, the three tenets of the PSED in light of the analysis in section 02.</p> <p><b>Age</b> 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. The Council has put in place mitigating actions and these include the provision of DHP to assist tenants in moving to smaller properties and managing down any arrears. The extent to</p>

which the Council is able to mitigate is limited to the availability of DHP as there is a need to build the Council's reserves and maintain the condition of Council homes (as at set out in the report). However, the Council has 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 always clear 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 properties are unlikely to receive a larger property. Disabled households that are unable to pay the 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 the extent to which it is possible to mitigate the effects of the rent increase is limited to the provision of DHP in the event of difficulties experienced in allocating a suitable alternative property; enabling moves through providing incentive payments of up to £2,000; and making available smaller properties including sheltered accommodation (which may be closer to hospitals) 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. As set out in the report, the Council needs to build up its reserves and to invest in tenants' homes to maintain them in good condition. However, the Council has 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.

**Human Rights, Children's Rights**

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). The Council is able to mitigate to an extent the impact on protected groups. through the provision of DHP to be issued on a case by case basis. In addition, the Council has 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 need to invest in tenants' homes to maintain them in good condition (warm, safe and accessible homes) and to increase its reserves to be a legitimate aim. As part of reaching this aim, the Council considers that increasing the rent towards the target formula rent is a legitimate way of helping to

reaching this aim. The Council has identified and implemented a number of mitigating actions for protected groups.

<b>Section 06</b>	<b>Reducing any adverse impacts and recommendations</b>
<b>Outcome of Analysis</b>	<p>The Council is directing those affected to housing officers for support and assistance and in cases of particular difficulty, support with the changes can be tailored with all the facts of each case taken into account. Further, mitigating action including the payment of DHP will reduce any adverse impact on a temporary basis until appropriate accommodation and support can be provided.</p> <p>The Council also plans to employ a further five extra officers, together with additional support from the London Plus Credit Union, to assist tenants with their finances and options, ensuring that tenants have support and information to sustain tenancies and are able to find a property more suitable to their needs should they be unable to afford rent increases in their current home.</p> <p>Disability: the provision of housing officers to advise those impacted will support disabled people plus financial support in the form of DHP where necessary.</p> <p>Pregnancy and maternity: the provision of housing officers to advise those impacted will support pregnant women plus financial support in the form of DHP where necessary.</p>

<b>Section 07</b>	<b>Action Plan</b>					
<b>Action Plan</b>	Summary of actions identified 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	The Council plans to increase the support available to assist these tenants with their finances, tenancy sustainment and options. This will include the provision of two Welfare Benefit Officers, a Housing Benefit	From Dec 2014	Duncan Brown	Tenants have support and information and are able to find a property more suitable to their	Dec 2014



		Assessment Officer, a Welfare Reform Officer, access to two independent specialist Money and Debt Advisors and to the London Plus Credit Union			needs if they cannot afford the extra rent	
	Disabled households	The Council plans to increase the support available to assist these tenants with their finances, tenancy sustainment and options. This will include the provision of two Welfare Benefit Officers, a Housing Benefit Assessment Officer, a Welfare Reform Officer, access to two independent specialist Money and Debt Advisors and to the London Plus Credit Union Disabled people's needs e.g. accessibility to be taken into account as part of this advice	From Dec 2014	Duncan Brown	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	Dec 2014
	Pregnancy and maternity (households with this group)	The Council plans to increase the support available to assist these tenants with their finances, tenancy sustainment and options. This will include the provision of two Welfare Benefit Officers, a Housing Benefit Assessment Officer, a Welfare Reform Officer, access to two independent specialist Money and Debt Advisors and to the London Plus Credit Union The needs of women who are pregnant to be taken into account	From Dec 2014	Duncan Brown	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	Dec 2014

<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: 5/01/15 Key equalities issues have been included: Yes
<b>Opportunities Manager (where involved)</b>	Name: David Bennett Position: Acting Head of Change Delivery Date advice / guidance given: 3 <sup>rd</sup> December 2014 Email: <a href="mailto:PEIA@lbhf.gov.uk">PEIA@lbhf.gov.uk</a> Telephone No: 020 8753 1628