

Initial Equality Analysis (EIA) Resident/Service User

1. Details of function, policy, procedure or service:	
Title of what is being assessed: Review of Council Temporary Accommodation rents for 2021/22	
Is it a new or revised function, policy, procedure or service? Revised approach	
Department and Section: Housing	
Date assessment completed: 24 May 2021	
2. Names and roles of people completing this assessment:	
Lead officer	Greg Terefenko, Head of Housing Management, Barnet Homes Ltd.
Other groups	
3. Employee Profile of the Project	<p>Will the proposal affect employees? No</p> <p>If no please explain why. It is an approach that affects Barnet council temporary accommodation clients.</p> <p>If yes, please seek assistance from HR to complete the employee EIA.</p>

How are the following equality strands affected? Please detail the effect on each equality strand, and any mitigating action you have taken / required. Please include any relevant data. If you do not have relevant data please explain why / plans to capture data			
Equality Strand	Affected?	Explain how affected	Indicate what action has been taken / or is planned to mitigate impact?
1. Age	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	<p>On the basis that the increased rent charge is applied consistently across all properties and not targeted to individual occupants, i.e. it applies to the tenant regardless of age, the increase is not considered to disproportionately disadvantage tenants on the grounds of age.</p> <p>The age profile of the majority of TA clients is as follows:</p> <p>18-29 - 21.0%</p> <p>30-39 - 29.1%</p> <p>40-49 - 26.7%</p>	See section 9 of this EIA

		<p>50-59 - 16.1%</p> <p>60-79 - 5.4%</p> <p>Older people who rely on state pensions are not expected to be more disadvantaged than those in work or on other benefits as it is estimated that (under the terms of the Triple Lock Guarantee) the basic state pension increased by 2.5% from 12 April 2021. This is favourable when compared to the ONS Data (Average household income, UK: financial year ending 2020 (provisional)) that “in financial year ending 2020, the average disposable household income was up 2.3% compared with the previous year, after accounting for inflation. In this period, real earnings increased by an average of 1.5%, however total annual pay growth for March to May 2020 fell by 1.3% after accounting for inflation.</p> <p>When benchmarked against the London Borough of Barnet’s demography (resident profile) we are able to establish our TA profiles are in line with those of LBB.</p>	
<p>2. Disability</p>	<p>Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/></p>	<p>On the basis that the increased rent charge is applied consistently across all properties and not targeted to individual occupants, i.e. it applies to the tenant regardless of disability, the increase is not considered to disproportionately disadvantage tenants on the grounds of disability.</p> <p>Our records indicate that approximately 5.8% of tenants have a disability, with a large proportion of unknown data at 85.1%.</p>	<p>See section 9 of this EIA</p>

		Whilst the rent is calculated on the property, no additional charges are levied to take account of any disabled adaptations, and rent charges are applied equally regardless of disability status.	
3. Gender reassignment	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	<p>On the basis that the increased rent charge is applied consistently across all properties and not targeted to individual occupants, i.e. it applies to the tenant regardless of gender reassignment, the increase is not considered to disproportionately disadvantage tenants on the grounds of gender re-assignment.</p> <p>No tenant data is currently held on this area.</p>	See section 9 of this EIA
4. Pregnancy and maternity	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	<p>On the basis that the increased rent charge is applied consistently across all properties and not targeted to individual occupants, i.e. it applies to the tenant regardless of pregnancy or maternity status, the increase is not considered to disproportionately disadvantage tenants on the grounds of pregnancy or maternity status.</p>	See section 9 of this EIA
5. Race / Ethnicity	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	<p>On the basis that the increased rent charge is applied consistently across all properties and not targeted to individual occupants, i.e. it applies to the tenant regardless of race, the increase is not considered to disproportionately disadvantage tenants on the grounds of race.</p> <p>The profile of our TA clients shows that the largest proportions of tenants are of the following ethnicities:</p> <p>White = 18.2%</p> <p>Black / Black British = 16.3%</p> <p>Asian / Asian British = 9.6%</p>	See section 9 of this EIA

		There is a large proportion of unknown data at 48%.	
6. Religion or belief	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	<p>On the basis that the increased rent charge is applied consistently across all properties and not targeted to individual occupants, i.e. it applies to the tenant regardless of religion or belief, the increase is not considered to disproportionately disadvantage tenants on the grounds of religion or belief.</p> <p>The profile of our tenants shows that the largest proportions of tenants are of the following religions or beliefs:</p> <p>Christian = 12.7%</p> <p>None = 4.5%</p> <p>Muslim = 10.1%</p> <p>Hindu = 0.3%</p> <p>The faith of approx. 64.3% of tenants is unknown.</p> <p>Despite the large number of tenants faith being unknown, we can see a greater percentage of ethnic minority backgrounds. LBBs resident profile shows a 39.2% Christian, 19.4% no religion, 19.2% Jewish, 11.8% Muslim, 4% Hindu, 1.9% Buddhist.</p>	See section 9 of this EIA
7. Gender / sex	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	<p>On the basis that the increased rent charge is applied consistently across all properties and not targeted to individual occupants, i.e. it applies to the tenant regardless of sex, the increase is not considered to disproportionately disadvantage tenants on the grounds of sex.</p> <p>Females make up 69.1% of tenancy holders. Whilst women comprise the greater proportion of those impacted by the rent increase this is because women</p>	See section 9 of this EIA

		make up more than half of the tenancy holders.	
8. Sexual orientation	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	<p>On the basis that the increased rent charge is applied consistently across all properties and not targeted to individual occupants, i.e. it applies to the tenant regardless of sexual orientation, the increase is not considered to disproportionately disadvantage tenants on the grounds of sexual orientation.</p> <p>27.7% of tenants indicate a sexual orientation of heterosexual, and 0.6% lesbian / gay / bisexual, with a large percentage (71.5%) preferring not to say or unknown.</p>	See section 9 of this EIA
9. Marital Status	Yes <input type="checkbox"/> / No <input type="checkbox"/>	<p>On the basis that the increased rent charge is applied consistently across all properties and not targeted to individual occupants, i.e. it applies to the tenant regardless of marital status, the increase is not considered to disproportionately disadvantage tenants on the grounds of marital status.</p>	See section 9 of this EIA
10. Other key groups? Carers People with mental health issues Some families and lone parents People with a low income Unemployed people Young people not in employment education or training	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/> Yes <input type="checkbox"/> / No <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	<p>On the basis that the increased rent charge is applied consistently across all properties and not targeted to individual occupants, i.e. it applies to the tenant regardless of socio-economic status, the increase is not considered to disproportionately disadvantage tenants on the grounds of socio-economic status, although households that face socio-economic disadvantage, including those on lower incomes, are highly represented within social housing.</p>	See section 9 of this EIA

5. Please outline what data sources, measures and methods could be designed to monitor the impact of the new policy or service, the achievement of intended outcomes and the identification of any unintended or adverse impact?

Include how frequently monitoring could be conducted and who will be made aware of the analysis and outcomes

Monthly monitoring of income KPIs at senior management meetings

Daily reviews of case work by specialist income officers and managers

Work with QL to identify arrears cases at an early point to enable officers to be proactive in arrears management.

6. Initial Assessment of Overall Impact

Positive Impact	Negative Impact or Impact Not Known ¹	No Impact
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

7. Scale of Impact

Positive impact:	Negative Impact or Impact Not Known	
Minimal <input type="checkbox"/> Significant <input type="checkbox"/>	Minimal <input checked="" type="checkbox"/> Significant <input type="checkbox"/>	

8. Outcome

No change to decision	Adjustment needed to decision	Continue with decision <i>(despite adverse impact / missed opportunity)</i>	If significant negative impact - Stop / rethink
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

¹ '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.

9. Please give a full explanation for how the initial assessment and outcome was decided. .

At the Housing and Growth Committee meeting held on 25 January 2021 it was agreed temporary accommodation (TA) rents for 2021/22 would be aligned with the latest published Local Housing Allowance (LHA) rates for all existing tenants and new lettings.

In April 2020, following a freeze of LHA levels between 2016 and 2020, the government took a decision to increase LHA levels to equal the 30th percentile of rents in each local area. This policy change was in response to the COVID-19 pandemic and was taken to benefit claimants in the private rented sector who are subject to LHA rules and have a shortfall between their rent and the LHA rate. Prior to the COVID-19 related decision, the government had announced that LHA rates would increase by 1.7% from April 2020.

Following government announcements in February which outlined the road map of easing COVID-19 restrictions, further impact analysis on existing TA clients was completed. This analysis highlighted concerns regarding the level of rent increases proposed and subsequent affordability issues for TA clients during the continuing pandemic. For this reason, previous rent levels were maintained from April 2021 and an amended recommendation to increase rents by 1.5% to take effect from 30 August 2021 is now being made, subject to the further approval of the Policy and Resources Committee.

As of February 2021, there were 1650 households subject to TA rents. Analysis shows that increasing rents to current LHA levels would mean average weekly rent increases of 4.59% (£13.75) for properties within inner London areas, 11.53% (£29.81) for those in outer and North West London areas and 5.87% (£12.10) for those out of London.

With 40% of TA clients being in receipt of only partial or no housing benefit, the nation still suffering from the COVID-19 pandemic and with a well-established expectation that significant increases in unemployment and homelessness will be seen in the year ahead, a more prudent increase of 1.5% is therefore being recommended.

For tenants, the rent increase will be viewed as having an adverse impact. The Equality Impact Assessment is undertaken from this perspective and as has been assessed in this paper, there is no disproportionate adverse effect on any group. The potential for a detrimental impact exists in as much as an increase in rent will put pressure on those individuals in, or at risk of financial hardship, however it should be noted that the recommended increase is significantly reduced from local housing allowance levels and as such will be payable through Housing Benefit where this applies. Thus, it is concluded that the detrimental effects of a rent increase are mitigated where appropriate. Should any residents present with additional support need we will ensure we create a tailored approach to housing management services. Equally we will ensure all staff receive diversity training around ethnicity, religion, gender, sex to ensure we are well placed to provide additional support and sign posting services.