

PART B – Equality Analysis Form

As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality and diversity.

This form:

- Can be used to prompt discussions, ensure that due regard has been given and remove or minimise disadvantage for an individual or group with a protected characteristic
- Involves looking at what steps can be taken to advance and maximise equality as well as eliminate discrimination and negative consequences
- Should be completed before decisions are made, this will remove the need for remedial actions.

Note – An Initial Equality Screening Assessment (Part A) should be completed prior to this form.

When completing this form consider the Equality Act 2010 protected characteristics Age, Disability, Sex, Gender Reassignment, Race, Religion or Belief, Sexual Orientation, Civil Partnerships and Marriage, Pregnancy and Maternity and other socio-economic groups e.g. parents, single parents and guardians, carers, looked after children, unemployed and people on low incomes, ex-offenders, victims of domestic violence, homeless people etc. – see page 11 of Equality Screening and Analysis Guidance.

1. Title	
Equality Analysis title: Housing Revenue Account Rents and Services Charges Report 2023-24	
Date of Equality Analysis (EA): 21 December 2022	
Directorate: Finance & Customer Services	Service area: Finance Business Partnering – Adult Care, Housing and Public Health
Lead Manager: Kathleen Andrews	Contact number: Extn 55987
Is this a: <input checked="" type="checkbox"/> Strategy / Policy <input type="checkbox"/> Service / Function <input type="checkbox"/> Other If other, please specify	

2. Names of those involved in the Equality Analysis (Should include minimum of three people) - see page 7 of Equality Screening and Analysis Guidance		
Name	Organisation	Role (e.g. service user, managers, service specialist)
Kathleen Andrews	RMBC	Manager
Paul Elliott	RMBC	Manager
Gioia Morrison	RMBC	Manager

3. What is already known? - see page 10 of Equality Screening and Analysis Guidance

Aim/Scope (who the Policy/Service affects and intended outcomes if known)
 This may include a group/s identified by a protected characteristic, others groups or stakeholder/s e.g. service users, employees, partners, members, suppliers etc.)

Section 23 of The Welfare Reform and Work Act 2016 implemented the Government’s policy on social housing rents which requires providers of social housing to reduce rents by 1% per year for four years with effect from April 2016 to March 2020. The policy applied to all registered providers of social housing including local authority landlords, who have a statutory obligation to implement the policy.

This has now been replaced by the Ministry of Housing, Communities & Local Government (MHCLG) – Policy Statement on rents for social housing (February 2019) allowing Councils to increase rents by Consumer Price Index (CPI) (as at September) plus 1% from April 2020 and in respect of shared ownership properties increase rents by Retail Price Index (RPI) (as at September) plus 0.5%.

The latest Government policy implements a 7% cap on increases on rents for social housing from April 2024 for one year.

The report also considers the non-dwelling rent charges for garages, garage plot sites, cooking gas and communal facilities including laundry services where provided recommending an increase of 6% in line with the proposed increase in fees and charges across the Council. Also included are proposals to increase District Heating charges in 2023/24 and the draft Housing Revenue Account (HRA) budget for 2023/24.

The report recommends the following proposals: -

1. That dwelling rents are increased by 7% in 2023/24 (Option 1) in line with the latest Government policy on rents for social housing which caps rent increases to 7% for 2023/24.
2. That shared ownership rents are increased by 7% in 2022/23 (Option 1) as per the increase on council dwelling rents.

3. That there is a 6% increase in charges for garages and parking spaces, communal facilities, cooking gas and use of laundry facilities, in line with the Council's policy on fees and charges.
4. The unit charge per Kwh is increased by 186.43% and weekly prepayment charges are increase by 44% to 150% depending on property size for District Heating Schemes in 2023/24 (Option 1).
5. Approve the draft Housing Revenue Account budget for 2023/24.
6. That the Council retain the policy of realigning rents on properties at below formula rent, to the formula rent level when the property is re-let.

What equality information is available? (Include any engagement undertaken)

The Council currently owns circa 20,000 homes, 544 leasehold homes and 3,375 garages with a turnover from rents and other sources approaching £89m per annum (excluding the sale of new properties). This includes approx. 1260 properties in the council's district heating scheme.

The Census population of Rotherham in 2021 is 265,800, an increase of 8,200 (+3.2%) compared with the 2011 Census, with around half living in and around the main urban area of Rotherham. The remainder live in smaller towns such as Wath, Dinnington and Maltby, and in numerous large villages and rural communities, all of which have their own distinct identities

The 2021 Census further shows that Rotherham had 113,900 households, compared with 108,300 in the 2011 Census, an increase of 5,600 or 5.2%. In 2021, 17.7% of Rotherham's population were under 15 years, whilst 25.8% were aged 60 or over. The population of Rotherham aged 60 or over is slightly higher than the England figure of 24.2% and the Yorkshire and Humber figure of 25%.

Rotherham's young population (under 15) increased from 46,000 in 2011 to 47,100 in 2021 (a 2.4% increase). This increase followed a 6% fall from 48,900 in 2001 to 46,000 in 2011. Whilst the school age population has increased, the number of children aged 0-4 has decreased from 15,738 in 2011 to 14,600 (a 7.3% reduction) which reflects the impact that the pandemic has had on the birth rate.

Rotherham's older population (over 60) has increased from 61,500 in 2011 to 68,600 in the 2021 Census, an 11.5% rise (51,700 in 2001). Rotherham's population is ageing broadly in line with national trends and the percentage aged over 85 increased from 2.1% in 2011 to 2.3% in 2021.

120,600 Rotherham residents are in employment whilst 106,000 people have workplaces in the Borough, giving a net outflow of 14,700 workers. One in five workers who live in Rotherham are employed in Sheffield and another one in five work elsewhere outside Rotherham.

45,259 children attend 117 Rotherham schools.

Rotherham has a similar age profile to the national average and in common with the national trends, the population is ageing. Central Rotherham has a younger population than average whilst the more suburban and rural areas, mainly in the south of the borough, have older age profiles.

Rotherham's Black and minority ethnic (BME) population was 8.1% in 2011 and is now estimated at around 11%. The central area of Rotherham is far more ethnically diverse than the rest of the Borough. The largest minority ethnic group is Pakistani & Kashmiri (4% of the population), followed by the Slovak & Czech Roma (1.5% of the population). Rotherham also has smaller Black African, Indian, Chinese, Irish and Arab communities, all with between 500 and 2,000 people.

The 2011 Census showed that 56,588 (22%) of Rotherham's population had a long term health problem or disability and 11.3% said their day-to-day activities were limited a lot by long term conditions (8.3% nationally). In November 2016, 30,306 Rotherham residents (11.6%) claimed Disability Living Allowance (16,680), Personal Independence Payment (6,100) or Attendance Allowance (7,516).

One in six homes is rented from the council and although house prices have risen over the years, they are about half the national average.

Rotherham Borough has 63 councillors representing 21 wards. 43% of councillors are women and 5% are BME.

There are 30 parish councils in Rotherham covering half the population.

Most neighbourhoods in Rotherham offer a good living environment and 78% of adults are satisfied with their local area as a place to live.

Despite improvements overall, some areas of Rotherham are affected by high economic and social deprivation. Rotherham is the 52nd most deprived district in England according to the Index of Multiple Deprivation 2015, which showed 19.5% of residents living in the 10% most deprived areas nationally.

Central Rotherham forms the main area of high deprivation although there are also pockets in Maltby, Rawmarsh, Dinnington, Thurgroft, Wath, Swinton and Aston. The main forms of deprivation affecting Rotherham are low levels of qualification, poor health, high rates of disability and high worklessness, notably long term sickness.

Adult qualification levels in Rotherham are below average, including the proportion of the population with higher qualifications which reflects Rotherham's industrial legacy. However, most pupils attending Rotherham's schools have attainment slightly above the national average. Rotherham colleges provide good quality further education and the new University Centre offer higher education courses

The Housing Service undertook a survey of tenants' views in 2019, referred to as the Star (Standard Tenant Assessment Response) Survey which supports how resources are

targeted and allows the Council to benchmark satisfaction with other social housing providers. The most recent survey found:

- 80% of tenants are satisfied with the overall service provided
- 80% of tenants are satisfied with the quality of their home
- 78% of tenants believe their rent provides value for money
- 48% of tenants were satisfied that their views were listened to and acted upon
- Satisfaction with grounds maintenance and estate services were varied across the borough

The HRA budget which feeds into the HRA Business Plan responds to the above concerns by continuing to invest in Tenant Involvement Services and capacity in the housing management teams.

The housing development programme is underpinned by analysis of housing need and demographic data which has been gained from a variety of sources including:

- Profile of applicants on Council's Housing Register (numbers of households eligible for age restricted accommodation etc). The Housing Occupational Health Team assesses households to determine their need which leads to a priority of allocation under the Housing Allocations Policy. A regular review of the profile of people on the housing register takes place to help plan for the types of new homes needed.
- Local population demographic data (Census 2021 emerging)
- Indices of Multiple Deprivation
- Profile of existing Council tenants (including protected characteristics)
- Strategic Housing Market Assessment
- Intelligence from Strategic Housing Forum which is attended by partners that represent different interests and groups eg, homelessness and young people etc
- Ward members will receive specific briefings on potential sites in their wards and their feedback will be considered and included in individual scheme EAs
- Ward profiles contain detailed, localised information both profiling housing stock in the ward and demand
- The Strategic Housing and Development service has worked with the Neighbourhood Service to assist with consultation and dissemination of information about development in localities, identifying alignment with ward priorities. Again, any feedback will be included in individual scheme EAs.
- Housing Involvement Panel which includes Council tenant volunteers.
- Data from new rented, shared ownership and open market sales is analysed to understand the equality impact of each development. The profiling of tenants/ owners is also reflected in completions report and any lessons learnt are applied when developing new projects.

Where possible the development programme will focus on increasing a specific housing type so homes can meet identified local housing needs. This is often where a particular group of people have been disadvantaged by the local housing market ie, they cannot afford, or do not have choice in where/how they live. The programme aims to make housing accessible to all regardless of their income and need. This includes taking a role in increasing the supply to meet local need, as well as enabling and encouraging other stakeholders to increase supply across the private market.

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<p>The Housing Rents report complies with Government policy on social housing to increase rents within the Government cap from April 2023. The implementation will be monitored as part of monthly budget monitoring and the collection of rent income from Council tenants; this will include any rent arrears.</p> <p>Members have been consulted on the proposals for housing rents as part of the review of the HRA Business Plan.</p>	
<p>Are there any gaps in the information that you are aware of?</p> <p>No data is collected in respect of gender reassignment and religion and belief protected characteristics.</p>	
<p>What monitoring arrangements have you made to monitor the impact of the policy or service on communities/groups according to their protected characteristics?</p> <p>The allocation of Council properties is monitored by protected characteristics and rent arrears are monitored by age, gender and disability.</p>	
<p>Engagement undertaken with customers. (date and group(s) consulted and key findings)</p>	<p>The Housing involvement Panel is consulted on all HRA service proposals the last meeting was held on 30 November 2022 (Housing Involvement Panel).</p>
<p>Engagement undertaken with staff (date and group(s) consulted and key findings)</p>	<p>Meetings with M3 managers and emails seeking feedback into the rents, charges and HRA Budget throughout August to November 2022.</p> <p>The proposals have been developed with support from Council Officers and input from the Strategic Leadership Team and Members.</p> <p>Engagement has been undertaken with Members and managers within Housing Services in respect of formulating the recommendations within this report.</p>

4. The Analysis - of the actual or likely effect of the Policy or Service (Identify by protected characteristics)

How does the Policy/Service meet the needs of different communities and groups? (Protected characteristics of Age, Disability, Sex, Gender Reassignment, Race, Religion or Belief, Sexual Orientation, Civil Partnerships and Marriage, Pregnancy and Maternity) - see glossary on page 14 of the Equality Screening and Analysis Guidance)

Included within the HRA budget there is increasing investment in Tenant Involvement Services and increasing capacity in the housing management teams to deal with issues of Anti- Social Behaviour, financial inclusion and engaging with under-represented groups through increasing staffing numbers.

The HRA Budget supports the Housing Business plan responds to the needs of communities for affordable housing through identifying funding towards building new properties of different tenure, size and type of accommodation (including Disabled person units) which has been informed by the Strategic Housing Market assessment.

Within the draft HRA budget for 2023/24 there is a contribution to the Housing Capital Programme of £1.929m towards investment in increasing and maintaining existing housing stock.

Does your Policy/Service present any problems or barriers to communities or Groups?

The proposed rent increase of 7% may affect low income groups in or out of work as both pay and benefits have increased at or below CPI inflation.

Does the Service/Policy provide any positive impact/s including improvements or remove barriers?

Vulnerable people are offered and provided with tenancy support which is tailored to individual needs to help them sustain their tenancy and live in the community.

A key priority is the ongoing work mitigating the impact of welfare reform and general financial pressures tenants face. The Council is committed to minimising any effects of welfare reform on tenants and to do this through continuing early intervention and arrears prevention.

Our efforts will continue to be in supporting tenants to continue to pay their rent; by offering additional support to vulnerable tenants to help with money, benefits and debt advice. Support available in Rotherham includes:

- RMBC Tenancy Support Service – provides practical support on all tenancy related issues including debt and budgeting. The team have access to funds to support people in crisis i.e. no gas/electric. Tenants must be actively working with the team to receive financial benefit
- Age UK Age Related Benefit Advisory Service – provide support and guidance to residents age 65 and over to claim all age related benefits to maximise income. They all provide holistic support in other areas of concern i.e. fuel poverty/home insulation etc
- RMBC DHP Fund- residents with rent arrears can apply to the RMBC Discretionary Housing Payment Fund for assistance to clear or reduce their debt subject to criteria

- ESF/RMBC Pathways and Inspire Employment Projects – provide support and assistance to people looking to access training and employment in order to better their financial situation. The team also have access to funding to help people in crisis i.e. no food/heating. Participants must be actively working with the team to receive financial benefit
- RMBC Household Support Fund – will be used to support vulnerable people through help with energy costs with a grant of £400 to those with a disposable income of less than £150 per month.
- RMBC Advocacy and Appeals Team – providing people with practical support to maximise their income by claiming any benefits they are entitled too. The Team can assist with application and also with mandatory reconsideration and appeals/tribunals.
- Foodbanks – provided through Liberty Church, the Trussell Trust and Rotherham Foodbank. Vulnerable tenants can be supported through the provision of free food parcels in times of crisis. Referrals have historically been made through the RMBC Community Hub
- Social Supermarket – Rotherham Minster and VAR supporting residents through the provision of a social supermarket that allows members to pay £3 a week for a maximum of 3 months to allow them to shop in their store. This service transitions people from foodbank dependency and promotes empowerment through teaching budgeting skills
- Rotherfed ‘Making your money go further’ project – This project works with communities to deliver bespoke advice on how tenants and residents can save money and survive on a limited income.
- Citizens Advice Rotherham – providing advice and guidance to all residents on money management and debt solutions enabling clients to resolve the cycle of debt.

The increase in funding identified within the Business Plan, supported by the HRA budget, to increase the supply of new council properties will assist vulnerable groups on the council house register, including reducing the number of temporary accommodation and increasing the support for accommodation for the disabled.

What affect will the Policy/Service have on community relations? (may also need to consider activity which may be perceived as benefiting one group at the expense of another)

It is not envisaged that the HRA Rents and Services Charges report will have any negative impact on community relations.

Please list any **actions and targets** that need to be taken as a consequence of this assessment on the action plan below and ensure that they are added into your

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service plan for monitoring purposes – see page 12 of the Equality Screening and Analysis Guidance.

5. Summary of findings and Equality Analysis Action Plan

If the analysis is done at the right time, i.e. early before decisions are made, changes should be built in before the policy or change is signed off. This will remove the need for remedial actions. Where this is achieved, the only action required will be to monitor the impact of the policy/service/change on communities or groups according to their protected characteristic - See page 11 of the Equality Screening and Analysis guidance

Title of analysis: Housing Revenue Account Rents and Services Charges Report 2023-24
Directorate and service area: Finance and Customer Services – Finance Business Partnering (Adult Care, Housing and Public Health)
Lead Manager: Kathleen Andrews
Summary of findings:
The proposed increase in Council Rents and Services Charges may impact on tenants on low income not receiving housing benefit or Universal Credit towards their housing rent. Vulnerable people are offered and provided with tenancy support which is tailored to individual needs to help them sustain their tenancy and live in the community.

Action/Target	State Protected Characteristics as listed below	Target date (MM/YY)
Monitor the demographics of tenants in rent arrears on a bi-annual basis	A,D,S,GR,RE,SO,RoB	03/2024
Monitor the impact of the 7% rent increase, 6% increase in service charges and impact of the increase in District Heating (including fluctuating energy prices) on the HRA budget	A,D,S,GR,RE,SO,RoB	03/2024

***A = Age, D= Disability, S = Sex, GR Gender Reassignment, RE= Race/ Ethnicity, RoB= Religion or Belief, SO= Sexual Orientation, PM= Pregnancy/Maternity, CPM = Civil Partnership or Marriage. C= Carers, O= other groups**

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6. Governance, ownership and approval

Please state those that have approved the Equality Analysis. Approval should be obtained by the Director and approval sought from DLT and the relevant Cabinet Member.

Name	Job title	Date
Paul Walsh	Assistant Director of Housing	
Gioia Morrison	Head of Finance, ACH&PH	

7. Publishing

The Equality Analysis will act as evidence that due regard to equality and diversity has been given.

If this Equality Analysis relates to a **Cabinet, key delegated officer decision, Council, other committee or a significant operational decision** a copy of the completed document should be attached as an appendix and published alongside the relevant report.

A copy should also be sent to equality@rotherham.gov.uk For record keeping purposes it will be kept on file and also published on the Council's Equality and Diversity Internet page.

Date Equality Analysis completed	30/11/2022
Report title and date	Housing Revenue Account Rents and Services Charges Report 2023-24
Date report sent for publication	
Date Equality Analysis sent to Performance, Intelligence and Improvement equality@rotherham.gov.uk	03/01/23