

**AGENDA MANAGEMENT SHEET**

**Report Title:** Housing Revenue Account stock condition survey

**Name of Committee:** Cabinet

**Date of Meeting:** 4 December 2023

**Report Director:** Chief Officer - Communities and Homes

**Portfolio:** Communities, Homes, Digital and Communications

**Ward Relevance:** All

**Prior Consultation:** Portfolio Holder; Party Representatives (Labour and Liberal Democrat); Budget Working Group

**Contact Officer:** William Winter (William.winter@rugby.gov.uk)

**Public or Private:** Public

**Report Subject to Call-In:** Yes

**Report En-Bloc:** No

**Forward Plan:** Yes

**Corporate Priorities:** This report relates to the following priority(ies):  
 Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effects of climate change. (C)  
 Rugby has a diverse and resilient economy that benefits and enables opportunities for all residents. (E)  
 Residents live healthy, independent lives, with the most vulnerable protected. (HC)  
 Rugby Borough Council is a responsible, effective and efficient organisation. (O)  
[Corporate Strategy 2021-2024](#)  
 This report does not specifically relate to any Council priorities but

**Summary:** The report demonstrates the Council's ongoing commitment to being a responsible and trusted landlord of choice.

The commissioning of a stock condition survey will provide a solid evidence base for determining future investment in the council's portfolio of Housing Revenue Account properties.

The proposal is to initially engage an external supplier to survey 60% of the housing stock and 100% of communal areas in the first tranche.

The proposed phase 1 of inspection will include the production of up-to-date Energy Performance Certificates for 700 homes, initially, to better inform our understanding of the decarbonisation requirements of the stock as well as compliance with the Decent Homes Standard (DHS).

**Financial Implications:**

The financial implications, including those of achieving value for money, are set out on section 9 of the report.

**Risk Management/Health and Safety Implications:**

The proposed approach enables the Council to have an informed view of the condition of the housing stock. The resulting evidence-base will determine the future investment requirements to ensure that the Council's homes are, at a minimum, compliant with the decent homes' standard and benefit from improved energy performance.

A clear understanding of stock condition also reduces the likelihood of future shock events arising that could adversely impact on the robustness of the Housing Revenue Account.

A more detailed commentary in respect of risk is detailed in section 8 of the report.

**Environmental Implications:**

An environmental impact assessment forms appendix 1 to this report.

**Legal Implications:**

The Social Housing Regulation Act (2023) sets out the regulatory regime for social housing.

The Regulator for Social Housing has a specific expectation that social landlords will have an accurate record at an individual property level on the condition of their stock, based on a physical inspection of all homes and that this is kept up to date.

Ensuring compliance with the Decent Homes Guidance is a requirement of all social housing providers.

**Equality and Diversity:**

An equality impact assessment forms appendix 2 to this report.

**Options:**

Procure a suitably qualified and experienced contractor with sufficient resource to conduct a stock condition survey, as outlined in 3.2. The utilisation of appropriate external expertise will enable the Council to achieve a rapid understanding of the current condition of its housing stock.

The alternative approach would be for the Council to independently secure and subsequently deploy resource to carry out the required survey works in-house. The risks of this approach are set out in more detail in section 8 of this report, indicating why this is not the preferred option.

To do nothing is not an option.

**Recommendation:**

IT BE RECOMMENDED TO COUNCIL THAT -

- (1) the proposed phase 1 (as outlined in section 3.2 of the report) stock condition survey be approved;
- (2) a supplementary budget of £283,000 from Housing Revenue Account reserves be established for phase 1 of the stock condition survey; and
- (3) provision be made at Housing Revenue Account budget setting for 2024/25 onwards for a rolling programme of 20% stock condition surveys and 350 Energy Performance Certificates per annum, or in compliance with the prevailing requirements of the Regulator for social housing, or its equivalent.

**Reasons for Recommendation:**

The Council is legally and morally obliged to ensure that its homes are safe, well-maintained and energy efficient for current and future tenants.

Adequate data on the condition of the stock will help future business planning and investment.

In adopting this approach, the council will be delivering on the priorities set out in its Housing Strategy 2022-24 which aims to *increase the quality and affordability of homes, not least by improving the energy efficiency of our poorer performing housing stock and at the same time reducing carbon emissions.*

**Cabinet - 4 December 2023**

**Housing Revenue Account stock condition survey**

**Public Report of the Chief Officer - Communities and Homes**

**Recommendation**

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**1.0 Executive summary**

The ambition of the Council is to be a trusted landlord of choice, providing quality homes at affordable rents for the residents of the borough now and into the future.

In addition, there is a recognition that good quality housing is a key determinant of ensuring positive health and social outcomes for our tenants.

The report sets out recommendations for conducting phase 1 of a stock condition survey of Housing Revenue Account properties – 60% of homes and 100% of communal areas, as well as Energy Performance Certificates for 700 properties.

The cost of phase 1 will be £283,000 and will be met from Housing Revenue Account reserves.

The proposal also recommends that, as part of future budget setting, provision should be made for delivering a rolling programme of surveys of 20% per annum. This demonstrates proactive asset management and provides a continued evidence base upon which to inform future investment decisions.

The scale, logistics and risks associated with this project requires that the work is best undertaken by a suitably qualified, experienced and adequately resourced contractor. Their services will be procured via a framework which has already been through the process of establishing both competency and value for money.

In the wider operational context, it should be noted that the Regulator for Social Housing has a specific expectation that social landlords will have an accurate record at an individual property level on the condition of their stock, based on a physical inspection of all homes and this is kept up to date.

## **2.0 Introduction**

- 2.1 The safety and welfare of our tenants is paramount in exercising our duties as a responsible landlord.
- 2.2 Conducting a stock condition survey, accompanied by collection of up-to-date Energy Performance Certificate data will create visibility of the condition of the council's Housing Revenue Account (HRA) asset base and in doing so be a robust evidence base for future and continued investment and robust HRA business planning.
- 2.3 The resulting evidence base will also demonstrate compliance with the Regulator for Social Housing's consumer regulation requirements and adherence to the Decent Homes standard.
- 2.4 The additionality of incorporating an assessment against the Housing Health and Safety Rating System (HHSRS), a risk based tool for evaluating risk in private-rented sector housing, improves the robustness of the data the council will hold about its housing stock.

## **3.0 Proposed works**

- 3.1 The appointed contractor will be required to conduct a visual inspection to systematically assess the age and condition of each key building component (both external and internal items) and report upon the current attributes and condition.
- 3.2 The first phase will comprise:
  - 2300 surveys
  - 200 communal areas
  - 700 energy performance certificates
- 3.3 Using digital solutions, the contractor will upload the stock survey data directly on to the council's asset management system (Technology Forge - TF). A key requirement is that the data can be extracted and manipulated to inform future reporting and business planning.

## **4.0 Managing the customer experience**

- 4.1 A key requirement is that the contractor will develop and implement a resident communication plan, to ensure effective and timely communication with tenants. This will be run in tandem with the Council's own communication channels, which will provide both reassurance and an explanation of the rationale for the survey work to the tenant base.

- 4.2 The contractor will own the booking process, confirming appointments by calling tenants as needed, rescheduling missed appointments etc to ensure the requisite quantity of surveys are completed without undue inconvenience or nuisance. Tenants will always be contacted to agree an alternative appointment if needed.
- 4.3 By taking account of tenant feedback and their experiences the contractor will be required to apply a lesson learned approach to adjust processes and to ensure the required contractual outcomes.

## **5.0 Proposed Key Performance Indicators (KPI's)**

- 5.1 The contractor will be required to produce succinct KPI data at agreed frequencies, as part of the wider contract. management process. These will include updates on:
- Total sites (communal areas) surveyed,
  - Total home surveys completed,
  - Total visits booked,
  - Total no access visit 1,
  - Total no access visit 2,
  - Total no access visit 3,
  - Overall Completion - communal areas %
  - Overall completion - homes %

## **6.0 The wider regulatory context**

- 6.1 The Regulator for Social Housing has recently completed consultation on its proposed amendments to consumer regulation, following Royal Assent of the Social Housing Regulation Act in July 2023.
- 6.2 They are planning to replace the current consumer standards with 4 new ones, which better reflect their statutory objectives, which will come into effect from April 2024. These are the:
- Safety and Quality Standard
  - Transparency, Influence and Accountability Standard
  - Neighbourhood and Community Standard
  - Tenancy Standard
- 6.3 The regulator's narrative around the Safety and Quality standard highlights a concern that:

*'there are significant variations in landlords understanding of the condition of their homes, and the recent cases of poor quality and disrepair coming to light demonstrate that not all tenants' homes are being maintained to the safety and quality standards required. This is unacceptable. Landlords must know the condition of their homes to ensure they comply with all relevant requirements'.*

6.4 A specific expectation is that social landlords will have an accurate record at an individual property level on the condition of their stock, based on a physical inspection of all homes and this is kept up to date.

## **7.0 Environmental aspects of the proposed works**

7.1 The completion of 700 EPC's in phase 1 will prioritise those properties where:

- There is no current EPC data
- Current certification is more than 10 years old
- Or, where any improvements have been carried out by the council that are likely to have changed the potential energy performance of the property.

7.2 Again, this data will support future investment planning in readiness for the current 2030 requirement for social landlords to achieve a minimum of EPC rating of C in their housing stock.

7.3 It is proposed that provision be made in future budget setting for to enable 350 EPC surveys per annum

7.4 An Environmental Impact Assessment forms appendix 1 to this report.

## **8.0 Risk management**

8.1 The absence of comprehensive stock condition data for the HRA is a risk to the Council.

8.2 The rationale for proposing 60% as phase 1 of the stock condition survey work is to ensure deliverability and to allow a period of reflection on lessons learned to support the commissioning of future phases.

8.3 There is an inevitability that some tenants will not permit access for surveyors to conduct the inspections. This is evident from our landlord experience in gaining safe access to tenants' homes in respect of gas servicing. This is likely to result in additional support being required from both the Legal Services and Housing Services Teams. The demand for repairs may also increase, because of survey findings. This will be monitored as part of the management of the project.

8.4 Stock condition surveying services are in extremely high demand across the social housing sector. For the council to attempt to this independently, without the support of an external specialist would be extremely risky, particularly in terms of being able to secure suitable qualified and experienced people to undertake the works. With the market for such services being so competitive, there is also the likelihood of a high turnover in any staffing secured as they move on to perceived better opportunities. here would also be potential delays to project implementation as a result.

8.5 A substantial benefit of contracting out the works means that the contractor will be taking responsibility for delivery but also for the administration involved in managing the logistic for delivery, not least the booking of appointments and managing of day-to-day enquiries.

- 8.6 This will have the added benefit of ensuring that the responsive repairs service telephony and back-office support will not be diverted away from the business-as-usual side of maintaining the Council's homes whilst the surveys progress.
- 8.7 The contractor proposals will be based on an assumed number of surveyors per day, as well as the remote inputting of data onto TF being effective and not slowing surveyors down. If the technology does prove to be cumbersome then the contractor will consider alternative to ensure progress is sufficient to ensure project viability.
- 8.8 Throughout the process, senior surveyors on the supplier's team will be required to audit quality and analyse any trends or failures to ensure issues are proactively rectified and/or accommodated for. This includes at least 10% of surveys being rechecked for both quality control and validation purposes. There will be a requirement that this % will increase if anomalies are found for any reason, to target remedial action.
- 8.9 There will be a robust approach to contract management by the Council's Asset Manager, which will include the development, maintenance and review of a risk register for the duration of the project.
- 8.10 It is proposed that following phase 1 there will be a period to reflect on the lessons learned and to refine requirements to inform the commissioning of phase 2 (the next 20% of the stock) to take place later in the 2024/25 and phase 3 (the remaining 20%) in the first half of 2025/26. Securing the required budgets to do this year-on-year form part of the recommendations of this report
- 8.11 The most efficient route to market is via a suitable and established framework. The benefit of this approach is that the procurement will have already been done to establish the framework, which will have included the appropriate due diligence in respect of value for money, quality, suitability, and experience. By calling off the framework the council can also substantially accelerate the project to implementation stage.

## **9.0 Financial issues**

- 9.1 It is proposed that budget provision be made as part of rent setting from 2024/25 onwards to enable:
- annual stock condition surveys of at least 20% of the stock to be carried out each year.
  - for collecting of a minimum of 350 Energy performance certificates (these only have to be renewed every 10 years and it is best proactive to do so when improvements have been made to properties)
- 9.2 By doing this, the approach of regular assessment and update of the Council's stock condition understanding will form business as usual.



9.3 The results arising from the stock condition survey work will have potential implications for the future HRA capital programme. However, until the survey findings are known then the potential impact cannot be quantified. That said, potential scenarios can be modelled and tested.

## **10.0 Conclusion**

10.1 The Council is already committed to being a proactive and responsible landlord, committed to providing high quality homes for our current and future tenants.

10.2 By having a comprehensive plan in place for the collection of stock condition and EPC data, the council will be better placed to make future decisions in respect of investment requirements.

10.3 By having a plan in place to ensure that this data is refreshed and re-validated at regular intervals, by undertaking a further 20% survey of the stock per year, integrated into business as usual demonstrates sound asset management principles.

**Name of Meeting:** Cabinet

**Date of Meeting:** 4 December 2023

**Subject Matter:** Housing Revenue Account stock condition survey

**Originating Department:** Communities and Homes

**DO ANY BACKGROUND PAPERS APPLY**  YES  NO

**LIST OF BACKGROUND PAPERS**

Doc No	Title of Document and Hyperlink

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

Exempt information is contained in the following documents:

Doc No	Relevant Paragraph of Schedule 12A

# Appendix 1 - Rugby Borough Council

## Climate Change and Environmental Impact Assessment

### CONTEXT

In 2019 the UK Parliament set a commitment in law to reach net zero carbon emissions by 2050. Achieving this target will require considerable effort with public bodies, private sector organisations, the third sector and individuals working together to take action. Rugby Borough Council declared a climate emergency in 2019, in doing so committed to:

- To move the Council's operations towards Carbon Neutrality by 2030.
- To establish action to tackle climate change as a key driver of all decision-making.
- To provide community leadership in reducing the impact of Climate Change.
- To take action to mitigate the impact of climate change on a Borough wide basis and beyond, through adaptation.

The Council's Corporate Strategy (2021-2024) [link](#) sets ambitious outcomes in relation to Climate Change. These ambitions must now be progressed through the decisions which the Council makes.

It is therefore important that Rugby Borough Council gives due regard to climate change when making decisions. In the context of the Council's business, Climate Change includes carbon emissions, biodiversity, habitat loss and environmental destruction. When putting forward recommendations for decision, officers must assess how these recommendations are likely to influence our climate change commitments by completing the following Climate Change and Environmental Impact Assessment.

A copy of this Climate Change and Environmental Impact Assessment, including relevant data and information should be forwarded to the Deputy Chief Executive.

**If you require help, advice and support to complete the form, please contact Dan Green, Deputy Chief Executive.**

## SECTION 1: OVERVIEW

<b>Portfolio and Service Area</b>	Communities and Homes
<b>Policy/Service/Change being assessed</b>	Implementation of stock condition surveys of RBC Social Housing Stock
<b>Is this a new or existing Policy/Service/Change?</b>	New Asset Management system procured.
<b>If existing policy/service please state date of last assessment</b>	2012-2013 and less than 1% of the HRA stock was surveyed
<b>Ward Specific Impacts</b>	All Wards
<b>Summary of assessment</b> Briefly summarise the policy/service/change and potential impacts	<p>Rugby Borough Council has procured and implemented a new Asset Management System called TF Cloud. The previous Asset Management system was not fit for purpose and contained little information of value.</p> <p>The new system requires all data from our HRA stock to be transferred to the new system to ensure it is current, correct and in line with the new Housing Regulators requirements. This needs to be done in a short timeframe to comply. The system also needs to be configured to our needs.</p> <p>RBC does not have the resources to survey and input data for the current housing stock of approximately 3500 properties.</p> <p>To achieve this, RBC have engaged with Ark Consultancy, configure the system, to carry out the necessary surveys and input the data, with a time frame of approximately 6-8 months commencing in October. Alongside the surveys, Ark to refresh all EPC data in the same timeframe.</p> <p>Ark proposes to carry out 2300 surveys (60%) of 3500 properties, and 100% of communal areas, reflecting regulator expectations, and norms being observed across other organisations in the sector.</p> <p>The benefits to RBC will be:</p> <ul style="list-style-type: none"> <li>• Up to date knowledge of the condition of HRA stock.</li> <li>• Comply with the Housing Regulators stipulations regarding stock condition.</li> </ul>

	<ul style="list-style-type: none"> <li>• Assist with mitigation in disrepair claims and complaints relating to damp and mould.</li> <li>• Target investment in the HRA stock.</li> <li>• EPC data will allow targeting of properties to deliver warm, energy efficient homes whilst reducing carbon emissions and fuel poverty.</li> <li>• Allow RBC to produce long term planned maintenance strategies over 5,10- and 30-year cycles.</li> <li>• Allow RBC to make informed decisions on acquisitions and disposals of the HRA stock.</li> <li>• Assist in the Councils ambition to reach net zero.</li> </ul>
<b>Completed By</b>	William Winter
<b>Authorised By</b>	Michelle Dickson
<b>Date of Assessment</b>	21 <sup>st</sup> September 2023

## SECTION 2: IMPACT ASSESSMENT

Climate Change and Environmental Impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
Energy usage	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The Housing regulator requires all providers to have up to date knowledge of their housing stock. Surveys are required to access this data and populate the new Asset Management system. The surveys will also allow RBC to mitigate possible disrepair claims as the data will advise which properties require attention.</p> <p>The government currently have several grant funding schemes relating to de-carbonisation. All are subject to competitive bid, subject to match funding, and they are generally dependent on EPC rating. This information will allow RBC to target bids and strategize match funding. The data will also guide which properties are worth investing in, and which may be disposed of and</p>			

Climate Change and Environmental Impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner	Timescales
				replaced by newer more efficient homes. Planned programmes can be developed to ensure all properties meet the current Decent Homes standard, and its successor when the current consultation has finished. Many properties will require large investment in the next 10-20 years as major elements reach the end of their life cycle.			
<b>Fleet usage</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<b>Sustainable Transport/Travel (customers and staff)</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<b>Sustainable procurement</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<b>Community leadership</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<b>Biodiversity and habitats</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

<b>Climate Change and Environmental Impacts</b>	<b>No Impact</b>	<b>Positive</b>	<b>Negative</b>	<b>Description of impact</b>	<b>Any actions or mitigation to reduce negative impacts</b>	<b>Action owner</b>	<b>Timescales</b>
<b>Adaptation</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<b>Impact on other providers/partners</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				



### SECTION 3: REVIEW

Where a negative impact is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

<b>Review date</b>	N/A-One off project
<b>Key points to be considered through review</b>	N/A
<b>Person responsible for review</b>	N/A
<b>Authorised by</b>	Michelle Dickson

# APPENDIX 2 - EQUALITY IMPACT ASSESSMENT (EqIA)

## Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
  - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
  - advancing equality of opportunity between people who share a protected characteristic and those who do not,
  - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
  - age
  - disability
  - gender reassignment
  - marriage/civil partnership
  - pregnancy/maternity
  - race
  - religion/belief
  - sex/gender
  - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published online.
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:

Corporate Equality & Diversity Team

## Equality Impact Assessment

<b>Service Area</b>	<b>Communities &amp; Homes</b>
<b>Policy/Service being assessed</b>	Provision of a Housing Revenue Account (HRA) Stock Condition Survey and collection of up-to-date Energy Performance Certificate (EPC) data.
<b>Is this a new or existing policy/service?</b> <b>If existing policy/service, please state date of last assessment</b>	New
<b>EqlA Review team – List of members</b>	William Winter Mary Jane Gunn
<b>Date of this assessment</b>	22 September 2023
<b>Signature of responsible officer (to be signed after the EqlA has been completed)</b>	

**A copy of this Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Team.**

### Details of Strategy/ Service/ Policy to be analysed

<b>Stage 1 – Scoping and Defining</b>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	<p>The safety and welfare of our tenants is paramount in exercising our duties as a responsible landlord.</p> <p>Conducting a stock condition survey (SCS), accompanied by collection of up-to-date Energy Performance Certificate (EPC) Data will create visibility of the condition of the Council's Housing Revenue Account (HRA) asset base and in doing so be a robust evidence base for future investment and HRA business planning.</p>
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	<p>The Stock Condition Survey and collection of up-to-date EPC certificates delivers against the following corporate priorities:</p> <ul style="list-style-type: none"> <li>- Rugby is an environmentally sustainable place, where we work together to reduce and mitigate the effect of climate change.</li> <li>- Residents live healthy, independent lives with the most vulnerable protected.</li> </ul> <p>The SCS will support future investment planning in helping the Council to achieve its Net Zero ambitions and support the decarbonisation of the council's housing stock.</p> <p>The data will provide an evidence base upon which to inform future investment decisions, in keeping with our objective of being a responsible, effective and efficient organisation.</p> <p>The Regulator of Social Housing (RSH) expects social landlords to have an accurate record at an individual property level on the condition of their stock, based on a physical inspection of all homes and that this is kept up to date.</p>
(3) What are the expected outcomes you are hoping to achieve?	<p>700 EPC's            2300 property surveys (60%)            200 communal areas surveyed (100%)</p>

<p>(4) Does or will the policy or decision affect:</p> <ul style="list-style-type: none"> <li>• Customers</li> <li>• Employees</li> <li>• Wider community or groups</li> </ul>	<p>The SCS/collection of EPC's will affect:</p> <p>RBC Tenants RBC Employees</p>
<p><b><u>Stage 2 - Information Gathering</u></b></p>	<p>As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, eg service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).</p>
<p>(1) What does the information tell you about those groups identified?</p>	<p>The population affected are RBC tenants and we have good quality data available on this population available through our CX system.</p>
<p>(2) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement? If yes, what were their views and how have their views influenced your decision?</p>	<p>We consult with tenants on a regular basis in a variety of forums both informal and more formal such as our Tenants Panel and we are aware that the condition of their homes, and the energy efficiency of their homes are their top priority, in addition, in 2023 we will be undertaking a Tenant Satisfaction Survey – See below.</p> <p>We do not need to specifically consult with tenants to undertake this work, as it is a requirement of the regulator to demonstrate compliance.</p>
<p>(3) If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.</p>	<p>In April 2023 the RSH introduced the Tenant Satisfaction Measures Standard. The Tenant Satisfaction Measures Standard requires us to undertake a comprehensive Tenant Satisfaction Survey using standardised questions formulated by the RSH in consultation with providers of social housing.</p> <p>RBC will undertake this significant consultation with all of our tenants commencing in October 2023 and this will give us a powerful opportunity to understand our tenants views on the housing service we provide including how satisfied tenants are that their homes are well maintained and safe.</p> <p>Our survey results will support other initiatives such as the SCS in making future decisions in respect of investment requirements and will underpin our ability to develop service improvement plans using a robust evidence base.</p>

<b>Stage 3 – Analysis of impact</b>			
<p><b>(1) Protected Characteristics</b> From your data and consultations is there any positive, adverse, or negative impact identified for any particular group, which could amount to discrimination?</p> <p>If yes, identify the groups and how they are affected.</p>	<p><b>RACE</b> No adverse impact</p>	<p><b>DISABILITY</b> Positive impact – We will be better able to understand how our properties may be suitable for aids and adaptations.</p>	<p><b>GENDER</b> No adverse impact</p>
	<p><b>MARRIAGE/CIVIL PARTNERSHIP</b> No adverse impact</p>	<p><b>AGE</b> Positive impact – We will be better able to understand how our properties may be suitable for aids and adaptations.</p>	<p><b>GENDER REASSIGNMENT</b> No adverse impact</p>
	<p><b>RELIGION/BELIEF</b> No adverse impact</p>	<p><b>PREGNANCY MATERNITY</b> No adverse impact</p>	<p><b>SEXUAL ORIENTATION</b> No adverse impact</p>
<p><b>(2) Cross cutting themes</b> (a) Are your proposals likely to impact on social inequalities e.g., child poverty, geographically disadvantaged communities? If yes, please explain how?</p> <p>(b) Are your proposals likely to impact on a carer who looks after older people or people with disabilities? If yes, please explain how?</p>	<p>Our proposals will help us improve our homes including their energy efficiency, this will have a direct positive impact on those in poverty including children in poverty who live in our homes.</p>		
<p><b>(3) If there is an adverse impact, can this be justified?</b></p>	<p>No adverse impacts have been identified.</p>		

(4) What actions are going to be taken to reduce or eliminate negative or adverse impact? (This should form part of your action plan under Stage 4.)	N/A
(5) How does the strategy/service/policy contribute to the promotion of equality? If not, what can be done?	This initiative promotes equality of opportunity to good quality housing by giving us a robust tool for making future decisions in respect of investment requirements.
(6) How does the strategy/service/policy promote good relations between groups? If not, what can be done?	N/A
(7) Are there any obvious barriers to accessing the service? If yes, how can they be overcome?	<p>We know that there is a risk that some tenants will not permit access for surveyors to conduct inspections. This is evident from our experience in gaining safe access to tenants' homes in respect of gas servicing.</p> <p>In order to overcome this the appointed contractor will develop and implement a tenant communication plan to ensure effective and timely communication with our tenants, this will be run in tandem with RBC's own communication and engagement channels.</p> <p>We will take account of tenant feedback and their experiences to adjust processes as required in order to meet the required contractual outcomes.</p>

<b><u>Stage 4 – Action Planning, Review &amp; Monitoring</u></b>	
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<p>If No Further Action is required, then go to – Review &amp; Monitoring</p> <p>(1) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>No further action is required.</p> <p>EqlA Action Plan</p> <table border="1" data-bbox="875 347 2112 579"> <thead> <tr> <th>Action</th> <th>Lead Officer</th> <th>Date for completion</th> <th>Resource requirements</th> <th>Comments</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>	Action	Lead Officer	Date for completion	Resource requirements	Comments																				
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<p>(2) Review and Monitoring State how and when you will monitor policy and Action Plan</p>	<p>This EqlA will be reviewed in September 2024.</p>																									

Please annotate your policy with the following statement:

**An Equality Impact Assessment on this policy was undertaken on 22 September 2023 and will be reviewed on 22 September 2024**