

## Equality Impact Assessment

<p>Sheltered Housing Service Charges (Proposed increase in service charges for residents in sheltered and good neighbour housing schemes)</p>	<p>Cabinet Member Signing 5 January 2016</p>
<p>Homes for Haringey</p>	<p>Cabinet meeting date <i>If applicable</i></p>
<p>Bernard Mooney / Allison Kennedy</p>	<p>Date EqIA created 16<sup>th</sup> June 2015</p>
<p>Lyn Garner Dan Hawthorn, Assistant Director for Regeneration</p>	<p>Date of approval 17 December 2015</p>

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity between those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Haringey Council also has a 'Specific Duty' to publish information about people affected by our policies and practices.

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**All assessments must be published on the Haringey equalities web pages. All Cabinet papers MUST include a link to the web page where this assessment will be published.**

This Equality Impact Assessment provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above, for more information about the Councils commitment to equality; please visit the Council's website.

<b>Stage 1 – Names of those involved in preparing the EqIA</b>	
1. Project Lead – Bernard Mooney / Allison Kennedy	
2. Equalities / HR – Kathryn Booth	5. Helicon Topulli (provision of equalities data relating to residents in sheltered and good neighbour housing schemes)
3. Legal Advisor (where necessary) – Robin Levett	6. John Elliot (provision of information on support being provided to residents in sheltered and good neighbour housing schemes)
4. Trade union – N/A	7. Andrew Adegboye (provision of information relating to consultation of residents in sheltered and good neighbour housing schemes)
	8.

**Stage 2 - Description of proposal including the relevance of the proposal to the general equality duties and protected groups. Also carry out your preliminary screening (Use the questions in the Step by Step Guide (The screening process) and document your reasoning for deciding whether or not a full EqIA is required. If a full EqIA is required move on to Stage 3.**

A Haringey Council review of services provided to council estates across Haringey noted that sheltered and good neighbour housing schemes receive some of these services but have not previously been charged for them. The costs until now have therefore have been met by the Council. On 10<sup>th</sup> February 2015, the Council's Cabinet agreed to consult residents in sheltered and good neighbour scheme accommodation and carry out an impact assessment on a proposed increase in service charges.

The proposed increase of service charges is to deliver a fair and transparent approach to how costs are properly recovered. Sheltered and good

neighbour scheme tenants currently do not pay for all aspects of the services they receive. Charges had not previously been set for some activities, although these do form part of what would normally and reasonably be collected through a service charge. The suggested increases being consulted on range between £3.01 to £8.95 in additional weekly charges.

As the majority of sheltered and good neighbour scheme residents are currently receiving full housing benefit, this change will not impact on these residents as most service charges are covered by housing benefit.

Out of the 1285 residents in sheltered and good neighbour schemes, the support service team initially identified a total of 294 residents, in 272 households, who would have been directly affected by the proposed change, as they received no housing benefit or had costs only partially covered by housing benefit (this relates to figures provided at 30/6/15). These 272 households received financial assessments and support from June 2015 as summarised in stages 7 and 8 below.

As part of this impact assessment, the support service team carried out further analysis and removed 'step-down' residents funded by Adult Social Services, recently deceased residents, and 'moved-on' residents from the figures. This further analysis identified an updated total of 282 affected residents, in 261 households, receiving no housing benefit or partial housing benefit (figures provided on 20/7/15). These 282 individual residents have been included in the assessment conducted in this EqIA.

#### The consultation process

Homes for Haringey (HfH) has consulted tenants in sheltered housing and good neighbour schemes on behalf of Haringey Council. A letter was sent to residents in these schemes to consult them on the proposed increase in service charges. The consultation ran from 9<sup>th</sup> June to 23<sup>rd</sup> June 2015 and the results are summarised in stage 7 of this assessment.

The consultation process was supported by a wide range of briefings and information sessions to engage with residents in sheltered and good neighbour schemes in person and to help them understand the impact by:

- Offering one to one sessions to explain the proposals
- Arranging individual budgeting meetings with the affected residents through our sheltered services and financial inclusion teams to help with advice and alternative funding options
- Advertising and holding drop in sessions.

Sessions have been held at each of the housing schemes, in particular with those individuals not in receipt of full housing benefit. Please note that leaseholders in sheltered and good neighbour schemes are not affected by the consultation process that is adopted for the purpose of setting the level of charges payable by tenants. On an annual basis, Homes for Haringey calculates and recharges all leaseholders based on the costs incurred in providing services or works to their block or estate. The methodology is determined by the terms of their lease.

<p><b>Stage 3 – Scoping Exercise - Identify the main sources of the evidence, both quantitative and qualitative, that supports your analysis. This could include for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of recent relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national.</b></p>	
<p>Data Source (include link where published)</p>	<p>What does this data include?</p>
<p>Sheltered and good neighbour scheme tenant Equalities Monitoring Data Analysis</p>	<p>This data covers all sheltered and good neighbour scheme tenants and includes: gender, age, disability, race and ethnicity, sexual orientation, religion or belief (or no belief). No gender reassignment data has been identified. The categories 'pregnancy and maternity' and 'marriage and civil partnership' are not covered in the data.</p>
<p>Equalities Monitoring Data Analysis for the 282 sheltered and good neighbour scheme tenants, in 261 households, likely to be impacted by the proposed service charge increase (figures provided on 20/7/15 for this analysis).</p>	<p>This data covers the sheltered and good neighbour scheme housing tenants likely to be impacted by the proposed service charge increase and includes: gender, age, disability, race and ethnicity, sexual orientation, religion or belief (or no belief), and marriage and civil partnership. No gender reassignment data has been identified. The category 'pregnancy and maternity' is not covered in the data.</p>
<p>Equalities profile of Haringey</p>	<p>This data provides gender, age, ethnicity, religion, disability, marital status and civil partnership, and sexual orientation information for Haringey based on the 2011 census.</p>

**Stage 4 – Scoping Exercise - Service data used in this Equality Impact Assessment**

<b>This section to be completed where there is a change to the service provided</b>	
Data Source (include link where published)	What does this data include?
Not applicable – there are no current plans to change the service provided.	

<b>Stage 5a – Considering the above information, what impact will this proposal have on the following groups in terms of impact on residents and service delivery: Positive and negative impacts identified will need to form part of your action plan.</b>			
	Positive	Negative	Details
Sex / Gender			Of the 282 residents identified as potentially being impacted, 150 are men and 132 are women.
Gender Reassignment			No gender reassignment has been identified in the 282 residents identified as being impacted.
Age		This proposal potentially impacts on the protected characteristic of age, as the majority	Of the 282 residents identified as being impacted, the average age is 66.
			None – why? Based on the data available, this proposal is not viewed as disproportionately impacting on sex / gender. No gender reassignment was identified in the 282 potentially impacted residents or in the sheltered and good neighbour scheme population as a whole.

		<p>of sheltered and good neighbour scheme tenants are older residents. The potential negative impact would be an increase in service charge costs for these residents and the possibility of associated hardship.</p>		
<p><b>Disability</b></p>		<p>This proposal potentially impacts on the protected characteristic of disability, as a significant number of sheltered and good neighbour scheme tenants have identified a disability. The potential negative impact will be an increase in service charge costs for these residents and the possibility of associated hardship.</p>	<p>Of the 282 residents likely to be impacted, 158 have identified one or more of the following: a mental health issue, a learning disability, a physical disability, a mobility issue, a sensory impairment, or a long term or terminal illness. (The figure of 158 includes 24 residents with mental health issues).</p>	
<p><b>Race &amp; Ethnicity</b></p>			<p>Of the 282 residents identified as being impacted, 102 are Black or Black British, 162 are White, 4 are Mixed, and 13 are Asian or Asian British, and 1 is Chinese.</p>	<p>Based on the data available, this proposal is not viewed as disproportionately impacting on any race or ethnic group.</p>

Sexual Orientation			Of the 282 residents identified as being impacted, 213 have identified as heterosexual and 69 have not disclosed their sexual orientation.	Based on the data available, this proposal is not viewed as disproportionately impacting on any sexual orientation.
Religion or Belief (or No Belief)			Of the 282 residents identified as being impacted, 108 are Christian, 32 are Catholic, 10 are Muslim, 1 is Jehovah's Witness, 2 are Buddhist, 7 are Anglican, 16 have no religion or belief, 10 are other, and 96 have not disclosed this information.	Based on the data available, this proposal is not viewed as disproportionately impacting on religion, belief, or no belief.
Pregnancy & Maternity			Of the 282 residents identified as being impacted, no information on pregnancy and maternity is available.	Due to the age profile of residents in supported and sheltered housing, this proposal is not viewed as likely to disproportionately impact on pregnancy or maternity.
Marriage and Civil Partnership (note this only applies in relation to eliminating unlawful discrimination (limb 1))			Within the 282 residents identified as being impacted, there are 21 couples (no civil partnerships have been	Based on the data available, this proposal is not viewed as disproportionately impacting on marriage or

			identified).	civil partnership.
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<b>Stage 5b – For your employees and considering the above information, what impact will this proposal have on the following groups: Positive and negative impacts identified will need to form part of your action plan.</b>				
<b>Not applicable – this proposal will have no impact on employees of the service.</b>				
	Positive	Negative	Details	None – why?
Sex				
Gender Reassignment				
Age				
Disability				
Race & Ethnicity				
Sexual Orientation				
Religion or Belief (or No Belief)				
Pregnancy & Maternity				
Marriage and Civil Partnership (note this only applies in relation to eliminating unlawful discrimination (limb 1))				

<b>Stage 6 - Initial Impact analysis</b>		<b>Actions to mitigate, advance equality or fill gaps in information</b>
Out of 1285 residents in the Council's sheltered and good neighbour		Homes for Haringey (HfH) is undertaking a wide range of actions to

schemes, HfH have identified 282 residents, in 261 households, who are likely to be impacted by the proposed increase in service charges, as these residents either receive no housing benefit or have costs only partially covered by housing benefit.

As this proposal relates to sheltered and good neighbour schemes it will, if implemented, impact on a number of older residents and residents with disabilities:

- Of the 282 residents identified as being impacted, the average age is 66.
- Of the 282 residents likely to be impacted, 158 have identified one or more of the following: a mental health issue, a learning disability, a physical disability, a mobility issue, a sensory impairment, or a long term or terminal illness
- The figure of 158 includes 24 residents with mental health issues.

The possible negative impact identified on these residents would be the charge of a fee that some might be unable to pay without the risk of associated financial hardship. Therefore, the majority of the actions planned to mitigate this impact are around determining which residents can afford to pay, which require assistance to pay, and which need assistance to avoid financial hardship. Alongside this, Homes for Haringey is taking action to reassure and offer assistance to all sheltered and good neighbour scheme residents concerned by the implications of the proposed change.

mitigate the proposed increase in service charge. In order to help people understand the subject of consultation, the process and the potential impact, HfH arranged drop-in sessions at the schemes and these were held in 21 schemes between 9<sup>th</sup> June 2015 and 24<sup>th</sup> June 2015. 243 people attended the drop-in sessions held in the 21 schemes, and 72 people were offered one-to-one sessions or given individual advice. HfH also provided one additional mop-up session at Campbell Court as no residents had attended following invitation to the session on 10<sup>th</sup> June 2015.

Scheme Support Managers provided further clarity on the proposed changes at coffee mornings throughout July at all 21 schemes. At these coffee mornings, Scheme Managers also provided further copies of the Frequently Asked Questions document (FAQs) produced for the earlier drop-in sessions to residents.

Scheme Managers are also arranging individual face to face contact with the remaining affected residents. If Scheme Managers are unable to have 1-to-1 meetings at the first attempt they will make up to 2 further attempts to visit, leaving a card, phoning, or getting in touch with a relative if it is difficult to make contact with the affected resident. Scheme Managers will be providing feedback on the outcome of each contact so that data is available on each affected residents' circumstances and preferences. Where relevant, HfH are referring affected residents to their Financial Inclusion Team, the Housing Benefit team or the Citizen's Advice Bureau to check if they qualify for any other benefits or if there are other ways to save money off other bills, such as water rates, gas or electricity.

All future support required by residents in relation to budgeting,

applying for benefits or seeking advice is part of the housing related support already provided. . This will be provided through regular support planning meetings with individuals and key-work sessions depending on each resident's level of assessed need. Homes for Haringey is also putting a robust system in place to flag residents who may be affected in the future, should their Housing Benefit circumstances change.

**Stage 7 - Consultation and follow up data from actions set above**

**Data Source (include link where published)**

Homes for Haringey consulted tenants in sheltered and good neighbour schemes on behalf of Haringey Council. The consultation asked 1,285 residents to give their views on a proposal to charge for services they receive, which are not currently charged with their rent. The consultation ran from 1 June 2015 until 30 June 2015.

**What does this data include?**

Homes for Haringey received 197 responses to the consultation, representing a 15% response rate. 74% of residents who responded had a negative response to the proposed service charges. Residents were advised to present their responses formally. No verbal responses were accepted as this was a formal consultation process. A summary of the consultation responses is set out below, together with officer comments on the negative responses received. Further actions by Homes for Haringey are also set out in stage 8 below.

Response/Comment	No. of responses	%	HfH further action
No - Vulnerable/Ability to pay	71	36%	Further individual assistance / assessments
No - Unfair Charges	26	13%	Explain basis for proposed charges

No - Unsatisfactory quality of service	19	10%	Investigate services provided
No - Council tax covers services	9	5%	Explain basis for proposed charges
No - No Comment	22	11%	
Total Negative responses	147	74%	
Yes - Ability to pay	3	2%	
Yes - No Comment	31	16%	
Yes - OK with the proposal	11	6%	
Yes - Quality of Service	1	1%	
Total Positive responses	46	23%	
Don't know - No comment	3	2%	
Don't know - Vulnerable Tenant	1	1%	Further individual assistance / assessments
Total Don't know	4	2%	
Total	197	100%	

HfH are engaging with all affected residents to prepare them for the change and are offering assessments to residents directly affected. Out of the 272 households who are directly affected, HfH arranged a financial assessment with 202 households. 70 households refused as they feel they are able to fund the difference and do not wish to disclose their financial situation.

From the 202 households:

- (a) 20 households have a saving of more than £16,000
- (b) 7 households have an income too high for support eligibility
- (c) 102 households are eligible for (further) Housing Benefit and HfH are assisting with the relevant application
- (d) 34 households are eligible for other benefits and HfH are helping with the relevant application process
- (e) 12 households now have full HB in place since the consultation in June 2015.
- (f) 8 households had a meeting arranged, but this has not taken place yet as they are abroad for a longer period.

This leaves 19 households having to pay the difference themselves. For these and other residents, HfH have provided the following:

- Budgeting Advice
- Utility Advice
- WaterSurePlus eligibility assessment and support with application to reduce the water charge by about £2 per week, which compensated for the proposed increase in Service Charges.

### Stage 8 - Final impact analysis

The proposal to increase service charges was advanced because it was intended to bring charges to sheltered and good neighbour scheme residents in line with those paid by other Council tenants of the borough. As a result of the proposed increase in service charge, Homes for Haringey aims to become more accountable and subject to challenge if services are not provided to the required standard.

The sheltered and good neighbour housing tenant group as a whole have been consulted and there was a 15% response rate. 74% of residents who responded had a negative response to the proposed service charges (as set out in the table in stage 7 above).

Homes for Haringey is responding to the consultation feedback by:

- Providing further opportunities to explain and reassure residents regarding the services they are benefiting from and how the service charges would be applied. This is being done by:
  - i. Scheme Managers speaking to each resident who responded and expressed concerns individually, in order to clarify and explain the reason for the proposed increase.
  - ii. Coffee mornings are being used to discuss the proposal with the purpose of clarifying and reassuring residents on the proposed increase.
- Carrying out assessments with those residents who feel they will struggle to pay any additional charges. HfH are speaking to each resident who is directly affected to work out affordability by providing budgeting support and advice. Where relevant, we refer residents directly to our Financial Inclusion Team to help assess benefits eligibility so that the relevant steps can be taken swiftly. All efforts will be taken to ensure affected residents are accessing any benefits to which they are entitled.
- Homes for Haringey is recording the activities described above in a log of all general and individual discussions and associated outcomes for future reference.

The overall proposed increase in charges is mitigated by the consideration that the majority of the service users will not be impacted by the

change as they will have their charges covered by housing benefit. Out of 1285 residents in our sheltered and good neighbour schemes, we identified 282 residents, in 261 households, who are likely to be impacted by the proposed increase in service charges, as these residents either receive no housing benefit or have costs only partially covered by housing benefit.

If this proposal is implemented, there would potentially be a negative impact on a number of older residents and residents with disabilities:

- Of the 282 residents identified as being impacted, the average age is 66.
- Of the 282 residents likely to be impacted, 158 have identified one or more of the following: a mental health issue, a learning disability, a physical disability, a mobility issue, a sensory impairment, or a long term or terminal illness
- The above figure of 158 includes 24 residents with mental health issues.

The potential negative impact identified on these residents would be the introduction of a charge that some might be unable to pay without the associated risk of financial hardship. To mitigate this impact, Homes for Haringey is working closely with all residents likely to be directly affected by the proposed increase:

- HfH are assessing affordability and providing help with budgeting advice
- HfH are referring relevant cases directly to our specialist Financial Inclusion Team to assess any further benefits eligibility and other funding opportunities to minimise potential impact
- HfH are developing a framework to ensure that any new cases caused by benefit changes in future are identified and that relevant action to minimise the potential impact is taken.

It is the view of this assessment that the potential negative impact identified on the 282 residents not fully covered by Housing Benefit is likely to be successfully mitigated as Homes for Haringey:

- is working closely with all the residents likely to be directly affected
- is clear about who can self fund and is making every effort to find funding for those who would not be able to cope with this increase
- is putting a sound mechanism in place to pick up new cases going forward based on changes of residents' circumstances.

The Homes for Haringey financial assessment work in respect of the 272 households (294 residents) identified in that work as directly affected by the service charge increases, established that just 19 of those households would have to pay the difference themselves and they were provided with advice on budgeting and utility savings schemes.

**Stage 9 - Equality Impact Assessment Review Log**

Review approved by Director / Assistant Director

Date of review

Review approved by Director / Assistant Director

Date of review

**Stage 10 – Publication**

Ensure the completed EqIA is published in accordance with the Council's policy.