

Equality Impact Assessment Form **Reference –**

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| **Department** | Place | **Version no** | 1 |
| **Assessed by** | Angela Blake | **Date created** | 5.12.2022 |
| **Approved by** | Alan Lunt | **Date approved** | 5.12.2022 |
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| **Final approval** |  | **Date signed off** |  |

The Equality Act 2010 requires the Council to have due regard to the need to

* eliminate unlawful discrimination, harassment and victimisation;
* advance equality of opportunity between different groups; and
* foster good relations between different groups

# Section 1: What is being assessed?

**1.1 Name of proposal to be assessed.**

Opening of a Housing Revenue Account (HRA) for the start of the financial year 2023-24, (subject to viability and the rent standard being set at a minimum of 5% from 1st April 2023).

**1.2 Describe the proposal under assessment and what change it would result in if implemented.**

On 14 March 2019 the Ministry of Housing, Communities and Local Government (MHCLG) published guidance which requires local authorities to open a HRA where their stock exceeds 200 units. As a result of this change in policy / guidance, the council put a hold on any future development programme in 2019. As a consequence of the guidance published in March 2019 by Ministry of Housing, Communities and Local Government (MHCLG), Bradford is expected to account for its housing stock within a Housing Revenue Account.

The Housing Revenue Account (HRA) is intended to record expenditure and income on running a council’s own housing stock and closely related services or facilities, which are provided primarily for the benefit of the council’s own tenants.

# Section 2: What the impact of the proposal is likely to be

* 1. **Will this proposal advance equality of opportunity for people who share a protected characteristic and/or foster good relations between people who share a protected characteristic and those that do not? If yes, please explain further.**

A key driver for many councils is about increasing the supply of social and low cost housing for those in the greatest need. Opening a HRA is aligned to corporate priorities - the Council Plan identifies ‘Decent homes that people can afford to live in’ and ‘Ensuring the supply of homes is the right type and location to meet demand’ as key priorities for the District as well as inclusive and sustainable growth ambitions.

* 1. **Will this proposal have a positive impact and help to eliminate discrimination and harassment against, or the victimisation of people who share a protected characteristic? If yes, please explain further.**

The provision of new and good quality affordable housing in the District has a positive impact on those groups and individuals who suffer multiple disadvantages associated with inadequate housing. The Council’s ‘Homes and Neighbourhoods - A Guide to Designing in Bradford’ which provides for enhanced accessibility standards ensuring homes are suitable for people with a disability and more flexible and adaptable to meet the needs of current and future generations. Living in good quality housing and a safe, well designed neighbourhood improves life chances in terms of health, employment and educational outcomes.

* 1. **Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.**

No

**2.4 Please indicate the level of negative impact on each of the protected characteristics?**

(Please indicate high (H), medium (M), low (L), no effect (N) for each)

|  |  |
| --- | --- |
| **Protected Characteristics:** | **Impact**  (H, M, L, N) |
| Age | L |
| Disability | L |
| Gender reassignment | L |
| Race | L |
| Religion/Belief | L |
| Pregnancy and maternity | L |
| Sexual Orientation | L |
| Sex | L |
| Marriage and civil partnership | L |
| **Additional Consideration:** |  |
| Low income/low wage | L |

**2.5 How could the disproportionate negative impacts be mitigated or eliminated?**

(Note: Legislation and best practice require mitigations to be considered, but need only be put in place if it is possible.)

# Section 3: Dependencies from other proposals

**3.1 Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.**

A Housing Revenue Account (HRA) is a separate ring fenced account in which the Council carries out a landlord function. It is funded from rents and service charges from council tenants and leaseholders. It pays for the costs of managing the Council’s housing stock: for example, major repairs, responsive repairs and liaison with tenants. As outlined, the HRA cannot budget for a deficit and it is not permissible for the HRA to go into an overall financial deficit position. As such, a HRA can only be opened if it is financially viable and can be sustained through rental income.

The financial analysis has been based on the existing stock the Council owns, which is a requirement to determine the viability before any new stock can be added. Expansion of HRA stock will be assessed based on business cases at the time.

Although the Council does not need to have permission from the Secretary of State to open an HRA, if the Council decides to open an HRA it will need to declare its intention to do so by writing to the Secretary of State. In the event that the Council does not open a HRA in time for the financial year 2023-24, a further S74 Direction would be required from DLUHC.

# Section 4: What evidence you have used?

**4.1 What evidence do you hold to back up this assessment?**

Work and progress to date that has been undertaken between officers and colleagues in Department of Levelling up, Housing and Communities (DLUHC)

Executive Paper 1st November 2022:

[Bradford Council - Agenda for Executive on Tuesday, 1st November, 2022, 10.30 am (moderngov.co.uk)](https://bradford.moderngov.co.uk/ieListDocuments.aspx?CId=143&MId=7753&Ver=4)

**4.2 Do you need further evidence?**

No

# Section 5: Consultation Feedback

**5.1 Results from any previous consultations prior to the proposal development.**

N/A

**5.2 The departmental feedback you provided on the previous consultation (as at 5.1).**

N/A

**5.3 Feedback from current consultation following the proposal development (e.g. following approval by Executive for budget consultation).**

No equality feedback received

**5.4 Your departmental response to the feedback on the current consultation (as at 5.3) – include any changes made to the proposal as a result of the feedback.**

N/A