



**EQUALITY RELEVANCE ASSESSMENT TEMPLATE**

<b>1. Policy details</b>	
Policy Title	2010/11 Housing Revenue Account & Rent Levels
Policy Lead Officer	Graham Hope – Director of Customer and Support Services
Date Relevance Assessment Conducted	13 January 2010
<b>2. Discretion?</b>	
YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
<b>3. Which groups of people do you think will be, or potentially can be, impacted upon by the implementation of this policy? (Please ✓ below as appropriate)</b>	
People from black and minority ethnic communities and different racial backgrounds	X
Women and men (boys and girls)	X
People with disabilities	X
Older people, children and young people	X
Lesbian, gay and bisexual people (including transgender people)	X
People of different religions or beliefs	X
<b>4. Do you have evidence or reason to believe that this policy will, or may potentially:</b>	
<b>General Duties</b>	<b>Level of impact (high, medium or low)</b>
Eliminate discrimination faced by particular groups	Low
Impact upon the promotion of equality of opportunity between particular groups	Medium
Impact upon good relations between particular groups	Low
Promote positive attitudes towards different groups	Medium
Increase participation of particular groups in public life	Low
Overall relevance to equality	Medium
<b>5. Equality impact assessment required? (All high and medium policies MUST be impact assessed)</b>	
YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
<b>6. Decision rationale</b>	
<p>The rent levels set by the council for 2010/11 are the results of a joint consultative process with tenants designed to continue to fund the Housing Revenue Account (HRA), a statutory account, separate from the council's General Fund. The result of this consultation was a 4 year rent strategy which set the level of rent increase for 4 consecutive years. All rent collected from tenants' funds the HRA, this is the account that records the income and expenditure in relation to managing, maintaining and repairing the council's housing stock. Any funding for new build properties is also</p>	

funded from the HRA.

Without due regard for the impact of equality, increasing the level of rent charged to WLC tenants may potentially impact disproportionately on vulnerable sections of the community. For these reasons the overall relevance to equality has been deemed to be medium therefore it is appropriate that a full assessment will be carried out to ensure the potential for any discrimination is eliminated.



## EQUALITY IMPACT ASSESSMENT TEMPLATE

<b>1. Policy details</b>	
Policy Title	2010/11 Housing Revenue Account & Rent Levels
Policy Lead Officer	Graham Hope – Director of Customer and Support Services
Others Involved	Ann Gee, David Henderson, Penny Hasling, Tenants Panel, respondent of full tenant consultation exercise, attendees of Tenant Information Day, Sarah Kelly, Liz Calder, Elaine Byrne.
Date Assessment Completed	13 January 2010
<b>2. Results of equality relevance process</b>	
<p>The rent levels set by the council for 2010/11 are the results of a joint consultative process with tenants designed to continue to fund the Housing Revenue Account (HRA), a statutory account, separate from the council's General Fund. The result of this consultation was a 4 year rent strategy which set the level of rent increase for 4 consecutive years. All rent collected from tenants' funds the HRA, this is the account that records the income and expenditure in relation to managing, maintaining and repairing the council's housing stock. Any funding for new build properties is also funded from the HRA.</p> <p>Without due regard for the impact of equality, increasing the level of rent charged to WLC tenants may potentially impact disproportionately on vulnerable sections of the community. For these reasons the overall relevance to equality has been deemed to be medium therefore it is appropriate that a full assessment will be carried out to ensure the potential for any discrimination is eliminated.</p>	
<b>3. Aims of the policy</b>	
<p>The level of rent charged to WLC tenants was set as a result of full consultation with tenants in 2007 on a 4 year rent strategy.</p> <p>The levels were set through examining a number of financial and non-financial factors, also taken into account:</p> <ul style="list-style-type: none"><li>▪ Increased need for more affordable housing in West Lothian</li><li>▪ Continued investment in current stock to meet/surpass Quality Standard</li><li>▪ Achieving Best Value for our tenants</li><li>▪ Continuing to provide a sustainable and satisfactory level of service delivery</li></ul>	

#### 4. What data, research or other evidence has been used to inform this assessment?

The following information, research and data was used to inform this assessment:

- Audit Scotland Report "Scotland's Public Finances - Preparing For The Future" – This report outlines the external financial context in relation to both the draft council budget and the subsequent reprioritisation measures identified across the authority. This was used by the assessment panel to understand the pressures and limitations on the council in relation to financial decision-making on the provision of services.
- The Prudential Framework  
Introduced from 1 April 2004 - Sustainable scope to increase borrowing. Capital finance must be affordable, prudent and sustainable and revenue savings can pay for capital borrowing costs
- Benchmarking Against Scottish Local Authorities & local Registered Social Landlords (RSL's)  
Examples of rent levels within other Scottish local authorities and local RSL's in West Lothian were provided in order to identify the impact of particular measures as appropriate.
- Scottish Government Equality and the Budget Website – This resource was utilised to identify examples of practical measures at a national level in relation to the impact of the budget on equality, in order to enable this at local level as appropriate.
- Modernising & Efficiency Agenda  
This outlines how services plan to make efficiency savings on operational costs. As rent revenue funds some operational costs within the service it was deemed appropriate that this was included as background research on the factors that are subject to a cost increase that would necessitate an increase in rent levels.
- Equality and Human Rights Commission Public Sector Advice Note: The public duties and financial decisions – This advice from the EHRC enables understanding of the context within which the equality impact assessment was taking place and to take on board the legal requirements to conduct the assessment under the existing disability, gender and race equality public sector duties.
- Financial Considerations  
Costs of borrowing (loan charges)                      Planned contributions to capital (CFCR)  
Pay award, inflation, etc.                                      House sales  
Efficiencies
- Non-financial considerations  
Affordable rent strategy                                      Corporate and Community Plan
- Draft budget reprioritisation measures for the Directorate – This was used as contextual information as to the measures being taken across WLC to overcome the difficulties of maintaining current levels of public services and meeting new demands when Scotland's economy is in recession. The Scottish public sector as a whole faces significant issues in balancing budgets and delivering on commitments at a time when there is increased demand for many of the services provided by the public sector and local government in particular. These service specific measures were used by the Financial Management Unit's assessment panel to specifically consider how each identified proposal would likely impact on particular groups within the community, and to assess any mitigating actions or opportunities as required. This involved a separate impact assessment in which Housing & Building Services was involved in. As this affects the service overall revenue it was deemed appropriate to consider the outcome of this assessment when assessing the level rent is set at.
- The outcome of tenant consultation  
This takes into account pay & prices inflation, ongoing repairs and maintenance and the need for capital investment.
- Scottish Housing Quality Standard (SHQS)  
Continued investment in current stock to meet/surpass Quality Standard

## 5. Details of consultation and involvement

Prior to the presenting the various options to tenants the Housing & Building Services management team and the service accountant evaluate the current and predicted economic climate in order that tenants can be provided with a range of realistic options for potential increases. This examines the cost to the service in continuing repairs and maintenance at the current level, future plans for capital works/stock investment/new builds and provides a comparative figure without capital works. Potential for discrimination against any particular group of tenants is discussed and measures to prevent this are identified and developed.

Tenants are consulted extensively in a variety of ways, via a full postal survey, Tenants News, Tenants Information days, Tenants Panel (where tenant reps have a vote) over a number of months.

Members of the front line Housing Services staff and central Housing & Building Services support team with specialist skills such as Assessment & Review, Organisational Development, Tenant Participation and equality are involved in the consultation and highlight any areas they feel will adversely affect any sections of the community. Any input from these methods of consultation is included in this assessment.

Consultation copies of the assessment will be issued to Disability West Lothian Forum for comments as a result of the duty to involve people with disabilities and to add value to the assessment from a disability perspective. They will also be advised of the online comment facility on the website below.

The consultation copy of the assessment will be made available via the council's website on the Housing pages (link indicated below) with instructions on providing comments or feedback on the content of this assessment.

<http://www.westlothian.gov.uk/917/925/EqualityinHousing>

<b>6. Impact of policy on particular groups</b>
<b>6.1. Disability equality</b>
As the rent level increase is across the board, no potential discrimination was identified for those with a disability. Properties with aids and adaptations will not be subject to any more of an increase than properties with no adaptations. The consultations were issued to every tenant in a council property and all events held pertaining to the rent consultation were open and advertised to all tenants in a variety of formats. Some tenant and residents groups do contain members with a disability and their input to the discussions was valued and utilised in the decision making process.
<b>6.2 Race Equality</b>
As the rent level increase is across the board, no potential discrimination was identified for this particular group of tenants.
<b>6.3. Gender equality</b>
As the rent level increase is across the board, no potential discrimination was identified for this particular group of tenants.
<b>6.4. Age equality</b>
There is a low level of possibility for discrimination against any elderly tenants surviving on a low income with no other means of income other than the state pension. Any potential hardship for vulnerable people has been discussed and provision made through service initiatives to support those in a vulnerable financial position. More details are given in 6.8 Cross-Cutting Equality.
<b>6.5. Religion or belief equality</b>
As the rent level increase is across the board, no potential discrimination was identified for this particular group of tenants.
<b>6.6. Sexual orientation equality</b>
As the rent level increase is across the board, no potential discrimination was identified for this particular group of tenants.
<b>6.7. Transgender equality</b>
As the rent level increase is across the board, no potential discrimination was identified for this particular group of tenants.
<b>6.8. Crosscutting equality (multiple discrimination)</b>
<p>In order to eliminate any financial hardship for vulnerable people of low income we have a number of initiatives embedded in our service delivery and support to enable tenants to manage their finances and maximise their income.</p> <ul style="list-style-type: none"> <li>• Benefits Take Up Campaign – high profile promotion to enable tenants to maximise their income through checking their current circumstances and ensuring that they are claiming the correct benefits and are in receipt of what they are entitled to.</li> <li>• Benefit Health Checks – all new tenants and any tenants referred to the Debt Support Team receive the opportunity for this service which ensures our tenants are in receipt of all the benefits they are entitled to.</li> <li>• Housing Support – officers within each housing local housing office to provide advice, support and referrals for tenants in need. This also takes the form of assistance in financial management, referrals to debt support officers and ongoing assistance to enable tenants to be successful in managing and coping with their responsibilities as a tenant. Our local Community Based Housing Officers are able to refer tenants they feel are struggling to the Debt Support Team for advice and Benefit Health Checks.</li> <li>• Rent free weeks – during the Christmas period and March.</li> <li>• Debt Support Team – team offering help and advice on financial issues, debt, benefit and money advice with close links to the Advice Shop for independent advice.</li> </ul>

## **7. Consultation and involvement feedback**

## Tenant Consultation Results

In 2007 tenants were consulted on a *4 year rent strategy*

- postal survey was sent to all tenants for their views
- proposed rent increase framework was discussed and agreed at Tenants Information Day in December 2007

After considering tenants views, the Council agreed a rent increase strategy of:

- 6% in 2008/2009
- 6% in 2009/2010
- 4% in 2010/2011
- 4% in 2011/2012

In the 2009 Annual Tenant Satisfaction Survey, which was carried out in the autumn, 90% 'rate the service for the money they pay' as acceptable/good

## Comparison with other local RSL's rent charge

### *Average Weekly Rent*

	2009/2010
➤ West Lothian Council	£55.47
➤ Almond Housing Association	£59.40
➤ Link Housing Association	£52.45
➤ Horizon Housing Association	£59.65
➤ Weslo Housing Management	£55.97
➤ West Lothian Housing Partnership	£73.88

## What the preferred rent increase is funding:

### *New Build*

- A further 452 new Council Houses

### *Environmental Improvements*

- External Paint Programme
- Rhone Programme
- Garage Refurbishment
- Fencing Works
- Common Stair Areas
- Street Improvement Projects

## Housing Capital Expenditure

2009/10 housing capital budget is £38.180 million made up as follows:

	£ million
➤ Social Housing Quality Standard (SHQS)	10.784
➤ External Upgrading	3.875
➤ Energy Efficiency	2.080
➤ New Build	17.929
➤ Miscellaneous	<u>3.512</u>
	<u>38.180</u>

The support mechanisms, campaigns and increased staff awareness in place for income maximisation, financial advice and assistance will limit any potential for discrimination against vulnerable, low-income tenants.

## **8. Monitoring and review arrangements**

This assessment is stand alone and relates purely to the rent increase for financial year 2010/11.

It should be noted however that consultation and involvement input and feedback as well as assessment findings will be used to support future assessments both on future rent increase measures for 2011/12 and beyond.

## **9. Publication of assessment results**

The summary results of this Equality Impact Assessment will be made available on the council website via:

<http://www.westlothian.gov.uk/917/925/EqualityinHousing>

In addition, the final assessment along with a copy of the final policy/procedure will be provided to all those who took part in the consultation process.

## **10. Recommendations and implementation**

Year on year impact assessments for any future rent level increases.

**Equality impact assessment completed**



## EQUALITY IMPACT ASSESSMENT PUBLISHING SUMMARY

<b>1. Policy details</b>	
Policy Title:	2010/11 Housing Revenue Account & Rent Levels
Policy Lead Officer:	Grahame Hope, Director Customer and Support Services
Telephone No: 01506 281762	E-mail address: <a href="mailto:grahame.hope@westlothian.gov.uk">grahame.hope@westlothian.gov.uk</a>
Others Involved:	Ann Gee, David Henderson, Penny Hasling, Tenants Panel, respondent of full tenant consultation exercise, attendees of Tenant Information Day, Sarah Kelly, Liz Calder, Elaine Byrne.
Date Assessment Completed:	13 January 2010
<b>2. Summary of policy aims</b>	
<p>The level of rent charged to WLC tenants was set as a result of full consultation with tenants in 2007 on a 4 year rent strategy.</p> <p>The levels were set through examining a number of financial and non-financial factors, also taken into account:</p> <ul style="list-style-type: none"><li>▪ Increased need for more affordable housing in West Lothian</li><li>▪ Continued investment in current stock to meet/surpass Quality Standard</li><li>▪ Achieving Best Value for our tenants</li><li>▪ Continuing to provide a sustainable and satisfactory level of service delivery</li></ul>	
<b>3. Key issues and judgements</b>	
<ul style="list-style-type: none"><li>• Only a low possibility of potential discrimination for those vulnerable tenants from low-income household. The research and discussions that form this assessment find that this potential is balanced by the measures provided through the service to help people maximise their income through Benefit Take up Campaigns, professional support, and benefit health checks.</li><li>• As the consultation was conducted in 2007, does the decision taken by tenants on the rent levels set increase any potential for discrimination? This assessment found that as the tenants had a wide range of choices, statistical information and frame of comparison provided by the service they made a realistic and appropriate recommendation that is still adequate and does not discriminate against any particular strands of equality.</li></ul>	
<b>4. Summary of consultation and involvement</b>	
<ul style="list-style-type: none"><li>• Tenants felt that a rent increase at the current level was appropriate to fund continued investment in current stock and to help meet the need for more affordable housing in West Lothian.</li><li>• Over 90% of tenants feel they receive value for money with the level rent is set at.</li></ul>	

- The level of rent charged by WLC compares favourably with that of other local Registered Social Landlords.
- The rent increase will fund a number of capital investment programmes across West Lothian that will significantly increase the quality of current housing stock towards reaching the targets set by the Scottish Housing Quality Standard (SQHS) and the local environment.
- There is a wide range of support mechanisms for tenants in financial difficulty to help vulnerable people cope.

#### **5. Key recommendations**

- Year on year impact assessment of future increase in rent levels.

**For further information or a copy of the full assessment, please contact the above mentioned Lead Officer.**

Assessments are available in alternative formats or languages on request.