

# Equality Impact Assessment

## Partial Assessment Form

Policy, practice, function or project assessed	<p>Lettings Policy</p> <p>Introduction of pre-assessment module</p> <p>Ending the large scale printing &amp; distribution of Home-link magazines</p>
Lead Officer	Andy Glaves
Team	Completed on behalf of the Sub-regional Home-link Team
Start date of assessment	28 May 2012 (pre-consultation)
Completion of assessment	2 October 2012 (post-consultation)

## A. Policy, Practice, Function or Project to be Assessed

### A1. Please describe what are the main aims, objectives, purpose and intended outcomes of the policy or function?

- To meet the legal requirements for letting social housing;
- To assist customers in the highest assessed need;
- To make the best use of existing housing stock;
- To provide a consistent lettings process across the sub-region, so properties are let in a fair and transparent way;
- To provide increased choice and information to customers in the allocation of social housing;
- To support vulnerable customers accessing available homes;
- To ensure that customers are not discriminated against, whether directly or indirectly;
- To provide a wider housing options approach in supporting customers to meet their housing needs;
- To improve mobility across the sub-region;
- To promote social inclusion and help achieve sustainable communities.

### A2. Is this policy or function associated with any other Council policy or priority?

Yes, this policy is linked with the Council's

- Housing strategy,
- Homelessness Strategy
- Tenancy Strategy
- Tenancy Policy

### A3. Who are the intended beneficiaries/stakeholders of the policy or function? How many people are affected and from what sections of the community?

Applicants on the Housing Register and those approaching the Council for advice, however potentially any resident or existing tenant in the district may apply for housing.

Stakeholders include housing associations and both statutory and voluntary support agencies.

A4. Is the policy / function corporate and far-reaching?

Far reaching, it has potential to affect large numbers of residents

A5. Are you expecting to make any significant change to the policy or service in the near future? If so, please give details.

Yes, three changes are planned:

1. The introduction of a pre-assessment module to the website which will allow people to apply online and also provide more information on housing options
2. Changes to the lettings policy in four main areas:
  - a) applicants will need to have a connection to an area before they will be accepted onto the Housing Register
  - b) Former Armed Forces personnel are to excluded from the requirement in a) and will be given additional priority for housing
  - c) There will be increased priority for people who are under occupying their current home and for those who are overcrowded although any overcrowding will be assessed using the Local Housing Allowance rules and so will be tighter
  - d) Households will only be offered properties that are the right size for them according to the LHA size criteria.
3. The withdrawal of large-scale printing and distribution of a sub-regional Home-link Magazine every two weeks replaced by the availability of a bespoke Personalised Property List.

A6. Is this a new or existing policy or function?

The existing Lettings policy is being amended in light of social housing and welfare benefit reforms.

Introduction of the pre-assessment module is new as is the availability of Personalised Property Lists.

## B. Evidence / Data and Consultation

It is important to consider all information that is available in determining whether the policy or function could have a differential impact. Please attach examples of monitoring information, research or consultation reports.

### B1. What monitoring or other information do you have about relevant target groups, which will show the impact of the policy or function?

Monitoring from the Locata IT system, which holds the Housing Register and details from previous reviews of the Home-link scheme, Subscribers lists, assisted bidders lists, bid method information, etcetera  
We have now consulted applicants and stakeholders on the proposed changes.

### B2. Have you compared the data you have with the equality profile of the local population? What does it show?

Yes, we have compared customers on the Housing Register by ethnicity, age and vulnerability.

**Ethnicity:** There appears to be a high percentage of white other at 10% on the housing register on average across the seven authorities. This is likely to reflect the growing eastern European workers living in the area. This may highlight a need for translation services. Asian / Black groups amount to around 5% of customers, which largely reflects the demographics in the general population as at the last Census.

**Age:** There is a broad spread of ages on the housing register with most customers in the 16 – 49 and over 65 age groups. Fewer customers are in the age group between 50 and 65 but this is likely to reflect a more stable period in people's lives with housing not being an issue. Bidding by age shows that people under 60 are most likely to bid on-line with a range between 80% and 93%, with those over 50 bidding on-line reducing by age band from 64% at 60 – 69 to 44% from 90 – 99 years of age. Many family members are thought to bid on behalf of older relatives.

**Vulnerability:** There is a broad range of vulnerabilities reflected on the register, with physical disability and mental health problems being the highest. There has been an issue with the capture of disability information on the housing register so current data is incomplete. When the housing register is reviewed the inclusion of vulnerability data will be mandatory and a clearer picture should emerge.

**Important:** Initial Census results for the Population and Household Estimates for England and Wales were released on the 16 July 2012 but only included age and sex not ethnicity. This will be released in later editions and can be reviewed later

**B3. Have you identified any improvements or other changes that could be made from monitoring the data?**

Monitoring of new applications will be easier with the on-line system as applications will not be 'submitted' unless they are correctly completed. Also see above regarding vulnerable applicants.

Consultation responses have helped to identify key actions to help with the changes, that is, FAQ leaflet and making applicants aware of the options available to those without a computer.

**B4. Have you consulted or involved external stakeholders about the policy or function? If so, what were their views?**

Consultation with both customers and stakeholders was carried out between July – September 2012 through a questionnaire and events. Overall, the responses were positive and have helped to inform the final Lettings policy and implementation, and issues relating to access to the service and any problems with this will inform a review of the Access Strategy.

- 72% felt that improvements to the website will improve access to information.
- 78% felt that the personalised property list will be a suitable replacement for the printed magazine.
- 63% agreed that only people with a local connection to the area should be able to apply for housing.
- 48% agreed with the method of using the date in service as a fair way of prioritising applications from former armed service personnel. (Most responses of a negative nature related to the issue of former armed service personnel having priority, as opposed to the method of awarding this – and this is a legal requirement).
- 81% agreed with additional priority being awarded for over-crowding and under-occupation.

**B5. Have you undertaken any consultation with staff to assess their perception of any impacts of the policy or function? If so, what has been learnt from them?**

Staff have been involved with the new lettings policy and other changes through the Home-link Review, the operations Group and the consultation events. Concerns about impacts have been discussed and resolved or mitigated against throughout the review of the lettings policy.

B6. Please provide information about any other consultation, research, or involvement undertaken in relation to this impact assessment.

A full consultation plan was drawn up to cover the formal consultation covering a wide range of individuals including applicants, stakeholders, agencies, staff, etcetera. A range of methods was used including individual letters to applicants, website promotions, events, etcetera

C1. Impact of the Policy or Function

Assess the potential impact on each of the following protected characteristics. The impact could be negative, positive or neutral. If you assess a negative impact for any of the groups then you will need to assess whether that impact is low, medium or high. Refer to the evidence you use.

Description of Impact	Nature of Impact (Positive, Neutral, Adverse)	Extent of Impact (Low, Medium, High)
Age: Identify The Potential Impact Of The Policy Or Function On Different Age Groups.	Nature of Impact	Nature of Impact
Older people may be at an advantage as they may be offered properties with a spare bedroom as they are not subject to the LHA rules.	Positive	Low
Older people will also benefit from increased priority for downsizing should they wish to move	Positive	Low
Older people on the subscribers list will be sent more personalised information than before.	Positive	Low
Children may be disadvantaged by the new matching policy restricting the size of home offered.	Negative	High
More officer time will be available to support people as more able customers will be able to apply on-line	Positive	Low

Disability: Identify the potential impact of the policy or function on disabled people.	Nature of Impact	Nature of Impact
Increased priority for people if a disability is affected by current housing	Positive	Low
More accessible on line options for applicants (along with support workers and family) to find information and access Home-link 24 / 7	Positive	Low
If subscribe to Personalised Property list this will be a prompt to bid	Positive	Low
Children with a disability will have to justify why they require separate bedrooms making applications take longer to process.	Negative	High
Gender Reassignment: Identify the potential impact of the policy or function on people that have changed gender identity.	Nature of Impact	Nature of Impact
Policy applied to all regardless of gender reassignment	Neutral	Low
Marriage and Civil Partnerships: Identify the potential impact of the policy or function on people who are married or in a civil partnership.	Nature of Impact	Nature of Impact
Policy applied to all regardless of relationship status	Neutral	Low
Pregnancy and Maternity: Identify the potential impact of the policy or function on pregnant or maternal mothers and those women who wish to breastfeed.	Nature of Impact	Nature of Impact
Pregnant women will not be offered accommodation including a bedroom for the child until the child is born unless any HB shortfall in the rent can be met from other sources	Negative	Medium
Race: Identify the potential impact of the policy or function on different ethnic groups, including national origins, colour and nationality.	Nature of Impact	Nature of Impact
Information is available in different languages and translation can be arranged. Audio information can be made available. In all cases officers will consider the needs of the customer and provide for these whilst acknowledging that the ideal solution cannot always be found.	Neutral	Low
Religion / Belief: Identify the potential impact the policy or function on different religious/faith groups.	Nature of Impact	Nature of Impact
Needs of individuals are assessed and considered under the policy	Neutral	Low

Sex: Identify the potential impact of the policy or function on men and women.	Nature of Impact	Nature of Impact
Policy applied to all regardless of gender. The only impact relating to gender is covered within pregnancy and maternity above.	Neutral	Low
Sexual Orientation: Identify the potential impact of the policy or function on lesbian, gay men, bisexual or heterosexual people.	Nature of Impact	Nature of Impact
Policy applied to all regardless of sexual orientation	Neutral	Low
Other Characteristic Specific to South Cambridgeshire – Rurality: Identify the potential impact of the policy or function on people who are rurally isolated.	Nature of Impact	Nature of Impact
Increased accessibility via on-line services	Positive	Low
Personalised property sheets can be sent to individuals by post	Positive	Low
Increased communication by email	Positive	Low
Withdrawal of magazine / not available in local pick up points – this can be replaced by a personalised property sheet for those, for whom this would cause a disadvantage.	Neutral	Low

**Please note:** Following completion of the section above, if the nature of the impact is adverse then you may need to proceed to a full equality impact assessment.

C2. Could you minimise or remove any adverse or potential impact that is high, medium or low significance, in advance of a full impact assessment? Explain how.

There are two areas that show a high negative impact. These are as a result of Government legislation. In addition the requirements for allocating social renting are the same as the size requirements for those renting privately.

We can also consider how we apply Discretionary Housing Payments locally and whether or not these can be used to reduce some of the impact, at least in the short term.

C3. Does the policy or function actively promote equal opportunities and good community relations? Or could changes be made so that it does so?

Yes, the Access Strategy and Directory of support services will be reviewed to ensure fair and equal access for all.

C4. Please provide any further information, qualitative or quantitative that does not fit into the questions but you feel has a likely impact on this assessment.

N / A

D. Conclusions	-	-	-
D1. Was there sufficient data to complete the partial assessment?	Yes? No?	X <input type="checkbox"/>	If <b>“no”</b> , what arrangements are in place for evidence gathering and continuing with the assessment?
D2. Is the outcome of the partial assessment that the policy or function would have an adverse impact (medium or high impact) on one or more target group?	Yes? No?	X <input type="checkbox"/>	<p>If <b>“yes”</b>, will you proceed to a full assessment? If so, what arrangements are in place to carry out the full assessment?</p> <p>No, a full assessment will not be necessary.</p> <p>The adverse impacts identified are as a direct result of government legislation and tenants in the private sector already have the same restrictions.</p>
D3. Is the outcome of the partial assessment that the policy or function would have a neutral or positive impact on equalities?	Yes? No?	X <input type="checkbox"/>	<p>If <b>“yes”</b>, have you included proposals in the Action Plan to further improve the impact of the policy or function on equalities?</p> <p>To review the access strategy</p> <p>Do you plan to review the service or policy again in future to assess whether there has been any change? If so, when?</p> <p>Has the Equalities Steering Group and the Consultative Forum reviewed the assessment? If so what were their comments?</p> <p>No</p>

D4. Do you have any other conclusions/outcomes from the partial assessment?

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Action Plan for enhancing existing practice

Recommendation / issue to be addressed	Planned Milestone	Planned completion of milestone (date)	Officer Responsible	Progress
Review of access strategy	-	-	-	-
FAQ leaflet	-	-	-	-

Resources

Does the above action plan require any additional resources?

No – within current resources and staff time

Arrangements for Monitoring

Please give your plans for monitoring the achievement of the above actions.

Progress monitored through Home-Link operations group and Home-Link Management Board

Sign off: The officers below confirm that this partial assessment has been completed in accordance with the Council's guidance

Signature of Lead Officer:		Date:
Signature of Corporate Manager or Chief Officer:		Date:

Please retain the original form on your service area and return a copy of the completed form to the Equality & Diversity Officer.
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