<b>Equality Impact Assessment</b>	Please enter responses below in the right hand columns
Report	
Date to EIA panel, department, DLT or DMT	EIA Panel on 4 February 2013
Sign-off path for EIA (please add/delete as applicable)	Corporate EIA Panel – 4 Feb 2013 Cabinet – 11 Feb 2013
Title of Project, business area, policy/strategy	Housing Revenue Account Rent Setting
Author	
Job title, division and department	Head of Finance Housing, Regeneration and Environment
Contact email and telephone	
SLB Sponsor	Executive Director of Housing, Regeneration and Environment

# London Borough of Lambeth Full Equality Impact Assessment Report

Please enter responses below in the right hand columns.

#### 1.0 Introduction

# 1.1 Business activity aims and intentions

In brief explain the aims of your proposal/project/service, why is it needed? Who is it aimed at? What is the intended outcome? What are the links to the cooperative council vision, corporate outcomes and priorities?

The report sets out proposals for rent, tenants service charges and other charges for the 2013/14 rent year as well as proposals regarding the Housing Revenue Account (HRA) budget.

needed? Who is it aimed at? What is the intended outcome? What are the links forthcoming financial year, and provides each individual tenant with a statutory notice of any proposed rent change.

Local Authorities and Housing Associations are expected to work towards a national average for rents covering similar properties in similar areas. This process is governed by the national social rent policy of convergence which sets out a formula for increasing rents each year and therefore setting annual council and housing association rent.

From April 2012 the HRA became self financing and the old subsidy system ceased, however the policy of convergence remains in place and forms the basis of the 30 year business plan in place for the HRA.

Self financing enables a locally run system where the council can keep rental income and use it locally to maintain homes for current and future tenants. A key feature is the ability to borrow against the value of the housing stock in order to invest on improvements to stock.

Impact assessment on characteristics from the proposed changes is based upon information recorded within individual tenancy rent accounts as per the Tenancies and Diversity Weekly Digest (week 39 December 2012). Data isn't available for all

characteristics, therefore, meaningful analysis has been conducted where possible.

Analysis focuses on the level of change per household based upon the rent and service charge proposals below. The impact of welfare reform is considered under socio-economic, however, detailed welfare reform analysis is not captured within this EIA.

## The proposals for rent increase are:

- 1. To increase rents based on the Government's Rent Restructuring Policy for Lambeth at a constrained level 4.17%
- 2. Service charges to be frozen except for grounds maintenance, TV aerials and heating and hot water, all of which will see a decrease due to falling costs overall
- 3. To increase garage rents and parking charges by inflation
- 4. To increase concierge service charges by £3.10 per week on a phased basis on the premise that a full service review is undertaken

# 2.0 Analysing your equalities evidence

#### 2.1 Evidence

Any proposed business activity, new policy or strategy, service change, or procurement must be informed by carrying out an assessment of the likely impact that it may have. In this section please include both data and analysis which shows that you understand how this decision is likely to affect residents that fall under the protected characteristics enshrined in law and the local characteristics which we consider to be important in Lambeth (language, health and socio-economic factors). Please check the council's equality and monitoring policy and your division's self assessment. Each division in 2011/12 reviewed its equality data and completed a self assessment about what equality data is relevant and available?

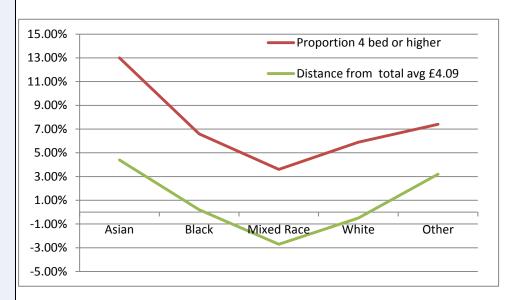
IF YOUR PROPOSAL ALSO IMPACTS ON LAMBETH COUNCIL STAFF YOU NEED TO COMPLETE A STAFFING EIA.

Protected characteristics and local equality characteristics	Impact analysis For each characteristic please indicate the type of impact (i.e. positive, negative positive and negative, none, or unknown), and:  Please explain how you justify your claims around impacts.  Please include any data and evidence that you have collected including from superformance data or complaints to support your proposed changes.  Please indicate sources of data and the date it relates to/was produced (e.g. 'Resurvey, wave 10, April 12' or 'Lambeth Business Survey 2012' etc)					
Race	Analysis by race categories provides both positive and negative movement when compared to the overall average. Movements are not deemed material and are consistent with type of property occupied.  Rent  The table below sets out the average increase per week by race. The overall average increase of 4.17% equates to an average of £4.09 per week.					
	Race of	% of	Avg impact £	Distance from	Distance from	
	Tenants	tenancies	per week	total avg (£4.09)	£4.09 avg %	
	Asian	2.6%	£4.27	+18p	+4.4%	
	Black	44.9%	£4.10	+1p	+0.2%	
	Mixed Race	1.9%	£3.98	-11p	-2.7%	
	White	34.0%	£4.07	-2p	-0.5%	
		7.00/	£4.22	+13p	+3.2%	
	Other	7.0%				
	Other Unclassified	9.6%	£4.02	-7p	-1.7%	

There is the greatest impact on households described as Asian or other within their tenancy agreements. This is due to the property type generally held by Asian and other households which are larger and fall into the 4 bed or higher category (see table). These properties are more expensive properties and will see a larger increase as they are further away from convergence.

Race of Tenants	3 bed or less	4 bed or higher	Distance from £4.09 avg %
Asian	87.0%	13.0%	+4.4%
Black	93.4%	6.6%	+0.2%
Mixed Race	96.4%	3.6%	-2.7%
White	94.1%	5.9%	-0.5%
Other	92.6%	7.4%	+3.2%
Unclassified	90.8%	9.2%	-1.7%

The graph below shows that the average distance from the overall average is a direct result of the proportion of properties with 4 beds or more:



The overall impact of the change is a negative effect of 18p a week for the worst affected category. This is not felt to be material at this stage and no further action has been taken to mitigate the impact.

The table below sets out tenants by race and corresponding impact in relation to service charges:

Race of		Net Impact					
Tenants	-£1.36	-£0.95	-£0.41	0	+£1.74	+£2.15	Total
Asian	0.2%	1.7%	0.0%	0.6%	0.0%	0.1%	2.6%
Black	2.0%	29.1%	0.5%	10.7%	0.6%	2.0%	44.9%
Mixed	0.1%	1.3%	0.0%	0.4%	0.0%	0.1%	1 00/
Race	0.1%	1.5%	0.0%	0.4%	0.0%	0.1%	1.9%
White	1.9%	20.2%	0.5%	9.6%	0.6%	1.2%	34.0%
Other	0.4%	4.5%	0.1%	1.4%	0.2%	0.4%	7.0%
Unclassified	0.5%	3.3%	0.4%	4.7%	0.1%	0.5%	9.6%
Total	5.1%	60.1%	1.5%	27.4%	1.5%	4.3%	100.0%

94.2% of tenants will receive a reduction or no change in service charges. The 5.8% that will see an increase are those where concierge services are provided. The two groups seeing the largest proportion of the increase are 'black' with 2.6% and 'white' with 1.8% and these are inline with the ethnicity split across the population.

The majority of tenants are within the 95p reduction grouping and proportions are consistent with population split.

#### Gender

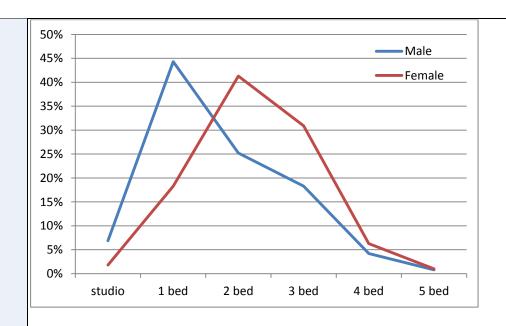
Analysis by gender categories provides both positive and negative movement when compared to the overall average. Movements are not deemed material and are consistent with type of property occupied.

#### Rent

The table below sets out the average increase per week by gender. The overall average increase of 4.17% equates to an average of £4.09 per week.

Gender for	% of	Avg impact £	Distance from	Distance from
Main Tenant	tenancies	per week	total avg (£4.09)	£4.09 avg %
Male	37.6%	£3.94	-15p	-3.6%
Female	62.4%	£4.21	+12p	+2.9%
Total	100%	£4.09	-	-

The analysis shows that there will be a greater impact on households where the main tenant is female with an increase 12p above average, while households where the main tenant is male will see rent decrease by 15p from the average. This is mainly due to the property size held by each gender type. As in the analysis under race, the greatest increase in average rents can be seen in the larger properties which are further away from convergence or "average" rent levels. These properties are predominantly occupied by households where the main tenant is female whereas those with male main tenants predominantly hold smaller, less expensive, properties. The table below shows the connection between size of property and gender.



The table below sets out tenants by gender and corresponding impact in relation to service charges:

Gender		Net Impact					
Main Tenant	-£1.36	-£0.95	-£0.41	0	+£1.74	+£2.15	Total
Male	2.4%	23.8%	0.4%	8.7%	0.6%	1.7%	37.6%
Female	2.7%	36.3%	1.1%	18.7%	0.9%	2.6%	62.4%
Total	5.1%	60.1%	1.5%	27.4%	1.5%	4.3%	100.0%

	94.2% of tenants will receive a reduction or no change in service charges. The 5.8% will see an increase are those where concierge services are provided. Households we the main tenant is female account for the largest proportion with 3.5% and where the main tenant is male 2.3%. This is in keeping with the overall split based upon gende where female is greater than male.  The majority of tenants are within the 95p reduction grouping and proportions are consistent with population split.				
Gender re-assignment	available. 93% of t As per Tenancies a	on gender re-assignment is unknown due to limited information being tenants are unclassified in this category.  and Diversity Digest:			
	Main tenant born				
	Yes	0%			
	No	7%			
	Unclassified	93%			
	Total	100%			

# Disability

Analysis by disability categories provides both positive and negative movement when compared to the overall average. Movements are not deemed material and are consistent with type of property occupied.

#### Rent

The table below sets out the average increase per week by disability. The overall average increase of 4.17% equates to an average of £4.09 per week.

Disability for	% of	Avg impact £	Distance from	Distance from
Main Tenant	tenancies	per week	total avg (£4.09)	£4.09 avg %
Yes	7.3%	£3.95	-14p	-3.4%
No	89.9%	£4.12	+3p	+0.7%
Unclassified	2.8%	£3.49	-60p	-14.6%
Total	100%	£4.09	-	-

In respect of disability, 7.3% of the main tenants are recorded as having a disability. The average impact for this group is 14p less than the overall average rent for all tenants and as with other groups the impact can be directly linked to size of properties. 93% of tenancies for households where the main tenant has a disability are housed within properties of 3 bed or less resulting in the lower than average rent increase.

Almost 90% of main tenants are classified as not having a disability. The average rent increase for this group is 3p above the overall average and does not indicate a significant adverse impact.

2.8% of tenants are unclassified – this does not provide a representative sample for analysis.

The table below sets out tenants by disability and corresponding impact in relation to service charges:

Disability		Net Impact					
Main Tenant	-£1.36	-£0.95	-£0.41	0	+£1.74	+£2.15	Total
Yes	0.5%	4.3%	0.1%	2.0%	0.1%	0.3%	7.3%
No	4.5%	54.6%	1.4%	23.9%	1.4%	4.0%	89.8%
Unclassified	0.1%	1.2%	0.0%	1.5%	0.0%	0.0%	2.8%
Total	5.1%	60.1%	1.5%	27.4%	1.5%	4.3%	100.0%

94.2% of tenants will receive a reduction or no change in service charges. The 5.8% that will see an increase are those where concierge services are provided. Households where the main tenant is disabled or vulnerable account for 0.4% of tenants with other households accounting for 5.4%. This is in keeping with the overall split based upon households where the main tenant is disabled being a small proportion of total households.

The majority of tenants are within the 95p reduction grouping and proportions are consistent with population split.

#### Age

Analysis by age categories provides both positive and negative movement when compared to the overall average. Movements are not deemed material and are consistent with type of property occupied.

#### Rent

The table below sets out the average increase per week by age of main tenant. The overall average increase of 4.17% equates to an average of £4.09 per week.

Age of Main	% of	Avg impact £	Distance from	Distance from
Tenant	tenancies	per week	total avg (£4.09)	£4.09 avg %
Under 25	3.8%	£3.78	-£0.31	-7.6%
25-44	33.9%	£4.12	£0.03	+0.7%
45-64	40.7%	£4.17	£0.08	+2.0%
Over 65	20.9%	£4.03	-£0.06	-1.5%
Unclassified	0.7%	£3.66	-£0.43	-10.5%
Total	100%	£4.09	-	-

There is a small adverse impact for tenants aged between 25 and 64 while all other tenants will see a positive impact against average with the largest benefit being received by tenants under 25. This latter impact reflects property size as 99% of this group are within 3 bed or less properties which are less expensive. The overall impact of age is not deemed to be significant.

The table below sets out tenants by age of main tenant and corresponding impact in relation to service charges:

Age of		Net Impact						
Main	-£1.36	-£0.95	-£0.41	0	+£1.74	+£2.15		
Tenant								
Under 25	0.2%	2.8%	0.0%	0.6%	0.0%	0.2%		
25-44	1.5%	23.3%	0.2%	6.5%	0.7%	1.7%		
45-64	1.6%	22.6%	0.8%	13.3%	0.6%	1.7%		
Over 65	1.7%	10.8%	0.5%	7.0%	0.2%	0.7%		
Unclassified	0.1%	0.6%	0.0%	0.0%	0.0%	0.0%		
Total	5.1%	60.1%	1.5%	27.4%	1.5%	4.3%		

94.2% of tenants will receive a reduction or no change in service charges. The 5.8% that will see an increase are those where concierge services are provided. The majority of tenants are within the 95p reduction grouping and proportions are consistent with population split.

# Sexual orientation Impact based upon sexual orientation is unknown due to limited information being available. 86% of tenants are unclassified in this category. As per Tenancies and Diversity Digest: Sexuality of main tenant Heterosexual 12% 0% Gay man Lesbian 0% Bisexual 0% Other/unsure 0% Won't say 2% Unclassified 86% Total 100%

Religion and belief	Impact based upon religion and belief is unknown due to limited information being available. 79% of tenants are unclassified in this category.				
	As per Tenancies ar	nd Diversity Digest:			
	Faith of main tenar	it			
	Buddhist	0%			
	Christian	13%			
	Hindu	0%			
	Humanist	0%			
	Jewish	0%			
	Muslim	2%			
	Sikh	0%			
	Rastafarian	0%			
	Other	1%			
	No Religion	3%			
	Won't say	2%			
	Unclassified	79%			
	Total	100%			
Pregnancy and maternity	This information is not recorded on the tenancy				
Marriage and civil partnership	This information is	not recorded on the	e tenancy		

#### Socio-economic factors

Analysis of socio economic factors, specifically welfare reforms, provides both positive and negative movement when compared to the overall average

The introduction of the benefit cap, bedroom tax and council tax support in 2013 as part of the Governments welfare reforms is likely to have an impact on household income. The following analysis considers the impact of the rent and service charge proposals alongside possible implications as a result of welfare reform.

The table below sets out the proportion of current tenants impacted:

			Avg weekly		Min weekly		Max weekly	
Welfare change	Tenants	%	impact		impact		impact	
Not affected	15,505	62.9%	£	-	£	-	£	-
Council Tax Support								
(CTS) reduced	6,373	25.9%	£	2.73	£	0.00	£	7.40
Underoccupying and								
CTS reduced	1,749	7.1%	£	23.49	£	7.95	£	46.67
Underoccupying only	883	3.6%	£	21.10	£	6.96	£	40.88
Benefit Cap only	107	0.4%	£	83.61	£	0.32	£	359.91
Benefit Cap &								
Underoccupying	18	0.1%	£	85.90	£	35.00	£	286.64
Grand Total	24,635	100%			•	•		

The analysis is based upon the councils welfare reform modelling as at December 2012, however, due to an ever changing population and changes to circumstances following the councils work to mitigate impact, the position will continue to change.

The analysis indicates that 62.9% are not impacted by the welfare changes and 25.9% are impacted by an average of £2.73 per week due to changes to council tax support reductions.

11.2% of households are impacted by a combination of benefit cap, bedroom tax and council tax support. The worst affected households represent 0.5% of tenancies and are mpacted primarily by the benefit cap. Within this group, the average weekly impact is between £83.61 and £85.90, and the range is between 32p and £359.91 per week.

The table below shows that 0.3% of households are impacted by between £60 and £360 per week. The majority of households, 62.9%, are not impacted by the changes.

		£0 -	£20 -	£60 -	£100 -	
Welfare change	£0	£20	£60	£100	£360	Total
Not affected	15,505	-	-	-	-	15,505
Council Tax Support (CTS) reduced	-	19	36	17	35	107
Underoccupying and CTS reduced	-	-	9	4	5	18
Underoccupying only	-	6,372	-	-	-	6,372
Benefit Cap only	-	602	281	-	-	883
Benefit Cap & Underoccupying	-	903	846	-	-	1,749
Grand Total	15,505	7,896	1,172	21	40	24,634
% of Tenants	62.9%	32.1%	4.8%	0.1%	0.2%	100%

The impact of the rent and service charge proposals are minimal in comparison to the potential impact of welfare reforms. The average rental increase is £4.09 per week and 94.2% of tenants will receive a reduction or no change in respect of service charges. The majority of tenants are within the 95p reduction grouping which is a positive step. Those

Health	This information is not recorded on the tenancy
Language	This information is not recorded on the tenancy
	households at the higher end of the scale in relation to welfare changes would remain broadly in the same impact brackets after rent and service charge proposals are considered. This is because the welfare impact is significantly larger than the rent increase and any savings achieved through service charges.  Both the council and Lambeth Living are working closely with tenants in respect of the welfare reform changes:  Tenants are being contacted directly to discuss implications. This includes which benefits they are entitled to and currently receive, financial support being available for those looking to get back into work in respect of the cost of child care and employment advice.  The potential longer term consequences include rent arrears and the threat of being made homeless. The support that we are able to provide for affected households includes a Tenancy Rescue Service; each affected household will be contacted by the service and signposted to money advice and financial support services. The strategy also states that support will be given to landlords in the private sector to try and lower rents and support good tenancies

## 2.2 Gaps in evidence base

What gaps in information have you identified from your analysis? In your response please identify areas where more information is required and how you intend to fill in the gaps. If you are unable to fill in the gaps please state this clearly with justification.

There are a number of gaps in the analysis due to

- 1) Limited information provided by tenants
- 2) Information not captured or recorded on the rent account system
- 3) Specific categories being transitory, such as pregnancy & maternity and health, and could potentially change on numerous occasions during the life of a tenancy

These gaps will not be filled for this EIA.

## 3.0 Consultation, Involvement and Coproduction

#### 3.1 Coproduction, involvement and consultation

Who are your key stakeholders and how area offices and tenants council. have you consulted, coproduced or make?

Proposed changes are consulted on with tenants through the organisation of dedicated consultation forums held between 7pm and 9pm. The events were publicised through

involved them? What difference did this Consultation events are open to all tenants. This year saw an additional event held within the South area following feedback last year in respect of accessibility.

#### 4 sessions were held:

- South Area (Streatham) 7 January 2012
- North Area 8 January 2012
- South Area (Norwood) 9 January 2012
- Central Area 10 January 2012

Proposals were made available on 21<sup>st</sup> December 2012 to allow appropriate time for consideration before the consultation events.

Each consultation forum put forward recommendations for discussion at Tenants Council. Tenants Council agreed the final set of recommendations which support the final report to Cabinet. They were:

- Rent Increase at a constrained level (under protest)
- Service Charges agreed
- Concierge service charge increase rejected
- Parking and garage service charges agreed

## 3.2 Gaps in coproduction, consultation None and involvement

What gaps in consultation and involvement and coproduction have you identified (set out any gaps as they relate to specific equality groups)? Please describe where more consultation, involvement and/or coproduction is required and set out how you intend to undertake it. If you do not intend to undertake it, please set out your justification.

#### 4.0 Conclusions, justification and action

# 4.1 Conclusions and justification What are the main conclusions of this EIA? What, if any, disproportionate you identify at 2.1? On what grounds

The proposed level of rent and service charges for 2013/14 show that the greatest impact is on tenancies for larger properties. These are more commonly households where the main tenant is Asian or female (or both) and reflect that these properties are more negative or positive equality impacts did expensive and further away from average rent levels therefore receive the greatest impact. However, the overall impact is not assessed to be outside of norms for rental do you justify them and how will they be changes within these areas and therefore it is concluded that there is no further action

mitigated?	required to mitigate the impact any particular group. 94.2% of tenants will receive a reduction or no change in respect of service charges with the majority of tenants are within the 95p reduction grouping. This is a positive impact with no further action required.
	The introduction of welfare changes in respect of under occupancy, benefit cap and council tax support have been analysed alongside the changes through rent and service charges. 95% of households are within the £0 to £20 impact bracket. Specific action is being undertaken by the council and Lambeth Living to address the impact of welfare reform. This includes:  • Awareness raising activity with key stakeholders • Credit union start up and take up campaign • Employment support and welfare advice
	No specific actions have been idenitifed through this EIA. The potential impact of welfare reform and the councils response will be progressed through dedicated cross council welfare reform groups.

# 4.2 Equality Action plan

Please list the equality issue/s identified through the evidence and the mitigating action to be taken. Please also detail the date when the action will be taken and the name and job title of the responsible officer.

Equality Issue	Mitigating actions
Example:	Example:
That the equality analysis may not have	Review the EIA and assess whether the mitigating actions were sufficient.
accurately covered all the equality	12/09/12. Head of Equality and Diversity
impacts; and the mitigations may not	
act to reduce disproportionate impact	

5.0 Publishing your results	
1	d. Once the business activity has been implemented the EIA must be periodically reviewed anticipated impact and the actions set out at 4.2 are still appropriate.
EIA publishing date	
EIA review date	
Assessment sign off (name/job title):	

All completed and signed-off EIAs must be submitted to <u>equalities@lambeth.gov.uk</u> for publication on Lambeth's website. Where possible, please anonymise your EIAs prior to submission (i.e. please remove any references to an officers' name, email and phone number).