



31 January 2022

THE RUGBY BOROUGH COUNCIL

A special meeting of Rugby Borough Council will be held in the Benn Hall, Newbold Road, Rugby at 7.00pm on Tuesday 8 February 2022.

Mannie Ketley
Executive Director

A G E N D A

PART 1 – PUBLIC BUSINESS

1. Apologies for absence.
2. Minutes.

To approve the minutes of the ordinary meeting held on 15 December 2021.
3. Declaration of Interests.

To receive declarations of -

(a) non-pecuniary interests as defined by the Council's Code of Conduct for Councillors;

(b) pecuniary interests as defined by the Council's Code of Conduct for Councillors;
and

(c) notice under Section 106 Local Government Finance Act 1992 - non-payment of Community Charge or Council Tax.
4. To receive the Mayor's announcements.
5. Questions pursuant to Standing Order 10.

6. To receive and consider the report of officers.

(a) Draft Housing Revenue Account Capital and Revenue Budgets 2022/23 and Medium Term Financial Plan 2022-26 – report of the Chief Officer – Communities and Homes and the Chief Officer – Finance and Procurement.

7. Notices of Motion pursuant to Standing Order 11 - in accordance with the Council's Constitution, no motions on notice have been received for consideration.

8. Correspondence.

9. Common Seal.

To order the affixing of the Common Seal to the various orders, deeds and documents to be made or entered into for carrying into effect the several decisions, matters and things approved by the Council and more particularly set out in the reports adopted at this meeting.

10. Motion to Exclude the Public under Section 100(A)(4) of the Local Government Act 1972.

To consider the following resolution:

“under Section 100(A)(4) of the Local Government Act 1972 the public be excluded from the meeting for the following item on the grounds that it involves the likely disclosure of information defined in paragraph 3 of Schedule 12A of the Act.”

PART 2 – EXEMPT INFORMATION

1. To receive and consider the private report of officers.

(a) Update to Getting Building Fund (GBF) Grant Award – private report of the Executive Director (report to follow).

QUESTIONS AT COUNCIL

A Councillor may ask a question at the meeting by giving notice in writing of the question to the Executive Director no later than midday on Wednesday 2 February 2022. The rules relating to Questions are set out in Part 3a of the Council's Constitution.

AGENDA MANAGEMENT SHEET

Report Title: Draft Housing Revenue Account Capital & Revenue Budgets 2022/23 and Medium Term Financial Plan 2022-26

Name of Committee: Special Council

Date of Meeting: 8 February 2022

Report Director: Chief Officer – Communities and Homes and Chief Officer – Finance and Performance

Portfolio: Communities, Homes, Digital and Communications

Ward Relevance: All

Prior Consultation: Not applicable

Contact Officer: Jon Illingworth, Chief Officer – Finance and Performance 01788 533410 or jon.illingworth@rugby.gov.uk
Michelle Dickson, Chief Officer – Communities and Homes 01788 533843 or michelle.dickson@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

(C) Climate
(E) Economy
(HC) Health and Communities
(O) Organisation

Summary:	The purpose of this report is to present a draft HRA revenue position (see Appendix A) and a capital position (see Appendix B) for 2022/23 based on budget submissions, plus a HRA Medium Term Financial Plan (MTFP) (see Appendix C).
Financial Implications:	As detailed within the report and appendices.
Risk Management/Health and Safety Implications:	There are no risk management implications arising from this report.
Environmental Implications:	Please see Climate Change and Environmental Impact Assessment as appended in appendix D of this report
Legal Implications:	As detailed within the report
Equality and Diversity:	Please see Equality Impact Assessment as appended in appendix E of this report.
Options:	<p>Option 1, approve recommendation of this report.</p> <p>Option 2, provide an alternative to the revenue and capital budgets and/or rent and service charge value.</p> <p>Any changes made to any of the recommendations will potentially affect the content of the subsequent appendices. If any changes to the rent setting levels are proposed, it is important to be clear about the effects of the change and to build these in during the consideration of each recommendation.</p>
Recommendation:	<ol style="list-style-type: none"> 1. The draft revenue and capital budgets for 2022/23 and the updated medium term at Appendices A, B and C be approved inclusive of a 4.1% increase in rent and service charges as per section 4.2 of this report; and 2. approval be given to appoint a permanent Health and Safety Officer within the Property Repairs Team to be funded from existing budgets as detailed in section 5.1.
Reasons for Recommendation:	<p>To comply with the Codes of Practice</p> <p>National rent guidance allows for rents to be increased by CPI + 1% as at September 2020 and this is the methodology used for calculating the rent in this report. Budgets for both revenue and</p>

capital have been proposed based on the expected requirements for the forthcoming financial year

Special Council - 8 February 2022

**Draft Housing Revenue Account Capital & Revenue Budgets
2022/23 and Medium Term Financial Plan 2022-26**

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

Recommendation

1. The draft revenue and capital budgets for 2022/23 and the updated medium term at Appendices A, B and C be approved inclusive of a 4.1% increase in rent and service charges as per section 4.2 of this report; and
2. Approval is given to appoint a permanent Health and Safety Officer within the Property Repairs Team to be funded from existing budgets as detailed in section 5.1.

1. INTRODUCTION

1.1 The Council is required by the Local Government and Housing Act 1989 (section 74) to keep a Housing Revenue Account (HRA) which records all revenue expenditure and income relating to the provision of council dwellings and related services. The use of this account is heavily prescribed by statute and the Council is not allowed to fund any expenditure for non-housing related services from this account. In addition, the Act ensures that the HRA does not fall into a deficit position.

1.2 In accordance with the constitution, the Council is required to carry out an annual review of rents and notify tenants not less than 28 days prior to the proposed date of change.

1.3 The Council has a retained housing stock of c3,450 homes currently available to let and manages an additional 59 leasehold properties with an annual rent roll of approximately £16m.

1.4 The primary purpose of this report is to present an updated draft HRA revenue position (see Appendix A) and a capital position (see Appendix B) for 2022/23 based on budget submissions, plus a HRA Medium Term Financial Plan (MTFP) (see Appendix C) ahead of the final budget presentation and rent setting at Full Council on 8 February 2022.

2. BUDGET AND POLICY FRAMEWORK

2.1 Significant activities within or impacting upon the Housing Revenue Account in 2021/22 to date include:

- The completion of 6 property acquisitions so far this year and
- A possible further 8 agreements on S106 properties.

2.2 The government review of the Decent Homes Standard remains a work in progress. When the outcomes are known, officers will need to consider the potential implications for future investment in the HRA stock, ahead of reporting back to Council, any budgetary implications to ensure ongoing compliance.

2.3 The Council's approach to reducing the carbon footprint of the housing stock is an evolving one which is heavily reliant on quality data analysis in respect of the existing stock. Consultants have been appointed to carry out this piece of work, with the detail to be used to inform investment plans and a pipeline of projects for which funding can be applied for. This data will also feed into the emerging HRA business plan and the review of the Asset Management Strategy which is due to be completed during in 2022.

2.4 Secondary legislation on the Fire Safety Act 2021 is anticipated in 2022 with an expected emphasis in inspections of fire doors, lifts, firefighting equipment and the development of personal evacuation plans. As detail of the legislation emerges, officers will be better placed to make an informed assessment on HRA investment requirements.

2.5 Rent guidance allows increases of CPI + 1% for the four years up to 2024. CPI as of September 2021 was 3.1% meaning that the indicative rise in rents for current tenants will be 4.1% (3.1% plus 1%). For the purposes of financial planning within the Medium-Term Financial Plan rent uplifts are estimated at 3% (Bank of England CPI target of 2% + 1%).

2.6 On 1 April 2021 Ministry of Homes, Communities and Local Government (MHCLG), now known as Department of Levelling Up, Housing and Communities (DLUHC), introduced a set of reforms to the rules around the use of retained additional Right to Buy receipts to supply replacement housing. The changes have been made in response to the 2018 Consultation on the use of Right to Buy Receipts.

The changes are as follows:

- Pooling of RTB receipts will take place annually. Deadlines for spending retained receipts will also be calculated on an annual basis.
- The timeframe local authorities have to spend new and existing Right to Buy receipts is extended from 3 years to 5 years. This is hoped to make it easier for local authorities to undertake longer-term planning, including remediation of larger plots of land.
- The percentage cost of a new home that local authorities can fund using Right to Buy receipts increases from 30% to 40%. This is hoped to make it easier for authorities to fund replacement homes using Right to Buy receipts, as well as making it easier to build homes for social rent.
- Authorities can use receipts to supply shared ownership and First Homes, as well as housing at affordable and social rent, to help them build the types of home most needed in their communities.

- v. A cap will be introduced on the use of Right to Buy receipts for acquisitions to help drive new supply with effect from 1 April 2022 and phased in over 2022/23 to 2024/25.

The medium-term plan for the HRA has incorporated these changes

2.7 The Council has a local limit on indebtedness to ensure compliance with the Prudential Code for Capital Finance in Local Authorities. It is recommended that the level remains at £152m approved in 2019/20 which will provide:

- Capacity to increase the Council's HRA Capital Financing Requirement to meet any significant unexpected capital expenditure; and
- Subject to support for the schemes above, capacity to increase the stock base via bids on developer affordable housing projects and/or Council projects.

2.8 The Biart Place and Rounds Garden's schemes have had a significant impact on the borrowing requirement of the HRA. To maximise the opportunity to provide a financially viable scheme, Council took advantage of the PWLB certainty rate to secure £66m at an interest rate of an average of 1.4%. As part of the Treasury Management Strategy, the Council has been managing the difference between the cost of the loan and the investment income that is being generated whilst the final schemes are being established.

2.9 To ensure that the Council has continuing earmarked balances to support the scheme as well as other major development (notwithstanding central Government financial support) in 2022/23, it is proposed that £3.620m that would otherwise have been set aside for the repayment of debt as part of the HRA Medium Term Financial Plan will be utilised as Revenue Contributions to Capital Expenditure. This will be reviewed during 2022/23.

2.10 The updated HRA Medium Term Financial Plan (Appendix C) also contains continuing Revenue Contributions to Capital Expenditure in place of voluntary debt repayments. Adjustments have also been made for temporary rent loss and additional interest on debt where timelines can be estimated.

3. REVIEW OF HRA BALANCES

3.1 The HRA draft budget for 2022/23 (Appendix A) allows for CPI + 1% rent increases for each year until 2024/25. The 30-year HRA financial plan has also been updated to reflect changes, including high-rise site redevelopment, where the impact can be forecast.

HRA Revenue Balance

3.2 The estimated HRA Revenue balance on 31 March 2022 will be £5.408m. This level is considered prudent to meet further revenue costs arising from potential risks moving forward over the term of the HRA Medium Term Financial Plan. It is recommended that £1.000m of this balance will be transferred to a Housing Climate Change reserve to meet the respective potential future development needs. Developments relating to eco works and retrofitting will be evaluated in detail and included in a longer term programme of works.

Major Repairs Reserve

3.3 The Major Repairs Reserve (MRR) reflects the need to replace major components as they wear out. This funding, together with previous allocations of supported borrowing and revenue contributions, has enabled the Council to maintain the housing stock in a good condition. Balances will require reviewing considering any regulatory changes in future years.

3.4 The forecast MRR balances reflecting the capital programme proposals at Appendix B are as follows:

	2022/23 £000s	2023/24 £000s	2024/25 £000s	2025/26 £000s
Balance b/fwd.	1,506	1,869	2,854	3,794
Depreciation/Appropriation from HRA Revenue	3,239	3,336	3,436	3,539
Capital Financing	(2,876)	(2,351)	(2,496)	(3,018)
Balance c/fwd.	1,869	2,854	3,794	4,315

Housing Repairs Account

3.5 The Housing Repairs Account is an earmarked reserve used to mitigate the risks associated with cyclical and responsive repairs over time. The forecast balance over the period of the medium-term financial plan is £0.316m.

Housing Capital Investment Balances

3.6 In addition to the above, the Council has also made revenue contributions set aside for capital investment in prior years to fund new build, estate regeneration and other works. The forecast balances over the period of the medium-term financial plan are as follows:

	2022/23 £000s	2023/24 £000s	2024/25 £000s	2025/26 £000s
Balance b/fwd.	7,638	9,719	12,713	15,980
Contributions from HRA	3,342	4,210	4,437	5,285
Capital Financing for New Build / Acquisitions / Other Projects	(1,261)	(1,216)	(1,171)	(1,071)
Balance c/fwd.	9,719	12,713	15,980	20,193

Right-to-Buy (RTB) Capital Receipts

3.7 The Council has a 1-4-1 retention agreement with DLUHC allowing it to retain a greater proportion of receipts upon the condition that they are utilised in provision of replacement housing within 5 years. Receipts that are not utilised must be returned to Her Majesty's Treasury (HMT) and incur an interest charge of Bank of England Base Rate plus 4%. Following on from the update in policy, 40% of the expenditure incurred on replacement housing may be financed from RTB receipts and as a cap is being introduced the reliance on this form of financing will be reduced during the next 3 years.

3.8 It is assumed that 33 homes will be sold under the Right-to-Buy scheme per year, from 2022/23 over the period of the medium-term financial plan, producing an average receipt of £0.120m per property (prior to pooling). Forecast balances over the period are as follows:

	2022/23 £000s	2023/24 £000s	2024/25 £000s	2025/26 £000s
Balance b/fwd.	4,536	7,570	10,604	13,638
Net Pooling Contribution	3,708	3,708	3,708	3,708
Capital Financing for New Build / Acquisitions	(674)	(674)	(674)	(674)
Balance c/fwd.	7,570	10,604	13,638	16,672

The opening balance has reduced since the earlier draft report as the estimated number of current year sales has been reduced.

4. MEDIUM TERM FUNDING OPTIONS

4.1 An updated HRA medium term financial plan reflecting the above position is included at Appendix C. The remainder of the report concentrates on proposals for 2022/23 including:

- Rent
- Service Charges
- Performance management – voids and debt collection
- Expenditure assumptions
- Housing repairs and major capital works
- Capital financing

RENT

4.2 Background

Rent guidance allows increases of CPI + 1% for the four years up to 2024, based on the September 2021 rate of inflation this equates to an increase of 4.1%. The guidance is not mandatory, and Members can set any annual increase. The table below identifies the loss of rental income that would be generated if a lower increase is adopted

	Reduction in income £000s
0%	633
1%	479
2%	324
3%	170

Any below inflationary increase has a number of consequences, the first being the compound impact on future generated income. The impact of the rent reduction between 2016/17 and 2019/20 led to the Council receiving £5.107m less income than it would have with an annual inflation increases during the period.

Any reduced income will have an impact in future service provision as it is this income which provides funding for the activity in the capital programme. The capital programme in appendix B identifies capital schemes of over £4m a year across the MTFP and as well as delivering Decent Homes standards, the Council as a responsible Social Landlord is striving to deliver improvements to deliver the Climate emergency requirements and strive to have a positive impact on tenant's energy bills. The 30-year programme will be dependent on the income generated from rents to support the programme that has been identified.

Currently, 64% of council tenants receive help with the payment of their rent through Universal Credit or Housing Benefit. The financial support received will be adjusted to take into account any changes in rent or eligible service charges.

Rent estimates for 2022/23 assume a stock level of 3,454 available to let HRA properties at the start of April 2022. It is estimated that stock will fall by an estimated 33 Right-to-Buy sales in year. It is also assumed that the Rounds Gardens site will be fully decanted by 31 March 2022. The fall in numbers will be mitigated by the acquisitions available on the open market (including purchases from developers as part of S106 provisions). A void rate of 1.00% is estimated for 2022/23.

4.3 Rent Calculation

The calculations for rents are based on average rents over the entire year. The percentages applied to this may not be the same as the ones applicable when considering a 48 or 49-week rent year.

The following calculations are based on stock numbers as of January 2022.

	2021/22	2022/23	Average	Average
	£'s	£'s	%	£'s
			Increase	Increase
Average Weekly Rent (52-week basis)	87.34	90.92	4.1	3.58

4.4 Since 2022/23 is a 48-week rent year, the rents will be charged accordingly and therefore the figures shown here are for illustrative purposes. Estimated rental income from dwellings of £16.107m for 2022/23 has been included within the draft HRA revenue budgets as shown in Appendix A. The estimate is based on the central business case of:

- An average 1% void rate across the stock.
- Full decant of Rounds Gardens by March 2022
- 33 Right-to-Buy sales in 2022/23.

- Acquisition of 10 new build properties; and
- 150 re-lets where rent is uplifted to target rent

4.5 For each 1% change in the void rate the HRA rent loss is equivalent to £0.163m. Each additional RTB sale produces an average rent loss of £4,730 in a full year. The average target rent in 2022/23 (52-week basis) will be £96.29 as compared to the average current rent of £90.92 (see above.)

4.6 Although the average increase is £3.58 a week, the Council is still the landlord with the lowest rents in the Borough, with a 1 bedroom apartment in the Private Rental Sector expected to cost 58% more than the equivalent property within the HRA

SERVICE CHARGES

4.7 In line with government guidance, service charges are de-pooled from rent charges which enables tenants to see the estimated amount spent on services. Income from service charges is estimated at £0.903m in 2022/23 (including a void allowance of 1.00%).

The average weekly impact upon utilities and cleaning service charges arising from the estimates of costs associated with that service in 2022/23 (on a 52-week basis) is as follows:

Charge Type	Average Charge p/w (52 wk basis) £	Average Change p/w £
Communal Lighting - Electricity (Rebateable – eligible for Housing Benefit)	0.92	0.01
Communal Heating - Gas (Rebateable – eligible for Housing Benefit)	0.44	0.04
Communal Cleaning (Rebateable – eligible for Housing Benefit)	2.80	-0.13
Communal Heating – Gas (Non-Rebateable – Very Sheltered Housing only – not eligible for Housing Benefit)	8.52	1.62
Subtotal	12.68	1.54
Independent Living Co-ordinator	8.94	0.35
Concierge	2.28	0.00
Control centre operators	N/A	N/A

4.8 Gas price increases have been included based on a 30% increase in prices (from the information provided by our suppliers).

4.9 Control centre operator charges are no longer chargeable as the Multi-Storey flats will have been decanted. Independent Living Co-ordinator charges will rise in line with rent levels at 4.10% in 2022/23.

PERFORMANCE MANAGEMENT

4.10 The financial management of the HRA is directly linked to key performance in several operational areas – void management, rent collection and arrears recovery.

4.11 Void Management

There is a direct relationship between the time a property remains void, and the rent foregone. Consequently, ensuring that homes are re-let in the most efficient manner is a key priority for housing and property repairs service staff.

For 2022/23 the target for void property rent and service charge loss will be set at 1.00%, equating to £0.163m. Most recent performance data shows void loss running at 2.6%. Where rechargeable works are identified at the point of tenancy termination, tenants are offered the opportunity to make good, or will be billed for the costs. Void rechargeable repairs (the works identified through this process) year to date are £0.048m.

4.12 Rent Collection/Bad Debt Provision

The collection rate for rent and service charges and the performance in managing rent debt is critical to the financial position of the HRA and has a direct impact on the amount of bad debt provision that must be set aside. The HRA is currently undertaking an exercise to write off all irrecoverable tenant arrears, therefore reducing the bad debt provision.

Arrears greater than 4 weeks amounted to £0.920m as at the first week of January 2022 and 48% of this total (£0.437m) relates to current tenants. Current in year collection of rent is performing strongly and the target collection rate of 95% is expected to be received in 2021/22. The HRA's contribution to the bad debt provision is currently estimated at £0.048m in 2022/23 reflecting the above circumstances.

5. EXPENDITURE ASSUMPTIONS

5.1 Employee costs

The HRA budgets are based on the current staffing establishment. The pay award for 2021/22 has not yet been agreed and pay negotiations are currently ongoing. An increase in pay of 2.00% has been included in the budget for 2022/23. Progression through pay scales and increased employer contributions to the Local Government Pension Scheme and Employers National Insurance have also been included in the base budget.

A temporary Health and Safety Officer role within the Property Repairs Team was approved by Leadership Team during 2021/22, and it has now been recognised that the role is needed on a permanent basis for the team to operate effectively and mitigate the potential risk of non-compliance in delivering maintenance services safely. The full year cost of this role is £42,400 including national insurance and pension contributions. There is no additional budget requirement for the team as this post is to be funded from realigning existing budgets.

Several members of staff spend their time on both HRA and General Fund activities and as a result, staff costs are split based on percentages of time relevant to services.

5.2 Utility Costs

Gas prices have risen due to an increase in demand and lower levels of stored gas which has influenced the wholesale price of gas. Estimates from our energy supplier suggest that the estimated increase in the price of gas is 30% and electricity prices are also expected to rise by 15% Utility inflation continues to be a significant risk for the HRA, the impact of prices increasing higher than the assumed rates will incur a budget pressure in the year.

	Inflation Rate
Gas	30.0%
Electricity	15.0%

5.3 Central Recharges

These costs are currently estimated at £2.696m in 2022/23 and include the HRA's proportion of Corporate Property, ICT, Legal, Human Resources, Payroll and other costs.

5.4 Charges for Capital

Depreciation is used to provide a measure of the cost of the economic benefits embodied in an asset that have been consumed during the year. Estimates for 2021/22 charges are based around Chartered Institute for Public Finance and Accountancy (CIPFA) and DLUHC guidance. If there is a variance on final depreciation charge the excess or deficit is transferred to the Major Repairs Reserve to ensure the smoothing of costs for major works over the medium term.

5.5 Amounts set aside for the repayment of debt/ Revenue Contributions to Capital Expenditure

The HRA business plan initiated at the point of self-financing assumed that all in-year surpluses would be utilised in the repayment of debt, subject to the maintenance of a prudent HRA working balance. Prior to the introduction of the 1% rent cut and the redevelopment projects at high rise sites, estimates were that the HRA self-financing debt allocation of £72.949m would be repaid in 2024 (12 years following the settlement). As noted above, sums set aside for the voluntary repayment of debt have been diverted to balances during the period of the HRA

Medium Term Financial Plan to fund major development costs. In the absence of significant government financial support or grant funding from Homes England, the revised debt repayment schedule is currently expected to extend to 2049/50, subject to sensitivity around project timelines and cost estimates.

Unlike the General Fund, there is no statutory requirement to set aside money from revenue for debt repayment within the HRA allowing flexibility to adjust debt repayment considering HRA business planning needs in future years.

6. HOUSING REPAIRS & MAJOR CAPITAL WORKS

6.1 Housing Repairs

Housing repairs expenditure covers both planned and responsive maintenance, some of which is capital funded. The funding is split between:

- the Housing Repairs Account for revenue expenditure such as boiler servicing, electrical inspections, etc.; and
- the Major Repairs Reserve (MRR) for capital works including the replacement of significant components (kitchens, bathrooms, central heating, etc.)

The transfer to the Housing Repairs Account in 2022/23 is estimated at £3.899m (£3.991m 2021/22). Works within this total include:

- Gas servicing and maintenance works – (£0.346m);
- Responsive repairs and voids (£2.593m);
- Repainting schemes - (£0.060m); and
- Electrical inspections and maintenance (£0.367m).

Major Capital Works

6.2 Transition to Net Zero

The Council is required to produce a capital programme which takes account of the requirement for major works for the period of the MTFP. As part of a wider capital strategy, schemes over the next 10 years are being coordinated to aid strategic planning. The plan will be established to incorporate and outline how the capital programme for the HRA can help the Council to deliver the climate change commitments as identified in the Corporate Strategy. In achieving this there will also be benefits to the tenants as the schemes will support them with affordable utilities and energy efficient homes.

This is a complex exercise and officers are working with external agencies and government departments to establish a plan of works for the short medium and long term. To support a programme of works and pump prime schemes, it is proposed that £1.000m will be transferred from the HRA Revenue balance in 2022/23 to a separate Housing Climate Change reserve. This is a high priority area and although the funding will not deliver all the Council's aspirations, it will support the establishment of a programme of works and will enable the Council to take advantage of relevant funding that becomes available at short notice, that also has a matched funding requirement.

As part of the authority's strategy to be net zero by 2030, the Council has adopted a 4-phase approach.

Carbon Management-officers have engaged with consultants to produce a Carbon Management plan to supersede the previous one which expired in 2017. This will focus on the Corporate Estate and Fleet vehicles. Their draft report has been received and is now being discussed with the consultants to finalise the plan. In order to deliver on climate change commitments a Climate Change Strategy is currently being drafted which will include provisions to decarbonise housing.

Local Authority Delivery Scheme 2 (LADS 2)-Funding of £0.507m has been secured from the Midlands Energy Hub (MEH) with a further £0.232m in match funding contributed by the Council to target approximately 90 properties with lower EPC ratings with a range of measures including Air Source Heat Pumps and Solar PV. The scheme is being carried out with E. ON as a delivery partner and now commenced it is expected to be completed during 2022.

ECO3-In conjunction with E. ON, 95 properties have been targeted to benefit from cavity wall insulation, loft insulation and loft insulation top ups. The only Cost the authority being £7,000 for the top ups, the rest being funded by ECO3. This is also expected to be completed during 2022.

Social Housing Decarbonation Fund (SHDF)-officers have submitted a bid to obtain grant funding for 47 properties to benefit from External Wall insulation. The result of this bid is now expected during January 2022.

6.4 Parity Projects

To further support the Councils aspirations, officers have engaged Parity Projects to carry out a stock modelling exercise on the social housing stock. This has been completed and will allow RBC to do the following.

- Identify potential measures for each property.
- Reach a baseline of stock performance and profile.
- Select the most cost-effective way to reach energy targets.
- Model the effect of planned installs and identify additional measures that may be added to the programme.
- Provide indicative costs to reach set SAP ratings or reach Carbon neutrality.

This will also guide future bids for funding streams with further training on the system being scheduled.

6.5 High rise replacement

As further analysis is taking place on the replacement of Rounds Gardens and Biart Place, there are currently no costs built into the capital programme detailed in appendix B. Officers will use future reports to update members on potential spend profiles.

6.6 Major Works

The full 2022/23 capital proposal of £4.811m is included at Appendix B. Material items within the programme include:

Bathrooms (£0.376m)

The proposals for 2022/23 include a bathroom replacement programme of approximately 145 properties to ensure continuing compliance with Decent Homes standards. A further 290 replacements will be undertaken in the period 2023/24 to 2025/26 at an approximate 145 properties per year. Funding is via the Major Repairs Reserve.

Kitchens (£0.683m)

The proposals for 2022/23 will allow a replacement programme of just under 190 kitchens to ensure compliance with Decent Homes (i.e., replace after 20 years). A similar number of renewals will be required for 2024/25 and 2025/26. Following this, a requirement of approximately 400 replacements for 2026/27 will be required.

Acquisitions (£1.685m)

To maintain compliance with its retained Right-to-Buy 1-4-1 Agreement with MHCLG, and to access homes made available via S106 agreement with developers the Council will acquire approximately 10 properties in 2022/23. The average cost of acquisition is estimated at £140,000 of which a maximum 40% (£56,000) is currently funded via Right-to-Buy sales receipts. The balance (60%) is funded via Housing Capital Investment balances. Where larger new build or acquisition schemes are envisaged, reports will be brought to Council outlining operational and financing recommendations.

Automated Repairs Scheduling System (£0.074m)

This was an update to the programme presented to Cabinet on 6 December. This system will be introduced to the Property Repairs Service to allow an automatic allocation of jobs to the team. This will be an integral part of a successful maintenance service and will generate efficiencies in service delivery. The Revenue costs are to be met from existing budgets.

7. CONCLUSION

7.1 The estimates contained within this report represent the most up-to-date information and sensitivity analysis available to officers. There are minor changes from the information presented to Cabinet in December.

7.2 Any changes made to the information will potentially affect the content of the subsequent appendices. If any changes to the rent setting levels are proposed, it is important to be clear about the effects of the change and to build these in during the consideration of each recommendation.

7.3 Although the proposal is to increase rents, the government recommended CPI +1% enables the HRA to have a fundable 30-year business plan to enable residents to continue to receive a high quality service.

Name of Meeting: Council

Date of Meeting: 8 February 2022

Subject Matter: Draft Housing Revenue Account Capital & Revenue Budgets 2022/23 and Medium Term Financial Plan 2022-26

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

DRAFT REVENUE BUDGETS 2022/23 SUMMARY**HOUSING REVENUE ACCOUNT**

	2021/22 Budget £000s	2021/22 Revised Budget £000s	2022/23 Draft Budget £000s	Notes
INCOME :-				
Rent Income From Dwellings	(15,716)	(15,716)	(16,107)	1
Rent Income From Non - Dwellings	(127)	(127)	(123)	2
Charges For Services	(946)	(946)	(905)	3
Contributions Towards Expenditure	(215)	(162)	(161)	4
Total Income	(17,004)	(16,950)	(17,296)	
EXPENDITURE :-				
Transfer To Housing Repairs Account	3,991	4,267	3,899	5
Supervision & Management	5,543	5,490	5,157	6
Rents, Rates, Taxes & Other Charges	5	5	125	7
Depreciation and Impairment	2,878	2,878	3,239	8
Debt Management Cost	24	24	24	
Provision For Bad or Doubtful Debt	57	57	66	
Total Expenditure	12,498	12,720	12,511	
HRA Share of Corporate & Democratic Core Costs	254	254	291	
NET COST OF HRA SERVICES	(4,252)	(3,976)	(4,495)	
HRA SHARE OF OPERATING INCOME & EXPENDITURE INCLUDED IN THE WHOLE AUTHORITY INCOME & EXPENDITURE ACCOUNT				
Interest Payable & Similar Charges	1,839	1,838	1,295	9
Interest & Investment Income	(783)	(694)	(191)	
NET OPERATING EXPENDITURE	(3,196)	(2,832)	(3,391)	
Revenue Contributions to Capital Expenditure	3,147	2,783	3,342	5
Contributions to (+) / from (-) Reserves	49	49	49	
Surplus(-)/Deficit for year	0	0	0	

Notes

- 1 Rent estimates based on rent increase of 4.1% and estimated 33 Right to Buy sales and 10 purchases in year.
- 2 Garage rents have been increased in line with national guidance but this has been offset by an increase in the number of void/empty properties.
- 3 The net change in service charge income reflects any inflationary rises noted within the report and includes a void allowance of 1.00%.
- 4 An adjustment has been made in year to correct an income item relating to capitalised salaries, this has also been corrected within Supervision and Management.
- 5 A supplementary budget for £0.276m was approved for 2021/22 only for additional resources within the Property Repairs Service to deal with a backlog of repairs and voids work.

- 6 The main adjustments from the supervision & management revised budget for 2022/23 are:

	£
Salaries (incremental and pay award costs)	84
Internal recharges	59
Insurance	34
Property maintenance recharge	(20)
Reduced service costs for multi-storey flats	(94)
Reduced security required for decanted multi storey flats	(399)
Other net changes less than £10,000	3
Total change in Supervision & Management budget	<u>(333)</u>

- 7 Since 2019 Council Tax is due on a void property as soon as it is empty (prior to this a six months empty void period was allowed where no Council Tax was due). The increase is based upon the current amount being charged for void properties.
- 8 MHCLG and CIPFA have produced guidelines regarding council dwelling depreciation to co-incide with the introduction of HRA self-financing. Estimates for 2022/23 have been prepared on this basis.
- 9 A number of loans will be paid off during 2022/23 resulting in a lower interest charge.

Proposed Housing Revenue Account (HRA) Capital Programme 2022/23 and onwards

	Revised 2021/22 Capital Programme £000s	Proposed 2022/23 Capital Programme £000s	Proposed 2023/24 Capital Programme £000s	Proposed 2024/25 Capital Programme £000s	Proposed 2025/26 Capital Programme £000s
Improvements & Capitalised Repairs					
Bathrooms	440	376	358	358	65
Bathrooms - Voids	107	125	100	100	100
Bathrooms - Unplanned Renewals	50	50	50	50	50
Fire Risk Prevention Works	117	105	100	100	100
Fire Risk Prevention Works Voids	0	70	70	70	70
Fire Risk Prevention Works - Unplanned Renewals	0	40	50	60	60
Heating Upgrades	2,166	21	20	60	20
Kitchen Improvements	143	683	560	655	1,510
Kitchen Improvements - Voids	191	200	200	200	200
Kitchen Improvements Unplanned Renewals	0	52	52	52	52
Driveways	50	25	25	25	25
Rewiring	90	168	160	160	160
Rewiring Unplanned Renewals	0	100	100	100	100
Patterdale Sheltered Scheme	42	0	0	0	0
CCTV Upgrades	0	0	0	0	0
Soffit / Gutter Improvements	77	100	100	100	100
Roofing	0	50	50	50	50
Replacement Footpaths	118	100	100	100	100
External Walls	81	50	50	50	50
Housing Window Replacement	26	0	0	0	0
Roof Refurbishment - Lesley Souter House	0	0	0	0	0
Roof Refurbishment - Tanser Court	175	0	0	0	0
Entrance Doors / Door Entry Systems	360	126	0	0	0
Electrical Upgrades - Community Rooms	190	0	0	0	0
Boiler Works - Tanser Court	0	114	0	0	0
LED Lighting	13	0	0	0	0
Laundry Equipment	100	105	0	0	0
Housing Management System	296	60	60	60	60
Carbon Management Plan	739	0	0	0	0
Mobysoft	39	0	0	0	0
Disabled Adaptations	209	216	206	206	206
Lifeline Renewal Programme	47	30	60	60	0
Property Repairs Vehicle Replacement	300	86	85	40	0
Roof Refurbishment Victoria House	70	0	0	0	0
Automated Repairs Scheduling System	0	74	0	0	0
Purchase of Council Homes	11,593	1,685	1,685	1,685	1,685
Rugby Gateway Houses - CALA Homes	251	0	0	0	0
Rounds Gardens Capital	2,358	0	0	0	0
Rounds Gardens Demolition	5,000				
Biart Place	1,151	0	0	0	0
Biart Place Demolition	81	0	0	0	0
HRA Garage Sites	0	0	0	0	0
Bell House Redevelopment	1,521	0	0	0	0
TOTAL	28,191	4,811	4,241	4,341	4,763
Draft Financing: -					
Revenue Contributions / RTB Receipts	23,446	1,935	1,890	1,845	1,745
Major Repairs Reserve	4,745	2,876	2,351	2,496	3,018
TOTAL	28,191	4,811	4,241	4,341	4,763

MEDIUM TERM FINANCIAL PLAN - HOUSING REVENUE ACCOUNT (HRA): 2022/23- 2025/26

	2022/23 £000s	2023/24 £000s	2024/25 £000s	2025/26 £000s
EXPENDITURE				
Supervision & Management	5,157	5,286	5,418	5,554
Repairs & Maintenance	3,899	3,999	4,099	4,199
Rents, Rates, Taxes	125	125	125	125
Charges for Capital	3,239	3,336	3,436	3,539
Debt Management	24	25	25	26
Provision for Bad Debts	66	68	69	71
HRA Share of Corporate & Democratic Core Costs	291	298	306	313
Revenue Contributions to Capital Expenditure	3,342	4,210	4,437	5,285
Net Interest Payments	1,104	923	911	900
Contribution to/from(-) reserves	49	50	52	54
Total	17,296	18,321	18,879	20,065
INCOME				
Dwelling Rent	(16,107)	(17,121)	(17,649)	(18,803)
Non Dwelling Rent	(123)	(122)	(120)	(119)
Service Charges	(905)	(912)	(939)	(967)
Contributions towards expenditure	(161)	(166)	(171)	(176)
TOTAL	(17,296)	(18,321)	(18,879)	(20,065)

Impact on Average Rent (52 week basis):	£	£	£	£
Prior Year	87.34	90.92	93.65	96.46
Current Year	90.92	93.65	96.46	99.35
Increase £'s	3.58	2.73	2.81	2.89
Increase %	4.10	3.00	3.00	3.00

Appendix D

Rugby Borough Council

Climate Change and Environmental Impact Assessment

TEMPLATE - SEPTEMBER 2021

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 (2021-24) [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 Executive Director.

If you require help, advice and support to complete the forms, please contact Dan Green, Deputy Executive Director.

SECTION 1: OVERVIEW

Portfolio and Service Area	Communities & Homes
Policy/Service/Change being assessed	HRA Rent Setting
Is this a new or existing Policy/Service/Change?	No – annual event
If existing policy/service please state date of last assessment	Feb 2021 – report to council
Ward Specific Impacts	All Wards
Summary of assessment Briefly summarise the policy/service/change and potential impacts.	
Completed By	Michelle Dickson and Bill Winter
Authorised By	Michelle Dickson
Date of Assessment	28 January 2022

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 checked="" type="checkbox"/>	The establishment of a Housing Climate Change Reserve utilising £1m in HRA reserves will enable the service to start planning its approach to supporting the decarbonisation of council homes as per the corporate strategy objective to achieve a reduction by 2030	None known negative impacts	Bill Winter	2022/23
				Ageing or early failing boiler replacements will continue for the time being as our approach to future capital programmes evolves in light of increased knowledge about the energy performance of our stock.	Evolving plans to move away from gas boilers which will be reflected in the new HRA business plan (to be developed) and forthcoming review of the asset management strategy	Bill Winter	June 2023
Fleet usage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Sustainable Transport/Travel (customers and staff)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

Sustainable procurement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Community leadership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Biodiversity and habitats	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Adaptation/Mitigation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Impact on other providers/partners	<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.

Review date	28 January 2023
Key points to be considered through review	Will feed into the corporate climate strategy, the HRA business plan and the review of the Asset Management Strategy.
Person responsible for review	Dan Green / Michelle Dickson & Bill Winter
Authorised by	Michelle Dickson

Appendix E

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:
Minakshee Patel
Corporate Equality & Diversity Advisor
minakshee.patel@rugby.gov.uk
Tel: 01788 533509

Equality Impact Assessment

Service Area	Communities and Homes, and, Corporate Resources
Policy/Service being assessed	Housing Revenue Account – Rent Setting 2022/23
Is this is a new or existing policy/service?	Existing
If existing policy/service please state date of last assessment	January 2021
EqlA Review team – List of members	Jon Illingworth
Date of this assessment	24 January 2022
Signature of responsible officer (to be signed after the EqlA has been completed)	

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

If you require help, advice and support to complete the forms, please contact Minakshee Patel, Corporate Equality & Diversity Advisor via email: minakshee.patel@rugby.gov.uk or 01788 533509

Details of Strategy/ Service/ Policy to be analysed

Stage 1 – Scoping and Defining	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	<p>Communities and Homes / Corporate Resources: The Housing Revenue Account (HRA) is the source of funding for landlord services to council tenants. The aims of the council are to deliver high quality services which are customer focused and cost effective. Council has been asked to approve the following for financial year 2022/23:</p> <ul style="list-style-type: none"> • An increase of 4.1% (CPI + 1%) in rents for all properties in line with government guidance <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/781746/Policy_Statement.pdf</p> <p>Without this increase, we cannot effectively manage resources and reserves to pay for additional works that will help tenants with broader affordability issues – for example affordable warmth works.</p>
(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?	<p>Corporate Priorities: Enable our residents to live healthy, independent lives; to provide excellent value for money services and sustainable growth</p> <p>Communities and Homes: Ensure residents have a home that works for them and is affordable; understand our communities and enable people to take an active part in them</p> <p>Corporate Resources: Prioritise use of resources to meet changing customer needs and demands.</p> <p>The Council has a statutory duty to set annual HRA capital and revenue budgets, along with the level of increase/decrease for council house rents. Central Government has in place a social housing rent policy which provides guidance about the level of rents that local authorities should set. The draft HRA Capital and Revenue Budget report for 2022/23 asks council to decide upon a rent setting option taking into consideration legislation, social housing policy, prior policy, and local capital investment priorities.</p>
(3) What are the expected outcomes you are hoping to achieve?	<p>The services provided with funding from the HRA are designed to meet the needs of council tenants and leaseholders which vary according to the groups displaying protected characteristics as defined by the Equality Act 2010. The services provided are of benefit to a large proportion of lower income families and others whose social and economic status may disadvantage them.</p>

<p>(4) Does or will the policy or decision affect:</p> <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	<p>The aims of the council are to deliver high quality services which are customer focused and cost effective. Council has been asked to approve the following for financial year 2022/23:</p> <ul style="list-style-type: none"> • An increase of 4.1% (CPI + 1%) in rents for all properties in line with government guidance <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/781746/Policy_Statement.pdf</p>
<p><u>Stage 2 - Information Gathering</u></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>All tenancy and housing application records are recorded within the Councils application and housing management system. This enables contact with applicants and tenants throughout the customer providing early intervention, advice and guidance on wellbeing and debt advice. This is in addition to customer satisfaction surveys and targeted contact with specific customer and tenants groups, an example of this is the work carried out with our Independent Living Tenants during the first lockdown in March 2020.</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>Consultation with Housing Service, Portfolio Holders, Cabinet on 2022/23 Draft Budget. The Council consulted with the tenant panel in 2020 on the Councils current arrears policy.</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>N/A</p>
<p><u>Stage 3 – Analysis of impact</u></p>	

<p>(1) Protected Characteristics From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination? If yes, identify the groups and how they are affected.</p>	<p>RACE N/A</p>	<p>DISABILITY N/A</p>	<p>GENDER N/A</p>
	<p>MARRIAGE/CIVIL PARTNERSHIP N/A</p>	<p>AGE N/A</p>	<p>GENDER REASSIGNMENT N/A</p>
	<p>RELIGION/BELIEF N/A</p>	<p>PREGNANCY MATERNITY N/A</p>	<p>SEXUAL ORIENTATION N/A</p>
<p>(2) Cross cutting themes (a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how? (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>	N/A		
<p>(3) If there is an adverse impact, can this be justified?</p>	N/A		
<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.)</p>	N/A		
<p>(5) How does the strategy/service/policy contribute to the promotion of equality? If not what can be done?</p>	<p>Money to provide financing for new capital works, to carry out work on dwellings to ensure they meet the decent homes standard, approving money to facilitate borrowing to finance the council's housing capital programme for housing revenue account dwellings.</p>		

(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?	Access to social housing is managed via the Council's housing lettings/allocation policy, the policy addresses, and priorities those who are the most vulnerable and have a housing need, therefore there are no barriers to applicants who have a need for assistance.

<u>Stage 4 – Action Planning, Review & Monitoring</u>																										
If No Further Action is required then go to – Review & Monitoring (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.	EqIA Action Plan <table border="1"> <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> </tbody> </table>	Action	Lead Officer	Date for completion	Resource requirements	Comments																				
Action	Lead Officer	Date for completion	Resource requirements	Comments																						
(2) Review and Monitoring State how and when you will monitor policy and Action Plan	Carry out the same equality impact assessment in January 2023.																									

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on 24 January 2022 and will be reviewed before February 2023.’