

Appendix 8

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: HRA Business Plan, Rent Setting and Service Charges 2024-25	
Date of Equality Analysis (EA): 13.12.23	
Directorate: ACH & PH	Service area: Housing Services
Lead Manager: Paul Elliott, Head of Housing Income and Support Services	Contact number: 01709 822494
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 (eg service user, managers, service specialist)
Paul Elliott	RMBC	Head of Service
Kath Andrews	RMBC	Finance Manager
Mark Edmondson	RMBC	Housing Income 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.)

The annual HRA Business Plan, Rent setting and service charges report sets out all proposed income and expenditure for the HRA for the next 30 years as required by HRA Self-financing.

Strategic allocation of resources within the HRA for period of 30 years.

Specifically responding to changes in government policy, macro-economic environment and gearing towards housing growth.

HRA Business Plan for 2024-25 provides information on the positioning of the HRA Business Plan as a driver of housing growth to assist in meeting the Council's housing objectives. In essence the overall approach is to make savings where it is feasible to do so these can be invested in future housing growth and to position the housing service so it is best placed to respond to future challenges that arise.

The overall financial strategy for the proposed HRA Business Plan is focused on:

- Supporting more new affordable housing – £126m investment concentrated in 2024-2026 including expected grant income, Right to Buy receipts and commuted sums, subject to Cabinet approval of the Housing Development Programme.
- Ensuring rent-setting policy supports a sustainable Business Plan while taking into account cost of living pressures.
- Keeping tenants safe and well-housed through robust management of landlord compliance duties including damp and mould, maintaining the Decent Homes standard and achieving EPC by 2030.

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 £84m per annum.

Demographic information

- 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.

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, Thurston, 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 HRA Business plan will fund key activities such as the housing development programme. The plan 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.

Members have been consulted on various aspects of the Housing Revenue Account Business Plan. Seminars and Workshops have been held on Housing Growth, Repairs and Maintenance, Cost of Living and Housing Policy updates. This has helped inform the proposed Business Plan.

Are there any gaps in the information that you are aware of?	
Do not collect data on gender reassignment or religion and belief at sign up.	
What monitoring arrangements have you made to monitor the impact of the policy or service on communities/groups according to their protected characteristics?	
Allocation of properties are monitored by protected characteristics. Rent arrears are monitored by protected characteristics Evictions are monitoring by protected characteristics	
Engagement undertaken with customers. (date and group(s) consulted and key findings)	Consultation on services provided by Housing are undertaken throughout the year via the Housing Involvement Panel. This panel meets bi monthly. A tenant open day is also held annually, the last one being held on October 2023.
Engagement undertaken with staff (date and group(s) consulted and key findings)	Meeting with M3 mangers and email seeking feedback into the business plan throughout August to November 2023. The plan has been developed with support from Council Officers and input from the Strategic Leadership Team and Members. Councillors, staff and partners play a vital role in the review of the business plan. Following approval the will be effectively communicated to staff and members and training will be undertaken in-house.

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)

The HRA Business Plan responds to the above concerns by earmarking investment in Supervision and management to increase capacity in the housing management teams to deal with the issue of complex tenancies including ASB, financial inclusion and engaging with under-represented groups.

The Business plan maintains investment in housing stock which ensures investment in properties to install insulation, new heating systems etc. which tackles fuel poverty agenda.

The Business plan responds to the needs of communities for affordable housing through gearing funds towards building circa 1000 new Council Homes by 2026. The tenure, size and type of accommodation (including Disabled person units) has been informed by the Strategic Housing Market assessment.

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

The proposed rent increase of 7.7% may affect low income groups out of work and under 25 as benefits are capped at a lower rate than those above the age of 25. This group will therefore struggle to meet affordability tests for housing.

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. 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
- Inclusive 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 £250 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.
- 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 for new build housing will assist vulnerable groups on the housing register as it will increase the supply of new Council housing so reducing the use of temporary accommodation for such groups when they are homeless. It will also increase the number of Disabled person units so meeting the needs of disabled tenants.

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 Business Plan, rent setting and service charges report will negatively impact on community relations.

The Council will closely monitor the viability of the HRA Business Plan; current measures monitored across the Housing service include:

- Number of homes built against the Council’s 1000 target
- Rental income
- Rent arrears and bad debts
- Voids and void rent loss
- Debt levels and repayment
- Reserve levels, and
- Maintenance backlog

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 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: HRA Business Plan, rent setting and service charges 2024-25

Directorate and service area: ACH & PH – Housing Services

Lead Manager: Paul Elliott, Head of Housing Income and Support Services

Summary of findings:

The HRA Business Plan responds to some of the above concerns by increasing investment in Supervision and management allowing the service to increase capacity in the housing allocations teams to reduce use of temporary accommodation and re-house people quicker. Management teams to deal with issues of ASB, financial inclusion and engaging with under-represented groups.

The Business plan, rent setting and service charges report maintains investment in housing stock which ensures investment in properties to install insulation, new heating systems etc. which tackle the fuel poverty agenda. The Business Plan also continues subsidies of District Heating to minimise fuel poverty to those households on District Heating.

The Business plan responds to the needs of communities for affordable housing through gearing funds towards building circa 500 more new Council homes over the next 3 years (1,000 overall). The tenure, size and type of accommodation (including Disabled person units) has been informed by the Strategic Housing Market assessment.

The proposes rent increase of 7.7% may affect low income groups in or out of work on benefits and under 25 as both benefits for this group are capped at a lower rate than those over 25.

Action/Target	State Protected Characteristics as listed below	Target date (MM/YY)
Collect protected characteristics at tenancy sign up	A,D,S,GR,RE,SO,RoB	31.03.25

*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

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
James Clark	Assistant Director of Housing	13.12.23

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	13.12.23
Report title and date	HRA Business Plan, Rent Setting and Service Charges 2024-25
Date report sent for publication	
Date Equality Analysis sent to Performance, Intelligence and Improvement equality@rotherham.gov.uk	13.12.23