

Equality Impact Assessment (EQIA)



The characteristics protected by the Equality Act 2010 are:

<p>Disability Gender reassignment Race</p>	<p>Age Marriage/civil partnership Sexual orientation</p>	<p>Sex (gender) Pregnancy/maternity Religion/belief</p>
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By law we must have due regard to the need to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act*
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it*
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.*

In effect, this means that we need to ensure that our policies and services are fair, equitable and proportionate and where possible mitigate against any adverse impacts on people from the different protected characteristics.

In addition to the above protected characteristics you should consider the impact of living in a **rural area** as part of this assessment. Where people live is not a characteristic protected by law, but for an organisation such as Babergh and Mid Suffolk District Councils it is good practice to consider carefully how location may affect people’s experience of a policy or service.

The Rural-Urban definition, defines the rurality of very small census based geographies. Census Output Areas forming settlements with populations of over 10,000 (which are urban), while the remainder are defined as one of three rural types: *town and fringe, village or hamlet and dispersed*.

Details	
Service or policy title	Proposals for Local Lettings Policy for properties which have been “de-sheltered”
Lead officer <i>(responsible for the policy or service/function)</i>	Sue Lister – CM Supported Housing
Officers carrying out the EQIA <i>(at least one must have done EQIA training and it is recommended that an officer responsible for the policy or service/function is involved in completion)</i>	Sue Lister and David Cleary
Is this new or a revision? <i>(If revision state when previous EQIA undertaken)</i>	New
Is this the first time this policy or function has been assessed?	Yes

Date of completing this EQIA	2 February 2017
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Description	
What exactly is proposed? <i>(Describe the service/policy and the changes that are being planned)</i> A local lettings policy for properties which have been “de-sheltered”	
Why? <i>(Give reasons why these changes are being introduced)</i> This local lettings policy will apply to vacancies which, following the review of sheltered housing, occur in properties which from April 2017 will no longer be sheltered. Sheltered properties are restricted to people who are over 60 or over 55 and in receipt of Disability Living Allowance or a Personal Independence Payment. The aim of the policy is to ensure that the environment remains suitable for the residents who have chosen to stay in “de-sheltered” properties and to ensure that vacancies can be allocated in a timely manner	
What will the effect of the changes be? <i>(Describe which people, communities, localities etc. will be affected by the changes)</i> In order to maintain a suitable environment for the current residents some applicants will not be considered suitable for vacancies which occur in the relevant housing schemes – see below for list of criteria.	
How will it be implemented? <i>(Describe the decision making process, timescales, process for implementation)</i> Once approved, and post April 2017 when the agreed schemes will be “de-sheltered” it will be implemented when properties are advertised and allocated via Gateway to Homechoice. This policy amends the Gateway to Homechoice allocations policy which sets out which applicants are eligible for bungalows which are not sheltered in normal circumstances i.e. <ul style="list-style-type: none"> • Applicants who are over 60 • Applicants of any age who have a medically assessed need for a bungalow • Applicants who are over 40 and who will release a property in need (for example those who are under-occupying a social tenancy) 	
When is it due to start? <i>(Planned start of new/revised policy/service)</i> After 1 April 2017	
Any other relevant details The policy proposes the following additions/adaptions to the existing allocations policy. Individuals wishing to move into recently “de-sheltered” properties will need to be:	

- Over 60 years of age or
- Over 40 with a medically assessed need for a bungalow or
- Over 40 and releasing a property in need and
- A quiet and settled lifestyle and
- No history of anti-social behaviour from themselves or close family members
- No history of drugs / alcohol issues
- Have no relevant offending history, which would deem them unsuitable to live in the scheme

Applicants who satisfy the above criteria and who have children can be considered for two bedroom vacancies (subject to section 6.5 of the Gateway to Homechoice allocations policy “Parents with staying access to dependent children or shared residency orders”).

Owner occupiers can be considered for de-sheltered properties only if the property has been advertised twice and no suitable tenant has been identified.

Data about the population

What is the demographic profile or make up of the community you are serving? (A brief overview of quantitative data used and qualitative research undertaken, including customer surveys and focus groups, plus links to reports, local or national data that you have used, suggested sources of information can be found at the end of this document)

- The policy has considered the needs of those individuals who wish to move into vacancies which occur in schemes which have been de-sheltered in the future to ensure that the environment remains suitable for them and current residents who have chosen to stay
- This policy has been drawn up as a result of the work of the Sheltered Housing review and the feedback/concerns raised or received from residents currently living in the schemes that are going to be de-sheltered about the need to maintain a calm/quiet environment
- The policy will not apply to all BMSDC properties but only to those schemes that have been “de-sheltered”

Babergh Schemes

- Angel Street, Hadleigh*
 - Ash Street, Boxford
 - Bradfield Avenue, Hadleigh*
 - First Avenue, Sudbury
 - Grimwood Corner, Sudbury
 - Hill House, Bildeston
 - Inkerman Terrace, Hadleigh*
 - Spring Street / Lane, Lavenham
- * schemes which have been de-sheltered as vacancies occur since 2005

- Tayler Close, Hadleigh

Mid Suffolk Schemes

- Albert Close, Rickinghall
- Millars Close, Walsham le Willows
- Richer Close, Badwell Ash
- School Close, Norton
- St Georges Road, Stowlangtoft
- St Nicholas Close, Rattlesden
- Tacon Close, Eye
- The Orchard, Felsham
- Victoria Gardens, Wattisfield
- Woodlands Close, Thurston
- Bungalows previously attached to sheltered schemes at:-
Hartismere House, Laxfield,
Jubilee Court, Stowupland,
Hurstlea Court, Needham Market
Elizabeth Court in Eye

Total number of properties 186

What is the profile or make up of your service users by protected characteristics?
(Where this data is available. If it is not currently available state any plans to collect this in future)

BMSDC Districts Population Data

Age Babergh:

- 16 years or under: 18.14%;
- 16 to 64 years: 60.48%;
- 65 years and over: 21.38%

Mid Suffolk:

- 16 years or under: 18.43%;
- 16 to 64 years: 61.44%;
- 65 years and over: 20.13%

Disability

Babergh

- 17.38% of the population are limited with day to day activities
- 7.22% Limited a lot
- 10.16 Limited a little

Mid Suffolk

- 16.55% of the population are limited with day to day activities
- 6.67% Limited a lot
- 9.88% Limited a little

Implications for communities and workforce

Disability	
What is the impact on people with a disability (including children with additional needs) and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	<p>This policy fits in with the current Gateway to HomeChoice Allocations policy giving priority to:</p> <ul style="list-style-type: none"> Applicants who have a medically assessed need for a bungalow <p>Section 167 (2E) of the 1996 Housing Act enables housing authorities to allocate accommodation to people of a particular description, whether or not they fall within the reasonable preference categories.</p>
How does it have a positive or negative impact?	The current policy has a positive impact on this group which will not be altered by this additional Local Lettings Policy
Do you expect the extent of the impact to be low, medium or high?	<p>Low</p> <p>The number of properties to which this policy applies is a small percentage of the social rented properties of this type. There are 881 bungalows in Babergh's housing stock and 1139 in Mid Suffolk's.</p>
What could be done to mitigate any adverse impact or further promote positive impact?	N/A
Age	
What is the impact on people of different ages and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	<p>This policy amends the current policy by restricting allocations of de-sheltered properties to those over 40 years of age</p> <p>Section 167 (2E) of the 1996 Housing Act enables housing authorities to allocate accommodation to people of a particular description, whether or not they fall within the reasonable preference categories.</p>
How does it have a positive or negative impact?	The impact is positive as it increases the number of properties available to people who are between 40 and 60
Do you expect the extent of the impact to be low, medium or high?	<p>Low</p> <p>Applicants who are between 40 and 60 are currently unable to apply for vacancies in these schemes as they are restricted to people over 60.</p> <p>The number properties to which this policy applies is a small percentage of the social rented properties of this type (see above). Those who are under 40 will continue to be able to apply for other vacancies which meet their needs.</p>

What could be done to mitigate any adverse impact or further promote positive impact?	N/A
Sex (gender)	
What is the impact on people of different genders and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	There is no positive or negative impact from this policy on people of different genders
How does it have a positive or negative impact?	Neutral
Do you expect the extent of the impact to be low, medium or high?	low
What could be done to mitigate any adverse impact or further promote positive impact?	N/A
Gender reassignment	
What is the impact on people who have undergone gender reassignment (i.e. transgender people) and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	There is no positive or negative impact from this policy on people of different gender reassignment
How does it have a positive or negative impact?	Neutral
Do you expect the extent of the impact to be low, medium or high?	low
What could be done to mitigate any adverse impact or further promote positive impact?	N/A
Marriage/civil partnership	
What is the impact on people who are married or in a civil partnership and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	There is no positive or negative impact from this policy on people of different marriage/civil partnership
How does it have a positive or negative impact?	Neutral
Do you expect the extent of	low

the impact to be low, medium or high?	
What could be done to mitigate any adverse impact or further promote positive impact?	N/A
Pregnancy/maternity	
What is the impact on people who are pregnant women or those with a young child and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	This policy amends the current policy by restricting allocations of de-sheltered properties to those over 40 years of age. Younger parents or pregnant women will not be eligible.
How does it have a positive or negative impact?	Neutral
Do you expect the extent of the impact to be low, medium or high?	Low Parents and pregnant women are currently unable to apply for vacancies in these schemes as they are restricted to people over 60. The number of two bedroom properties to which this policy applies is a small percentage of the social rented properties of this type. Parents under 40 will continue to be considered for other vacancies which meet their needs.
What could be done to mitigate any adverse impact or further promote positive impact?	N/A
Race	
What is the impact on people from different races or ethnic groups and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	There is no positive or negative impact from this policy on people of different races or ethnic groups
How does it have a positive or negative impact?	Neutral
Do you expect the extent of the impact to be low, medium or high?	low
What could be done to mitigate any adverse impact or further promote positive impact?	N/A
Sexual orientation	

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What is the impact on people according to their sexual orientation and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	There is no positive or negative impact from this policy on people of different sexual orientation
How does it have a positive or negative impact?	Neutral
Do you expect the extent of the impact to be low, medium or high?	low
What could be done to mitigate any adverse impact or further promote positive impact?	N/A
Religion/belief	
What is the impact on people according to their religion or belief and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	There is no positive or negative impact from this policy on people of different religion/belief
How does it have a positive or negative impact?	Neutral
Do you expect the extent of the impact to be low, medium or high?	low
What could be done to mitigate any adverse impact or further promote positive impact?	N/A

Rurality	
Where people live is not a characteristic protected by law: but for Babergh and Mid Suffolk District Councils it is good practice to consider carefully how location may affect people's experience of a policy or service.	
What is the impact on people according to whether they live in an urban or rural environment and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	The aim of the policy is to ensure that the environment remains suitable for the residents who have chosen to stay in "de-sheltered" properties and to ensure that properties are allocated in a timely manner. The policy was drafted as a result of the work undertaken in consultation with sheltered housing tenants as part of the review, when over 50 % of tenants feedback via F2F or written comment
How does it have a positive or negative impact?	neutral
Do you expect the extent of the impact to be low, medium or high?	low
What could be done to mitigate any adverse impact or further promote positive impact?	N/A

Making Decisions	
Having completed this equality impact assessment indicate which decision is recommended to be taken.	
Should the policy or service be implemented as the correct course of action?	Yes
Should the policy or service be amended as suggested by the report so that mitigating actions are taken to address an adverse or negative impact on any characteristic?	No
Should the policy or service be reviewed and revised more significantly to take into account its impact on different groups?	The policy should be reviewed annually to consider whether it needs to be continued and if amendments need to be made
Should the policy or service not be actioned as there are too many negative impacts?	It should be actioned

Monitoring Impact	
Assessing the impact on equality is an ongoing process that does not end once a policy or service had been agreed or implemented.	
How frequently will the policy or service be reviewed?	Ongoing
Who will be involved?	Allocations Team Community Housing Officers Corporate Manager – Housing Options Corporate Manager – Supported Living
Will there need to be an action plan completed for any amendments?	No
What further evidence or consultation will be needed to check that the policy or service is working well?	The success of allocations made to de-sheltered properties including:- <ul style="list-style-type: none"> • Information from Tenancy Service Officers • Any complaints received from new or existing tenants • The number of allocations made and the percentage of remaining residents who were initially sheltered tenants.

Completion	
Authors signature	
Date of completion	

Additional sources of data can be found on the following links:

<http://www.suffolkobservatory.info/Default.aspx>

<http://www.nomisweb.co.uk/>

<https://www.ons.gov.uk/>

<http://suffolkcf.org.uk/publications/hidden-needs-2016/>

<https://www.nao.org.uk/>