

# Priority Based Budgeting 3: 2016/17

## HRA Equality Impact Assessment (Savings, Rent and Service Charges)

### Equality at Stevenage Borough Council

Stevenage Borough Council as a service provider, employer and community leader is committed to achieving equal opportunities for everyone. We want to deliver services that are fair, accessible and open to everyone who needs them.

Equality Impact Assessments (EqIAs) are an important part of the process in ensuring that our intention is translated into action. They help to ensure that decisions are made in a fair, transparent and accountable way, considering the needs and the rights of different people in the community.

Based on the protected characteristics under the Equality Act 2010, the EqIA considers the impact on the following groups when making decisions, updating policies and starting new projects:

- Age
- Disability
- Gender reassignment
- Marital status
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation.

Although non-statutory, the Council has chosen to adopt the Socio-Economic Duty and so decision-makers should use their discretion in considering the impact on people in terms of their social or economic background.

EqIAs also help the council to demonstrate compliance with the requirements of the Public Sector Equality Duty (Section 149 of the Equality Act 2010). The Duty states that a public authority must, in the exercise of its functions, have due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is unlawful under this Act
- advance equality of opportunity between people who share a protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not.

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## Savings Proposals 2016/17

Prior to their consideration at Executive in November 2015, the savings proposals have been reviewed to determine any potential impact on Stevenage residents in terms of their protected characteristics under the Equality Act 2010. The majority of these have no public impact and so have not been subject to any further EqlA.

Where a negative, positive or disproportionate impact is likely, heads of service and other appropriate managers have drafted Brief or Full EqlAs. These have been summarised over the following pages and will inform the recommendations made at Executive on 11 November 2015. Action to mitigate or further analyse the impact on equality groups is identified where appropriate.

The following activity has taken place:

November 2015 – January 2016 – Consultation on individual proposals as appropriate

November 2015 – January 2016 – EqlAs finalised and Full EqlAs completed where necessary considering further evidence and consultation results

Overarching HRA Budget EqlA developed considering the collective impact of the HRA Budget on equality groups

Overarching Budget 2016/17 EqlA developed considering the collective impact of all HRA and GF Budget proposals on equality groups

January – February 2016 – Consideration of all completed EqlAs at Council

## Savings Proposals 2017/18 and 2018/19

Savings proposals for subsequent years as part of the three-year priority based approach have not been reviewed at this stage to determine any potential impact on local people. These savings will be agreed in principle in the first instance, and will be subject to assessment and agreement as part of future annual Budget-setting processes. Those that are likely to affect equality groups will have EqlAs completed.

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Ref	Saving proposed	Summary of impact	Possible Mitigation	Contact Officer
S40	Phased increase in Careline charges (to recover the costs of the service)	<p><b>Positive</b> The same charges will apply to all service users at the end of the phasing-in period. This will be irrespective of tenure or equality characteristics.</p> <p><b>Negative impact – likely</b> <b>Age</b> People who use the Careline service do so because they have vulnerabilities relating to age, disability or both, that mean they require additional support and reassurance to maintain a good quality of life. Customer data shows that of 858 customers 83% are aged over 65.</p> <p><b>Disability</b> Whilst there is no robust data to evidence this point it is possible that some users may no longer wish to use the service.</p> <p><b>Socio-economic</b> The phased increase in Careline charges may require some current users to reprioritise their expenditure where they are able to do so. This service is not eligible for Housing Benefit.</p>	The council's intention is to recover the costs for providing services thereby ensuring that they are not subsidised through the rental income received from tenants or the funds received from Council Tax payers. In doing so, some people will be affected by the introduction of charges for Careline that they currently do not pay for. To reduce the impact of this change the new charges will be phased in over the next 2-3 years.	Jaine Cresser
HS9	Increase of laundry charges for tenants in Brent Court and Harrow Court (to recover the costs of the service)	<p><b>Positive</b> The council is drafting a new policy on Concessions for Fees and Charges, of which one of the principles is to recover the costs of providing the service. This includes the cost of laundry services provided for all flat blocks. Increased charges were implemented at Roundmead in 2014/15 and to date no residents have approached us with concerns or asked for support. Applying the same charges to all other flat blocks will make this service fair to all users.</p> <p><b>Negative</b> <b>Socio-economic</b> It is possible that some people may choose not to pay the increased</p>	Mitigation is not possible, but this proposal reflects the Council's ambition to recover the costs for the services it provides.	Jaine Cresser

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		charges and/or seek to use alternative services elsewhere where they are available. However, it should be noted that increased charges were implemented at Roundmead in 2014/15 and to date no residents have approached us with concerns or asked for support.		
HS12	Charge £7.50 per property for Concessionary TV licences in sheltered housing schemes for under 75s	<p><b>Positive</b> All residents aged under 75 living in sheltered housing will have to pay for a TV licence (a standard set by the TV Licensing Authority) whereas at the moment the Council is subsidising a quarter of residents. A TV Licence is not a council service and so should be paid for by residents. Applying this charge to all residents in sheltered accommodation will be fair to all.</p> <p><b>Negative – minimal Age, Disability and Socio-economic</b> Tenants living in sheltered housing do so because they have additional needs that require support relating to age, disability or both. The minimum age for entry into sheltered housing is 55 years and data from Northgate shows that 94% of tenants in sheltered housing are aged 60+. Northgate data on sheltered housing tenants in relation to disability was collected some years ago and is not up to date. Affordability may be an issue for those with low incomes, but the impact is considered to be minimal since the cost is £7.50 per year.</p>	The fee is set by the TV Licencing Authority and is at a concessionary rate compared with the cost of a licence in general accommodation. The council cannot offer further mitigation, but this proposal will support the council with its ambition to apply fair charging principles for concessions.	Jaine Cresser
HRA	Revised Rent and Service Charge Policy	<p><b>Positive</b> The aim of the policy is to provide a fair method of calculating affordable rents and service charges for all of our tenants. It also aligns with the council's proposed new Concessions for Fees and Charges Policy and the principle of recovering the cost of providing services. Applying concessions across all council services will support the council in being fair to all residents. This includes services for which</p>	A cap has been applied to the increase in service charges of £3 per week. In some instances, applying the principle of recovering the cost of services results in an	Jaine Cresser

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		<p>service charges are payable by tenants in flat blocks and sheltered accommodation.</p> <p><b>Socio-economic</b> The rent decrease will be applied across all tenancies prescribed by the Work and Welfare Reform Bill regardless of circumstances. The Government is currently planning for it to be applied for four years. Those reliant on Housing Benefit to cover their rent and HB eligible service charges represent 54% of the Council’s tenants (a reduction from last year’s 57%) and won’t be affected by the increase in service charges. Their HB award will be recalculated.</p> <p><b>Negative / Unequal</b></p> <p><b>Age</b> Around 2,600 properties will be subject to an increase in service charges, and approx. 800 of these are sheltered accommodation. Tenants living in sheltered housing do so because they have additional needs that require support relating to age, disability or both. The minimum age for entry into sheltered housing is 55 years and data from Northgate indicates that the proportion of tenants aged 60+ in sheltered housing, is almost three times that in all tenant housing. In relation to flat blocks, the data indicates that there is a higher proportion of people aged 18-29 years in flat blocks compared with all SBC housing.</p> <p><b>Disability</b> Northgate data on tenants in relation to disability was collected a number of years ago and is not up to date. This information was also disclosed at the tenants’ discretion so some tenants may not have provided it. To give some context, the data indicates that the proportion of tenants in sheltered housing declaring that they had a disability was almost double the proportion for the whole SBC tenant population. The</p>	<p>increase to service charges of more than £3. As a means of mitigating the impact on these tenants, the council will subsidise the costs that exceed the £3 cap in for those affected.</p>	

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		<p>proportion of tenants living in flat blocks declaring a disability was very similar to the proportion living in all properties, and so a disproportionate impact on these tenants is not anticipated.</p> <p><b>Socio-economic</b> Properties exempt from this clause will have the rent increased by CPI + 1%. (Currently this is circa 95 LSSO properties and 2 shared ownership properties). Those who receive services for which a service charge is made will be charged the actual cost of these services. However, the increase in the charge will be capped at £3 per week. Heating charges are exempt from HB and tenants are expected to pay. Water charges are also exempt from HB and are set by the Water Authority. SBC collects the water charges on behalf of the Water Authority.</p>		



## Full Equality Impact Assessment

**For a policy, project, service or other decision that is new, changing or under review**

<b>What is being assessed?</b>		<b>HRA Savings, Rent and Service Charges Proposals 2016/17</b>			
Lead Assessor	Strategic Management Board			Assessment team	Elizabeth Ddamulira Karen Long Janet Hagger Katrina Shirley Jaine Cresser Emma Barron
Start date	23/10/15	End date	7/1/2016		
When will the EqIA be reviewed?		January 2017			

Who may be affected by it?	All tenants, particularly older and disabled people living in sheltered schemes, Careline customers, and residents in flat blocks with laundry services
What are the key aims of it?	To set a balanced, fair and sustainable HRA Budget for 2016/17 and thereafter. The EqIA considers: <ul style="list-style-type: none"> <li>• S40: Increase in Careline charges</li> <li>• HS9: Increase of laundry charges for tenants in Brent Court and Harrow Court</li> <li>• HS12: Charge £7.50 per property for Concessionary TV Licenses in sheltered housing schemes for under 75s</li> <li>• HRA: Rent and Service Charge Policy (the increase of service charges for flat blocks by up to £3 per week includes the new charge for pest control works in communal areas)</li> </ul>

<b>What positive measures are in place (if any) to help fulfil our legislative duties to:</b>					
Remove discrimination & harassment		Promote equal opportunities	The aim of the Rent and Service Charges policy is to provide a fair method of calculating affordable rents and service charges for all of our tenants. The charges and concessions applied for all council services that the council has discretion to set should be applied fairly and consistently across all services. The council is drafting a new policy on Concessions for Fees and Charges, of which one of the principles is to recover the costs of providing the service. It will also ensure the council applies the same principles for concessions fairly to everyone who uses a service,	Encourage good relations	

		<p>irrespective of equality characteristics or tenure. All residents aged under 75 living in sheltered housing will have to pay for a TV licence (a standard set by the TV Licensing Authority) whereas at the moment we are subsidising a quarter of them. A TV Licence is not a council service and so should be paid for by residents, to be fair to all of them.</p>	
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<p>What sources of data / information are you using to inform your assessment?</p>	<ul style="list-style-type: none"> <li>• Customer feedback from laundry charges survey in 2014</li> <li>• Consultation with Residents' Panel in 2014</li> <li>• Housing Census data</li> <li>• E&amp;D data on residents living in the sheltered schemes</li> <li>• E&amp;D data on Careline customers</li> <li>• Welfare Reform and Work Bill (<a href="http://services.parliament.uk/bills/2015-16/welfarereformandwork/documents.html">http://services.parliament.uk/bills/2015-16/welfarereformandwork/documents.html</a>)</li> <li>• DCLG Consultation on "pay to stay" (<a href="https://www.gov.uk/government/consultations/pay-to-stay-high-income-social-tenants">https://www.gov.uk/government/consultations/pay-to-stay-high-income-social-tenants</a>)</li> <li>• <a href="http://www.parliament.uk/documents/impact-assessments/IA15-006F.pdf">http://www.parliament.uk/documents/impact-assessments/IA15-006F.pdf</a></li> <li>• Rent and service charge policy to be agreed by Exec 19 January 2016</li> <li>• Rent account information</li> </ul>
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<p>In assessing the potential impact on people, are there any overall comments that you would like to make?</p>	<p>The requirement to decrease rents by 1% for the next 4 years is being considered as part of the broader HRA Business Plan review which, subject to discussion and agreement with Members, is likely to result in the reprioritisation of our remaining resources. This 1% rent reduction will result in a £12 million shortfall in the original Business Plan (Nov 14) in the first 4 years, escalating to £225 million over the 30 years of the Plan.</p> <p>Most of those who receive services for which there is a service charge payable will see an increase in their weekly charge. This relates to those who live in flats predominantly, as well as sheltered accommodation. We have recognised that this may cause financial difficulty for some people hence the cap in the service charge increase of £3 per week. We will provide advice and support to help those who may have difficulty in making these payments.</p> <p>The DWP's impact assessment confirms that where a tenant is not in receipt of Housing Benefit (HB) and has no service charges, they will be better off financially through the 1% rent reduction.</p>
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## Evidence and impact assessment

Explain the potential impact and opportunities it could have for people in terms of the following characteristics, where applicable:

Age					
Positive impact		Negative impact	The aim of the proposed policy on charges and concessions is to be fair to all users of our services and to recover the costs of services provided. The council will not make a surplus from such charges. A direct result of the intention to be fair to all, this year's HRA Budget will include an increase in charges particularly for older tenants. Many people who use the Careline service ( <b>S40</b> ) do so because they have vulnerabilities relating to age, disability or both, that mean they require additional support and reassurance to maintain a good quality of life. Customer data shows that 711 out of 858 (83%) Careline customers are over 65 years of age. Around 2,600 properties will be subject to an increase in service charges of up to £3 per week ( <b>HRA</b> ), and approx. 800 of these are sheltered accommodation. In relation to flat blocks, the data indicates that a higher proportion of people aged 18-29 years living in flat blocks compared with all SBC housing. The minimum age for entry into sheltered housing is 55 years and data from Northgate indicates that the proportion of tenants aged 60+ in sheltered housing, is almost three times the proportion for all tenant housing. Tenants in sheltered housing who are aged under 75 will also be required to pay for their concessionary TV Licence ( <b>HS12</b> ), although the impact of this is thought to be very small as the fee is £7.50 per year, per property.	Unequal impact	
Please evidence the data and information you used to support this assessment			See page eight.		
What opportunities are there to mitigate the impact?	A cap has been applied to the increase in service charges of £3 per week. In some instances, applying the principle of recovering the cost of services results in an increase to service charges of more than £3. As a means of mitigating the impact on these tenants, the council will subsidise the costs that exceed the £3 cap for those affected.		What do you still need to find out? Include in actions (last page)		

<b>Disability</b> e.g. physical impairment, mental ill health, learning difficulties, long-standing illness					
Positive impact		Negative impact	<p>The increase in Careline charges (<b>S40</b>) may result in some users who are unable to reprioritise their personal expenditure choosing to no longer use the service which could leave them at risk. This assessment is based on knowledge of the service and of the types of customers who use it. Robust, valid and up-to-date data relating to customers' disabilities is not available to support this comment.</p> <p><b>(HRA)</b> Northgate data on tenants in relation to disability was collected a number of years ago and is not up to date. This information was also disclosed at the tenants' discretion so some tenants may not have provided it. To give some context, the data indicates that the proportion of tenants in sheltered housing declaring that they had a disability was almost double the proportion for the whole SBC tenant population. The proportion of tenants living in flat blocks declaring a disability was very similar to the proportion living in all properties, therefore a disproportionate impact on these tenants is not anticipated.</p>	Unequal impact	
Please evidence the data and information you used to support this assessment			See page eight.		
What opportunities are there to mitigate the impact?				What do you still need to find out? Include in actions (last page)	

<b>Gender reassignment, Marriage or civil partnership, Pregnancy &amp; maternity, Race, Religion or belief, Sex, Sexual orientation – all N/A</b>					
Positive impact		Negative impact		Unequal impact	
Please evidence the data and information you used to support this assessment					
What opportunities are there to promote equality and inclusion?				What do you still need to find out? Include in actions (last page)	

<p style="text-align: center;"><b>Socio-economic<sup>1</sup></b>  <b>e.g. low income, unemployed, homelessness, caring responsibilities, access to internet, public transport users, social value in procurement</b></p>					
Positive impact	<p>The rent decrease (<b>HRA</b>) will be applied across all tenancies prescribed by the Work and Welfare Reform Bill regardless of circumstances. It is expected to be applied for four years. Those reliant on Housing Benefit to cover their rent and HB eligible service charges represent 54% of the Council's tenants (a reduction from last year's 57%) and won't be affected by the increase in service charges. Their HB award will be recalculated.</p>	Negative impact	<p>Some properties will be exempt from the 1% rent reduction (<b>HRA</b>) and will see their rent increase by CPI +1% (currently this is circa 95 LSSO properties and 2 shared ownership properties). The increase in Careline charges (<b>S40</b>) may, subject to personal budget choices, make the service unaffordable for some of the current users. This service is not eligible for Housing Benefit. This year's HRA Budget is seeing an increase in various charges for the majority of tenants living in flat blocks and sheltered accommodation:</p> <ul style="list-style-type: none"> <li>• These tenants will be charged the actual cost of services for which a service charge is payable (<b>HRA</b>). However, we recognised that this may result in large increases for some tenants and will cap the increase to £3 per week. If the actual charge exceeds this, the council will subsidise any costs above the £3 a week increase.</li> <li>• Those that are aged under 75 and live in sheltered housing will have to pay their concessionary TV Licence (<b>HS12</b>). Affordability may be an issue for those with low incomes, but the impact is considered to be minimal since the cost is £7.50 per year, per property.</li> <li>• Tenants living in flat blocks Brent Court, Harrow Court, High Plash and Walden End will incur increased laundry charges (<b>HS9</b>). It is possible that some people may choose not to pay the increased charges and/or seek to use alternative services elsewhere where they are available. However, increased charges were implemented at Roundmead in 2014/15 and to date no residents have approached us with concerns or asked for support. Charging the same costs for services to all tenants who use them, supports the council's ambition to be fair to all service users.</li> </ul>	Unequal impact	

<sup>1</sup>Although non-statutory, the council has chosen to implement the Socio-Economic Duty and so decision-makers should use their discretion to consider the impact on people with a socio-economic disadvantage.

Please evidence the data and information you used to support this assessment	See page eight.		
What opportunities are there to mitigate the impact?	<p>In order to move towards full cost recovery for the Careline service (<b>S40</b>) on an equitable basis but limit the impact on vulnerable individuals, charges will be introduced on a phased basis over a 2-3 year period.</p> <p><b>(HRA)</b> A cap has been applied to the increase in service charges of £3 per week. In some instances, applying the principle of recovering the cost of services results in an increase to service charges of more than £3. As a means of mitigating the impact on these tenants, the council will subsidise the costs that exceed the £3 cap in these circumstances.</p> <p>The rent notification letter (to be sent out at the end of February) will offer tenants the opportunity to discuss any queries they have with staff. It will explain why the rent has decreased and also explain that in most instances there has been an increase in service charges. Where a property has a number of service charges they will be fully explained, with a summary of how the weekly charge has increased overall.</p> <p>Where support charges are also included (mainly but not exclusively for sheltered and flexi care schemes) separate notifications will be sent out to these residents to ensure it is clearly set out how each element of the weekly charge is made up.</p> <p>To ensure that this is explained as clearly as possible there will be a FAQ sheet and details on the website. The Housing Management Board has agreed the content of the letters, which were subsequently approved by the Housing Portfolio Holder.</p>	What do you still need to find out? Include in actions (last page)	

<p style="text-align: center;"><b>Other</b></p> <p style="text-align: center;"><b>please feel free to consider the potential impact on people in any other contexts</b></p>				
Positive impact		Negative impact		<p><b>(HRA)</b> Those in properties that are exempt from the 1% rent decrease will have their rent increased by CPI +1%. Service charges will also reflect actual charges (increase capped at £3 per week). The overall impact for most of those in flat blocks and sheltered accommodation will be an increase in combined rent and service charges, whereas all other eligible tenants will see a decrease in the rent.</p>

Please evidence the data and information you used to support this assessment	See page eight.		
What opportunities are there to mitigate the impact?		What do you still need to find out? Include in actions (last page)	

### What are the findings of any consultation with:

Residents?	<b>(HRA)</b> In the Residents' Survey 2015, 54% of tenants said they had felt the impact of government cuts to public services compared with 43% of all respondents. 'Increase income from fees and charges' was the second priority of all respondents (and tenants). 'Selling our services where possible' was the first priority and the council is investigating opportunities to do more of this.	Staff?	
Voluntary & community sector?		Partners?	
Other stakeholders?	<b>(HS12)</b> The sheltered and flexicare housing focus group were consulted on 14 <sup>th</sup> December 2015 with regards to charging all residents eligible for the £7.50 per year concessionary TV licence. All agreed that this should go ahead. <b>(HRA)</b> Housing Management Board was consulted in Dec 2015 and was supportive of the rent and service charge proposals.		

### Overall conclusion & future activity

Explain the <b>overall findings</b> of the assessment and <b>reasons for outcome (please choose one)</b> :		
1. No inequality, inclusion issues or opportunities to further improve have been identified		
Negative / unequal impact, barriers to inclusion or improvement opportunities identified	2a. Adjustments made	
	2b. Continue as planned	The future viability of the HRA Business Plan will be reliant in part upon us being able to recover the cost of service provision where it's possible to do so in line with the Council's broader ambition in this regard.
	2c. Stop and remove	



Detail the <b>actions that are needed</b> as a result of this assessment and how they will help to <b>remove discrimination &amp; harassment, promote equal opportunities</b> and / or <b>encourage good relations</b> :				
Action	Will this help to remove, promote and / or encourage?	Responsible officer	Deadline	How will this be embedded as business as usual?
Develop a Full EqIA that covers all supported housing services and further considers the impact using available Careline user data, Housing Census profiling and other relevant information.	Remove and promote	Karen Long	Dec 2016	As part of service review

**Approved by Matt Partridge on behalf of Strategic Management Board**  
**Date: 7 January 2016**