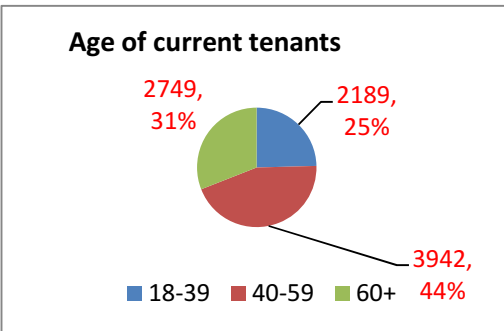


Appendix 2- Equality Impact Analysis (EIA) Resident/Service User

Please refer to the guidance and initial Equality Impact Analysis before completing this form.

1. Details of function, policy, procedure or service:							
Title of what is being assessed: Rent Setting Policy							
Is it a new or revised function, policy, procedure or service? New policy							
Department and Section: Re/ Barnet Council/ Barnet Homes							
Date assessment completed: April 2015							
2. Names and roles of people completing this assessment:							
Lead officer	Chloe Horner						
Stakeholder groups	Barnet Homes, tenants and residents, advice agencies and community groups.						
Representative from internal stakeholders	Cath Shaw						
Representative from external stakeholders	Derek Rust						
Delivery Unit Equalities Network rep	Lesley Holland						
Performance Management rep	N/a						
HR rep (for employment related issues)	N/a						
3. Full description of function, policy, procedure or service:							
<p>The policy proposes that from April 2016 council dwelling rents for new homes/tenancies will be set at 65% of local average market rents or the equivalent LHA rate, whichever is lower. This will increase the average rent by £97.07 per week based on an average rent in 2015 of £103.27.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: black; color: white;"> <th style="text-align: left;">Rental Basis</th> <th style="text-align: left;">Average Rent</th> </tr> </thead> <tbody> <tr> <td>Current rent @ April 2015</td> <td>£103.27</td> </tr> <tr> <td>Proposed rent from April 2016</td> <td>£214.46</td> </tr> </tbody> </table> <p>The increased rental income will be used by the council to increase the supply of affordable homes and bring council rents more in line with rents charged by housing associations and private landlords.</p>		Rental Basis	Average Rent	Current rent @ April 2015	£103.27	Proposed rent from April 2016	£214.46
Rental Basis	Average Rent						
Current rent @ April 2015	£103.27						
Proposed rent from April 2016	£214.46						

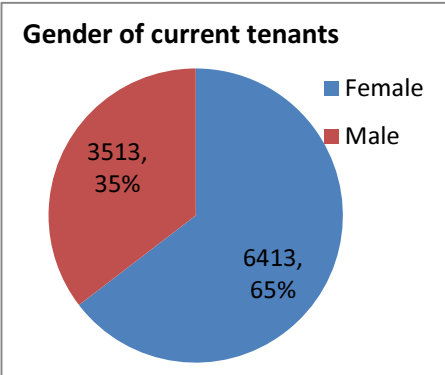
How are the equality strands affected? Please detail the effects on each equality strand, and any mitigating action you have taken so far. Please include any relevant data. If you do not have relevant data please explain why.

Equality Strand	Affected?	Please explain how affected	What action has been taken already to mitigate this? What further action is planned to mitigate this?
1. Age	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	<p style="text-align: center;">Age of current tenants</p>  <p>31% of current tenants¹ are aged 60+. 53% of them are on full housing benefit (HB) (1,461), 26% on partial HB (714) and 21% on no HB (574). 65% market rent is likely to result in more people aged 60+ relying on full HB as they are less likely to be able to increase their income through work beyond retirement age.</p> <p>44% of current tenants are aged 40 to 59. 32% of them are on full HB (1,273), 28% on partial HB (1,100) and 40% on no HB (1,570). 25% of current tenants are aged 18 to 39. 43% of them are on full HB (932), 22% are on partial HB (487) and 35% on no HB (770). Fewer tenants aged 18 to 59 are likely to be claiming no housing benefit if rents are increased to 65% market.</p> <p>Young people (18 to 25) who are leaving care do not need to make a community contribution (e.g.: training/employment) to be placed in band 2 of the housing allocations scheme. These new council tenants will be reliant on full housing benefit to pay their rent.</p> <p>Increasing rents may act as a disincentive for working age tenants to work, or if they already have a job to increase their earnings.</p>	<p>Analysis has shown that for tenants on income support housing benefit should cover the increased rent. For families in 3 or 4 beds there is a risk that 65% of market rent will bring some families into the Overall Benefit Cap.</p> <p>Analysis has shown that housing benefit should cover the increased rent for tenants who are working at the national minimum wage level or below. It suggests that workers will still benefit from taking a higher paid job up to the point where housing benefit is no longer payable.</p> <p>Young people aged 18 to 25 who are allocated fixed-term tenancies are assisted into training and employment which will improve their ability to sustain their tenancy.</p> <p>Given the emphasis in the housing allocations scheme to applicants making a community contribution banded households who are housed in council are more likely to be working than has been the case before. This will improve their ability to sustain a tenancy.</p> <p>There will need to be more work by Barnet Homes on tenancy sustainment and training and employment support if 65% market rents are not going to lead to increased rent arrears and increased risk of eviction and homelessness.</p> <p>New homes will be delivered by the increased rents and this will have a positive impact on all ages as more people in need will have access to council housing.</p>
2. Disability	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	6% of the Barnet population ² had a disability or longstanding illness that limits their day-to-day activities in some way.	All new homes delivered must meet the Lifetime Homes Standard and 10% must be fully wheelchair accessible to increase the supply of

¹ Barnet Homes management information

² 2011 National Census, Office for National Statistics

		<p>Disability is a key factor in determining housing need and access to council housing so disabled people are disproportionately represented in the Barnet Homes tenant population compared to the borough as a whole.</p> <p>As the number of older people increases- as is expected in the population projections described above, there could be increasing age related disability in the population as a whole in the future.</p> <p>Disabled tenants may be more likely to be benefit recipients if they are unable to work.</p>	<p>homes suitable for disabled applicants.</p> <p>New homes will be delivered by the increased rents and this will have a positive impact on disabled people as more people in need will have access to council housing.</p> <p>Housing benefit will usually cover the increased rent for tenants who cannot work because of severe disability and therefore are claiming disability living allowance or personal independence payments. Tenants claiming employment and support allowance or incapacity benefit may be drawn into the benefit cap if they live in large properties.</p>															
<p>3. Gender reassignment</p>	<p>Yes / No <input checked="" type="checkbox"/> / <input type="checkbox"/></p>	<p>There is limited data on the incidence in Barnet and it is not possible to ascertain the specific impact on this group.</p>																
<p>4. Pregnancy and maternity</p>	<p>Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/></p>	<p>Given the fact that 65% (6,413) of council tenanted households are headed up by females it is likely that pregnancy and maternity will be issues for some households at some stage during their tenancy.</p> <p>Lone parents may be unable to go out to work without access to affordable childcare and therefore reliant on more benefit to pay the rent.</p>	<p>New homes will be delivered by the increased rents and this will increase access to council housing.</p> <p>There will need to be more work by Barnet Homes on tenancy sustainment and training and employment support if 65% market rents are not going to lead to increased rent arrears and increased risk of eviction and homelessness.</p>															
<p>5. Race / Ethnicity</p>	<p>Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/></p>	<p>Ethnicity of current tenants</p> <table border="1"> <caption>Ethnicity of current tenants</caption> <thead> <tr> <th>Ethnicity</th> <th>Count</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>White</td> <td>4640</td> <td>60%</td> </tr> <tr> <td>Black</td> <td>1544</td> <td>20%</td> </tr> <tr> <td>Other</td> <td>973</td> <td>12%</td> </tr> <tr> <td>Asian</td> <td>617</td> <td>8%</td> </tr> </tbody> </table> <p>The biggest ethnicity after White is Black with 1,544 tenants.</p> <p>60% of council tenants are White. 42% of them (1,965) claim full housing benefit (HB), 25% claim partial HB (1,180) and 31% claim no HB (1,495).</p> <p>20% of council tenants are Black. 38% are on full HB (586), 25% are on partial HB (382) and 37% claim no HB (576). The largest sub-group of Black ethnicity amongst council tenants is Black African, followed by Black Caribbean, Black Other and Black British. 38% of Black African tenants claim no HB, 39% of Black Caribbean tenants claim no HB.</p>	Ethnicity	Count	Percentage	White	4640	60%	Black	1544	20%	Other	973	12%	Asian	617	8%	<p>There may be a disproportionate impact on Black tenants [particularly Afro- Caribbean and African] if council rents are increased. 37.3 % Black tenants receive no HB and may be impacted adversely compared to 3.2% White and 23.2% Asian receiving no HB respectively.</p> <p>Low-income working households receiving no housing benefit are at risk of being drawn into the benefits system by increasing rents to 65% market.</p> <p>Evidence shows that BME groups are more likely to be users of council's housing services so homes will be delivered by the increased rents and this will have a positive impact on BME groups as more people in need will have access to council housing.</p>
Ethnicity	Count	Percentage																
White	4640	60%																
Black	1544	20%																
Other	973	12%																
Asian	617	8%																

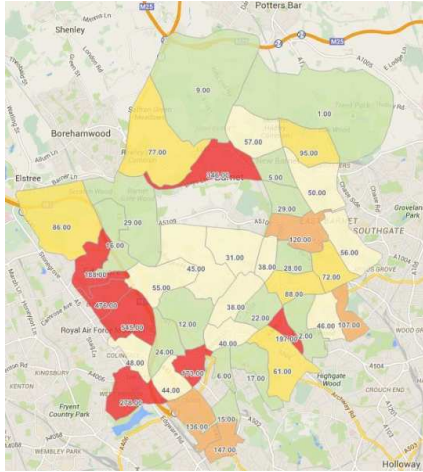
<p>6. Religion or belief</p>	<p>Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/></p>	<p>The most common religious beliefs ³ in Barnet are Christianity (41.2%), followed by Judaism (15.2%), Islam (10.3%), No religion (8.4%), Hinduism (6.2%), Buddhism (1.3%), Other (1.1%), and Sikhism (0.4%).</p> <p>Of the Barnet Homes tenants were a religion is recorded 36% are Christian and 9.9% are Muslim.</p> <p>The ONS report⁴ on religion (2013) states that the Jewish population have the highest level of employment, and that Muslims have the lowest level of employment. Muslims also have a significantly lower level of economic activity than other religions at 55%; the main reasons for this inactivity being because they were looking after the home and family (31%), or because they were students (30%).</p>	<p>Muslim tenants may be more likely to be on housing benefit as they have a lower level of economic activity. Increasing council rents could make them more dependent on welfare and reduce incentives to find work.</p> <p>There will need to be more work by Barnet Homes on tenancy sustainment and training and employment support if 65% market rents are not going to lead to increased rent arrears and increased risk of eviction and homelessness.</p>
<p>7. Gender / sex</p>	<p>Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/></p>	<p>Gender of current tenants</p>  <p>According to the 2013 GLA projections, 48.9% (179,580) of the population in 2015 are male, and 51.1% (187,685) are female.</p> <p>64.6% of current tenants are headed by females⁵. 37% (2,432) of female tenants receive full housing benefit (HB), 27% receive partial HB (1,726) and 35% receive no HB (2,255). 43% (1,526) of male tenants receive full HB, 23% receive partial HB (826) and 33% receive no HB (1,161).</p>	<p>Proportionally there are more male headed household tenants claiming full housing benefit (HB) than female headed household tenants, 43% to 38%.</p> <p>Proportionally there are more female headed household working tenants claiming no HB than male headed household tenants, 35% to 33%.</p> <p>Better access to childcare will enable female tenants to take on more hours for work.</p> <p>Otherwise 65% rents may result in more tenants claiming full HB.</p>
<p>8. Sexual orientation</p>	<p>Yes <input type="checkbox"/> / No <input checked="" type="checkbox"/></p>	<p>ONS Integrated Household Survey January to December 2013⁶ revealed that 1.6% of the adult population identified themselves as gay, lesbian or bisexual. However there is insufficient data on the sexual orientation of council tenants to ascertain the specific impact on this group.</p>	
<p>9. Marital</p>	<p>Yes <input type="checkbox"/> /</p>	<p>47% of Barnet households are married, 27% are single, 5% are separated, 12% are divorced and 8% are widowed⁷. The main impact in terms of the rents policy is</p>	

³ Census 2011

⁴ Full Story: What does the Census tell us about religion in 2011? <http://www.ons.gov.uk/ons/rel/census/2011-census/detailed-characteristics-for-local-authorities-in-england-and-wales/rpt---religion.html>

⁵ Barnet Homes management information system 2015

⁶ <http://www.ons.gov.uk/ons/rel/integrated-household-survey/integrated-household-survey/january-to-december-2013/sty-facts-about-lgb-community-in-the-uk.html>

Status	No <input checked="" type="checkbox"/>	the affordability of 65% rents on a separated household although there is insufficient data on tenants on which to make any firm conclusions.
10. Other key groups?		All of these groups could be council tenants and affected by increased rents.
Carers	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	<p>The red colour in the map below shows the postcode areas with the highest number of council tenants on full housing benefit and this correlates with the areas of highest deprivation in the borough.</p> 
People with mental health issues	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	
Some families and lone parents	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	
People with a low income	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	
Unemployed people	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	
Young people not in employment education or training	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	
		<p>Analysis has shown that housing benefit should cover the increased rent for tenants who are working at the national minimum wage level or below. It suggests that workers will still benefit from taking a higher paid job up to the point where housing benefit is no longer payable.</p> <p>Increasing the rent on council homes in these areas could result in more tenants becoming dependent on welfare and for some households lead to Barnet Homes taking court action against non-payment of rent.</p> <p>There will need to be more work by Barnet Homes on tenancy sustainment and training and employment support if 65% market rents are not going to lead to increased rent arrears and increased risk of eviction and homelessness.</p>

4. What will be the impact of delivery of any proposals on satisfaction ratings amongst different groups of residents?
<p>The Residents Perception Survey 2013 found an increase in concern from residents about lack of affordable housing and homelessness (with Barnet residents more concerned about the former compared to the London average). The purpose of 65% market rents is to build more affordable housing so this should increase satisfaction amongst residents as a whole. In the last four years, overall tenants' satisfaction with the services provided by council tenants has risen by 8.5%. It currently stands at 81.1%. Given the fact that council tenants are more diverse than residents in the borough as a whole, increased affordable housing supply is likely to increase satisfaction amongst a diverse group of residents.</p>
5. How does the proposal enhance Barnet's reputation as a good place to work and live?
<p>As above there is a high demand for affordable housing in the borough and increasing rents will enable the council to build more affordable homes and meet more demand. This will enhance Barnet's reputation as good place to live as long as there is support available to help tenants with 65% market rents to sustain their tenancies. This will be done by reviewing the Barnet Homes Successful Tenancies Strategy to ensure that there is sufficient support for tenants to enter into training and /or work and reduce their dependence on housing benefit.</p>

6. How will members of Barnet's diverse communities feel more confident about the council and the manner in which it conducts its business?

There is a high demand for housing in the borough and the decision to increase rents to 65% market is based on the requirement to build more affordable homes in order to better meet the demand for housing. Although the broad principle of increasing rents has been consulted upon as part of the overall housing strategy, the council will consult further with tenants during Summer 2015 and will be clear about the rationale for increasing the rents and what tenants can expect in return. This will enable tenants to be more confident about the council and the manner in which it conducts its business.

7. Please outline what measures and methods have been designed to monitor the application of the policy or service, the achievement of intended outcomes and the identification of any unintended or adverse impact? Include information about the groups of people affected by this proposal. Include how frequently the monitoring will be conducted and who will be made aware of the analysis and outcomes? This should include key decision makers. Include these measures in the Equality Improvement Plan (section 16)

The key areas that have been identified include older people over the age of 60 claiming no housing benefit, Black tenants claiming no housing benefit and lone parent families. It will be necessary for Barnet Homes to review its tenancy sustainment policies in light of a decision to increase council rents and the increased risk of tenancy failure from these groups.

8. How will the new proposals enable the council to promote good relations between different communities? Include whether proposals bring different groups of people together, does the proposal have the potential to lead to resentment between different groups of people and how might you be able to compensate for perceptions of differential treatment or whether implications are explained.

Council dwelling rents are currently 30% of average market rents and many housing association tenants are now charged "Affordable Rents" which can be charged at up to 80% of average market rents. Increasing the rents charged on council homes brings rents for council tenants in line with the rents charged to tenants of housing associations and also more in line with tenants living in the private sector. Bringing greater equity between tenants in different sectors will help to promote good relations between different communities.

9. How have employees and residents with different needs been consulted on the anticipated impact of this proposal? How have any comments influenced the final proposal? Please include information about any prior consultation on the proposal been undertaken, and any dissatisfaction with it from a particular section of the community. Please refer to Table 2

Increasing council rents to 80% market was included in the Housing Strategy consultation. Comments were mainly against the proposal. The key concerns raised included:

- PRS rents in Barnet have become unaffordable for many working families.
- Increasing council rents will substantially increase the housing benefits bill and mean more households are affected by the overall benefits cap.
- Council tenants, given local allocation policies, are already those most in need of assistance. Pegging council rents to the private sector may increase welfare dependency.
- This proposal may push families who may just be managing without claiming housing benefit onto reliance on housing benefit.
- It is likely to drive Right To Buy sales as the individual business case for those who can afford to buy will buy rather than pay higher rents thus reducing affordable housing supply
- The strategy is silent on whether tenants will see any specific improvements in service, or a revised service offer as a result of the rents increase.

There was some recognition from one respondent that there is room to increase council rents above their current level and that increased rental income can assist the council in developing more affordable homes.

Overall Assessment

10. Overall impact			
Positive Impact <input checked="" type="checkbox"/>	Negative Impact or Impact Not Known ⁸ <input type="checkbox"/>	No Impact <input type="checkbox"/>	
11. Scale of Impact			
Positive impact: Minimal <input type="checkbox"/> Significant <input checked="" type="checkbox"/>	Negative Impact or Impact Not Known Minimal <input checked="" type="checkbox"/> Significant <input type="checkbox"/>		
12. Outcome			
No change to decision <input checked="" type="checkbox"/>	Adjustment needed to decision <input type="checkbox"/>	Continue with decision <i>(despite adverse impact / missed opportunity)</i> <input type="checkbox"/>	If significant negative impact - Stop / rethink <input type="checkbox"/>

⁸ 'Impact Not Known' – tick this box if there is no up-to-date data or information to show the effects or outcomes of the function, policy, procedure or service on all of the equality strands.

13. Please give full explanation for how the overall assessment and outcome was decided.

As there is a high demand for affordable housing in the borough, increasing council rents to 65% market/LHA in order to build more homes is considered to have an overall positive outcome for residents as there will be more affordable homes available for the council to allocate to more households in housing need.

Given the fact that older people over the age of 60 claiming no housing benefit, Black tenants claiming no housing benefit and lone parent families have been identified as groups that may be adversely affected by increased rents the following actions will be required to ensure that tenancy sustainment for these groups is maximised including.:

- Barnet Homes will review the Successful Tenancies Strategy and Flexible Tenancies Toolkit to ensure that tenants at risk are identified early on.
- Additional targeted support for working age tenants to access training and employment to reduce reliance on housing benefit.
- Review strategy for rent collection and rent arrears recovery.

It is proposed that rents for existing tenants, who signed up expecting their rent to be a traditional social rent, are increased to the target rent level in April 2016. For nearly half of the existing tenants this will mean that their rent will increase by less than £5 per week. The policy proposes that the rent increase is capped at £10 per week to ensure that existing tenants are not unfairly affected and can manage their tenancy effectively.

