

**Chesterfield Borough Council**

**Equality Impact Assessment - Full Assessment Form**

Service Area: Housing Services

Section: Housing Options

Lead Officer: Carl Griffiths – Housing Options Manager

Title of the policy, project, service, function or strategy the preliminary EIA is being produced for: Implementation of Local Lettings Plan

Is the policy, project, service, function or strategy:

Existing

Changed

New/Proposed

**STEP 1 – MAKE SURE YOU HAVE CLEAR AIMS AND OBJECTIVES**

What is the aim of the policy, project, service, function or strategy?

The Council last amended its Housing Allocations Policy in April 2016 when some minor changes were required to Policy in order to comply with new statutory guidance and to how the Council discharges its duty to statutory homeless households to provide an improved service for customers and minimise costs to the Council.

A full review of the Policy is due in 2017/2018, but one minor amendment is now necessary before the review takes place. This can be achieved through a Local Lettings Plan (LLP). This EIA has therefore been reviewed to take into account the amendments which include:

- In order to increase the number of new applicants to our housing register there will not be a residency requirement to qualify for entry on to the housing register, but applicants who satisfy the residency requirement will be given preference.

Who is the policy, project, service, function or strategy going to benefit and how?

### **Benefits in relation to 2017 update**

Relaxing the residency requirement would enable the Council to effectively manage demand through our housing register but also provide us with a solution to the ongoing issue of long term empty properties and loss of rent.

### **Benefits in relation to 2015/16 review**

Certain application types on the housing register will benefit from the proposed changes. These include:

Discharging duty to statutory homeless households by way of direct match- this will enable the Council to match homeless households with vacant properties thus reducing the time taken to discharge the Councils statutory duty. This means potentially less time in temporary accommodation and a better service for the customer

Introduction of new points category for transfer applicants – points were previously awarded to families with a child/children living in a flat who were not overcrowded. This points category was removed in April 2013 as we did not anticipate that we would have sufficient numbers of properties void to give preference to this group of tenants. Due to the increase in void properties coupled with the increase in the transfer quota, we are proposing that we reintroduce this points category. This will enable this group of applicants to access houses

What outcomes do you want to achieve?

The desired outcomes of the proposed policy are to:

1. let vacant properties via the CBL scheme in accordance with the Council's Allocation Policy
2. to house those households in housing need as defined by Law
3. prevent homelessness
4. make best use of council stock
5. to make all allocations fairly, equitably and without any unlawful discrimination

What barriers exist for the Council and the groups/ people with protected characteristics to enable these outcomes to be achieved?

**Barriers in relation to 2015/16 review**

The Council has previously operated an open waiting list to allow any person or household to apply for accommodation even if they have no connections to the borough. The Code of Guidance recommends that local authorities introduce a 'residency test' of up to 5 years to ensure local people have preference for local housing.

By implementing a residency test that excluded out of borough applications it has resulted in an increase in void properties and a considerable loss of rental income.

**STEP 2 – COLLECTING YOUR INFORMATION**

What existing data sources do you have to assess the impact of the policy, project, service, function or strategy?

Routine quarterly monitoring of applicants on the housing register is carried out.

**STEP 3 – FURTHER ENGAGEMENT ACTIVITIES**

Please list any additional engagement activities undertaken to complete this EIA e.g. met with the Equalities Advisory Group, local BME groups, Employee representatives etc. Could you also please summarise the main findings.

<b>Date</b>	<b>Engagement Activity</b>	<b>Main findings</b>
2017	Consultation with Derbyshire Law Centre	The minimum income requirement was challenged as being an illegal clause so this change is fully supported. The residency requirement is also supported as it will enable better management of supply of and demand for accommodation.
Jan 2015	Notice in Our Homes Magazine	

Jan 2015	Notice on Council's website	
Jan 2015	Contact with households on the register affected by proposed changes	

#### **STEP 4 – WHAT'S THE IMPACT?**

Is there an impact (positive or negative) on some groups/people with protected characteristics in the community? (Think about race, disability, age, gender, religion or belief, sexual orientation and other socially excluded communities or groups). You may also need to think about sub groups within each equalities group or protected characteristics e.g. older women, younger men, disabled women etc.

Please describe the potential impacts both positive and negative and any action we are able to take to reduce negative impacts or enhance the positive impacts.

<b>Group or Protected Characteristic</b>	<b>Positive impacts</b>	<b>Negative impacts</b>	<b>Action</b>
Overall impact	<p><b>Impacts in relation to 2017 update</b></p> <p>Relaxing the residency requirement would enable the Council to effectively manage demand through our housing register but also provide us with a solution to the ongoing issue of long term empty properties and loss of rent.</p> <p><b>Impacts in relation to 2015/16 review</b></p> <p>The changes to Policy proposed will benefit families with children in flats; enable statutory homeless households to secure settled accommodation sooner and will give preference to local people on the waiting list</p>		
Age – including older people and younger people.	The changes to Policy proposed will benefit families with		

	children in flats  Young people – primarily those age 18-24 on JSA or low incomes will be able to access accommodation.		
Disabled people – physical, mental and sensory including learning disabled people and people living with HIV/Aids and cancer.	No disproportionate impact anticipated		
Gender – men, women and transgender.	No disproportionate impact anticipated		
Marital status including civil partnership.	No disproportionate impact anticipated		
Pregnant women and people on maternity/paternity. Also consider breastfeeding mothers.	The changes to Policy proposed will benefit families with children in flats		
Sexual Orientation – Heterosexual, Lesbian, gay men and bi-sexual people.	No disproportionate impact anticipated		
Ethnic Groups	No disproportionate impact anticipated		
Religions and Beliefs including those with no religion and/or beliefs.	No disproportionate impact anticipated		
Other groups e.g. those experiencing deprivation and/or health inequalities.	Homeless households will spend less time in temporary accommodation and will move in to suitable accommodation sooner	Homeless applicants will not be able to bid for properties	Any property must be suitable as defined by Homelessness Legislation

From the information gathered above does the policy, project, service, function or strategy directly or indirectly discriminate against any particular group or protected characteristic?

Yes   
No

If yes what action can be taken to stop the discrimination?

N/A

**STEP 5 – RECOMMENDATIONS AND DECISION MAKING**

How has the EIA helped to shape the policy, project, service, function or strategy or affected the recommendation or decision?

A comprehensive analysis of lettings data has taken place and careful consideration of changes in legislation and the potential impact has taken place. By considering the impact via the EIA, this has informed both the development of the policy and EIA simultaneously.  
  
As explained above, a full review of the Policy will be taking place during 2017-2018.

How are you going to monitor the policy, project, service, function or strategy, how often and who will be responsible?

The allocation policy and how, and to whom, properties are allocated to and the housing register are routinely monitored. This monitoring identified the need to make changes to the allocations policy and this process will continue going forward. It will be the responsibility of Housing Manager and Housing Options Manager.

**STEP 6 – KNOWLEDGE MANAGEMENT AND PUBLICATION**

Please note the draft EIA should be reviewed by the appropriate Head of Service/Service Manager and the Policy Service before WBR, Lead Member, Cabinet, Council reports are produced.

Reviewed by Head of Service/Service Manager

Name: Carl Griffiths – Housing Options Manager

Date: March 2017

Reviewed by Policy Service

Name: Katy Marshall

Date: March 2017

Final version of the EIA sent to the Policy Service

Decision information sent to the Policy Service