

LONDON BOROUGH OF CAMDEN	WARDS: All
REPORT TITLE Housing Revenue Account Budget and Rent Review 2019/20 and Medium Term Financial Strategy (SP/2019/05)	
REPORT OF Cabinet Member for Better Homes	
FOR SUBMISSION TO Housing Scrutiny Committee Cabinet	DATE 14 January 2019 16 January 2019
SUMMARY OF REPORT The budgetary context for the medium term is challenging with the Council needing resources to meet three key priorities; 1) building homes; 2) maintaining high quality housing stock; and 3) delivering a new standard in resident safety. These challenges have been exacerbated by Government imposed annual rent reductions of 1% resulting in the need for savings, simply to balance the Housing Revenue Account (HRA) Budget. Good quality housing is a key contributor to a number of Camden Plan objectives including providing sustainable neighbourhoods, reducing health inequalities and supporting complex families. Cabinet decisions are required to produce a balanced HRA budget and in order to set the levels of rent and service charges and to update the medium term financial strategy to ensure it remains able to support the council's key housing priorities. Local Government Act 1972 – Access to Information No documents that require listing were used in the preparation of this report Contact Officer: Jason Blackhurst Team Leader (HRA and Capital Projects) 5 Pancras Square Telephone 020 7974 4729 E-mail jason.blackhurst@camden.gov.uk	
RECOMMENDATIONS The Housing Scrutiny Committee is asked to note the report and make any recommendations to the Cabinet. Having considered the views of the District Management Committees (Appendix	

G) and the Housing Scrutiny Committee, **the Cabinet** is recommended to agree the following recommendations and that, subject to the agreement of the Chair of Housing Scrutiny Committee, the following decisions be exempted from call in to facilitate the notice of rent change being given to tenants:

- (i) Approve the Housing Revenue Account budget for 2019/20 (Appendix A).
- (ii) Confirm the implementation of the Government mandated reduction of council rents by 1% from April 2019 (paragraph 2.1).
- (iii) Agree the updated MTFS (paragraph 2.3) and note the revised MTFS savings target detailed in paragraph 2.4 and Appendix B.
- (iv) Agree to the revised tenant service charges for Caretaking, Communal Lighting, Mobile Security and Communal Mechanical and Electrical Maintenance (paragraph 3.1).
- (v) Agree to a new service charge of £2.10/week for an enhanced CCTV service to be levied from the April following the installation of a new CCTV service (paragraph 3.4)
- (vi) Agree that the Heating Pool scales remain unchanged and refund the surplus generated on bulk gas sites to tenants, (paragraph 3.6 and Appendix E).
- (vii) Agree to the revised service charges in the HRA hostels and supported housing (paragraph 3.7 and Appendix C).
- (vii) Agree to the revised Leaseholder Administration Charges, (paragraph 3.8 and Appendix D).

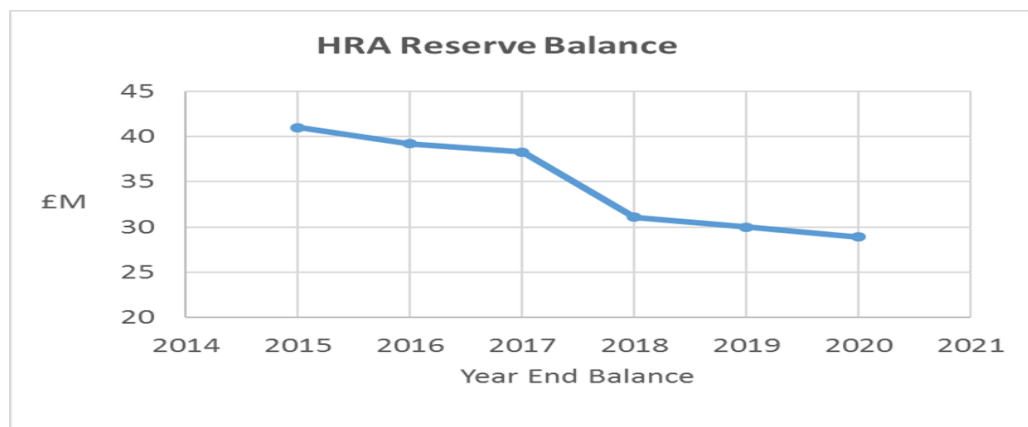
Signed: Kathy Freeman
Director of Finance

Date: 20th December 2018

1. CONTEXT AND BACKGROUND

- 1.1 The Council is committed to being an exemplary social housing landlord and views its role as a social landlord as a key contributor to a number of Camden Plan objectives including providing sustainable neighbourhoods, reducing health inequalities and supporting complex families.
- 1.2 Since 2016/17 the Government legislation has mandated annual rent reductions of 1% across the entire social housing stock and a consequential reduction of 17.9m in annual resources available to the HRA. 2019/20 represents the last of four years of rent reductions. .
- 1.3 In addition to identifying efficiency savings to offset the rent reductions, as part of the Medium Term Financial Strategy (MTFS) the council has had to draw down on reserves to continue investment in the Better Homes programme, to fund the evacuation of the Chalcot Estate and to provide investment in an enhanced level of resident safety. This has seen HRA balances reduce from £41m in 2015 to an estimated £28.9m by 2020.

Table One: HRA Reserve Balances



- 1.4 The Council will have new options for rent setting from April 2020, with a limit on any rent increase of inflation (CPI) plus 1%. The government have announced that this limit on rent increases will last until 2025. Raising rents from April 2020 onwards, could potentially raise £3.8m per year in additional rental income. The medium term outlook for the HRA is likely to continue to be challenging and any income from rent increases could be used to meet the existing and new inflationary pressures and to meet a number of other potential investment requirements (identified in the paragraphs that follow).
- 1.5 As stated in table one the HRA reserves will reduce to £28.9m by April 2020. HRA reserves are held to cover all known future liabilities and to act as a contingency against unforeseen costs. During 2017/18 the Council invested £7.2m (approximately 19% of the reserve) to help fund the evacuation and emergency repairs to the Chalcot estate. It would be prudent to replenish the reserve to ensure the Council has adequate contingencies against any other unexpected cost pressures.

- 1.6 The outcome of the Hackett review and the implementation of a new legal framework for building regulations are likely to require further investment in HRA services in the future, and the eventual roll out of Universal Credit and an uncertain general economic outlook may also require further investment in tenancy support services.
- 1.7 The Governments recent announcement that the HRA debt cap has been abolished provides an opportunity for the Council to borrow in order to accelerate the Better Homes programme across the existing stock and to help to increase the borrowing capacity for the Council's Community Investment Programme. Any additional borrowing, while providing much needed investment, would also require additional funding to service any additional debt. £50m of investment from borrowing would generate a requirement to fund £1.4m per year of interest payments to service the debt. The Council has been successful in bidding for £30.8m of funding from the Greater London Authority to support the Community Investment Programme, however additional sources of subsidy are necessary in order to continue to build social and genuinely affordable housing.
- 1.8 The Council remains committed to delivering well managed and maintained council homes. The £51.6m annual cost of maintenance and reactive repairs, accounts for 46% of the day to day running costs. The ongoing Better Homes capital programme includes planned expenditure of a further £298.3m on major works on the existing stock over the next three years. This includes renewing or repairing kitchens, bathrooms, windows and roofs as well as upgrading heating systems, lifts, wiring and door entry systems.

Table Two: BETTER HOMES INVESTMENT PROGRAMME 2019-2023

	2019/20	2020/21	2021/21	2022/23
	£m	£m	£m	£m
External Works	35.5	34.2	33.4	20.8
Internal Works - Kitchens, Bathrooms, Electrics	3.3	3.3	3.3	3.3
Better Homes Total	38.8	37.5	36.7	24.1
Fire risk and assessment	48.5	21.5	6.8	10.3
Mechanical and Electrical	17.8	14.6	18.1	23.6
Total	105.1	73.6	61.6	58

- 1.9 The Council has made a commitment to achieve a new standard of resident safety for Camden and an £87.1m programme of fire safety works is being prepared as part of the Council's capital programme. The Council has also successfully secured £80m in funding from the government to support the removal and replacement of Aluminium Composite Material (ACM) cladding on buildings on one of the Council's estates.

2. PROPOSAL AND REASONS

- 2.1 In contrast to this background of increasing cost pressures however, Government legislation requires the Council to reduce rents by 1% from April 2019. The effect of the 1% rent reduction on individual rents is shown in table three.

Table Three: Effect of 1% rent reduction

Bedrooms	Average Rent 2018/19	Average Rent 2019/20	Average reduction in Rent
0	£83.38	£82.55	-£0.83
1	£100.30	£99.30	-£1.00
2	£113.65	£112.51	-£1.14
3	£127.22	£125.95	-£1.27
4	£141.11	£139.70	-£1.41
5+	£157.16	£155.59	-£1.57

- 2.2 **Appendix A.** The revenue budget for 2019/20 (APPENDIX A) includes increased investment of £2.7m per year to ensure an enhanced resident safety standard is delivered across the housing stock. The HRA is projected to require a draw-down of £1.405m in 2019/20 to ensure that all cost pressures are fully funded. This draw down in reserves can be offset in part by the recommended service charge options detailed in section three of this report.
- 2.3 Since the HRA Medium Term Financial Strategy was agreed in January 2017 there have been a number of favourable changes to the financial outlook for the HRA in 2019/20. There have been changes in government policy such as the cancelling of 'Pay to Stay' and delaying the implementation of Universal credit, and an increased level of stock numbers as a result of reductions in Right to Buy sales and the completion of new build properties from the Council's Community Investment Programme. However new cost pressure relating to the delivery of the Council's enhanced resident safety standards of **£2.7m per year** have also been identified. Overall HRA budget pressure for 2019/20 are estimated to be **£6.67m**.
- 2.4 As part of the Medium Term Financial Strategy (MTFS), Members agreed to a three year savings programme to deliver £14.9million between 2017/18 and 2019/20. The revised savings programme has been reduced by £2m as the implementation of Universal Credit across Camden has been delayed, removing the expected pressure on rent collection.

3. OPTIONS APPRAISAL

- 3.1 Whilst rent increases are currently effectively determined by Government, the Council does have some discretion over the level of tenant service charges (eligible for housing benefit) for the following services; caretaking, grounds maintenance, CCTV, mobile security, concierge, maintenance of mechanical and electrical equipment in communal areas and block and estate lighting. For 2019/20, Cabinet is recommended to increase tenants' service charges

for Caretaking, Communal Lighting and Communal Mechanical and Electrical Maintenance by (CPI inflation (2.4%). A slightly higher rise of 2.9% (CPI+0.5%) is proposed for the Responsive Patrol Service to ensure that service charges continue to cover the full cost of the services provided. It is also recommended to make no increase to Service charges for CCTV and Grounds Maintenance as the cost of the services can be met from existing charges. The effect of the recommended increases on current service charge levels is detailed in the table below.

Table Four: Recommended Tenant Service Charge Increase

Service charge	18/19 weekly charge	recommended Increase	Weekly increase £	additional income from tenants from Increase
Caretaking	£ 8.95	2.4%	£ 0.21	£ 200,340
CCTV	£ 0.98	0.0%	£ -	£ -
Communal lighting	£ 1.05	2.4%	£ 0.03	£ 23,250
Communal M&E maintenance	£ 1.13	2.4%	£ 0.03	£ 15,590
Grounds maintenance	£ 1.80	0.0%	£ -	£ -
Responsive Housing Patrol	£ 0.61	2.9%	£ 0.02	£ 17,810
Total				£ 256,990

- 3.2 The recommended increases in tenants' service charges can be used to fund the inflationary pressures in providing the specific services. The recommended charges would, in total, raise an additional £257,000 per annum and help to ensure the individual services remain fully funded.
- 3.3 Consultation with the District Management Committees (DMCs) has identified a desire for an enhanced CCTV service across the housing estates. A new CCTV system is being developed, with a high bandwidth wireless ring network. This would replace existing cameras with new state of the art CCTV cameras and the inclusion of 'Rapidly Deployable Cameras' that can be deployable strategically to cover high risk areas.
- 3.4 The new CCTV service could be funded from a service charge to tenants and leaseholders in order to recover the capital cost of the installation of the CCTV systems. This could be a similar arrangement to the recovery of the cost of installing the IRS system when a service charge was levied from the April following installation, for a period of seven years. In order to recover the full cost of the implementation of the new CCTV system the service charge would need to £2.10 per week for a period of seven years. This would replace the existing CCTV service charge of £0.98 per week. It is recommended that a new service charge of £2.10 per week is levied on the appropriate tenancies from the April following the installation of CCTV cameras to the specific blocks and estates. The installation is planned to take place over the next twelve months.
- 3.5 The heating pool is a ring fenced self-financing account within the HRA. Some 10,500 tenanted and 3,500 leasehold properties receive district-heating services and/or gas supplies from the Council. For 2018/19, heating charges were frozen. The Council's procurement strategy for gas supplies includes

buying gas in advance from the wholesale markets, to even out fluctuations in wholesale prices. Continued successful procurement, combined with the council's long-term commitment to invest in energy efficiency works has resulted in a projected surplus of £1.2m for the end of 2018/19.

- 3.6 Gas prices from Camden's bulk purchasing agreement fluctuate from year to year and are projected to be 26% higher this year with a further price rise of 9% in October 2019. It is estimated however that costs can be recovered by the existing level of charges and the use of some of the Heating Pool surplus. Therefore, it is recommended that heating scale charges do not change in 2019/20 (**Appendix E**). It is also recommended to refund residents in "Bulk gas" Heating sites the equivalent of eight weeks charges so that annual charges reflect expenditure incurred on these blocks.
- 3.7 A review of the charges levied within the Supported Housing portfolio within the HRA has been carried out. In order to ensure that the Council's hostels remain self-financing and remain affordable for residents, taking into account continuing pressure on welfare benefits, it is recommended that service charges for cleaning, concierge and communal amenities, along with the enhanced housing management charges for sheltered housing are increased by 2.4% (CPI as at September 2018). The revised rents and service charges will raise an additional £55,000 per annum and are set out in **Appendix C**.
- 3.8 A review of the Council's non-dwelling assets is currently taking place and it is recommended that no changes are made to the charges for Garages and Sheds at this time. A review of the leaseholder administration charges has also been carried out to ensure that the charges are reasonable and cover the cost of the activities, changes to a small number of the leaseholder administration charges are recommended, the proposed changes are detailed in **Appendix D**.
- 3.9 To ensure that all resident safety work and other budgetary pressures are fully funded a drawdown of £1.4m of reserves could be required. However if the recommended service charge increases are agreed, the drawdown from reserves would be reduced to £1.09m (Table 5). A summary of the pressures and savings, and the proposed changes to charges for 2019/20 is shown in the table below.

Table Five: **Summary of Budget Movements 2019/20**

	£'000
Budgetary Pressures:	
Inflation, Employee costs, loss of rental Income, repairs.	3,947
Enhanced resident safety	2,725
Less:	
MTFS Savings Applied (Appendix B)	-5,267
Budget Pressure	1,405
Proposed Tenants Service Charges	-312
Drawdown from Reserves	-1,093
Net Budget	0

4. WHAT ARE THE KEY IMPACTS / RISKS? HOW WILL THEY BE ADDRESSED?

- 4.1 The HRA currently has debt of £479million, including £182m of internal borrowing, and repays interest of c£17million per annum. While the majority of external debt is secured at fixed interest rates, £109million of loans and the internal borrowing are at variable rates. Interest rates are forecast to rise over the medium term and every 1% increase in the interest rate applied to the variable rate loans equates to a £2.9million budget pressure to the HRA.
- 4.2 The Government have recently lifted the HRA borrowing cap in order to help free Councils to build more social and affordable housing. While the debt cap has been lifted the Council must still comply with the prudential code and ensure that all borrowing it enters into is affordable. It is only through stringent planning and monitoring of both expenditure and resources that the Council ensures that all borrowing it enters into can be repaid from HRA resources.
- 4.3 The cumulative impact of 4 years of the 1% reduction in rents has meant that the Council has not been able to make additional revenue contributions to the capital budget, increasing the likelihood of higher reactive repairs costs in future years.
- 4.4 The planned introduction of universal credit as part of the Government's welfare changes could also have an impact on the HRA. There is a significant risk that the introduction could lead to an increase in rent arrears, the Council is addressing this risk by reviewing the way officers work with vulnerable tenants to provide more financial and welfare advice as tenants.
- 4.5 Overall the medium term outlook for the HRA is challenging, but the financial strategy will remain focused on delivering efficiency improvements to protect front-line services.
- 4.6 An Equality Impact Assessment has been carried out (**appendix F**) and it concludes there will be no potential for discrimination. The net impact of the decrease in rent and small increase in service charges means that no social housing tenant will be worse off as a result of the recommendations in this report. The Housing Service will continue to identify and assist those affected with welfare and debt management issues. No disproportionate impact is expected between gender (though the majority of single parents in Camden are women) or disability groups compared to other groups. Set against these impacts, raising some charges, would provide resources to improve the quality of housing in the borough, for some of the most vulnerable residents. Good quality housing is a generally accepted key determinate of health and general well-being.

5. LINKS TO OUR CAMDEN PLAN

- 5.1 The provision of well-maintained housing is a key contributor to a number of objectives included in the Camden Plan outcomes including providing

sustainable neighbourhoods, reducing health inequalities and supporting complex families.

6. CONSULTATION/ENGAGEMENT

- 6.1 In line with previous years, feedback has been sought from District Management Committee members at their individual December meetings and at their joint meeting in January. Views of the district management committees will be circulated separately to Cabinet after the January consultation meeting have taken place (**Appendix G**).

7. LEGAL IMPLICATIONS

- 7.1 Under section 74 of the Local Government and Housing Act 1989 (“the 1989 Act”), the Council is required to keep a separate Housing Revenue Account of sums falling to be credited or debited in respect of its housing stock. Sections 75 and 76 of the 1989 Act set out the rules for establishing and maintaining that account. Under section 76 of the 1989 Act, the Council is required to formulate in January and February of each year proposals for the HRA for the following year which satisfy the requirements of that section and which relate to income, expenditure and any other matters which the Secretary of state has directed shall be included. In formulating these proposals the Council must secure that upon their implementation the HRA will not show a debit balance assuming that the best assumptions and best estimates it can make at the time prove to be correct. The 1989 Act also requires the authority to review the proposals from time to time and make such adjustments as are necessary to ensure that the requirements, as set out above, continue to be met.
- 7.2 The Council may make such reasonable charges as it so determines for the tenancy or occupation of their dwellings and shall review those rents and charges from time to time, as circumstances may require (s24 Housing Act 1985). In so doing the Council must have regard to any relevant standards set for them under section 193 of the Housing and Regeneration Act 2008. In addition, although the Government’s Guidance on rents for social housing is non statutory, it is a relevant consideration for the Council to have regard to the guidance when deciding on its approach to rent/service charge setting and the options being considered in this report should, where applicable, consider the matters set out within it.
- 7.3 The council’s conditions of tenancy permit a variation relating to rent or to payments in respect of services by the landlord in accordance with a provision in the lease or agreement creating the tenancy. The formal statutory steps to vary the terms of contract contained in sections.102-103 of the Housing Act 1985 do not apply to a variation of the rent, or of payments in respect of services or facilities provided by the landlord and therefore all that is required is the issue of a notification letter of the new annual charges signed by an officer with the appropriate delegation.
- 7.4 The Council must take into account in coming to any decision its equality duties under s149 of the Equality Act 2010 and have due regard to them. In summary these legal obligations require the Council when exercising its functions to have ‘due regard’ to the need to eliminate discrimination,

harassment and victimisation and other conduct prohibited under the Act, advance equality of opportunity between people who share a relevant protected characteristic and those who don't and foster good relations between people who share a relevant protected characteristic and those who don't (which involves tackling prejudice and promoting understanding). Under the Duty the relevant protected characteristics are: Age, Disability, Gender Reassignment, Pregnancy and maternity, Race, Religion, Sex, Sexual orientation. Paragraph 6.2 provides a summary of the overarching EIA, which is attached (Appx F). A careful consideration of the assessment carried out is one of the key ways in which Members can show "due regard" to any equalities impact. "Due regard" means the regard that is appropriate in all the particular circumstances in which the authority is carrying out its functions. There must be a proper regard for the goals set out in s.149. Members should be aware that the duty is not to achieve the objectives or take the steps set out in s.149 but to bring these objectives into consideration when carrying out public functions. In summary, the EIA analyses the equalities impact of the individual proposals recognising that there will be or may be some adverse impacts and the measures to be taken to mitigate such effects; and at pages 29–30 a summary of both negative as well as positive impacts to promote opportunities to advance equality. Lastly, Stage 4 'planning for improvement' includes mitigation measures to address the impact on vulnerable groups, and that the savings initiative is to be kept under review as savings are implemented to monitor any unforeseen outcomes.

8. RESOURCE IMPLICATIONS

- 8.1 The comments of the Executive Director Corporate Services are incorporated within the report.

9. TIMETABLE FOR IMPLEMENTATION

- 9.1 Any decisions made by Members regarding rents and service charges will be implemented from April 2019. The required legal notification letters will be sent to tenants at least one month before the implementation of any changes to rents and service charges.

10. APPENDICES

Appendix A – DRAFT Housing Revenue Account BUDGET 2019/20

Appendix B – Housing Revenue Account Medium Term Financial Strategy

Appendix C – Revised Supported Housing Service Charges

Appendix D – Changes to Leaseholder Administrative Charges

Appendix E – Heating Pool Charges

Appendix F – Equality Impact Assessment

Appendix G – Views of the District Management Committees (to follow).

Appendix A

DRAFT HRA BUDGET 2019/20

	2018/19 Budget £'000	2019/20 Draft Budget £'000	Change in Budget £'000
Expenditure			
Repairs	50,148	51,609	1,461
Housing Management Services	21,647	23,885	2,238
Commercial Properties	1,668	1,703	35
Housing Needs	1,283	1,310	26
Temporary Accommodation	2,706	2,625	-80
Estate Management	13,831	14,338	507
Power	10,004	10,347	343
Rent and Rates	6,353	6,180	-173
Tenant Mgmt Organisations	2,394	2,540	147
Debt/Capital Outlay/Contingency	78,428	68,150	-10,278
Bad Debts Provision	1,236	1,236	0
Corporate & Democratic Core	3,930	3,939	10
Total Expenditure	193,627	187,862	-5,765
Income:			
Government PFI Grant	-6,824	0	6,824
Dwelling Rents	-130,743	-130,222	521
Other Rents	-12,314	-13,219	-904
Charges for Services	-43,146	-42,166	980
HRA Investment Income	-600	-850	-250
Total Income	-193,627	-186,457	7,170
Budgetary gap to Close	0	1,405	1,405
LESS: Proposed action to close budgetary gap			
Increased service charges		-312	
Use of Reserves		-1093	
NET TOTAL	0	0	0

APPENDIX B

Housing Revenue Account – Medium Term Financial Strategy

Project Name	Agreed Savings 17/18 £000	Agreed Savings 18/19 £000	Agreed Savings 19/20 £000
Management of Property Portfolio. <ul style="list-style-type: none"> • Utilisation of Better Homes framework and the contract for major repairs. • Standardise procurement of materials across the whole property portfolio. • Review of specifications. • Review of discretionary repairs taking place. 		2,065	3,120
Increasing income from the commercial property portfolio. <ul style="list-style-type: none"> • Leasing of roof space for digital connectivity – most contracts already signed. • Lease reviews for commercial units. • Portfolio review to identify underutilised assets 	812	1,340	2,252
Void Performance Improvement <ul style="list-style-type: none"> • Work under way to reduce the average cost of void work. Repair work on a number of voids being carried out by In-House teams. • Whole system review supporting the drive to improve Void turnaround times and increase rent and service charge income. 	320	1,100	1,100

Service charges <ul style="list-style-type: none"> • 	902	1,500	1,500
Developing a new Landlord service <ul style="list-style-type: none"> • Leases ending on buildings where the Council is the leaseholder. Savings in service charges and lease payments. • Review of the whole landlord service expected to facilitate savings across the HRA by reducing duplication and increasing early intervention work for tenants and leaseholders avoiding more costly future work. 	200	200	500
Long term Property, Landlord and Asset Strategy Review <ul style="list-style-type: none"> • A new integrated asset strategy for 2017 – 2020, to consider making best of assets, identification of high cost assets and options, understanding of cost drivers and scope for funding solutions. • Review of contracts for major works, maintenance and repairs across the whole council. • Review of delivery of management of properties across the whole Council, housing, corporate, schools. • Re-focusing housing management and tenancy support to ensure residents are supported through the implementation of Universal Credit and to protect the Council's rental income streams. 		1,500	4,500
TOTAL	2,234	7,705	12,972

Appendix C

Revised Supported Housing Service Charges

Weekly Rent Charges to Residents	Charges 2018/19 £	Charges 2019/20 £	Change 2.4%
<u>Service Charges</u>			
Cleaning	48.67	49.84	1.17
Cleaning Self-Contained	30.94	31.68	0.74
Concierge (where applicable)	76.99	78.84	1.85
Amenity Charge Single	15.10	15.10	0.00
Amenity Charge Couple	25.91	25.91	0.00
Amenity Charge Communal	3.96	3.96	0.00
Sheltered Housing Enhanced Management Charge	43.32	44.36	0.43

APPENDIX D

Changes to Leasehold Administration Charges

Description	Fees 2018-19	Changes proposed for 2019-20
Commercial Assignment Fees	£300.00	£350.00
Discharge fee	£82.00	£84.00
Letters Of Postponement	£124 for statutory and £196 for voluntary	£125 for statutory and £200 for voluntary
Ad Hoc Assignment queries (Copy Of Lease)	£34.00	£40.00

Appendix E

Heating Pool Charges

Financial summary

The following table sets out expected costs and income, based on the estimates set out in the report. .

HEATING POOL 2019/20	2017/18 Actual £'000	2018/19 Forecast £'000	2019/20 Estimates £'000
Increase (Decrease) in charges from 1 April		0.00%	0.00%
Fuel Costs	5,496	7,026	7,692
Bad Debt Costs	28	205	215
Maintenance & Infrastructure Costs	915	985	1,090
TOTAL EXPENDITURE	6,439	8,216	8,997
TOTAL INCOME	-8,413	-8,411	-8,726
(Surplus)/Deficit for Year	-1,974	-195	271

Movement in Reserves

(Surplus) / Deficit Brought Forward	-2,259	-3,039	-1,250
Surplus/Deficit in year	-1,974	-195	271

Refund or investment in energy efficient works	1,195	1,083	80
Surplus earmarked for a cold winter		900	900
Reserves Carried Forward	-3,038	-1,250	0

Bulk Gas sites will be refunded according to consumption data as outlined in the table below;

Address	Number of weeks to be refunded
College PI Est 1 & 2	8
Ingestre Road Estate	8
Abbey Estate(Excl Mary Green & Newton House)	8
Gresse St (25, 1-92)	8
Whitton(1-75)	8
Kingsland (1-72)	8
Heybridge 1-35/Widford 1-32 & Roxwell (1-4)	8
Hardington (1-64) & Belmont St (94-102)	8
Webheath 1-55 & 197-207	8

Highgate Rd Estate (Haddo Hse, Ravenswood, Wheatley & Clanfield)	8
Mansfield Road (17-79)	8
Rowstock (1-48)	8
Pooled Gas Sites	8

HEATING POOL CHARGES (Uncapped) 2019/20 (£/Week)

Scale	Type	Season	Hours	Supply	No of Bedrooms						
					0	1	2	3	4	5	6
A1	Full Heating	52 Weeks	24 Hours	H & HW & C	9.30	12.21	17.15	19.51	22.75	27.15	29.88
A2	Full Heating	52 Weeks	24 Hours	H & HW	8.30	11.21	15.79	17.95	21.06	24.97	27.55
A3	Full Heating	52 Weeks	24 Hours	H & C	7.39	9.35	12.80	13.72	15.55	17.05	18.30
A4	Full Heating	52 Weeks	24 Hours	H	6.39	8.34	11.43	12.16	13.86	14.88	15.97
B1	Full Heating	52 Weeks	Night Setback	H & HW & C	9.03	11.86	16.67	18.99	22.16	26.51	29.22
B2	Full Heating	52 Weeks	Night Setback	H & HW	8.03	10.86	15.30	17.43	20.47	24.34	26.88
B3	Full Heating	52 Weeks	Night Setback	H & C	7.12	8.99	12.31	13.20	14.96	16.42	17.64
B4	Full Heating	52 Weeks	Night Setback	H	6.12	7.99	10.95	11.64	13.27	14.25	15.30
C1	Full Heating	52 Weeks	Night Shutdown	H & HW & C	8.15	10.71	15.09	17.32	20.25	24.46	27.01
C2	Full Heating	52 Weeks	Night Shutdown	H & HW	7.15	9.71	13.73	15.76	18.56	22.29	24.68
C3	Full Heating	52 Weeks	Night Shutdown	H & C	6.24	7.84	10.74	11.53	13.05	14.37	15.43
C4	Full Heating	52 Weeks	Night Shutdown	H	5.24	6.84	9.37	9.97	11.36	12.20	13.09
D1	Partial Heating	52 Weeks	24 Hours	H & HW & C	9.75	10.71	15.09	16.72	18.26	21.64	23.28
D2	Partial Heating	52 Weeks	24 Hours	H & HW	8.75	9.71	13.73	15.16	16.57	19.47	20.95
D3	Partial Heating	52 Weeks	24 Hours	H & C	7.84	7.84	10.74	10.93	11.06	11.55	11.70
D4	Partial Heating	52 Weeks	24 Hours	H	6.84	6.84	9.37	9.37	9.37	9.37	9.37
E1	Partial Heating	52 Weeks	Night Setback	H & HW & C	9.11	10.07	14.21	15.84	17.38	20.76	22.40
E2	Partial Heating	52 Weeks	Night Setback	H & HW	8.10	9.06	12.85	14.28	15.69	18.59	20.07

E3	Partial Heating	52 Weeks	Night Setback	H & C	7.20	7.20	9.86	10.05	10.18	10.67	10.82
E4	Partial Heating	52 Weeks	Night Setback	H	6.20	6.20	8.49	8.49	8.49	8.49	8.49
F1	Partial Heating	52 Weeks	Night Shutdown	H & HW & C	7.90	8.86	12.55	14.18	15.72	19.10	20.74
F2	Partial Heating	52 Weeks	Night Shutdown	H & HW	6.90	7.86	11.18	12.62	14.03	16.92	18.41
F3	Partial Heating	52 Weeks	Night Shutdown	H & C	5.99	5.99	8.19	8.39	8.52	9.00	9.16
F4	Partial Heating	52 Weeks	Night Shutdown	H	4.99	4.99	6.83	6.83	6.83	6.83	6.83
G1	Background Heating	52 Weeks	24 Hours	H & HW & C	9.36	11.20	15.77	18.03	21.07	25.34	27.96
G2	Background Heating	52 Weeks	24 Hours	H & HW	8.36	10.20	14.41	16.47	19.38	23.17	25.63
G3	Background Heating	52 Weeks	24 Hours	H & C	7.45	8.33	11.41	12.24	13.87	15.25	16.38
G4	Background Heating	52 Weeks	24 Hours	H	6.45	7.33	10.05	10.68	12.18	13.08	14.04
GMQ2	Partial Heating	Heating Season	24 Hours	H & HW	7.84	9.30	10.03	10.70	11.99	14.08	15.14
H1	Background Heating	52 Weeks	Night Setback	H & HW & C	9.11	10.91	15.36	17.61	20.57	24.82	27.39
H2	Background Heating	52 Weeks	Night Setback	H & HW	8.10	9.91	14.00	16.05	18.88	22.64	25.05
H3	Background Heating	52 Weeks	Night Setback	H & C	7.20	8.04	11.01	11.82	13.38	14.72	15.80
H4	Background Heating	52 Weeks	Night Setback	H	6.20	7.04	9.64	10.26	11.69	12.55	13.47
J1	Background Heating	52 Weeks	Night Shutdown	H & HW & C	7.91	9.56	13.51	15.63	18.33	22.40	24.80
J2	Background Heating	52 Weeks	Night Shutdown	H & HW	6.91	8.55	12.14	14.07	16.64	20.23	22.47

J3	Background Heating	52 Weeks	Night Shutdown	H & C	6.00	6.69	9.15	9.84	11.13	12.31	13.22
J4	Background Heating	52 Weeks	Night Shutdown	H	5.00	5.68	7.79	8.28	9.44	10.14	10.89
K1	Full Heating	Heating Season	24 Hours	H & HW & C	9.05	11.88	16.69	19.02	22.19	26.55	29.25
K2	Full Heating	Heating Season	24 Hours	H & HW	8.04	10.88	15.33	17.46	20.50	24.38	26.92
K3	Full Heating	Heating Season	24 Hours	H & C	7.14	9.01	12.34	13.23	15.00	16.46	17.67
K4	Full Heating	Heating Season	24 Hours	H	6.13	8.01	10.97	11.67	13.31	14.28	15.34
L1	Full Heating	Heating Season	Night Setback	H & HW & C	8.58	11.27	15.86	18.13	21.17	25.46	28.08
L2	Full Heating	Heating Season	Night Setback	H & HW	7.58	10.27	14.49	16.57	19.48	23.28	25.75
L3	Full Heating	Heating Season	Night Setback	H & C	6.67	8.40	11.50	12.34	13.97	15.36	16.50
L4	Full Heating	Heating Season	Night Setback	H	5.67	7.40	10.14	10.78	12.28	13.19	14.17
M1	Full Heating	Heating Season	Night Shutdown	H & HW & C	8.15	10.71	15.09	17.32	20.25	24.46	27.01
M2	Full Heating	Heating Season	Night Shutdown	H & HW	7.15	9.71	13.73	15.76	18.56	22.29	24.68
M3	Full Heating	Heating Season	Night Shutdown	H & C	6.24	7.84	10.74	11.53	13.05	14.37	15.43
M4	Full Heating	Heating Season	Night Shutdown	H	5.24	6.84	9.37	9.97	11.36	12.20	13.09
N1	Partial Heating	Heating Season	24 Hours	H & HW & C	8.85	9.81	13.86	15.49	17.03	20.41	22.05
N2	Partial Heating	Heating Season	24 Hours	H & HW	7.85	8.81	12.50	13.93	15.34	18.23	19.72
N3	Partial Heating	Heating Season	24 Hours	H & C	6.94	6.94	9.50	9.70	9.83	10.31	10.47
N4	Partial Heating	Heating Season	24 Hours	H	5.94	5.94	8.14	8.14	8.14	8.14	8.14
P1	Partial	Heating	Night	H & HW & C	8.62	9.57	13.53	15.16	16.70	20.08	21.73

	Heating	Season	Setback								
P2	Partial Heating	Heating Season	Night Setback	H & HW	7.61	8.57	12.17	13.60	15.01	17.91	19.40
P3	Partial Heating	Heating Season	Night Setback	H & C	6.71	6.71	9.18	9.37	9.50	9.99	10.15
P4	Partial Heating	Heating Season	Night Setback	H	5.70	5.70	7.81	7.81	7.81	7.81	7.81
Q1	Partial Heating	Heating Season	24 Hours	H & HW & C	6.50	7.46	10.63	12.26	13.80	17.18	18.82
Q2	Partial Heating	Heating Season	24 Hours	H & HW	5.50	6.46	9.27	10.70	12.11	15.00	16.49
Q3	Partial Heating	Heating Season	24 Hours	H & C	4.59	4.59	6.27	6.47	6.60	7.08	7.24
Q4	Partial Heating	Heating Season	24 Hours	H	3.59	3.59	4.91	4.91	4.91	4.91	4.91
R1	Partial Heating	Heating Season	Night Shutdown	H & HW & C	8.33	9.29	13.15	14.78	16.32	19.69	21.34
R2	Partial Heating	Heating Season	Night Shutdown	H & HW	7.33	8.29	11.79	13.22	14.63	17.52	19.01
R3	Partial Heating	Heating Season	Night Shutdown	H & C	6.42	6.42	8.79	8.98	9.12	9.60	9.76
R4	Partial Heating	Heating Season	Night Shutdown	H	5.42	5.42	7.43	7.43	7.43	7.43	7.43
S1	Background Heating	Heating Season	24 Hours	H & HW & C	8.91	10.69	15.07	17.29	20.21	24.43	26.97
S2	Background Heating	Heating Season	24 Hours	H & HW	7.91	9.69	13.70	15.73	18.52	22.26	24.64
S3	Background Heating	Heating Season	24 Hours	H & C	7.00	7.82	10.71	11.50	13.02	14.34	15.39
S4	Background Heating	Heating Season	24 Hours	H	6.00	6.82	9.35	9.94	11.33	12.16	13.06
T1	Background Heating	Heating Season	Night Setback	H & HW & C	8.64	10.38	14.64	16.84	19.71	23.88	26.39
T2	Background Heating	Heating Season	Night Setback	H & HW	7.64	9.38	13.28	15.29	18.02	21.71	24.06

T3	Background Heating	Heating Season	Night Setback	H & C	6.73	7.52	10.29	11.05	12.51	13.79	14.81
T4	Background Heating	Heating Season	Night Setback	H	5.73	6.51	8.92	9.50	10.82	11.62	12.48
U1	Background Heating	Heating Season	Night Shutdown	H & HW & C	7.62	9.22	13.04	15.14	17.77	21.81	24.15
U2	Background Heating	Heating Season	Night Shutdown	H & HW	6.62	8.22	11.68	13.58	16.08	19.63	21.82
U3	Background Heating	Heating Season	Night Shutdown	H & C	5.71	6.35	8.69	9.35	10.57	11.71	12.57
U4	Background Heating	Heating Season	Night Shutdown	H	4.71	5.35	7.32	7.79	8.88	9.54	10.23
W	Hot Water Only				4.25	4.39	5.12	5.79	7.08	9.17	10.23
Z	Warm Air Units				0.00	0.00	0.00	0.00	0.00	0.00	0.00
Z1	Background Heating	52 Weeks	24 Hours	H	5.81	6.60	9.04	9.62	10.96	11.77	12.64
Z2	Background Heating	Heating Season	Night Setback	H & HW	7.00	9.53	13.48	15.50	18.26	21.96	24.33
Z3	Partial Heating	Heating Season	24 Hours	H	5.34	5.34	7.32	7.32	7.32	7.32	7.32
Z4	Partial Heating	Heating Season	Night Setback	H	5.13	5.13	7.03	7.03	7.03	7.03	7.03
Z5	Partial Heating	Heating Season	Night Shutdown	H	4.88	4.88	6.69	6.69	6.69	6.69	6.69
Z6	Background Heating	Heating Season	24 Hours	H	5.40	6.13	8.41	8.95	10.20	10.95	11.76
Z7	Background Heating	Heating Season	Night Shutdown	H & HW	6.14	7.68	10.95	12.80	15.19	18.67	20.79
Z8	Partial Heating	Heating Season	24 Hours	H	5.52	7.21	9.87	10.51	11.97	12.86	13.80

Bulk Gas Heating Charges (Uncapped) 2019/20 (£/Week)

Scale	Address	Type	Supply	No of Bedrooms						
				0	1	2	3	4	5	6
X1	College Place Estate 1 & 2 -BH	Bulk Gas site, individual boiler	H & HW & C	4.81	6.30	8.85	10.06	11.74	14.01	15.44
Y1	College Place Estate 1 & 2 -BH	Bulk Gas site, individual boiler	H & HW	4.29	5.78	8.15	9.27	10.87	12.88	14.22
X2	Ingestre Road Est -BH	Bulk Gas site, individual boiler	H & HW & C	6.27	8.24	11.57	13.15	15.34	18.30	20.14
Y2	Ingestre Road Est -BH	Bulk Gas site, individual boiler	H & HW	5.59	7.54	10.63	12.08	14.18	16.81	18.55
X3	Abbey Estate 1 (excl Mary Green & Newton Hse)	Bulk Gas site, individual boiler	H & HW & C	5.75	7.54	10.60	12.06	14.05	16.79	18.48
Y3	Abbey Estate 1 (excl Mary Green & Newton Hse)	Bulk Gas site, individual boiler	H & HW	5.13	6.93	9.76	11.10	13.00	15.44	17.04
X4	Gresse St 25 (1-92)-BH	Bulk Gas site, individual boiler	H & HW & C	4.83	6.34	8.90	10.14	11.82	14.10	15.52
Y4	Gresse St 25 (1-92)-BH	Bulk Gas site, individual boiler	H & HW	4.31	5.83	8.20	9.33	10.94	12.98	14.32
X5	Whitton(1-75)-BH	Bulk Gas site, individual boiler	H & HW & C	4.49	5.88	8.27	9.40	10.96	13.08	14.40
Y5	Whitton(1-75)-BH	Bulk Gas site, individual boiler	H & HW	4.00	5.40	7.61	8.65	10.15	12.02	13.27
X6	Kingsland (1-72)-BH	Bulk Gas site, individual boiler	H & HW & C	6.35	8.34	11.71	13.33	15.53	18.54	20.42
Y6	Kingsland (1-72)-BH	Bulk Gas site, individual boiler	H & HW	5.67	7.66	10.78	12.27	14.38	17.05	18.82
X7	Heybridge 1-35/Widford 1-32/ Roxwell 1-4-BH	Bulk Gas site, individual boiler	H & HW & C	6.09	7.99	11.23	12.77	14.90	17.78	19.57

Y7	Heybridge 1-35/Widford 1-32/ Roxwell 1-4-BH	Bulk Gas site, individual boiler	H & HW	5.43	7.33	10.33	11.75	13.78	16.35	18.04
X8	Hardington (1-64) & Belmont Street (94-102)-BH	Bulk Gas site, individual boiler	H & HW & C	6.14	8.05	11.32	12.88	15.00	17.92	19.72

Bulk Gas Heating Charges (Uncapped) 2019/20 (£/Week)

Scale	Address	Type	Supply	No of Bedrooms						
				0	1	2	3	4	5	6
Y8	Hardington (1-64) & Belmont Street (94-102)-BH	Bulk Gas site, individual boiler	H & HW	5.47	7.40	10.42	11.84	13.90	16.48	18.19
X9	Webheath 1-55 & 197-207-BH	Bulk Gas site, individual boiler	H, HW & C	6.56	8.62	12.11	13.78	16.06	19.17	21.11
Y9	Webheath 1-55 & 197-207-BH	Bulk Gas site, individual boiler	H & HW	5.86	7.91	11.15	12.68	14.86	17.64	19.46
X10	Highgate Rd Est-BH (Haddo Hse, Ravenswood, Wheatley, Clanfield)	Bulk Gas site, individual boiler	H, HW & C	6.06	7.96	11.18	12.72	14.83	17.71	19.50
Y10	Highgate Rd Est-BH (Haddo Hse, Ravenswood, Wheatley, Clanfield)	Bulk Gas site, individual boiler	H & HW	5.42	7.32	10.31	11.73	13.75	16.31	18.00
X11	Mansfield Road (17-79)-BH	Bulk Gas site, individual boiler	H, HW & C	8.95	11.74	16.51	18.77	21.89	26.11	28.77
Y11	Mansfield Road (17-79)-BH	Bulk Gas site, individual boiler	H & HW	7.98	10.78	15.18	17.27	20.25	24.02	26.51
X12	Rowstock (1-48)-BH	Bulk Gas site, individual boiler	H, HW & C	5.57	7.32	10.29	11.70	13.63	16.27	17.92
Y12	Rowstock (1-48)-BH	Bulk Gas site, individual boiler	H & HW	4.97	6.71	9.47	10.76	12.62	14.97	16.52
X50	Pooled Gas Sites	Bulk Gas site, individual boiler	H, HW & C	6.87	9.00	12.64	14.39	16.79	20.02	22.04
Y50	Pooled Gas Sites	Bulk Gas site, individual boiler	H & HW	6.12	8.27	11.66	13.26	15.55	18.43	20.35

* Supply Key

C Cooking
H Heating
HW Hot Water

Name of proposed decision/policy being reviewed:

Housing Revenue Account (HRA) Budget and Rent Review 2019/20 and Medium Term Financial Strategy

What is changing and why?

If the issue is going for decision, e.g. at Cabinet meeting, what are the decision makers being asked to decide? If you are reviewing a policy what are its main aims? How will these changes affect people?

The changes proposed as part of the proposed HRA budget for 2019/20 are:

- Government mandated reduction in council rents by 1% from April 2018
- Revised tenant service charges for Caretaking, Communal Lighting, Mobile Security and Communal Mechanical and Electrical Maintenance
- A new service charge of £2.10/week for an enhanced CCTV service to be levied from the April following the installation of a new CCTV service
- Heating Pool scales unchanged from 2018/19 prices and refund the surplus generated on bulk gas sites to tenants
- Revised service charges in the HRA hostels and supported housing
- Revised Leaseholder Administration Charges

The purpose of the changes is to enable the Council to achieve its objective of being an exemplary social housing landlord and views its role as a social landlord as a key contributor to a number of Camden Plan objectives including providing sustainable neighbourhoods, reducing health inequalities and supporting complex families.

Question 2

Who will be affected by this decision and how?

In particular do those from protected groups benefit or will they experience specific and disproportionate impacts? Will there be any direct or indirect discrimination?

The changes will affect the c.22,000 tenant households in the following ways:

- Reduction of council rents by 1% from April 2018 – tenants who do not claim housing benefit would benefit from increased disposable income, offset by the potential for reduced services. Note that this is a central government policy rather than a council policy and as such will have been subject to a central government EIA when first introduced.
- Increase in tenant service charges for Caretaking, Communal Lighting, Mobile Security and Communal Mechanical and Electrical Maintenance – tenants who do not claim housing benefit would have less disposable income but this should be offset by fully funded services which meet their needs.
- A new service charge of £2.10/week for an enhanced CCTV service – this should have a beneficial impact by improving security and helping tenants to feel safer.
- Heating Pool scales unchanged from 2018/19 prices and refund the surplus generated on bulk gas sites to tenants – this would have a neutral impact on tenants and leaseholders who are part of the Heating Pool and potentially beneficial if their household income increases. The refund would benefit those tenants and leaseholders affected.
- Revised service charges in the HRA hostels and supported housing – tenants who do not claim housing benefit would have less disposable income but this should be offset by fully funded services which meet their needs.
- Increase in some Leaseholder Administration Charges – leaseholders who need or wish to use these services would have to pay slightly more for them.

Some protected groups are overrepresented among tenants – older people, children, women, disabled people and people from certain BAME groups. See the data section below for details. Little data is available on the characteristics of leaseholders.

However these overrepresented protected groups will not experience any specific and disproportionate impacts as a result of the changes proposed nor any direct or indirect discrimination.

Data on protected groups

Data on protected groups from various different sources (such as the 2011 census, Northgate Housing Management System, and national research) helps to form a summary of the demographics of HRA tenants. Very little data is available on leaseholders.

A section on the demographic of those residing in hostels has been added to this summary of protected groups, as they are a particularly vulnerable group.

Although Census data is now rather old it is often still the only or best source of data on tenants.

Age

Age data is available for lead tenants (from Northgate) or head of households (from the Census) only.

This shows that lead tenants are significantly older than the population as a whole. The tenant median age is 54 compared with 33 for the population as a whole¹.

More data is available from the Census at household level.

Households in which all members are aged 65 or over make up 18.4% of council tenant households compared with 13.4% of households as a whole².

On the other hand, a greater proportion of council tenant households have dependent children than households as a whole – 33.9% compared with 22.1%³.

Disability

2011 Census data is only available for social housing residents as a whole in Camden i.e. housing association and council tenants. It shows that 13.9% of social tenants' day-to-day activities are limited "a lot" by a long-term health problem or disability compared with 7.0% of all residents⁴.

Gender

Northgate data shows that women make up 62.6% of lead tenants⁵. The 2011 Census found that women make up 52.6% of social housing residents compared with 51.0% of residents as a whole (as for disability, there is no data available specifically for council tenants)⁶.

Race and Ethnicity

According to the 2011 Census, black and minority ethnic (BAME) residents make up of 50.3% of residents in council households compared with 33.4% of all residents⁷. Bangladeshi, Black African, White Other and White Irish are the four largest ethnic groups among tenants after White British.

Religion or Belief

The 2011 Census has data by tenure about the religion of the head of the household only. It showed that 45.1% of heads of council households were Christian compared with 36.1% of all heads of household, 17.7% were Muslim compared with 7.9%, and 16.3% were of no religion compared with 26.9%.

Sexual Orientation

The 2011 Census did not cover sexual orientation, nor do we routinely collect information on the sexual orientation of tenants. In the June 2016 STAR survey of Council tenants and leaseholders (a standardised tenant satisfaction survey carried out by Acuity), 1400 tenants provided response. Of the respondents, 94.55% identified themselves as heterosexual, 4.63% as gay or lesbian and 0.82% bisexual.

Demographic of Hostels

Data collected on the residents in hostels provides us mainly with data on gender, age and race/ethnicity. 44 household hostel residents provided information on the ages of 124 members of their households, while other age data was taken from the available date of birth information of other hostel residents. 22.66% of hostel residents are under 19, 75% of hostel residents are aged between 19-64 and 2.34% are over 65. Disproportionately few hostel residents are elderly, but the proportion of households with dependent children is not dissimilar to that of the wider population of Camden.

The split between male and female tenants is fairly representative of the borough as a whole with 51.98% of respondents being male and 48.02% being female. 33.15% of these

¹ LB Camden analysis of Northgate and Census data

² LB Camden analysis of Census table DC4101EW: Tenure by Household Composition

³ *ibid.*

⁴ LB Camden analysis of Census table DC3408EW - Long-term health problem or disability by tenure by sex by age

⁵ LB Camden analysis of management information

⁶ LB Camden analysis of Census table DC3409EW: General Health by Tenure by Sex by Age

⁷ BAME is taken to include all Black, Asian, Mixed and Other ethnic groups. Source: DC4203EW: Tenure by Car or Van Availability by Ethnic Group

residents refused or were not asked to supply details of their race/ethnicity and 1.69% are grouped as 'any other group'. 30.34% were white. 34.83% were BME, broadly in line with that of the wider population of Camden.

Gaps in data

Data on some protected characteristics is neither available from Census data or management information - gender reassignment, marriage and civil partnership and pregnancy and maternity. The limitations of data on other protected characteristics are noted above. When collecting data on protected groups, the council must balance several considerations including the privacy of tenants, the resources required to collect data and the usefulness of such data in decision-making.

Question 3

Does the proposed decision have an impact (positive or adverse) on our duty to eliminate discrimination/harassment and victimisation, promote equality of opportunity or foster good relations between different groups in the community (those that share characteristics and those that do not)?

The proposed decisions are not anticipated to have any impact (positive or negative) on the Council's duties to eliminate discrimination/harassment and victimisation, promote equality of opportunity or foster good relations between different groups in the community.

Question 4

If there is an adverse impact, can it be avoided?

If it can't be avoided, what are we doing to mitigate the impact?

This section does not apply as no adverse impacts are anticipated.

Question 5

Could any part of the proposed activity discriminate unlawfully?

Can we advance equality of opportunity via this decision/policy?

Can we foster good relations via this decision/policy?

None of the changes will discriminate unlawfully.

While Camden's council housing and the services that support tenants generally make an important contribution to the advancement of equality of opportunity and fostering good relations, the proposed changes do not have an impact, positive or negative, on this contribution.

EIA prepared by: Michael Webb

Date: 21 December 2018

EIA checked by: Jason Blackhurst

Date: 21 December 2018

EIA approved by: Mary McGowan

Date: 21 December 2018

(Relevant Director Sponsor)