# **Thurrock Council**

# **Community Equality Impact Assessment**

# Service area and lead officer

Name of service	Housing
CEIA Lead Officer	Ryan Farmer
CEIA Lead Officer job title	Housing Strategy and Quality Manager
CEIA Lead Officer email address	rfarmer@thurrock.gov.uk

## Subject of this assessment

#### What specific policy, strategy, function or service is the subject of this assessment?

The subject of this assessment is in relation to the Housing Revenue Account (HRA) 30 year business plan, updated for 2024/25. Income raised through tenants' rents and service charges is ring-fenced and cannot be used to fund expenditure outside of the HRA.

#### Borough-wide or location-specific?

 $\boxtimes$  Borough-wide  $\Box$  Location-specific – please state locations below.

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#### Why is this policy, strategy, function or service development or review needed?

Local authorities and registered providers have the ability to increase social and affordable rents in line with the Government's policy statement on Rents for Social Housing.

The proposed changes to rents and service charges are essential to ensure the level of investment identified in the HRA business plan can be fulfilled and the HRA properties are provided to a standard that primarily meets the needs of residents, whilst also delivering the statutory responsibilities of the council.

The Transforming Homes programme, which is intrinsically linked to the stock condition survey has identified the investment required annually across the life of the 30-year HRA Business Plan. Delivery of these works will ensure properties reach and are maintained to the decent homes' standard. Specific capital investment in certain types of dwellings is also needed, namely non-traditional properties. This encompasses internal and external features of residential units (general needs and sheltered) as well as other assets such as communal hallways, parking areas, and garages.

The Housing service is focussed on ensuring that the HRA remains financially sustainable, and that the right priorities are set for capital expenditure to ensure residents have safe and secure accommodation maintained to a good standard of repair.

# 1. Engagement, consultation and supporting information

1.1. What steps you have taken, or do you plan to take, to engage or consult (where applicable) the whole community or specific groups affected by this development or review? **This is a vital step.** 

#### Steps you have taken, or plan to take, to engage or consult

Relevant legislation regarding matters for engagement and consultation specifically exclude the need for consultation with tenants regarding rent levels or service charges.

Section 105 of the Housing Act (1985) states that:

"a landlord authority shall maintain such arrangements as it considers appropriate to enable those of its secure tenants or secure contract-holders who are likely to be substantially affected by a matter of housing management to which this section applies—

(a) to be informed of the authority's proposals in respect of the matter, and

(b) to make their views known to the authority within a specified period;

and the authority shall, before making any decision on the matter, consider any representations made to it in accordance with those arrangements.

(2) For the purposes of this section, a matter is one of housing management if, in the opinion of the landlord authority, it relates to—

(a) the management, maintenance, improvement or demolition of dwelling-houses let by the authority under secure tenancies or secure contracts, or

(b) the provision of services or amenities in connection with such dwelling-houses;

**but not so far as it relates to the rent payable under a secure tenancy** or secure contract or to charges for services or facilities provided by the authority."

In recent years, formal government consultation whereby tenants and tenants' representative bodies were able to take part have been undertaken, and the government has issued instruction to cap the level of housing rent increases which the Housing service is adhering to.

1.2. What data or intelligence sources have you used to inform your assessment of the impact? How have these helped you understand who will be affected by the development or review?

#### Sources of data or intelligence, and how they have been used

The review of rents has identified a proposed rent increase for 2024/25 and the impact on the HRA. In brief, this uses the formula of the September 2023 CPI rate of inflation (6.7 per cent) plus 1 per cent. This equates to a maximum level of increase applicable to a dwelling of 7.7 per cent. This provides the resources to meet the projected increase in cost demands in order maintain the service provision.

# 2. Community and workforce impact

2.1. What impacts will this development or review have on communities, workforce and the health and wellbeing of local residents?

Communities and groups	Positive	Neutral	Negative	Summary of positive and negative impacts	How will positives be maximised, and negatives minimised or eliminated?
Local communities in general				Whilst there may be an additional negative financial implication for some affected residents who are council tenants, these will be balanced through the benefits provided through an appropriately funded housing service which can meet its statutory obligations and continue to invest in the quality of its stock. The wider communities across Thurrock living in non- council owned accommodation would be unaffected by this increase	Robust financial management of the HRA with appropriate transparency of decision making will ensure maximum benefit can be realised from this necessary increase in rental income.
Age				There are no specific disproportionate impacts due to rent increases relating to age, however those at pension age remain under the preexisting	There are no specific disproportionate impacts.

Communities and groups	Positive	Neutral	Negative	Summary of positive and negative impacts	How will positives be maximised, and negatives minimised or eliminated?
				Housing Benefit arrangements and would be unaffected by any further financial implications combined with the 'spare room subsidy'.	
Disability				Tenants which may be receiving disability living allowance may be negatively affected – in 2024/25 benefit rates will increase by 6.7%, below the proposed rental increase of 7.7%	Households which may be at risk of financial difficulty due to this can be offered holistic approach from the housing service, from relevant officers in Tenancy Management, and Rents and Welfare.
Gender reassignment				There are no specific disproportionate impacts.	There are no specific disproportionate impacts.
Marriage and civil partnership				There are no specific disproportionate impacts.	There are no specific disproportionate impacts.
Pregnancy and maternity				Tenants which may be receiving maternity pay/maternity allowance could be negatively affected – in 2024/25 these rates will increase by 6.7%, below the proposed rental increase of 7.7%	Households which may be at risk of financial difficulty due to this can be offered holistic approach from the housing service, from relevant officers in Tenancy Management, and Rents and Welfare.

Communities and groups	Positive	Neutral	Negative	Summary of positive and negative impacts	How will positives be maximised, and negatives minimised or eliminated?
Race				There are no specific disproportionate impacts.	There are no specific disproportionate impacts.
Religion or belief				There are no specific disproportionate impacts.	There are no specific disproportionate impacts.
Sex				There are no specific disproportionate impacts.	There are no specific disproportionate impacts.
Sexual orientation				There are no specific disproportionate impacts.	There are no specific disproportionate impacts.
Location-specific impact, if any				There are areas in Thurrock with higher levels of council-owned accommodation, which would in turn be affected more by an increase in rents.	Households which may be at risk of financial difficulty due to this can be offered holistic approach from the housing service, from relevant officers in Tenancy Management, and Rents and Welfare.
					Tailored work can be undertaken on a locality basis to meet specific needs within neighbourhoods.
Workforce				By applying a rent increase in line with inflation, this will support the continuation of service delivery and mitigate additional pressures which may otherwise	Support will be offered to staff experiencing any negative impacts resulting from the rent increase through peers and line management interaction. Training for lone working, resilience and difficult

Communities and groups	Positive	Neutral	Negative	Summary of positive and negative impacts	How will positives be maximised, and negatives minimised or eliminated?
				have impacted the workforce.	conversations can be made available.
				Tenant satisfaction may be negatively affected by the increase in rent, which could in turn affect workforce morale, exacerbated by the current challenges facing the council.	The employee assistance programme is available for all staff to access for further support outside of the workplace.
Health and wellbeing of residents Please also see: <u>WHIASU_Population_Groups_Checklist.pdf</u> (phwwhocc.co.uk)				There may be examples of economic conditions affecting health due to concerns surrounding income, poverty, and personal and household debt.	Households which may be at risk of financial difficulty due to this can be offered holistic approach from the housing service, from relevant officers in Tenancy Management, and Rents and Welfare.
				There may also be potential impacts on mental health and wellbeing if concerned about feeling financially safe and secure. There may also be positive impacts on social and community influences on health, improvements in	Continued delivery of stock investment programme to maintain quality of stock and the ongoing delivery of necessary support services will maximise the benefit of the rent increase.
				improvements in living and environmental	

Communities and groups	Positive	Neutral	Negative	Summary of positive and negative impacts	How will positives be maximised, and negatives minimised or eliminated?
				conditions affecting health, and access and quality of services.	
Socio-economic outcomes				Some households may experience impact on household finances due to additional pressures following any rent increase. The increase in rent will also contribute to the ongoing delivery of key partnerships and contracts which invest heavily in the local economy, such as repairs and maintenance	Households which may be at risk of financial difficulty due to this can be offered holistic approach from the housing service, from relevant officers in Tenancy Management, and Rents and Welfare. Continued delivery of stock investment programme to maintain quality of stock and the ongoing delivery of necessary support services will maximise the benefit of the rent increase.
Veterans and serving members of the armed forces				Impacts in this area may be similar to those outlined under the age and disabilities sections of this CEIA. There are no specific disproportionate impacts which have been identified due to serving or having served in the armed forces.	There are no specific disproportionate impacts.

Communities and groups	Positive	Neutral	Negative	Summary of positive and negative impacts	How will positives be maximised, and negatives minimised or eliminated?
Unpaid carers				By appropriate funding for planned investment in stock or installation of adaptations, hazards can be eliminated from properties and overall quality maintained, reducing risk to vulnerable people, promoting independence and may in turn reduce anxiety or pressure for unpaid carers.	Continued delivery of stock investment programme to maintain quality of stock

# 3. Monitoring and review

3.1. How will you review community and equality impact once the policy, strategy, function or service has been implemented? These actions should be developed using the information gathered in sections 1 and 2 and included in your service area's business plans.

Action	By when	By who
Greater understanding of the overall demographics and prevalence of protected characteristics of households across the council's housing stock	March 2025	The Housing service, in collaboration with other services and partners which interact with and support households living in and around the council's homes and estates.
Greater understanding at locality level to tailor support and local responses	March 2025	The Housing service, in collaboration with other services and partners which interact with and support households living in and around the council's homes and estates.

Review of this CEIA ahead of work to start assessing rent increase for 2025/26	October 2024	The Housing service, in collaboration with Finance
Identification of emerging trends and risks around rent arrears and financial difficulties for households living within the council's stock	Ongoing	Rents and Welfare, in collaboration with the wider Housing Operations team and overarching Housing service

### 4. Next steps

4.1. The information gathered must be used to inform reports presented to Cabinet or overview and scrutiny committees. This will give members a necessary understanding of the impact their decisions will have on different groups and the whole community.

Summarise the implications and customer impact below. This summary should be added to the committee reports template in the Diversity and Equality Implications section for review and sign-off at the consultation stage of the report preparation cycle.

#### Summary of implications and customer impact

The council's HRA works to reflect the council's policy in relation to the provision of social housing with particular regard to the use of its own stock. In addition to the provision of general housing, it incorporates a number of budgetary provisions aimed at providing assistance to disadvantaged groups including adaptations to the stock for residents with disabilities.

Whilst a number of financial implications and impact on tenants and their households have been identified, the negative impact on all households living in council-owned accommodation would be far greater without implementing such a rent increase. This also includes the risk of regulatory action for non-compliance from both the Building Safety Regulatory and Regulator of Social Housing.

## 5. Sign off

- 5.1. This Community Equality Impact Assessment must be authorised by the relevant project sponsor, strategic lead, or assistant director. This should not be the CEIA Lead Officer. Officers authorising this assessment are responsible for:
  - the accuracy of the information
  - making sure actions are undertaken

Name	Role	Date
Ryan Farmer	Housing Strategy and Quality Manager	15/02/2024
Mike Jones	Head of Finance	15/02/2024
Ewelina Sorbjan	Assistant Director – Housing Management and Development	15/02/2024