

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 or ext 3430

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Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	2016/17
Name and details of policy, strategy, function, project, activity, or programme	<p>Title of EIA: Financial Plan For Council Homes: The Housing Revenue Account Financial Strategy, 2016/17 Housing Revenue Account budget and 2016/17 Rent Reduction</p> <p>Short summary: This report covers:</p> <ul style="list-style-type: none"> • the 1% decrease in rents for Council Homes which is being forced on the Council by central Government for each of the next four years; • the changes required as a result to the long-term 40 year financial plan for the Council's homes; • how, although initially the 1% decrease in rents looks like good news for tenants, it has a significant impact on the ability of the Council to carry out repairs and improvements on Council homes and the Council's ability to develop on its Council Estates; • how, despite further savings and additional income being included in the business plan, it means that currently £76million of work planned over the next ten years can now not be carried out. The revised plan for major works postpones the equivalent of window and door replacements to 4,400 homes, roof renewals for 2,650 homes, 4,400 new heating systems, 1,750 electrical rewires, 1,750 new kitchens and 1,100 new bathrooms. Officers continue to look for additional savings and income that will not compromise service delivery; • the 2016/17 budget for the Council's homes (also known as the annual Housing Revenue Account (HRA) budget) including a reduction in rents for Council homes of 1% for 2016/17. <p>The decision by the Chancellor of the Exchequer to <u>reduce</u> social housing rents by 1% each year for four years from April 2016 means that the current approved Financial Plan for Council Homes is no longer viable and the Council's approved investment plans can no longer be realised under the current financial strategy. Based on the level of planned repairs and investment in current Council homes approved in January 2015 and taking account of the investment requirements from a recently completed stock condition survey, after allowing for further savings and additional income, the Council would need to take out additional borrowing of more than £76million during the next 10 years over and above the existing debt cap¹ of £255m.</p> <p>The Council is proposing to re-phase necessary major works to a much later period to produce a balanced 40 year</p>

¹ The HRA debt cap is the Government-restricted borrowing limit. This is £255m for the Council.

long term financial plan for Council homes, while maintaining a level of investment for 2016/17 in line with the investment plans approved by Cabinet in January 2015 in the “Financial Plan for Council Homes”.

This will enable the Council to continue to manage Council homes without compromising the condition of the homes in the immediate future while continuing to seek a long-term solution to the problem. In future years, however, the revised financial plan requires a postponement in planned work originally scheduled to take place within the first ten years (2015/16 – 2024/25).

This will inevitably mean that we continue to have a significant repairs backlog and that this backlog starts to grow. It means that there is a risk that, not only will the condition of the Council’s homes deteriorate, but that the day to day repair costs will start to increase.

Tenants and residents have been consulted on the significant impact on the Council’s financial plans for the HRA of the Government-imposed 1% reduction in rents for each of the next four years and on the Council’s plan to re-phase necessary major works. This consultation has taken place via the Borough Forum on 13th October 2015 and via the Housing Representatives Forum on 20th October 2015 and 17th November 2015.

Further, tenants and residents were also consulted on the plans at the Economic Regeneration, Housing and the Arts Policy & Accountability Committee on 1st December 2015 in order that the committee could comment on the implications in advance of any formal decision being taken by Cabinet on 11th January 2016.

The detailed revised plan for major works for the next ten years at estate level will be presented to tenants at the Housing Representatives Forum in January 2016 and to individual Tenants’ and Residents’ Associations. This plan will set out in detail the work that the Council will be able to do on each estate and what work the Council has had to postpone. The plan will as far as possible take into account the views expressed by tenants. The plan will also be subject over time to changes as a result of emerging issues, including any further Government policy changes.

There is a risk of further reductions to major works over the next fifteen years if in 2021 rents continue to be enforced by statute. This would mean that the Council is unable to return to the rent policy agreed last year with tenants of CPI plus 1% plus £1.

Further, the impact of Welfare Reform on income and bad debts, specifically the additional reduction in the benefit caps, the reduction in housing benefit for single tenants in social housing who are under 35, and direct payments to tenants when they move to Universal Credit.

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 rephasing of necessary major works.

	<p>There are no impacts on existing staff as a result of this project.</p> <p>The rent reduction is expected to be positive or neutral for protected groups. However, the postponement of major works may impact disproportionately on groups whose homes are more adversely affected by the postponement of major works, especially those who may be disproportionately represented in the Council's stock of homes. However, the Council considers that the main driver of the change in the plan for major works is due to the forced reduction in rents by Government and therefore, largely outside of the Council's control.</p> <p>It is not possible for the Council to mitigate the effects by funding the shortfall in rental income from other resources as the Council needs to maintain a viable financial plan. However, the Council plans to take into account the views expressed by tenants on detailed estate plans of major works for their area. Officers will also be on hand to help tenants and their households in ensuring that tenants' homes are safe, warm and weather-proof.</p>
Lead Officer	<p>Name: Kathleen Corbett Position: Lead Director for Housing & Director of Finance and Resources, Housing and Regeneration Email: kathleen.corbett@lbhf.gov.uk Telephone No: 020 8753 3031</p>
Date of completion of final EIA	18/12/15

Section 02	Scoping of Full EIA
Plan for completion	<p>Timing: Sept 2015 to Dec 2015 Resources: Officer time, and see section 03 for data resources</p>
Analyse the impact of the policy, strategy, function, project, activity, or programme	<p>The principal impact of the report arises from the plan to re-phase necessary major works to a much later period. The plan maintains a level of investment for 2016/17 in line with the investment plans approved by Cabinet in January 2015 which will enable the Council to continue to manage Council homes without compromising the condition of the homes in the immediate future. In future years, however, the revised financial plan requires a postponement in planned work originally scheduled to take place within the first ten years (2015/16 – 2024/25).</p> <p>The revision to the programme of works will affect tenants across all wards according to the distribution of dwellings by bedroom size set out in the table below:</p> <div style="background-color: black; color: white; text-align: center; padding: 5px;"> HRA Dwellings by Bed Size – Budgeted for 2016/17 </div>

Ward	Studio	1	2	3	4	5	6	All Dwellings
Addison	11	276	258	106	19	1		671
Askew	27	339	249	136	24	14	3	792
Avonmore And Brook Green	18	260	234	85	19	1		617
College Park & Old Oak	1	90	112	113	68			384
Fulham Broadway	36	369	223	185	18	4	4	839
Fulham Reach	24	276	213	218	81	2		814
Hammersmith Broadway	39	440	302	102	36	3	2	924
Munster	13	104	117	107	43	7		391
North End	28	395	396	186	46	3		1,054
Palace Riverside	9	218	52	68	12	4	1	364
Parsons Green And Walham	18	166	116	82	26	4		412
Ravenscourt Park	31	98	83	56	18	2		288
Sands End	44	232	393	175	41	15		900
Shepherds Bush Green	173	408	367	85	16	6	1	1,056
Town	54	284	330	156	35	6	1	866
Wormholt & White City	57	322	652	556	277	2		1,866
All Wards	583	4,277	4,097	2,416	779	74	12	12,238

A number of general mitigating actions are in place to enable the impact of the re-phasing of works to be minimised for tenants. This includes:

- maintaining the level of investment for 2016/17 in line with the investment plans approved by Cabinet in January 2015,
- prioritising investment in future years to ensure that tenants' homes are safe, warm and weather-proof,
- taking into account the views expressed by tenants on detailed estate plans of major works for their area,
- taking into account any identified negative impacts on protected groups and taking mitigating action where possible,
- minimising any reduction in the disabled adaptations budget throughout the term of the 40 year financial plan,
- completing the programme of lift improvements by 2018/19,
- ensuring housing officers are on hand to help tenants and their households in identifying repairs requirements at an early stage and supporting tenants in progressing moves to alternative accommodation where necessary,
- the provision of a fuel poverty officer who will advise tenants to ensure they remain in their home.

Protected characteristic	Analysis	Impact: Positive, Negative, Neutral
Age	<p>It is likely that there will be a negative impact on tenants of all age groups as a result of the Council's plans to re-phase investment works. The impact will be less for those tenants whose homes are not as significantly affected by the re-phasing of works but the impact for all tenants will be negative. There may be a greater impact on younger and older groups of tenants.</p> <p>It can be seen from the data in section 03 that 3,508 of them are under-occupied. Additionally, 1,745 tenancies are over-crowded. It should be noted that this data is unreliable due to the need for an household member update of the Council's housing management database. Also, age data is not reliable for these tenancies and therefore note included, though under / over occupation data can indicate whether tenants have children to look after. It is therefore not possible to determine the impact, although it is likely that the re-phasing of works may have a negative impact on these groups.</p> <p>The Council has put in place a number of mitigating actions as referred to</p>	Unknown, likely negative

		<p>above.</p> <p>Given that investment will be prioritised to ensure that tenants' homes are safe, warm and weather-proof, it is unlikely that any home would deteriorate to the extent that tenants need to be rehoused. However, in such an event, and when works are carried out, the Council will ensure that where the works are deemed disruptive (for example in the case of lift replacement), tenants will be supported and provided with alternative accommodation where necessary.</p>	
	Disability	<p>It is likely that there will be a negative impact on tenants with disabilities as a result of the Council's plans to re-phase investment works. The impact will be less for those tenants whose homes are not as significantly affected by the re-phasing of works but the impact for all disabled tenants is likely to be negative. A total of 1,817 households in Council dwellings have been identified where the claimant or partner is in receipt of a disability benefit/allowance/award/carer premium.</p> <p>The Council has put in place a number of mitigating actions as referred to above. The Council plans to minimise any reduction in the disabled adaptations budget throughout the term of the long term 40 year financial plan, and to complete the programme of lift improvements by 2018/19.</p> <p>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.</p> <p>Given that investment will be prioritised to ensure that tenants' homes are safe, warm and weather-proof, it is unlikely that any home would deteriorate to the extent that tenants need to be rehoused. However, in such an event, and when works are carried out, the Council will ensure that where the works are deemed disruptive (for example in the case of lift replacement), tenants will be supported and provided with alternative accommodation where necessary.</p>	Unknown, likely negative
	Gender	There is no data available on our tenants with this protected characteristic.	Neutral

	reassignment	<p>However, it is unlikely that those who have transitioned, or who are transitioning, will be negatively affected by the re-phasing of the works.</p> <p>Given that investment will be prioritised to ensure that tenants' homes are safe, warm and weather-proof, it is unlikely that any home would deteriorate to the extent that tenants need to be rehoused. However, in such an event, and when works are carried out, the Council will ensure that where the works are deemed disruptive (for example in the case of lift replacement), tenants will be supported and provided with alternative accommodation where necessary. 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 ensuring housing officers are on hand to help tenants and their households in identifying repairs requirements and supporting tenants in progressing moves to alternative accommodation where necessary.</p>	Negative
	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 affected by the re-phasing of works will be negatively affected by the change. The impact will be less for those tenants whose homes are not as significantly affected by the re-phasing of works but the impact for all tenants in this group will be negative.</p> <p>The Council has put in place a number of mitigating actions as referred to above.</p> <p>Given that investment will be prioritised to ensure that tenants' homes are safe,</p>	Negative

		<p>warm and weather-proof, it is unlikely that any home would deteriorate to the extent that tenants need to be rehoused. 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>In such an event, and when works are carried out, the Council will ensure that where the works are deemed disruptive (for example in the case of lift replacement), tenants will be supported and provided with alternative accommodation where necessary.</p>	Neutral
	Race	<p>The available data in section 03 does not give a breakdown by ethnicity according to estate. 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> <p>Black Caribbean; White Irish; Black African; Other Black; Pakistani; Bangladeshi; Other Asian; Mixed White and Black Caribbean; and Mixed White</p>	

		<p>and Black African are all over-represented</p> <p>White British; Other White; Indian; Chinese; and Mixed White and Asian are all under represented.</p> <p>Households 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 Council homes. However, it is likely that those of any race group who are affected by the re-phasing of works will be negatively impacted by the change. The impact will vary for tenants depending on the impact of re-phasing 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 re-phasing of works. However, the Council has housing officers on hand to help people with this protected characteristic with managing the impact of any reduction in major works.</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 affected by the re-phasing of works will be negatively affected by the change. The impact will depend on the effect of the re-phasing for each Council property but the impact on all tenants will be 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 re-phasing of works. However, the Council will have housing officers on hand to help people with this protected characteristic with managing the impact of any reduction in major works.</p>	<p>Negative</p> <p>Neutral</p>
	Sex		

	There is no data available on men and women as our tenants. However, it is likely that men and women will be negatively affected by the re-phasing of works. The impact will depend on the effect of the re-phasing for each Council property but the impact on all tenants will be negative.	Negative
Sexual Orientation	<p>There is no data available on those with this protected characteristic as our tenants. However, it is likely that men and women will be negatively affected by the re-phasing of works.</p> <p>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.</p> <p>It is not possible to mitigate the effects of this disruption as it is unlawful to exempt one group with a particular sexual orientation from another from the re-phasing of works. However, given that investment will be prioritised to ensure that tenants' homes are safe, warm and weather-proof, it is unlikely that any home would deteriorate to the extent that tenants need to be rehoused. Further, the Council will have housing officers on hand to help people with this protected characteristic with managing the impact of any reduction in major works.</p>	<p>Negative</p> <p>Neutral</p>

Human Rights or Children's Rights

If your decision has the potential to affect Human Rights or Children's Rights, please contact your Equality Lead for advice

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 impacted by the rephasing of works. 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)?

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, 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.

Section 03

Analysis of relevant data

Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.

Documents and data reviewed

Re-phasing plans

No detailed data currently exists to ascertain the impact on individual tenants. The Council is proposing to re-phase necessary major works to a much later period to produce a balanced 40 year long term financial plan for Council homes, while maintaining a level of investment for 2016/17 in line with the investment plans approved by Cabinet in January 2015 in the "Financial Plan for Council Homes". Therefore, any change to planned works will impact from 2017/18 onwards.

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.

Age

Data from the Council's housing management database demonstrates that tenants of the Council's homes contain a significant proportion of people aged over 50 years old (58%). It should be noted that the data from the housing management database may contain some inaccuracies and that the data refers to the main tenant and not all of the occupants of the Council's homes.

Age Range	Council Stock Tenants (iWorld) as at 15/12/2015	% Council Stock Tenants (iWorld)
Under 16	4	0.0%
16-34	1669	13.8%
35-49	3319	27.4%
50-64	3610	29.8%
65+	3415	28.2%
unknown	93	0.8%
Grand Total	12110	100.0%

The table below summarises the overcrowding / underoccupying data based on the DWP bed standard. Where Housing Benefit data is not available, iWorld (the Council's housing management database) has been used. It should be noted that a significant number of tenancies have not had recent household member updates on iWorld. Therefore, the figures below must be treated with caution.

Summary of Households by DWP bed standard and whether in receipt of HB (contains multiple claimants)

Count of Tenancy Reference	Receiving HB & match to HB data		Grand Total
	Household Status Desc. by DWP bed criteria	Y - HB Data	
Severely Overcrowded (by 2+ beds)	153	182	335
Overcrowded by 1 bed	868	542	1,410
Meets Bed standard	4,203	2,679	6,882
Under-occupied by 1 bed	1,169	1,102	2,271
Under-occupied by 2+ beds	589	648	1,237
Grand Total	6,982	5,153	12,135

Disability

Disability data based on tenancies in receipt of benefit / allowance / award associated with disability.

In receipt of benefit/allowance/award associated with disability (Multiple Items)

Row Labels	Count of In receipt of benefit/allowance/award associated with disability
HB Data	1,796
HB data used - multiple claimant	21
Grand Total	1,817

Race

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

Tenure	All categories: Tenure	Social rented: Rented from council (Local Authority)
All categories: Ethnic group	180,652	27,606
White: Total	123,101	13,227
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
Mixed/multiple ethnic group: Total	9,930	2,168
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
Asian/Asian British: Total	16,376	2,109
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
Black/African/Caribbean/Black British: Total	21,221	8,038
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
Other ethnic group: Total	10,024	2,064
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

	<p>population data, in order to draw comparisons between Council tenants and the borough as a whole:</p> <p>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</p> <p>The largest ethnicity minority group in the Borough is the Black population, accounting for 11.75% of the total, or 21,221 people.</p> <p>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).</p> <p>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.</p> <p>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%).</p> <p>From: http://www.lbhf.gov.uk/Images/2011%20Census%20report_LBHF%20briefing_tcm21-177945.pdf</p>
New research	(No new research undertaken)

Section 04	Consultation
Consultation	<p>Tenants have been consulted on the significant impact on the Council's financial plans for the HRA of the Government-imposed 1% reduction in rents for each of the next four years and on the Council's plan to re-phase necessary major works. This consultation took place via the Borough Forum on 13th October 2015 and via the Housing Representatives Forum on 20th October 2015 and 17th November 2015.</p> <p>Further, tenants and residents were also consulted on the plans at the Economic Regeneration, Housing and the Arts Policy & Accountability Committee on 1st December 2015.</p>
Analysis of consultation outcomes	Tenants were in overall support of the Council's plans to re-phase major works as a result of the Government's forced 1% rent reduction.

Section 05	Analysis of impact and outcomes
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Analysis

This section sets out the likelihood of the re-phasing of major works contributing to, having no effect on, or adversely impacting, the three tenets of the PSED in light of the analysis in section 02.

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 and older age groups are more likely to be impacted as set out in the analysis above. The Council has put in place mitigating actions and these include prioritising investment in future years to ensure that tenants' homes are safe, warm and weather-proof, taking into account the views expressed by tenants on detailed estate plans of major works for their area, taking into account the likely negative impacts on younger and older age groups and taking mitigating action where possible, minimising any reduction in the disabled adaptations budget throughout the term of the 40 year financial plan, completing the programme of lift improvements by 2018/19, ensuring housing officers are on hand to help tenants and their households in identifying repairs requirements at an early stage and supporting tenants in progressing moves to alternative accommodation where necessary, the provision of a fuel poverty officer who will advise tenants to ensure they remain in their home.

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 the re-phasing of major works resulting in a deterioration in the condition of the homes of disabled households. 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 therefore more likely to spend more time at home than others. They are also likely to find it more difficult to find a property that is suitable for their needs, for example if the property were to deteriorate significantly and if they have a mobility or sensory impairment. In such a case, 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. The impact any move 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 re-phasing of major works will not result in discrimination, harassment, or victimisation.

The Council has put in place mitigating actions as outlined above in section 2. This includes the possibility that 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.

Further, the Council has housing officers on hand to help disabled tenants and their households in identifying repairs requirements at an early stage and supporting tenants in progressing moves to alternative accommodation where necessary, the provision of a fuel poverty officer who will advise tenants to ensure they remain in their home, 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 as outlined above in section 2.

	<p>Overall Assessment</p> <p>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 maintain a viable long term business plan a legitimate and necessary aim. As part of reaching this aim, the Council considers that re-phasing necessary major works is the only viable response to accommodating the impact on the business plan of the Government-imposed 1% reduction in rents. The Council has identified and will implement a number of mitigating actions for protected groups.</p>
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Section 06	Reducing any adverse impacts and recommendations
Outcome of Analysis	<p>The Council is:</p> <ul style="list-style-type: none"> • maintaining the level of investment for 2016/17 in line with the investment plans approved by Cabinet in January 2015, • prioritising investment in future years to ensure that tenants' homes are safe, warm and weather-proof, • taking into account the views expressed by tenants on detailed estate plans of major works for their area, • taking into account any identified negative impacts on protected groups and taking mitigating action where possible , • minimising any reduction in the disabled adaptations budget throughout the term of the 40 year financial plan, • completing the programme of lift improvements by 2018/19, • ensuring housing officers are on hand to help tenants and their households in identifying repairs requirements at an early stage and supporting tenants in progressing moves to alternative accommodation where necessary, • providing a fuel poverty officer who will advise tenants to ensure they remain in their home . <p>Disability: The Council has put in place mitigating actions as outlined above. This includes the possibility that 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.</p> <p>Further, the Council has housing officers on hand to help disabled tenants and their households in identifying repairs requirements at an early stage and supporting tenants in progressing moves to alternative accommodation where necessary, the provision of a fuel poverty officer who will advise tenants to ensure they remain in their home, albeit the Council recognises that the disruption for disabled people will be more acute than for non-disabled people.</p> <p>Age: The Council has put in place mitigating actions as outlined above including ensuring housing officers are on</p>

hand to help younger and older tenants and their households in identifying repairs requirements at an early stage and supporting tenants in progressing moves to alternative accommodation where necessary. Also fuel poverty officer will be available to advise tenants to ensure they remain in their home. Given that investment will be prioritised to ensure that tenants' homes are safe, warm and weather-proof, it is unlikely that any home would deteriorate to the extent that tenants need to be rehoused. However, in such an event, and when works are carried out, the Council will ensure that where the works are deemed disruptive (for example in the case of lift replacement), tenants will be supported and provided with alternative accommodation where necessary.

Section 07		Action Plan				
Action Plan	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 experience a deterioration in the condition of their home	It is not possible for the Council to mitigate the effects by funding the shortfall in rental income from other resources as the Council needs to maintain a viable financial plan. However, the Council plans to take into account the views expressed by tenants on detailed estate plans of major works for their area. Officers will also be on hand to help tenants and their households in ensuring that tenants' homes are safe, warm and weather-proof.	From Apr 2017	Paul Monforte	Tenants have a forum to express their concerns, receive support and information in ensuring their homes are maintained as safe, warm and weather-proof.	
Disabled households	It is not possible for the Council to mitigate the effects by funding the shortfall in rental income from other resources as the Council needs to maintain a viable financial plan. However, the Council plans to take into account the views expressed by tenants on detailed estate plans	From Apr 2017	Paul Monforte	Tenants have a forum to express their concerns, receive support and information in ensuring their homes are maintained as		

		of major works for their area. Officers will also be on hand to help tenants and their households in ensuring that tenants' homes are safe, warm and weather-proof.			safe, warm and weather-proof.	
	Age	It is not possible for the Council to mitigate the effects by funding the shortfall in rental income from other resources as the Council needs to maintain a viable financial plan. However, the Council plans to take into account the views expressed by tenants on detailed estate plans of major works for their area. Officers will also be on hand to help tenants and their households in ensuring that tenants' homes are safe, warm and weather-proof.	From Apr 2017	Paul Monforte	Tenants have a forum to express their concerns, receive support and information in ensuring their homes are maintained as safe, warm and weather-proof.	

Section 08	Agreement, publication and monitoring
Chief Officers' sign-off	Name: Kathleen Corbett Position: Lead Director of Housing & Director of Finance & Resources, Housing and Regeneration Email: kathleen.corbett@lbhf.gov.uk Telephone No: 020 8753 3031
Key Decision Report (if relevant)	Date of report to Cabinet: 08/02/16 Key equalities issues have been included: Yes
Opportunities Manager (where involved)	Name: David Bennett Position: Acting Head of Change Delivery Date advice / guidance given: 18 th December 2015 Email: PEIA@lbhf.gov.uk Telephone No: 020 8753 1628