

## RBG Housing Equality Impact Assessment (EIA)

This assessment enables us to check that the proposal does not have an adverse impact on target groups, have considered how it may further equality aims, and help us to identify relevant action to be taken. This is in line with the 3 aims of the Equality Duty to have due regard to:

- Eliminate unlawful discrimination
- Advance equality of opportunity
- Foster good relations

<b>Name of Proposed (policy, review, project, restructure or functional change)</b>	<b>Status</b>	<b>Date(s) of assessment</b>	<b>Responsibility for policy Name, job title, section</b>	<b>Person(s) carrying out EAA</b>
<b>Introduction of new combined service charge to Sheltered Housing tenants</b>	New	Feb: 2021	Robert Linton, Sheltered Housing and Extra Care Manager, Sheltered Housing	Michael Hammonds
<b>Summary of the policy/project/service change and scope</b>	<p>The purpose of this equality impact assessment is to identify and mitigate against existing or potential inequalities that would arise from the proposed changes to Greenwich’s Charging Policy.</p> <p>Royal Greenwich is seeking to implement a new combined service charge which would be applied to all tenants living in sheltered housing schemes managed by RBG. This charge will be cheaper than the cost of the previous charges and will cover the cost of housing management features such as caretaking, repairs, the allocations and scheme manager services. Note: the charge will exclude all personal care and Greenwich Telecare services.</p> <p>As the charge is to be applied across all tenants for the first time, it does mean that a small section of tenants will be adversely affected. This means that some tenants will be paying a service charge for the</p>			

	<p>first time as previously a local means test was applied. To support these existing tenants, there will be a temporary cap to ensure that they pay no more than they did previously.</p> <p>Everyone else will be unaffected by the new charge as they paid for by Housing Benefit or if they were paying the charge themselves, they will benefit from a small reduction in cost.</p> <p>It is anticipated that the new charge will simplify the current charging arrangements and can be applied equally across all tenants. It is equally anticipated that the charge will be affordable and provide the best value for money.</p>
<p><b>Aims, objectives, expected outcomes</b></p>	<p><b>Aim:</b></p> <ul style="list-style-type: none"> <li>• One simplified charge to cover the cost of the housing management function split equally across all tenants living in sheltered housing schemes managed by Royal Greenwich.</li> </ul> <p><b>Objectives:</b></p> <ul style="list-style-type: none"> <li>• To implement a combined service charge for housing management functions to tenants which enable the council to generate revenue to sustain current levels of service to all who need it</li> <li>• To simplify the charging process</li> <li>• To ensure the new charge is reflective of efficiencies made through staff structure realignment to provide better value for money for the tenants.</li> <li>• Making the scheme management service 100% housing benefitable to help tenants who are on low incomes.</li> <li>• To ensure that the new charge is affordable to everyone.</li> <li>• To apply a temporary cap on the charge to anyone is adversely affected</li> <li>• To position Royal Greenwich alongside other comparable London local Authorities in respect of the levels and types of charges that are levied</li> </ul> <p><b>Outcomes:</b></p> <ul style="list-style-type: none"> <li>• Clearer charging and easier to understand for tenants</li> <li>• Charges that are value for money</li> <li>• Charges which can be picked up by Housing Benefit</li> <li>• Mutual cost reductions for both the tenants and the council.</li> </ul>

<p><b>Responsibility for implementing and monitoring this policy/service change?</b></p>	<p>The implementation of the charge will be the responsibility of Sheltered Housing Team. They will also monitor the number of tenants who are adversely affected by the change, consider the common profile of those who are affected and offer appropriate support to ensure the tenant</p> <p>The charge will be reviewed regularly, ensuring that it continues to provide best value for the tenants whilst ensuring that it is affordable and meets their anticipated needs.</p>
<p><b>Data and research</b></p>	<p>The data used to inform this impact assessment has been captured from:</p> <ul style="list-style-type: none"> <li>• Housing Management System – Northgate This provides data on the make-up of our tenant base, their existing</li> <li>• ‘Proposed service charge for sheltered scheme manager: HB eligibility’ Report – Independent Professional – Peter Baker</li> <li>• Data from Health and Adults Services informed the number of tenants who would be in receipt of personal services to help support independent living.</li> </ul>
<p><b>Consultation and communication</b></p>	<p>All tenants were consulted on the changes between 18<sup>th</sup> November 2020 and 3<sup>rd</sup> January 2021 inclusive of a 2-week extension to allow more time for those with advocacy needs.</p> <p>Tenants were sent a handy booklet to demonstrate the proposals and tenants were invited to complete either a hard copy survey and send it back in the pre-paid envelope or they could take part on-line. The majority opted for the paper survey.</p> <p>The consultation was hampered by the second national lockdown which meant all of the ‘Covid-19 safe’ arrangements made to meet with residents face to face had to be cancelled. Instead, a message system was in operation which allowed residents to call and request a telephone call with a consultation officer. In the end, there was 45% response rate to the consultation.</p> <p>Data provided by scheme managers identified a large demographic of Nepalese residents so the consultation was translated for this group to ensure that understood what was being consulted on and that they felt encouraged to get involved.</p> <p>The outcome of consulting with the tenants was:</p>

	<ul style="list-style-type: none"> <li>• 273 responses were received.</li> <li>• 72% were in favour of keeping the Scheme Manager Service</li> <li>• 36% were in favour a new combined service charge against 23% against</li> </ul>
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**People Impact - Are there any reasons to believe that the policy/ service change could have an impact on the following:**

People Strand	Likely impact High/low/n one	Brief Explanation
<b>Age</b>	No negative impact	<p><b>AGE</b> According to data from Northgate Housing Management system, the majority of tenants are over the age of 65 and are unlikely to be working. 10% are of working age.</p> <p>For those who qualify for Housing Benefit, the new charge covered in full. Those who are working will already be paying for the previous charge and will see a positive reduction in their liability as the new charge is cheaper than before.</p>

		<p style="text-align: center;"><b>Age of tenants in Sheltered Housing</b></p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Age Group</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>45-64</td> <td>10%</td> </tr> <tr> <td>65-74</td> <td>32%</td> </tr> <tr> <td>75-84</td> <td>37%</td> </tr> <tr> <td>85-94</td> <td>19%</td> </tr> <tr> <td>95-106</td> <td>2%</td> </tr> </tbody> </table> <p style="text-align: center;"><b>Source: Data from Housing management systems (Northgate September 2020)</b></p>	Age Group	Percentage	45-64	10%	65-74	32%	75-84	37%	85-94	19%	95-106	2%
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<b>Disability or Impairment</b>	No impact	<p><b>Disability or Impairment</b></p> <p>A total of 83 tenants across the all the sheltered housing schemes hold personal care packages (data supplied by Health and Adults Services – correct as of 4/9/20).</p> <p>This charge does not have a negative impact in respect of disability as all tenants will receive the same service and be charged the same.</p>												

		<p>Tenants will have the cost of the charge covered by housing benefit or Universal Credit.</p>						
<p><b>Sex (Gender)</b></p>	<p>No impact</p>	<p><b>Sex (Gender)</b>          According to data held on Northgate, the Housing management system, there is a relatively equal split in gender with 51% being female and 49% being male.</p> <p>This policy does not have a negative impact in respect of gender as all tenants will receive the same service and be charged the same.</p> <p>Tenants will have the cost of the charge covered by housing benefit or Universal Credit</p> <div data-bbox="696 699 1895 1305" data-label="Figure"> <p style="text-align: center;"><b>Gender of those in sheltered housing</b></p> <table border="1"> <caption>Gender of those in sheltered housing</caption> <thead> <tr> <th>Gender</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Female (F)</td> <td>51%</td> </tr> <tr> <td>Male (M)</td> <td>49%</td> </tr> </tbody> </table> </div>	Gender	Percentage	Female (F)	51%	Male (M)	49%
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		<p><b>Source: Data from Housing services management systems – based on all tenants report (Northgate) September 2020</b></p>												
<p><b>Race and Ethnicity (including language)</b></p>	<p>No impact</p>	<p><b>Race and Ethnicity (including language)</b></p> <p>This policy does not have a negative impact in respect of race or ethnicity as all tenants will receive the same service and be charged the same.</p> <p>Staff will continue to support tenants where identified, English is not their first language. Staff are also trained to respond sensitively to the cultural differences and can sign post to additional support where required.</p> <div data-bbox="728 611 1688 1190" data-label="Figure"> <table border="1"> <caption>Ethnicity in sheltered housing</caption> <thead> <tr> <th>Ethnic grouping</th> <th>No of people</th> </tr> </thead> <tbody> <tr> <td>Asian (all)</td> <td>48</td> </tr> <tr> <td>Black (all)</td> <td>51</td> </tr> <tr> <td>Mixed (all)</td> <td>9</td> </tr> <tr> <td>White (all)</td> <td>322</td> </tr> <tr> <td>Refused</td> <td>89</td> </tr> </tbody> </table> </div> <p><b>Source Data from Housing management systems – (Northgate) September 2020</b></p>	Ethnic grouping	No of people	Asian (all)	48	Black (all)	51	Mixed (all)	9	White (all)	322	Refused	89
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<p><b>Other</b></p>														

<b>What other risks/factors will be taken into account in the decision making?</b>	Independent and expert advice has been sought on the welfare benefits to ensure that the services will still be eligible for housing benefit and universal credit and not adversely affect tenants.
<b>How will any identified risks be minimised?</b>	The policy will be reviewed to maintain alignment with any future legislative and service changes.

**Decision making:**

<b>If yes to any of the questions below - prepare an action plan to address</b>	<b>Yes/No</b>
Does the policy/service discriminate (directly or indirectly) against any section of the community?	No
Do the changes have the potential to create inequality or worsen existing inequality?	No
Do the changes have potential to address existing inequality – such as promoting positive treatment, attitudes to, or participation of disadvantaged groups?	No
Are there ‘significant’ gaps in our knowledge which prevent us from making a reasonable assessment?	No

<b>High/Low/No impact (on protected characteristics)</b>	
<ol style="list-style-type: none"> <li>1. No major change</li> <li>2. Adjust proposal</li> </ol>	No potential adverse impact and all opportunities to advance equality have been taken.

<b>3. Continue proposal - with clear justification</b>	
<b>4. Stop/remove proposal</b>	
<b>Action plan attached?</b>	No
<b>Sign off</b>	Person(s) (name, job title) or group e.g. DMT  Date

**Summary Report** (where required):

<b>Focus: relevant protected characteristics</b>	
<b>Key Questions considered</b>	
<b>Summary findings</b>	
<b>Data reviewed</b>	Summarise or state if appended
<b>Assessment of impacts (avoid, mitigate, justify)</b>	
<b>Recommendations</b>	
<b>Any further action</b>	

