

# **Equalities Impact Assessment (EqIA)**

EqIAs make services better for everyone and support value for money by getting services right first time.

EqIAs enable us to consider all the information about a service, policy or strategy from an equalities perspective and then create an action plan to get the best outcomes for service users and staff<sup>1</sup>. They analyse how all our work as a council might impact differently on different groups protected from discrimination by the Equality Act 2010<sup>2</sup>. They help us make good decisions and evidence how we have reached them.<sup>3</sup>

An EqIA needs to be started as a project starts to identify and consider possible differential impacts on people and their lives, inform project planning and, where appropriate, identify mitigating actions. A full EqIA must be completed before any decisions are made or policy agreed so that the EqIA informs that decision or policy. It is also a live document; you should review and update it along with your project plan throughout.

You should first consider whether you need to complete this full EqIA<sup>4</sup>.

## Other key points to note:

- Full guidance notes to help you are embedded in this form see the End Notes or hover the mouse over the numbered notes.
- Please share your EqIA with your Equalities Champion and the final/updated version at the end of the project.
- Major EqlAs should be reviewed by the relevant Head of Service.
- Examples of completed EqIAs can be found on the Equalities Hub

| 1. Responsibility for the EqIA                |   |
|---|---|
| Title of proposal <sup>5</sup>                | Annual Review of Council Dwelling Rents and Service Charges and Temporary Accommodation rents for 2024/25 |
| Name and job title of completing officer      | Tim Mulvenna (CEO The Barnet Group)   |
| Head of service area responsible              | Housing   |
| Equalities Champion supporting the EqIA       | Tim Mulvenna (CEO The Barnet Group)   |
| Performance Management rep                    | n/a   |
| HR rep (for employment related issues)        | n/a   |
| Representative (s) from external stakeholders | Greg Terefenko, Head of Housing Management Services (Barnet Homes)  |

| 2. Description of proposal  |  |  |  |  |  |  |  |
|---|--|--|--|--|--|--|--|
| Is this a: (Please tick all that apply)                                     |  |  |  |  |  |  |  |
| New policy /strategy / function / procedure / service                       | Review of Policy /strategy / function / procedure / service                                |  |  |  |  |  |  |
| Budget Saving   | Other 🗵  |  |  |  |  |  |  |
| If budget saving please specify value below:                                | If other please specify below: Budget income generation                                    |  |  |  |  |  |  |
|   |  |  |  |  |  |  |  |
| Please outline in no more than 3 paragraphs <sup>6</sup> :                  |  |  |  |  |  |  |  |
| The council is required to set council dwelling rents and associated serv   | ice charges for council tenants on an annual basis. These are set out in a formal rent     |  |  |  |  |  |  |
| notice issued to all tenants before the start of the financial year. Variou | is items of legislation apply to the process, including the Localism Act 2011, the Housing |  |  |  |  |  |  |
| Act 1985, the Housing Act 1988, the Local Government and Housing Act        | : 1989, and the Welfare Reform and Work Act 2016. The Local Government and Housing         |  |  |  |  |  |  |

Act 1989 requires the Housing Revenue Account (HRA) to be maintained as a ring-fenced account and prescribes the debits and credits to be applied to it. The principal items of expenditure within the HRA are management and maintenance costs, together with charges for capital expenditure (depreciation and interest). This is substantially met by rent and service charge income from dwellings, garages, and commercial premises. The HRA is self-financing and has a 30-year business plan in place with planned spending including the development of new homes to meet local housing need, the maintenance of existing homes, and essential fire safety works.

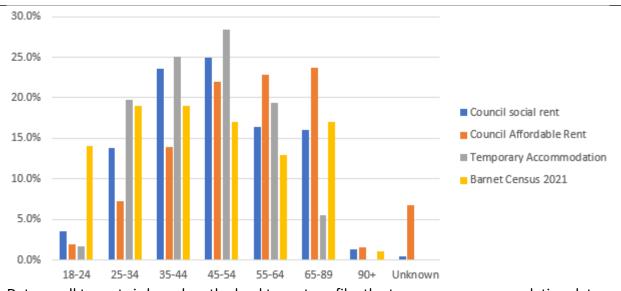
For **council dwellings** it is proposed that for both **social rents and Affordable Rents**, Barnet follow the national rent setting cap announced by the Government in the Autumn Statement 2023, and that social rent is increased by 7.7% for 2024/2025 for existing tenants. For **temporary accommodation rents** It is proposed that those temporary accommodation rents that are currently below Local Housing Allowance rates are increased for 2024/25 in line with the rent increase proposed for council dwellings at 7.7%, up to a maximum of the applicable LHA level.

Service charges usually reflect additional services that may not be provided to every tenant, or that may relate to communal facilities. For properties let at social rents, service charges are subject to separate legal requirements and are limited to covering the cost of providing the services. For Affordable Rent properties, the rent is inclusive of service charges and these households are therefore unaffected by any changes. Service charges and garage rents have been reviewed to ensure that costs are being recovered. It is proposed that some service charges are increased from 1 April 2024 to reflect the increased costs of providing the services, to ensure that this is recouped to allow essential HRA investment in housing and property services, safety, and provision of new affordable housing supply to be maintained.

## 3. Supporting evidence

What existing data informs your assessment of the impact of the proposal on protected groups of service users and/or staff? Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis

|                 | What does the data tell you <sup>7</sup> ?   | What do            |
|-----------------|--|--------------------|
| Protected group | Provide a summary of any relevant demographic data about the borough's population from the | people tell        |
|                 | Joint Strategic Needs Assessment, or data about the council's workforce                    | you <sup>8</sup> ? |

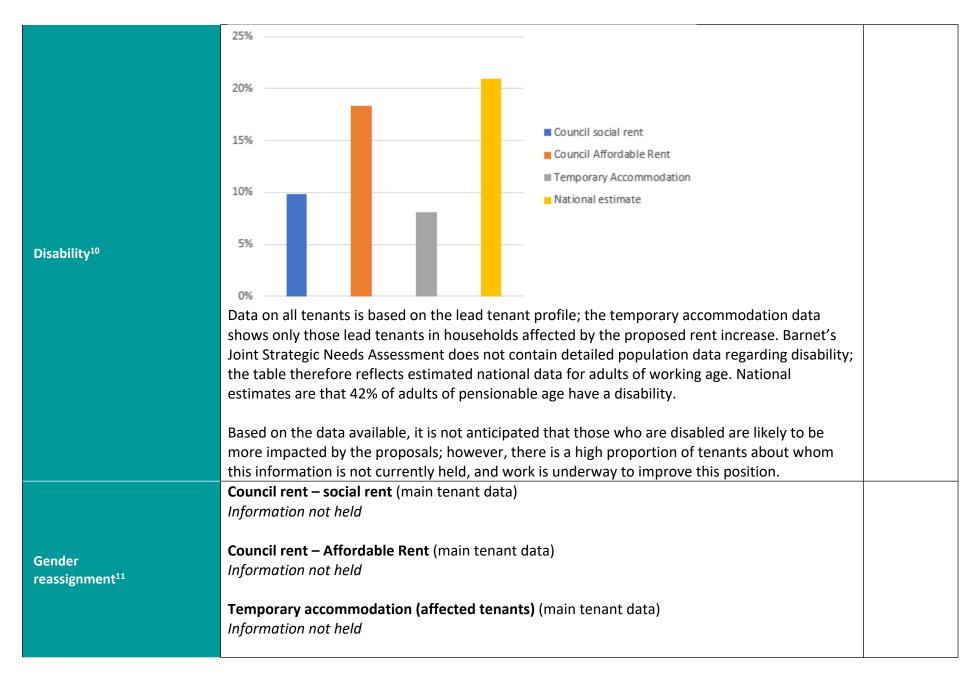


Age<sup>9</sup>

Data on all tenants is based on the lead tenant profile; the temporary accommodation data shows only those lead tenants in households affected by the proposed rent increase. Barnet's population data for comparison is taken from the 2021 Census. It should be noted that the youngest age group based on Census data is 15-24, and the Census data shows all residents of the borough aged 15+.

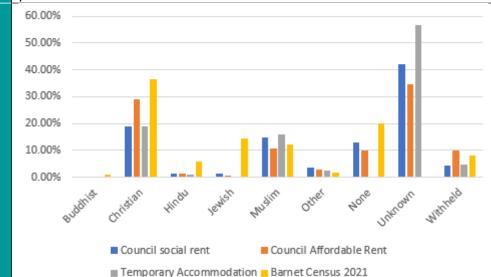
Within the council tenant social rent population, there is greater representation of those aged 35-64 compared to the overall borough, and lesser representation of those aged 18-34, although the Census data includes those aged 15 and older in the youngest banding. Within the council tenant Affordable Rent population, there is greater representation of those aged 45 and above compared to the Census, and lesser representation of those aged 18-44. Within the affected TA population, there is greater representation of those aged 35-64, and lesser representation of those aged 18-24 and 65 plus. Generally, this means that older council tenants and younger TA tenants are more affected by the proposal due to their prevalence in the relevant populations.

n/a



|   | Barnet population (Barnet Joint Strategic Needs Assessment)   |
|---|---|
| Marriage and Civil  | Information not held  n/a - This protected characteristic is relevant to employment under the Equality Act 2010.  |
| Partnership <sup>12</sup> Pregnancy and Maternity <sup>13</sup> | Council rent – social rent (main tenant data) Information not held  Council rent – Affordable Rent (main tenant data) Information not held  |
|   | Temporary accommodation (affected tenants) (main tenant data)  Information not held   |
| Race/<br>Ethnicity <sup>14</sup>                                | 80.0% 70.0% 60.0% 50.0% 40.0% 30.0% 20.0% 10.0% Asian / Black / Mixed Other White Unknown Withheld Asian Black British British  Council social rent Temporary Accommodation Barnet Census 2021  Data on all tenants is based on the lead tenant profile; the temporary accommodation data shows only those lead tenants in households affected by the proposed rent increase. Barnet's population data for comparison is taken from the Census 2021. It should be noted the Census data shows all residents of the borough. |

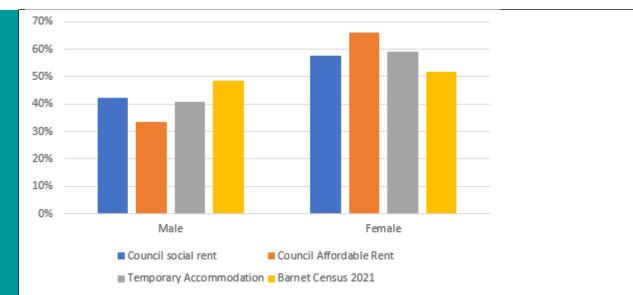
For the social rent and temporary accommodation group, there is greater representation of those from an ethnic minority background compared to the Census data; there is lesser representation for the Affordable Rent group. When disaggregated, we see greater representation of those from a Black or Black British background, and for social rent in particular from an 'Other' background, with these groups more likely to be affected by the proposals due to their prevalence in the populations. It should also be noted that there is a high proportion of tenants about whom this information is not known, and work is underway to improve this position.



Religion or belief<sup>15</sup>

Data on all tenants is based on the lead tenant profile; the temporary accommodation data shows only those lead tenants in households affected by the proposed rent increase. Barnet's population data for comparison is taken from the Census 2021. It should be noted that the Census data shows all residents of the borough.

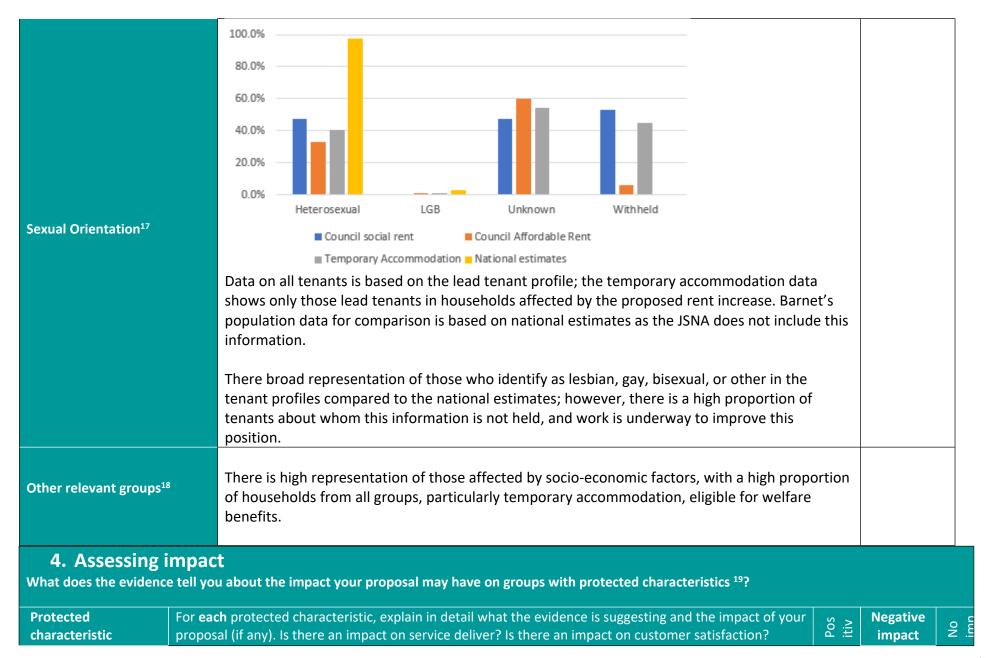
There is lesser representation of those with a religion or belief for all tenant populations compared to the Census data; however there is a high proportion of tenants about whom this information is not held, and work is ongoing to improve this position.



Data on all tenants is based on the lead tenant profile; the temporary accommodation data shows only those lead tenants in households affected by the proposed rent increase. Barnet's population data for comparison is taken from the Census 2021. It should be noted that the Census data shows all residents of the borough aged 15+.

There is higher representation of women in the three tenant populations compared to the wider Barnet profile. It should be noted that the tenant profile reflects the 'lead' tenant only, and does not reflect any joint tenants; however, it is expected that there will be a higher female population within the tenant groups due to the higher rate of female tenants as sole tenants, particularly those who are parents, due to higher priority need under the Housing Allocations Scheme. Women will therefore be more likely to be affected due to their higher prevalence in the relevant populations.

Sex<sup>16</sup>



| Click the appropriate box on the right to indicate the outcome of your analysis. |     |      |  |
|--|-----|------|--|
|  | nor | ajor |  |
|  | Αij | Ma   |  |
|  |     |      |  |

The tables below set out the average increase per week by gender/sex. The overall average increase of 7.7% equates to an average per week of £9.56 for social rent, £18.36 for Affordable Rent, and £21.41 for temporary accommodation.

## Social rent

| Age   | % Known | Current<br>Rent<br>Average | Proposed<br>Rent<br>Average<br>(+7.7%) | Average<br>Impact £<br>per Week | Distance<br>from Total<br>Average<br>(£) (£9.56) | Distance<br>from Total<br>Average % |
|-------|---------|----------------------------|--|---------------------------------|--|-------------------------------------|
| 18-24 | 2.10%   | 112.94                     | 121.64                                 | 8.70                            | -0.86  | -9.03%                              |
| 25-34 | 7.70%   | 121.16                     | 134.46                                 | 9.33                            | -0.23  | -2.41%                              |
| 35-44 | 15.00%  | 128.56                     | 138.46                                 | 9.90                            | 0.34   | 3.55%                               |
| 45-54 | 23.50%  | 130.14                     | 140.16                                 | 10.02                           | 0.46   | 4.82%                               |
| 55-64 | 24.50%  | 128.55                     | 138.45                                 | 9.90                            | 0.34   | 3.54%                               |
| 65+   | 27.10%  | 123.57                     | 133.08                                 | 9.51                            | -0.05  | -0.47%                              |

There is the greatest impact on households where the main tenant is aged 45-54, with an increase of 46 pence above the average per week, which is 12 pence more than the next highest group. The impact is not considered to be substantial. The difference in average rent values is mainly due to the property size held as the greatest increase in average rents can be seen in the larger properties.

### **Affordable Rent**

| Age   | % Known | Current<br>Rent<br>Average | Proposed<br>Rent<br>Average<br>(+7.7%) | Average<br>Impact £<br>per Week | Distance<br>from Total<br>Average<br>(£)<br>(£18.36) | Distance<br>from Total<br>Average % |
|-------|---------|----------------------------|--|---------------------------------|--|-------------------------------------|
| 18-24 | 3.60%   | 225.61                     | 242.98                                 | 17.37                           | -0.99  | -5.38%                              |
| 25-34 | 13.80%  | 246.43                     | 265.41                                 | 18.98                           | 0.62   | 3.35%                               |
| 35-44 | 23.70%  | 263.71                     | 284.02                                 | 20.31                           | 1.95   | 10.60%                              |
| 45-54 | 25.00%  | 279.35                     | 300.86                                 | 21.51                           | 3.15   | 17.16%                              |
| 55-64 | 16.50%  | 223.1                      | 240.28                                 | 17.18                           | -1.18  | -6.43%                              |
| 65+   | 17.40%  | 192.83                     | 207.68                                 | 14.85                           | -3.51  | -19.13%                             |

 $\boxtimes$ 

There is the greatest impact on households where the main tenant is aged 45-54, with an increase of £3.15 above the average, which is £1.21 more than the next highest group. This is mainly due to the property size held as the greatest increase in average rents can be seen in the larger properties. Although the rent increase is being applied consistently, the impact is higher than that for other protected characteristics, and is affected by the high proportion of tenants within this age group. The information above can be used to ensure preventative measures regarding the risk of rent arrears and other mitigations to ensure tenancy sustainment are appropriate and can be targeted to those potentially most in need.

#### **Temporary Accommodation**

| Age   | % Known | Current<br>Rent<br>Average | Proposed<br>Rent<br>Average<br>(+7.7%) | Average<br>Impact £<br>per Week | Distance<br>from Total<br>Average<br>(£)<br>(£26.51) | Distance<br>from Total<br>Average % |
|-------|---------|----------------------------|--|---------------------------------|--|-------------------------------------|
| 18-24 | 5.10%   | 272.37                     | 293.34                                 | 20.97                           | -5.54  | -20.89%                             |
| 25-34 | 15.00%  | 311.79                     | 335.80                                 | 24.01                           | -2.50  | -9.44%                              |
| 35-44 | 31.10%  | 347.16                     | 373.89                                 | 26.73                           | 0.22   | 0.83%                               |
| 45-54 | 33.70%  | 388.62                     | 418.54                                 | 418.54 29.92                    |  | 12.88%                              |
| 55-64 | 12.90%  | 369                        | 397.41                                 | 28.41                           | 1.90   | 7.18%                               |
| 65+   | 2.30%   | 376.63                     | 405.63                                 | 29.00                           | 2.49   | 9.39%                               |

There is the greatest impact on households where the main tenant is aged 45-54, with an increase of £3.41 above the average, which is 92 pence more than the next highest group. This is mainly due to the property size held as the greatest increase in average rents can be seen in the larger properties. The impact is higher than others seen but is not considered to be substantial. The value of the rent increase will not be consistent across all households as some are currently charged a greater amount below the LHA, and this will also have an impact on the actual increase experienced compared to the overall average. The information above can be used to ensure preventative measures regarding the risk of rent arrears and other mitigations to ensure tenancy sustainment are appropriate and can be targeted to those potentially most in need.

The rent increase will affect all council households and all temporary accommodation households that are currently paying weekly rent below the LHA level; however, it does not have a disproportionately adverse effect on tenants on the grounds of age.

The potential longer-term consequences for those who will be negatively impacted include rent arrears and the threat of being made homeless. Barnet Homes, Barnet Council's Arms-Length Management

|            | Organisation, will pro-<br>entitlement, training,<br>range of preventative<br>issues or barriers arou<br>communication used<br>with different commu | and employme<br>measures dep<br>and communic<br>to engage but  | ent. Eviction i<br>loyed to incre<br>ation for both<br>individual off | s only underta<br>ease tenancy s<br>n young and el | aken as a last<br>sustainment.<br>derly tenants | resort and is<br>There may be<br>regarding th    | very rare, with<br>potential<br>e type of |   |  |  |  |
|------------|---|--|---|--|---|--|---|---|--|--|--|
|            | The rent increase will management services existing homes includ to the Housing Reven   | , the developn<br>ing essential fi   | nent and acqure re safety wor   | uisition of new<br>ks. The rental                  | properties, a income for co                     | and the maint<br>ouncil homes                    | enance of                                 |   |  |  |  |
|            | The rent increase for increase in revenue to  |  |   |  |   |  | t due to the                              |   |  |  |  |
|            | The increase in service will ensure the contin  |  |   |  | a positive im                                   | pact on those                                    | tenants as it                             |   |  |  |  |
|            | The tables below set of 7.7% equates to an average temporary accommode.  Social rent  | erage per wee  |   |  |   |  |   | r |  |  |  |
|            | Disability  | % Known  | Current<br>Rent<br>Average  | Proposed<br>Rent<br>Average<br>(+7.7%)             | Average<br>Impact £<br>per Week                 | Distance<br>from Total<br>Average<br>(£) (£9.56) | Distance<br>from Total<br>Average %       |   |  |  |  |
| Disability | Yes   | 20.3%  | 124.85  | 134.46   | 9.61  | 0.05   | -0.56%                                    |   |  |  |  |
|            | •   | There is an impact on households where the main tenant has declared themselves to have a disability, with these households on average paying 5 pence more than the average in additional rent each week. |   |  |   |  |   |   |  |  |  |
|            | Affordable Rent   |  |   |  |   |  |   |   |  |  |  |
|            | Disability  | % Known  | Current<br>Rent<br>Average  | Proposed<br>Rent<br>Average<br>(+7%)               | Average<br>Impact £<br>per Week                 | Distance<br>from Total<br>Average<br>(£18.36)    | Distance<br>from Total<br>Average %       |   |  |  |  |
|            | Yes   | 9.9%   | 201.92  | 217.47   | 15.55   | -2.81  | -15.32%                                   |   |  |  |  |

There is a lesser impact on households where the main tenant has declared themselves to have a disability, with these households on average paying £2.83 less than the average in additional rent each week.

## **Temporary Accommodation**

| Disability | % Known | Current<br>Rent<br>Average | Proposed<br>Rent<br>Average<br>(+7.7%) | Average<br>Impact £<br>per Week | Distance<br>from Total<br>Average<br>(£)<br>(£26.51) | Distance<br>from Total<br>Average % |
|------------|---------|----------------------------|--|---------------------------------|--|-------------------------------------|
| Yes        | 4.0%    | 317.10                     | 342.16                                 | 24.46                           | -2.05  | -7.72                               |

There is a lesser impact on households where the main tenant has declared themselves to have a disability, with these households on average paying £2.05 less than the average in additional rent each week. This is likely to be linked to typical property sizes as the greatest increase in average rents can be seen in the larger properties. The value of the rent increase will not be consistent across all households as some are currently charged a greater amount below the LHA, and this will also have an impact on the actual increase experienced compared to the overall average.

The rent increase will affect all council households and all temporary accommodation households that are currently paying weekly rent below the LHA level; however, it does not have a disproportionately adverse effect on tenants on the grounds of disability. Those who are disabled are likely to be eligible for support including welfare benefits, which is likely to further mitigate any impact of the proposal.

The potential longer-term consequences for those who will be negatively impacted include rent arrears and the threat of being made homeless. Barnet Homes, Barnet Council's Arms-Length Management Organisation, will provide support to affected households, including advice and support on benefit entitlement, training, and employment. Eviction is only undertaken as a last resort and is very rare, with a range of preventative measures deployed to increase tenancy sustainment. There may be potential issues or barriers around communication for some tenants with a disability regarding the type of communication used to engage but individual officers will ensure a tailored approach to individual need with different communication channels.

The rent increase will also directly benefit all council tenants as all rental income is used to fund housing management services, the development and acquisition of new properties, and the maintenance of existing homes including essential fire safety works. The rental income for council homes is 'ring-fenced' to the Housing Revenue Account, ensuring that it is used for no other purpose.

|                                   | The rent increase for those living in temporary accommodation will have a positive impact due to the increase in revenue to fund temporary accommodation and homelessness services.  The increase in service charges for social rent tenants will have a positive impact on those tenants as it will ensure the continued supply of these services. |  |  |
|-----------------------------------|---|--|--|
| Gender<br>reassignment            | There is insufficient data to identify any impact on this protected characteristic.   |  |  |
| Marriage and Civil<br>Partnership | There is insufficient data to identify any impact on this protected characteristic.   |  |  |
| Pregnancy and<br>Maternity        | n/a - This protected characteristic is relevant to employment under the Equality Act 2010.  |  |  |

|                    | Social rent   |               |                            |  |                                 |  |                                     |  |  |
|--------------------|---|---------------|----------------------------|--|---------------------------------|--|-------------------------------------|--|--|
|                    | Race  | % Known       | Current<br>Rent<br>Average | Proposed<br>Rent<br>Average<br>(+7.7%) | Average<br>Impact £<br>per Week | Distance<br>from Total<br>Average<br>(£) (£9.56)     | Distance<br>from Total<br>Average % |  |  |
|                    | Asian / Asian British   | 10.00%        | 126.42                     | 126.42                                 | 9.73                            | 0.17   | 1.82%                               |  |  |
|                    | Black / Black British   | 23.30%        | 127.1                      | 127.1                                  | 9.79                            | 0.23   | 2.37%                               |  |  |
|                    | Mixed   | 1.10%         | 126.47                     | 126.47                                 | 9.74                            | 0.18   | 1.86%                               |  |  |
|                    | Other   | 11.60%        | 125.39                     | 125.39                                 | 9.66                            | 0.10   | 0.99%                               |  |  |
|                    | White   | 54.00%        | 126.77                     | 126.77                                 | 9.76                            | 0.20   | 2.11%                               |  |  |
| Race/<br>Ethnicity | There is the greatest in increase of 23 pence a increase in average rer substantial.  Affordable Rent | bove the aver | age. This is m             | ainly due to t                         | he property s                   | ize held as the                                      | e greatest                          |  |  |
|                    | Race  | % Known       | Current<br>Rent<br>Average | Proposed<br>Rent<br>Average<br>(+7.7%) | Average<br>Impact £<br>per Week | Distance<br>from Total<br>Average<br>(£)<br>(£18.36) | Distance<br>from Total<br>Average % |  |  |
|                    | Asian / Asian British   | 21.70%        | 276.06                     | 297.32                                 | 21.26                           | 2.90   | 30.30%                              |  |  |
|                    | Black / Black British   | 16.80%        | 273.2                      | 273.20                                 | 21.04                           | 2.68   | 28.00%                              |  |  |
|                    | Mixed   | 0.70%         | 235.3                      | 235.30                                 | 18.12                           | -0.24  | -2.53%                              |  |  |
|                    | Other   | 10.50%        | 251.13                     | 251.13                                 | 19.34                           | 0.98   | 10.22%                              |  |  |
|                    | 0 0.1.0.  |               |                            |  |                                 |  |                                     |  |  |

There is the greatest impact on households where the main tenant is Asian or Asian British, or Black or Black British, with an increase of £2.68 to £2.90 above the average. This is mainly due to the property size generally held by Asian and Black households, as the greatest increase in average rents can be seen in the larger properties. The impact is higher than others seen but is not considered to be substantial. The

information above can be used to ensure preventative measures regarding the risk of rent arrears and other mitigations to ensure tenancy sustainment are appropriate and can be targeted to those potentially most in need.

### **Temporary accommodation**

| Race                  | % Known | Current<br>Rent<br>Average | Proposed<br>Rent<br>Average<br>(+7.7%) | Average<br>Impact £<br>per Week | Distance<br>from Total<br>Average<br>(£)<br>(£26.51) | Distance<br>from Total<br>Average % |
|-----------------------|---------|----------------------------|--|---------------------------------|--|-------------------------------------|
| Asian / Asian British | 20.90%  | 366.92                     | 395.17                                 | 28.25                           | 1.74   | 18.23%                              |
| Black / Black British | 33.00%  | 374.06                     | 402.86                                 | 28.80                           | 2.29   | 23.98%                              |
| Mixed                 | 2.30%   | 388.93                     | 418.88                                 | 29.95                           | 3.44   | 35.96%                              |
| Other                 | 13.40%  | 376                        | 404.95                                 | 28.95                           | 2.44   | 25.54%                              |
| White                 | 30.40%  | 340.5                      | 366.72                                 | 26.22                           | -0.29  | -3.05%                              |

There is the greatest impact on households where the main tenant is from an ethnic minority background, particularly from a Mixed, Other, or Black or Black British background with an increase of £2.29 to £3.44 above the average. This is mainly due to the property size generally held by Asian, Black, Mixed, and Other households, as the greatest increase in average rents can be seen in the larger properties. The impact is higher than others seen but is not considered to be substantial. The value of the rent increase will not be consistent across all households as some are currently charged a greater amount below the LHA, and this will also have an impact on the actual increase experienced compared to the overall average. The information above can be used to ensure preventative measures regarding the risk of rent arrears and other mitigations to ensure tenancy sustainment are appropriate and can be targeted to those potentially most in need.

The rent increase will affect all council households and all temporary accommodation households that are currently paying weekly rent below the LHA level; however, it does not have a disproportionately adverse effect on tenants on the grounds of race.

The potential longer-term consequences for those who will be negatively impacted include rent arrears and the threat of being made homeless. Barnet Homes, Barnet Council's Arms-Length Management Organisation, will provide support to affected households, including advice and support on benefit entitlement, training, and employment. Eviction is only undertaken as a last resort and is very rare, with a range of preventative measures deployed to increase tenancy sustainment. Barnet Homes' Housing Management team will work with the data intelligence team to identify groups that may require a

|                    | targeted approach to engagement. Individual officers will ensure a tailored approach to individual need with different communication channels.  The rent increase will also directly benefit all council tenants as all rental income is used to fund housing management services, the development and acquisition of new properties, and the maintenance of existing homes including essential fire safety works. The rental income for council homes is 'ring-fenced' to the Housing Revenue Account, ensuring that it is used for no other purpose.  The rent increase for those living in temporary accommodation will have a positive impact due to the increase in revenue to fund temporary accommodation and homelessness services.  The increase in service charges for social rent tenants will have a positive impact on those tenants as it will ensure the continued supply of these services. |                                 |                              |                                      |                                 |  |                                     |  |  |
|--------------------|---|---------------------------------|------------------------------|--------------------------------------|---------------------------------|--|-------------------------------------|--|--|
|                    | The tables below set of 7% equates to an aver temporary accommod  | age per week                    |                              |                                      |                                 |  |                                     |  |  |
|                    | Religion or Belief  | % Known                         | Current<br>Rent<br>Average   | Proposed<br>Rent<br>Average<br>(+7%) | Average<br>Impact £<br>per Week | Distance<br>from Total<br>Average<br>(£) (£9.56) | Distance<br>from Total<br>Average % |  |  |
|                    | None / atheist / agnostic   | 18.10%                          | 125.48                       | 135.14                               | 9.66                            | 0.10   | 1.07%                               |  |  |
| Religion or belief | Christian   | 52.70%                          | 126.3                        | 136.03                               | 9.73                            | 0.17   | 1.73%                               |  |  |
|                    | Muslim  | 19.30%                          | 130.42                       | 140.46                               | 10.04                           | 0.48   | 5.05%                               |  |  |
|                    | Hindu   | 2.50%                           | 123.18                       | 132.66                               | 9.48                            | -0.08  | -0.79%                              |  |  |
|                    | Jewish  | 1.20%                           | 115.81                       | 124.73                               | 8.92                            | -0.64  | -6.72%                              |  |  |
|                    | Other   | 5.50%                           | 124.63                       | 134.23                               | 9.60                            | 0.04   | 0.38%                               |  |  |
|                    | Buddhist  | 0.70%                           | 121.41                       | 130.76                               | 9.35                            | -0.21  | -2.21%                              |  |  |
|                    | Jain  | 0.00%                           | 110.6                        | 119.12                               | 8.52                            | -1.04  | -10.92%                             |  |  |
|                    | There is the greatest in increase of 48 pence a to the property size ge seen in the larger prop   | bove the aver<br>nerally held b | age; 31 penc<br>y Muslim ten | e more than t<br>ants, as the g      | he next highe<br>reatest increa | st group. This<br>se in average                  | is mainly due                       |  |  |

| Afford | labl | le R | ent |
|--------|------|------|-----|
|--------|------|------|-----|

| Allordable Kellt          |         |                            |  |                                 |  |                                     |
|---------------------------|---------|----------------------------|--|---------------------------------|--|-------------------------------------|
| Religion or Belief        | % Known | Current<br>Rent<br>Average | Proposed<br>Rent<br>Average<br>(+7.7%) | Average<br>Impact £<br>per Week | Distance<br>from Total<br>Average<br>(£)<br>(£18.36) | Distance<br>from Total<br>Average % |
| None / atheist / agnostic | 24.20%  | 238.35                     | 256.70                                 | 18.35                           | -0.01  | -0.04%                              |
| Christian                 | 35.80%  | 238.92                     | 257.32                                 | 18.40                           | 0.04   | 0.20%                               |
| Muslim                    | 27.50%  | 275.14                     | 296.33                                 | 21.19                           | 2.83   | 15.39%                              |
| Hindu                     | 2.50%   | 288.92                     | 311.17                                 | 22.25                           | 3.89   | 21.17%                              |
| Jewish                    | 2.50%   | 215.13                     | 231.70                                 | 16.57                           | -1.79  | -9.78%                              |
| Other                     | 5.80%   | 234.65                     | 252.72                                 | 18.07                           | -0.29  | -1.59%                              |
| Buddhist                  | 0.80%   | 213.19                     | 229.61                                 | 16.42                           | -1.94  | -10.59%                             |
| Jain                      | 0.80%   | 261.01                     | 281.11                                 | 20.10                           | 1.74   | 9.46%                               |

There is the greatest impact on households where the main tenant is of the Muslim or Hindu faiths, with an increase of £2.83 to £3.89 above the average. This is mainly due to the property size generally held by Muslim and Hindu tenants, as the greatest increase in average rents can be seen in the larger properties. The impact is higher than others seen but is not considered to be substantial. The information above can be used to ensure preventative measures regarding the risk of rent arrears and other mitigations to ensure tenancy sustainment are appropriate and can be targeted to those potentially most in need.

## **Temporary accommodation**

| Religion or Belief        | % Known | Current<br>Rent<br>Average | Proposed<br>Rent<br>Average<br>(+7.7%) | Average<br>Impact £<br>per Week | Distance<br>from Total<br>Average<br>(£)<br>(£26.51) | Distance<br>from Total<br>Average % |
|---------------------------|---------|----------------------------|--|---------------------------------|--|-------------------------------------|
| None / atheist / agnostic | 14.70%  | 323.66                     | 348.58                                 | 24.92                           | -1.59  | -5.99%                              |
| Christian                 | 36.70%  | 354.68                     | 381.99                                 | 27.31                           | 0.80   | 3.02%                               |
| Muslim                    | 42.00%  | 414.49                     | 446.41                                 | 31.92                           | 5.41   | 20.39%                              |
| Hindu                     | 1.30%   | 290.62                     | 313.00                                 | 22.38                           | -4.13  | -15.59%                             |

|     | Jewish  | 2.00%   | 349.54   | 376.45   | 26.91   | 0.40   | 1.53%  |             |             |  |
|-----|---|---|--|--|---|--|--|-------------|-------------|--|
|     | Other   | 3.30%   | 349.59   | 376.51   | 26.92   | 0.41   | 1.54%  |             |             |  |
|     | There is the greatest in increase of £5.41 above property size generally the larger properties. It value of the rent increase greater amount belowed compared to the overaregarding the risk of reand can be targeted to the rent increase will a | npact on house the average held by Musline impact is lase will not be the LHA, and all average. The tarrears and those potent | seholds where ; £4.61 more im tenants, as nigher than of e consistent actions will also le information dother mitigatially most in research. | the main ter<br>than the next<br>s the greatest<br>thers seen but<br>cross all house<br>have an impac<br>n above can be<br>tions to ensu | nant is of the I<br>highest group<br>increase in ava-<br>t is not conside<br>eholds as some<br>ton the acture<br>used to ensure<br>te tenancy sur | Muslim faith, p. This is mair verage rents of lered to be sure are current al increase extra preventat stainment are | with an only due to the can be seen in obstantial. The cly charged a experienced cive measures e appropriate |             |             |  |
|     | are currently paying w<br>adverse effect on tena<br>The potential longer-te<br>and the threat of being  | eekly rent belents on the grooters  | ow the LHA le<br>ounds of religi<br>nces for those   | evel; however<br>on or belief.<br>e who will be  | , it does not h<br>negatively im  | ave a disprop<br>pacted includ   | oortionately<br>le rent arrears  |             |             |  |
|     | Organisation, will proventitlement, training, a range of preventative a tailored approach to  | ide support to<br>and employme<br>measures dep  | affected houent. Eviction is loyed to incre  | useholds, inclus<br>s only underta<br>ease tenancy s   | iding advice a<br>aken as a last<br>sustainment. I  | ind support o<br>resort and is<br>Individual offi  | n benefit<br>very rare, with a   |             |             |  |
|     | The rent increase will a management services, existing homes including to the Housing Revenu  | the developm<br>ng essential fi   | nent and acqu<br>re safety work  | uisition of new<br>ks. The rental  | properties, a income for co   | and the maint<br>ouncil homes  | enance of  |             |             |  |
|     | The rent increase for the increase in revenue to  |   |  |  |   |  | t due to the   |             |             |  |
|     | The increase in service will ensure the continu   |   |  |  | a positive im   | pact on those  | tenants as it  |             |             |  |
| Sex | The tables below set o 7% equates to an averatemporary accommodates   | age per week  |  |  |   |  |  | $\boxtimes$ | $\boxtimes$ |  |
|     | Social rent   |   |  |  |   |  |  |             |             |  |

| Sex    | % Known | Current<br>Rent<br>Average | Proposed<br>Rent<br>Average<br>(+7%) | Average<br>Impact £<br>per Week | Distance<br>from Total<br>Average<br>(£) (£9.56) | Distance<br>from Total<br>Average % |
|--------|---------|----------------------------|--------------------------------------|---------------------------------|--|-------------------------------------|
| Female | 66.20%  | 129.48                     | 139.45                               | 9.97                            | 0.41   | 4.29%                               |
| Male   | 33.70%  | 122.32                     | 131.74                               | 9.42                            | -0.14  | -1.48%                              |

There is the greatest impact on households where the main tenant is female, with an increase of 41 pence above the average (+55 pence compared to households where the main tenant is male). This is mainly due to the property size held by each lead tenant gender type as the greatest increase in average rents can be seen in the larger properties. The impact is not considered to be substantial.

#### **Affordable Rent**

| Sex    | % Known | Current<br>Rent<br>Average | Proposed<br>Rent<br>Average<br>(+7.7%) | Average<br>Impact £<br>per Week | Distance<br>from Total<br>Average<br>(£)<br>(£18.36) | Distance<br>from Total<br>Average % |
|--------|---------|----------------------------|--|---------------------------------|--|-------------------------------------|
| Female | 57.80%  | 247.21                     | 266.25                                 | 19.04                           | 0.68   | 0.80%                               |
| Male   | 42.20%  | 242.34                     | 261.00                                 | 18.66                           | 0.30   | -1.10%                              |

There is the greatest impact on households where the main tenant is female, with an increase of 68 pence above the average (+98 pence compared to households where the main tenant is male). This is mainly due to the property size held by each gender type as the greatest increase in average rents can be seen in the larger properties. The impact is not considered to be substantial.

The rent increase will affect all council households and all temporary accommodation households that are currently paying weekly rent below the LHA level; however, it does not have a disproportionately adverse effect on tenants on the grounds of sex/gender. Single women are more likely than men to have dependent children living with them.

The potential longer-term consequences for those who will be negatively impacted include rent arrears and the threat of being made homeless. Barnet Homes, Barnet Council's Arms-Length Management Organisation, will provide support to affected households, including advice and support on benefit entitlement, training, and employment. Eviction is only undertaken as a last resort and is very rare, with a range of preventative measures deployed to increase tenancy sustainment.

The rent increase will also directly benefit all council tenants as all rental income is used to fund housing management services, the development and acquisition of new properties, and the maintenance of

|                    | existing homes including essential fire safety works. The rental income for council homes is 'ring-fenced' to the Housing Revenue Account, ensuring that it is used for no other purpose.  The rent increase for those living in temporary accommodation will have a positive impact due to the increase in revenue to fund temporary accommodation and homelessness services.  The increase in service charges for social rent tenants will have a positive impact on those tenants as it will ensure the continued supply of these services. |  |  |
|--------------------|--|--|--|
| Sexual Orientation | Due to the high number of households with unknown data about sexual orientation, there is insufficient data to identify any firm conclusions about impact on this protected characteristic.  |  |  |

# 5. Other key groups Are there any other vulnerable groups that might be affected by the proposal? These could include carers, people in receipt of care, lone parents, people with low incomes or unemployed Negative impact Dead 15 of 15 of

| The table below provides detail on the number of properties charged a social rent that are affected by the proposed rent increase of 7.7%, and the average weekly rent increases. |
|---|
|---|

|       | Social Rents 2022/23 with proposed increase at 7.0% |   |  |                               |  |  |  |  |  |  |
|-------|---|---|--|-------------------------------|--|--|--|--|--|--|
| Size  | Number of units                                     | Current<br>average weekly<br>social rents | Proposed average<br>weekly rent (7.7%<br>increase) | Average<br>weekly<br>increase |  |  |  |  |  |  |
| 0 bed | 180   | £92.99                                    | £100.15  | £7.16                         |  |  |  |  |  |  |
| 1 bed | 2,329   | £110.20                                   | £118.69  | £8.49                         |  |  |  |  |  |  |
| 2 bed | 3,427   | £125.68                                   | £135.36  | £9.68                         |  |  |  |  |  |  |
| 3 bed | 2,524   | £143.60                                   | £154.66  | £11.06                        |  |  |  |  |  |  |
| 4 bed | 233   | £158.77                                   | £171.00  | £12.23                        |  |  |  |  |  |  |
| 5 bed | 15  | £180.30                                   | £194.18  | £13.88                        |  |  |  |  |  |  |
| 6 bed | 4   | £189.26                                   | £203.83  | £14.57                        |  |  |  |  |  |  |

The table below provides detail on the number of properties charged an Affordable Rent that are affected by the proposed rent increase of 7.7%, and the average weekly rent increases.

|       | Affordable Rents 2022/23 with proposed increase at 7.0% |   |  |                               |  |  |  |  |  |  |
|-------|---|---|--|-------------------------------|--|--|--|--|--|--|
| Size  | Number<br>of units                                      | Current<br>average weekly<br>social rents | Proposed average<br>weekly rent (7.7%<br>increase) | Average<br>weekly<br>increase |  |  |  |  |  |  |
| 1 bed | 83  | £194.93                                   | £209.94  | £15.01                        |  |  |  |  |  |  |
| 2 bed | 76  | £253.14                                   | £272.63  | £19.49                        |  |  |  |  |  |  |

| 3 bed | 67 | £298.50 | £321.48 | £22.98 |  |
|-------|----|---------|---------|--------|--|
|       |    |         |         |        |  |

The table below provides detail on the number of households (council tenants) affected by an increase in service charges across all tenures:

| Service Charge                      | Number of households (council tenant occupiers) affected |
|-------------------------------------|--|
| Alarm Services                      | 688  |
| Caretaking quarterly                | 167  |
| Caretaking weekly                   | 3,614  |
| Digital TV                          | 2,513  |
| Door Entry Systems                  | 458  |
| Enhanced Housing Management Support | 351  |
| Grounds Maintenance                 | 4,720  |
| Heating and Hot water               | 4,720  |
| Lighting                            | 4,522  |
| Sprinkler system / fire safety      | 67   |

The rent increase will also directly benefit all council tenants as all rental income is used to fund housing management services, the development and acquisition of new properties, and the maintenance of existing homes including essential fire safety works. The rental income for council homes is 'ring-fenced' to the Housing Revenue Account, ensuring that it is used for no other purpose.

The rent increase for those living in temporary accommodation will have a positive impact due to the increase in revenue to fund temporary accommodation and homelessness services.

The increase in service charges for social rent tenants will have a positive impact on those tenants as it will ensure the continued supply of these services.

|    |        |          |      | . วก |
|----|--------|----------|------|------|
| h  | Cumu   | lative i | ımna | CTZU |
| U. | Culliu | Ialive   |      |      |
|    |        |          |      |      |

No

Considering what else is happening within the council and Barnet could your proposal contribute to a cumulative impact on groups with protected characteristics?

X

Yes

If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below

It is inevitable that all tenants irrespective of tenure will be affected by these proposed rent increases, but it is not envisaged any tenant with a protected characteristic will be unduly affected as a result of having that protected characteristic. The rent increase proposals come at a time when UK households are broadly affected by an anticipated squeeze on incomes, including higher food costs with prices for food and non-alcoholic beverages rising significantly over the year to September 2023, energy price increases of 54% in April 2022, 27% in October 2022, and a further 20% in April 2023, and fuel costs set to increase by 23% from March 2023. All of these impacts are likely to more greatly affect households that are already experiencing socio-economic disadvantage.

However, the proposed rent increases will also have a positive impact upon the households affected due to the rental income to the HRA funding the provision of housing services and ensuring the delivery of fire safety works and property maintenance works, in addition to the development and acquisition of more affordable housing within the borough, and due to the rental income to the General Fund ensuring the provision of temporary accommodation and homelessness services. Without an increase in revenue, it will not be possible to deliver essential safety works or environmental sustainability improvements.

Barnet Homes, the council's Arms-Length Management Organisation, recognises the potential impact and the risk that increasing the service charges will make it more difficult for tenants to pay and impact adversely on the HRA Business Plan by making service charge collection more difficult. This is considered to be a low risk as for most tenants, Housing Benefit or Universal Credit will continue to cover the costs, including the costs relating to grounds maintenance.

There is also a risk that increasing rental charges will make it more difficult for tenants to pay and impact adversely on the HRA Business Plan by making rent collection more difficult and increasing rent arrears. Of all council tenants, 69.8% are currently in receipt of either full or partial Housing Benefit or the housing element of Universal Credit, and of all clients living in temporary accommodation, 81.6% are currently in receipt of either full or partial Housing Benefit or the housing element of Universal Credit; and as such we do not expect the majority of individuals to be directly affected by any increase to the rental charge.

Barnet Homes will work with all tenants who may suffer financial hardship during the course of their tenancy at the earliest opportunity to mitigate the risk to both the individual and the council. We will ensure the appropriate advice and support is given, and work with key partners within the borough to support them and avoid them getting into rent arrears or financial difficulty. For those affected, Barnet Homes provides services to manage the range of demands from council tenants and temporary accommodation clients, including income maximisation and tenancy sustainment. A range of operational mitigations are in place regarding the risk to rent collection, including those indicated in table 7 of this EIA.

## 7. Actions to mitigate or remove negative impact

Only complete this section if your proposals may have a negative impact on groups with protected characteristics. These need to be included in the relevant service plan for mainstreaming and performance management purposes.

| Group affected  | Potential negative impact  | Mitigation measures <sup>21</sup> If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.  | Monitoring <sup>22</sup> How will you assess whether these measures are successfully mitigating the impact?   | Deadline<br>date | Lead Officer  |
|---|--|--|---|------------------|---|
| All (with some over-<br>representation as<br>indicated regarding<br>age, disability, race,<br>religion and belief,<br>and gender) | Although rental charges are applied to properties and not people there is a risk that increasing the rents and service charges will make it more difficult for tenants to pay. | For those affected, Barnet Homes provides services to manage the range of demands from council tenants and temporary accommodation clients, including income maximisation and tenancy sustainment. A range of operational mitigations are in place regarding the risk to rent collection, including: | Barnet Homes' Income officers using specialist monitoring systems will monitor customer accounts to identify any customers getting into arrears at the earliest opportunity.  We will work with our business intelligence team to identify any trends in specific demographics. | Ongoing          | Greg Terefenko,<br>Head of<br>Housing<br>Management<br>(Barnet Homes) |

This is considered to be a low risk as for most tenants, Housing Benefit or Universal Credit will continue to cover the costs, including the costs relating to grounds maintenance.

The potential longer-term consequences for those who will be negatively impacted include rent arrears and the threat of being made homeless.

- Raising tenant awareness of their benefit entitlement and supporting them to receive the maximum financial support available depending on their individual circumstances, including accessing as appropriate Discretionary Housing Payments, Council Tax support, Council Tax discretionary relief, Council Tax severe mental impairment exemption, Resident Support Fund, the Mayor's Benevolent Fund, DWP Universal Credit direct housing payments, and DWP Budgeting Loan;
- Referring tenants in need of further assistance to in-house support services where appropriate, including specialist welfare benefit advisors who can help signpost tenants and help them to maximise their benefits;
- Income Collection Service trained on supporting people with financial difficulties, including training from the Credit Union which officers may promote to tenants;
- Early intervention work in partnership with the Department of Work and Pensions to support tenants at risk of or in rent arrears;

Should any be identified we will carry out a targeted campaign to support and mitigate any increase in arrears.

We will continue to work with colleagues from across the sector to share best practice and working methods to support our customers.

| <ul> <li>Working in partnership with the</li> </ul>   |  |  |
|---|--|--|
| JobCentre Plus, Barnet and Southgate  |  |  |
| College, and local community  |  |  |
| organisations through the BOOST   |  |  |
| service which assists unemployed  |  |  |
| residents in local areas to find work,  |  |  |
| and provides housing support,   |  |  |
| benefits advice, and training   |  |  |
| opportunities, including support with   |  |  |
| digital inclusion and improving   |  |  |
| tenants' digital capacity;  |  |  |
| Working in partnership with Family  |  |  |
| Services Welfare Benefit Advisers   |  |  |
| where those in difficulty have  |  |  |
| children;   |  |  |
| Provision of floating support services  |  |  |
| to provide practical assistance and   |  |  |
| support to help people maintain their   |  |  |
| homes and their independence;   |  |  |
| Allocation of foodbank vouchers;  |  |  |
| • Access to The Barnet Group's £40k   |  |  |
| Innovation Fund, which is available to  |  |  |
| staff to promote innovative solutions   |  |  |
| •   |  |  |
| securing investment in training   |  |  |
| webinars and financial  |  |  |
| inclusion/awareness for residents to  |  |  |
|   |  |  |
| financial difficulty;   |  |  |
| digital inclusion and improving tenants' digital capacity;  • Working in partnership with Family Services Welfare Benefit Advisers where those in difficulty have children;  • Provision of floating support services to provide practical assistance and support to help people maintain their homes and their independence;  • Allocation of foodbank vouchers;  • Access to The Barnet Group's £40k Innovation Fund, which is available to staff to promote innovative solutions and projects. Successful bids include securing investment in training webinars and financial inclusion/awareness for residents to help those who are experiencing |  |  |

- Advice on and incentives to encourage downsizing to a smaller property, where this is possible;
- Social value investment from Barnet
   Homes' contractors to help fund
   projects and activities that will benefit
   communities and residents who are in
   need; and
- Implementation of a Sustainable Tenancies Strategy to target early intervention and support for those in most need and maximise income collection.

Barnet has also been allocated £80k in Homelessness Prevention Grant to be spent on preventing private tenants from becoming homeless and £80k from the Household Support Fund which may be used to support households, for example, through small grants to meet daily needs such as food, clothing, and utilities; whilst this funding currently must be spent by March 2023, it will assist those currently under financial pressure to sustain their tenancies and is likely to have a sustained impact on household finances into 2022/23.

There will also be robust communications regarding the rent increase and service charge increase, including informing all tenants in February 2022 including what they need to pay, providing tenants with an explanation of the rent increase and targeted offers of support as required, and informing frontline staff of the increases in order to manage enquiries. Additional support is available from the council in response to the cost of living crisis, which tenants may benefit from, including: • £240k Community Innovation Fund for voluntary and community projects; • Warm Spaces Scheme; • Signposting to food banks; • Signposting to support services and charities; • Free 12-month fibre broadband offer; • Signposting to government schemes including the Energy Bills Support Scheme, Cold Weather Payments, Winter Fuel Payments, social tariffs, and Cost of Living Payments.

| 8. Outcome of the Equalities Impact Assessment (EqIA) 23 Please select one of the following four outcomes  |
|--|
| Proceed with no changes The EqIA has not identified any potential for a disproportionate impact and all opportunities to advance equality of opportunity are being addressed   |
| Proceed with adjustments  Adjustments are required to remove/mitigate negative impacts identified by the assessment  |
| Negative impact but proceed anyway  This EqIA has identified negative impacts that are not possible to mitigate. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below      |
| Do not proceed  This EqIA has identified negative impacts that cannot be mitigated and it is not possible to continue. Outline the reasons for this and the information used to reach this decision in the space below   |
| Reasons for decision   |
| From the perspective of the tenant, the rent and service charge increase will be viewed as having an adverse impact. The Equality Impact Assessment is undertaken from this perspective and has been assessed as not having a disproportionate adverse effect on any specific group. |
| The actual amount of increase will vary across property sizes for all tenures. Larger properties will see a greater increase in £ than smaller properties due to the higher rents.   |

The rent increase is applied to the property in that it has no bearing on the profile of the tenants, age, race, gender, or any other protected characteristic. The rent increase does not target or disproportionately affect any group of people based on the protected characteristics, although some sub-groups will be disproportionately affected due to their prevalence within the population.

The increase will also have more of an impact on households on lower incomes. Tenants on low incomes are able to obtain Housing Benefit (HB) or the Universal Credit (UC) housing element to assist with rent payments. Just under 70% of council tenants are in receipt of HB or the UC housing element, with approximately 28% receiving the full allowance and approximately 13% receiving partial, and a further 29% of tenants receiving UC. Within temporary accommodation, just under 82% of tenants are in receipt of HB (64.5%) or the UC housing element (17.5%).

Barnet Homes will need to ensure that those council tenants and TA tenants who will be affected are given appropriate advice and support to help them avoid rent arrears and financial hardship. Informing tenants well in advance of the rent increase will help them to budget effectively and make informed and independent choices.

Barnet Homes and the council are also in a position to assist tenants with identifying additional income sources to help mitigate the impact. This can include welfare benefits advice for income maximisation, applications for discretionary payments and funding, referrals to floating support services and other specialist services, and making tenants aware that they can access independent financial and housing advice. Furthermore, the Housing Options service operates an under-occupation scheme through which social housing tenants with spare bedrooms may receive financial incentives and other assistance when downsizing to a suitably-sized property.

It should be noted that all rent levels will remain well below both market rent and the potential 'Affordable Rent' (which may be set at 80% of market rent) and at or below the Local Housing Allowance (LHA) level for the borough. The LHA is the maximum amount payable through Housing Benefit or the housing element of Universal Credit. In addition, Barnet Homes' in-house Income Collection Service takes a proactive, supportive approach to preventing rent arrears and offering financial inclusion through money advice, referrals for support, and assistance in maximising income (through benefit claims, or advice on management of other debts, for example).

## Sign-off

| 9.Sign off and approval by Head of Service / Strategic lead <sup>24</sup> |           |  |  |
|---|-----------|--|--|
| Name  | Job title |  |  |
| Shaun McLean Group Director of Resources, Barnet Homes                    |           |  |  |

| Tick this box to indicate that you have approved this EqIA | Date of approval: 14/12/22    |  |
|--|-------------------------------|--|
| Tick this box to indicate if EqIA has been published       | Date of next review: Nov 2023 |  |
| Date EqIA was published:                                   |                               |  |
| Embed link to published EqIA:                              |                               |  |

## Footnotes: guidance for completing the EqIA template

<sup>1</sup> The following principles explain what we must do to fulfil our duties under the Equality Act when considering any new policy or change to services. They must all be met or the EqIA (and any decision based on it) may be open to challenge:

- **Knowledge:** everyone working for the council must be aware of our equality duties and apply them appropriately
- Timeliness: the duty applies at the time of considering proposals and before a final decision is taken
- **Real Consideration:** the duty must be an integral and rigorous part of your decision-making and must influence the process.
- **Sufficient Information:** you must assess what information you have and what is needed to give proper consideration.
- **No delegation:** the council is responsible for ensuring that anyone who provides services on our behalf complies with the equality duty.
- **Review:** the equality duty is a continuing duty it continues after proposals are implemented/reviewed.
- Proper Record Keeping: we must keep records of the process and the impacts identified.

## <sup>2</sup> Our duties under the Equality Act 2010

The council has a legal duty under this Act to show that we have identified and considered the impact and potential impact of our activities on all people with 'protected characteristics' (see end notes 9-19 for details of the nine protected characteristics). This applies to policies, services (including commissioned services), and our employees.

We use this template to do this and evidence our consideration. You must give 'due regard' (pay conscious attention) to the need to:

- **Avoid, reduce or minimise negative impact**: if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately.
- Promote equality of opportunity: by
  - Removing or minimising disadvantages suffered by people with a protected characteristic
  - Taking steps to meet the needs of these groups
  - Encouraging people with protected characteristics to participate in public life or any other activity where participation is disproportionately low
  - Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary
- Foster good relations between people who share a protected characteristic and those who don't: e.g. by promoting understanding.

## <sup>3</sup> EqIAs should always be proportionate to:

- The size of the service or scope of the policy/strategy
- The resources involved
- The size of the likely impact e.g. the numbers of people affected and their vulnerability

The greater the potential adverse impact of the proposal on a protected group (e.g. disabled people) and the more vulnerable the group is, the more thorough and demanding the process required by the Act will be. Unless they contain sensitive data – EqIAs are public documents. They are published with Cabinet papers, Panel papers and public consultations. They are available on request.

## <sup>4</sup> When to complete an EqIA:

- When developing a new policy, strategy, or service
- When reviewing an existing service, policy or strategy

- When making changes that will affect front-line services
- When amending budgets which may affect front-line services
- When changing the way services are funded and this may impact the quality of the service and who can access it
- When making a decision that could have a different impact on different groups of people
- When making staff redundant or changing their roles

Wherever possible, build the EqIA into your usual planning and review processes.

### Also consider:

- Is the policy, decision or service likely to be relevant to any people because of their protected characteristics?
- How many people is it likely to affect?
- How significant are its impacts?
- Does it relate to an area where there are known inequalities?
- How vulnerable are the people who will be affected?

If there are potential impacts on people but you decide <u>not</u> to complete an EqIA you should document your reasons why.

<sup>5</sup> Title of EqIA: This should clearly explain what service / policy / strategy / change you are assessing.

<sup>6</sup> **Focus of EqIA:** A member of the public should have a good understanding of the proposals being assessed by the EqIA after reading this section. Please use plain English and write any acronyms in full first time - eg: 'Equality Impact Assessment (EqIA)'

This section should explain what you are assessing:

- What are the main aims or purpose of the proposed change?
- Who implements, carries out or delivers the service or function in the proposal? Please state where this is more than one person or group, and where other organisations deliver it under procurement or partnership arrangements.
- How does it fit with other services?
- Who is affected by the service, or by how it is delivered? Who are the external and internal service-users, groups, or communities?
- What outcomes do you want to achieve, why and for whom? E.g.: what do you want to provide, what changes or improvements, and what should the benefits be?
- What do existing or previous inspections of the service tell you?
- What is the reason <u>for</u> the proposed change (financial, service, legal etc)? The Act requires us to make these clear.

<sup>7</sup> Data & Information: Your EqIA needs to be informed by data. You should consider the following:

- What data is relevant to the impact on protected groups is available? (is there an existing EqIA?, local service data, national data, community data, similar proposal in another local authority).
- What further evidence is needed and how can you get it? (e.g. further research or engagement with the affected groups).
- What do you know from service/local data about needs, access and outcomes? Focus on each characteristic in turn.
- What might any local demographic changes or trends mean for the service or function? Also consider national data if appropriate.
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any group(s)?

Is the service having a positive or negative effect on particular people or groups in the community?

## 8 What have people told you about the service, function, area?

- Use service user feedback, complaints, audits
- Conduct specific consultation or engagement and use the results
- Are there patterns or differences in what people from different groups tell you?
- Remember, you must consult appropriately and in an inclusive way with those likely to be affected to fulfil the equality duty.
- You can read LBB <u>Consultation and Engagement toolkit</u> for full advice or contact the Consultation and Research Manager, <u>rosie.evangelou@barnet.gov.uk</u> for further advise
- <sup>9</sup> **Age**: People of all ages, but consider in particular children and young people, older people and carers, looked after children and young people leaving care. Also consider working age people.
- <sup>10</sup> **Disability**: When looking at disability, consideration should be given to people with different types of impairments: physical (including mobility), learning, aural or sensory (including hearing and vision impairment), visible and non-visible impairment. Consideration should also be given to: people with HIV, people with mental health needs and people with drug and alcohol problems. People with conditions such as diabetes and cancer and some other health conditions also have protection under the Equality Act 2010.
- <sup>11</sup> **Gender Reassignment:** In the Act, a transgender person is someone who proposes to, starts or has completed a process to change their gender. A person does not need to be under medical supervision to be protected. Consider transgender people, transsexual people and transvestites.
- <sup>12</sup> Marriage and Civil Partnership: consider married people and civil partners.
- <sup>13</sup> **Pregnancy and Maternity:** When looking at pregnancy and maternity, give consideration to pregnant women, breastfeeding mothers, part-time workers, women with caring responsibilities, women who are lone parents and parents on low incomes, women on maternity leave and 'keeping in touch' days.
- <sup>14</sup> **Race/Ethnicity:** Apart from the common ethnic groups, consideration should also be given to Traveller communities, people of other nationalities outside Britain who reside here, refugees and asylum seekers and speakers of other languages.
- <sup>15</sup> **Religion and Belief:** Religion includes any religion with a clear structure and belief system. As a minimum you should consider the most common religious groups (Christian, Muslim, Hindu, Jews, Sikh, Buddhist) and people with no religion or philosophical beliefs.
- <sup>16</sup> **Sex/Gender:** Consider girls and women, boys and men, married people, civil partners, part-time workers, carers (both of children with disabilities and older cares), parents (mothers and fathers), in particular lone parents and parents on low incomes.
- <sup>17</sup> **Sexual Orientation:** The Act protects bisexual, heterosexual, gay and lesbian people.
- <sup>18</sup> Other relevant groups: You should consider the impact on our service users in other related areas.
- <sup>19</sup> **Impact:** Your EqIA must consider fully and properly actual and potential impacts against each protected characteristic:
- The equality duty does not stop changes, but means we must fully consider and address the anticipated impacts on people.
- Be accurate and transparent, but also realistic: don't exaggerate speculative risks and negative impacts.

- Be detailed and specific where you can so decision-makers have a concrete sense of potential effects.
- Questions to ask when assessing whether and how the proposals impact on service users, staff and the wider community:
- Are one or more protected groups affected differently and/or disadvantaged? How, and to what extent?
- Is there evidence of higher/lower uptake of a service among different groups? Which, and to what extent?
- Does the project relate to an area with known inequalities (where national evidence or previous research is available)?
- If there are likely to be different impacts on different groups, is that consistent with the overall objective?
- If there is negative differential impact, how can you minimise that while taking into account your overall aims?
- Do the effects amount to unlawful discrimination? If so the plan must be modified.
- Does it relate to an area where equality objectives have been set by LBB in our <u>Barnet 2024 Plan</u> and our <u>Strategic Equality Objective</u>?

## <sup>20</sup> Cumulative Impact

You will need to look at whether a single decision or series of decisions might have a greater negative impact on a specific group and at ways in which negative impacts across the council might be minimised or avoided.

## <sup>21</sup> Mitigating actions

- Consider mitigating actions that specifically address the impacts you've identified and show how they will remove, reduce or avoid any negative impacts
- Explain clearly what any mitigating measures are, and the extent to which you think they will reduce or remove the adverse effect
- Will you need to communicate or provide services in different ways for different groups in order to create a 'level playing field'?
- State how you can maximise any positive impacts or advance equality of opportunity.
- If you do not have sufficient equality information, state how you can fill the gaps.

#### <sup>23</sup> Outcome:

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Also explain what positive impacts will result from the actions and how you can make the most of these.
- Make it clear if a change is needed to the proposal itself. Is further engagement, research or monitoring needed?
- Make it clear if, as a result of the analysis, the policy/proposal should be stopped.

<sup>&</sup>lt;sup>22</sup> **Monitoring:** The Equality Duty is an ongoing duty: policies must be kept under review, continuing to give 'due regard' to the duty. If an assessment of a broad proposal leads to more specific proposals, then further monitoring, equality assessment, and consultation are needed.

<sup>&</sup>lt;sup>24</sup> **Sign off:** Your will need to ensure the EqIA is signed off by your Head of Service, agree whether the EqIA will be published, and agree when the next review date for the EqIA will be.