



## Equality Impact Assessment Record Form 2012-16

### Section 1 – Service Details and Summary of EIA Activity

<b>Title of activity:</b>	<b>Change to the age criteria within the Local Lettings Policy</b>
<b>Lead Officer responsible for this EIA:</b>	Ken Davies
<b>Telephone:</b>	01325 388435
<b>Service Group:</b>	Neighbourhood Services and Resources
<b>Service or Team:</b>	Housing Services
<b>Assistant Director accountable for this EIA</b>	Pauline Mitchell
<b>Who else will be involved in carrying out the EIA:</b>	

<b>What stage has the EIA reached? Update as EIA develops.</b>		
<b>Stage</b>	<b>Date</b>	<b>Summary of position</b>
<b>Stage 1: Initial Officer Assessment. Whole Population likely to be affected identified</b>		Tenants living in Council flats and those applying for that form of accommodation.  The Council has over 1900 flats with a variety of designs ranging from terraced properties with separate entrances to blocks of three storey flats with a communal entrance and stair case.
<b>Stage 2: Further Assessment. Target</b>		Up to 800 applicants registered on the Compass Choice Based Lettings system who may apply for ground floor and first floor

<b>Population likely to be affected identified</b>		flats 700 people who are aged between 18 and 40 registered for Council Housing who are restricted to applying for about 140 second floor flats
<b>Stage 3: Further Assessment. Individuals likely to be affected identified</b>		Single people and couples without children aged under the age of either 40 or 50 who apply for first floor flats and people aged between 55 and 60 who apply for ground floor flats  Older people already living in flats are concerned about the impact of younger people living in the same block
<b>Stage 4: Analysis of Findings</b>		There is a mismatch between demand from younger people for council accommodation and supply. Changes in the population and the impact of the Welfare reforms have seen an increase in demand. Successive regeneration programmes has seen a reduction in properties to younger people. Although the council will improve supply through new build this will take time and will produce a limited number of suitable properties. The new build programme has to address a number of housing needs.to address the short and medium term needs of younger people there is a need to make changes to the age criteria. However, the consultation process has highlighted the fears of some tenants about the risks involved in mixing different age groups.
<b>Stage 5: Sign-Off</b>		Ken Davies Pauline Mitchell
<b>Stage 6: Reporting and Action Planning</b>		The actions will fit into the monitoring processes established for the Housing Strategy

## Section 2 – The Activity and Supporting Information

<b>Details of the activity (main purpose and aims)</b>
<p>Significant changes are taking place in demand for Council Housing. There have been noticeable increases in the number of people under the age of 40 who are applying for housing. The housing options for this age group are currently limited due to age restrictions that are placed on some flats through the Local Lettings Policy. During this time we have seen some decrease in demand for older people's accommodation.</p> <p>Local Lettings Policies are supplementary to the Common Allocations Policy and only apply to the stock of the provider who introduced the local policy. The Council's current Local Lettings Policy restricts access to some first floor flats to people aged either over 40 or 50 depending on the location while second floor flats are available to anyone aged over 18. Ground floor flats are restricted to people aged over 60 or people with a disability.</p> <p>The proposed change simplifies the Local Lettings Policy to allow applicants over the age of 18 to apply for flats above ground floor and a reduction in the age for Ground Floor properties to 55. This change will not apply to the Council's 7 fully comprehensive sheltered housing schemes and the Extra Care schemes.</p>

<b>Who will be affected by the activity? (groups and numbers)</b>
<b>Whole population</b>
There are approximately 1900 tenants living in flats affected and about 800 applicants who are registered on the Compass Choice Based Lettings system who may apply for ground floor and first floor flats
<b>Target population</b>
<p>43.3% of tenants are Male and 56.7 Female</p> <p>About 48% of tenants are 60 or over</p> <p>96% of Tenants are White British</p> <p>1% are Gypsy or Traveller</p> <p>1.9% are White other</p> <p>0.6% Asian or Asian British</p> <p>0.5% Black or Black British</p> <p>57% of tenants have a long term health problem</p> <p>In 8.8% of tenants households someone is a wheel chair user</p> <p>2208 Tenants are in receipt full Housing Benefit and 1616 are in receipt of partial Housing benefit. This is about 70% of all tenants</p>
<b>Individuals</b>
It is difficult to identify individuals who are applicants as the properties they bid for are a personal choice. While the impact on existing tenants also contains a number of variables that make it difficult to identify the impact beyond those who live in flats. However, the consultation process suggest that the single group most concerned by the change is older people
<b>What data, research and other evidence or information is available which is relevant to the EIA?</b>
<p>An analysis was under taken of the waiting list and performance information was gathered concerning the allocation of flats that formed the basis for these proposals.</p> <p>A detailed consultation was undertaken that included:</p> <ul style="list-style-type: none"> <li>• A survey of all tenants</li> <li>• A survey of applicants applying for 1 and 2 bed properties</li> <li>• A survey of stakeholders and Representative groups</li> </ul> <p>An analysis of noise complaints in 2013/14</p> <p>A review of flat design</p>

## Section 3: Officer Assessment

Use this table to record your views on potential impact on Protected Characteristics. As the activity and the assessment develop your views may change – record them here.

It is important to be searching and honest about this – many Council activities are planned to be of positive benefit to identified target groups but can often have the potential for inadvertent effects on other groups.

Protected Characteristics	Potential Impact			Potential level of impact				Summary of Impact
	Positive	Negative	Not Applicable					
Age	P	N					L	<p>The older population in Darlington is increasing in total numbers and as a proportion of the population. However this does not translate to increased demand for council accommodation. The numbers of older people who are owner occupiers is about 77% of the older population and is still growing. When they decide to move they are less likely to want to rent.</p> <p>When older people decide to move it tends to be at a later stage in life and this also has an impact on demand.</p> <p>The change reflects changing demand and by reducing the age restriction on ground floor flats to 55 will open up these properties to more people.</p> <p>Introducing younger people into first floor flats are a cause of concern. They are worried about increased noise and nuisance</p>
Race			NA				nil	There are no specific impacts
Sex			NA				nil	There are no specific impacts

Protected Characteristics	Potential Impact Positive/Negative/ Not Applicable			Potential level of impact				Summary of Impact
Gender Reassignment	P				M			Evidence that flexibility in allocation of flats has helped provide safe accommodation
Disability (summary of detail on next page)		N				L		People with disabilities living in ground floor flats may be concerned about younger people living above them
Religion or belief			NA				nil	There are no specific impacts
Sexual Orientation			NA			L	nil	There are no specific impacts
Pregnancy or maternity			NA				nil	There are no specific impacts
Marriage/ Civil Partnership			NA				nil	There are no specific impacts
<p><b>The Council must have due regard to disabled people's impairments when making decisions about 'activities'. This list is provided only as a starting point to assist officers with the assessment process. It is important to remember that people with similar impairments may in reality experience completely different impacts. Consider the potential impacts and summarise in the Disability section on the previous page. Officers should consider how the 'activity' may affect a disabled person.</b></p>								
Mobility Impairment			NA			L		The change will affect first floor flats which are likely to be impractical for people with mobility issues. Access to ground floor accommodation will be unchanged

Protected Characteristics	Potential Impact Positive/Negative/ Not Applicable			Potential level of impact				Summary of Impact
Visual impairment	P					L		Will increase supply of flats available to people aged under 50 and ground floor accommodation for those 55 and over
Hearing impairment	P					L		Will increase supply of flats available to people aged under 50 and ground floor accommodation for those 55 and over
Learning Disability	P					L		Will increase supply of flats available to people aged under 50 and ground floor accommodation for those 55 and over
Mental Health	P					L		<p>Will increase supply of flats available to people aged under 50 and ground floor accommodation for those 55 and over</p> <p>An increase in noise and nuisance may have a different affect on people with mental health issues in comparison to the general population</p>
Long Term Limiting Illness	P					L		Will increase supply of flats available to people aged under 50 and ground floor accommodation for those 55 and over
Multiple Impairments			NA				nil	The change will affect first floor flats which are likely to be impractical for people with mobility issues Access to ground floor accommodation will be unchanged
Other - Specify								

<b>Cumulative Impacts</b>	
<b>Change activities</b>	<b>Potential cumulative impacts</b>
	The mix of different age groups could lead to management issues over time through for example clashes of lifestyle. Within the Local Lettings Policy the Council can already make adjustments to age criteria for individual properties or areas

## Section 4: Engagement Decision

<b>Is engagement with affected people with Protected Characteristics required, now or during the further development of the activity?</b>	<b>Yes</b>
<b>If YES, proceed to the next section.</b>	
<b>If NO, briefly summarise below the reasons why you have reached this conclusion.</b>	

## Section 5 – Involvement and Engagement Planning

<b>Has the assessment shown that the activity will treat any groups of people with Protected Characteristics differently from other people? Yes</b>
<p><b>If yes, please state which groups and how</b></p> <p>The impact will be on people aged 50 and below who are seeking a first floor flat and people aged between 55 and 60 who are seeking a ground floor flat. It will mean that people who are aged either under 40 or 50 will have the same opportunity to apply for first floor flats. It will also expand the opportunities for people aged between 55 and 60 to apply for ground floor flats.</p> <p>Older people and people with disabilities who live in ground floor flats are concerned that noise and nuisance will be caused by mixing age groups</p>

**Will the differential treatment advance equality for people with Protected Characteristics? Yes**

**If yes, please state which groups and how**

By changing the age criteria first floor flats will be made available to applicants of any age

**Will the differential treatment cause or increase disadvantage for people with Protected Characteristics? Yes**

**If yes, please state which groups and how**

58% of respondents to the consultation believed that the change would have a negative impact on older and disabled people who would be more likely to experience noise and nuisance

### **Involvement and Engagement Plan**

Which organisations, groups and individuals do you need to involve or engage and how?

<b>Date of plan entry</b> <b>Organisation, Group or Individuals</b>	<b>Date of event or activity</b>	<b>Type of activity – venue, channels, method and staffing</b>
All Council tenants and Leaseholders	9/5/14 30/5/14	A survey of Council Tenants was carried out to assess the level of support for the change. The survey was sent out with Hot News. The survey was also made available on the council Website.  The survey was promoted on Facebook and tweeted
Applicants Registered on the Compass Choice Based Lettings system	9/5/14 30/5/14	All applicants for one and two bed properties were surveyed  Applicants were identified on Compass Choice Based Lettings system and posted the survey. They were given the option to complete the survey on line.
General Public	9/5/14 30/5/14	A survey was placed on the Council Website  The survey was promoted on Facebook and tweeted and reported in the local press
All Council tenants	28/5/14	A public consultation was organised at the Dolphin Centre. The invite was included within the surveys. It was also



		<p>promoted on Facebook reported in the local press.</p> <p>North Road Residents Association held a public meeting to discuss the changes</p>
Stakeholders and representative groups	<p>9/5/14</p> <p>30/5/14</p>	A survey was sent to stakeholders and representative groups via email
Local Councillor survey		Local Councillors carried out a survey of Council flats in North Ward.

## Section 6: Engagement Findings

	<b>Date/summary of engagement carried out</b>	<b>Summary of impacts identified</b>
<b>Age</b>	See engagement plan	<p>Concern that in mixing age groups problems will arise particularly noise and nuisance. There was a concern that that some flats had poor noise insulation and this would exasperate the problem</p> <p>Investigation of the properties identified in the consultation indicated that these were properties with a higher level of insulation than properties built in earlier years</p>
<b>Disability</b>	See engagement plan	<p>Concern that in mixing age groups problems will arise particularly noise and nuisance. People of any age who have a physical disability can apply for a ground floor flat</p>
<b>Mobility Impairment</b>	See engagement plan	There were no specific comments
<b>Visual impairment</b>	See engagement plan	There were no specific comments
<b>Hearing impairment</b>	See engagement plan	There were no specific comments
<b>Learning Disability</b>	See engagement plan	There were no specific comments
<b>Mental Health</b>	See engagement plan	There were no specific comments
<b>Long Term Limiting Illness</b>	See engagement plan	There were no specific comments
<b>Multiple Impairments</b>	See engagement plan	There were no specific comments
<b>Other - Specify</b>		
<b>Race</b>	See engagement plan	There were no specific comments
<b>Sex</b>	See engagement plan	There were no specific comments

<b>Gender Reassignment</b>	See engagement plan	One tenant had been allocated a property among mainly older people and now felt safe
<b>Religion or belief</b>	See engagement plan	There were no specific comments
<b>Sexual Orientation</b>	See engagement plan	There were no specific comments
<b>Pregnancy or maternity</b>	See engagement plan	There were no specific comments
<b>Marriage / Civil Partnership</b>	See engagement plan	There were no specific comments
<b>a) How will the proposal help to eliminate discrimination, harassment and victimisation?</b>		
The change in the age criteria will reduce age discrimination for the allocation of flats. It will increase flexibility in finding suitable accommodation for those who may be at risk of harassment and discrimination		
<b>b) How will the proposal help to advance equality of opportunity?</b>		
It will remove an age barrier to applying for first floor flats increased housing options. It will also increase access to ground floor accommodation for people aged between 55 and 60.		
<b>c) How will the proposal help to foster good relations?</b>		
The proposals will increase housing options which should help to relieve housing stress for younger people who are currently living in unsuitable conditions.		
<b>During the engagement process were there any suggestions on how to avoid, minimise or mitigate any negative impacts? If so, please give details.</b>		
<ul style="list-style-type: none"> <li>• Take positive action to vet prospective tenants</li> <li>• Provide regular housing management supervision</li> <li>• Take strong management action where any problems arise</li> <li>• Consider flat design in terms of noise problems</li> </ul>		

## Section 7 - Sign-off when assessment is completed

Officer Completing the Form:		
Signed	<b>Name:</b>	Ken Davies
	<b>Date:</b>	28-01-14
	<b>Job Title:</b>	Housing Strategy Officer
Assistant Director:		
Signed	<b>Name:</b>	Pauline Mitchell
	<b>Date:</b>	28-01-14
	<b>Service:</b>	Assistant Director- Housing and Building Services

## Section 8 – Reporting of Findings and Recommendations to Decision Makers

Based on the EIA findings, the report may consider the options in the table below, but the report must contain a clear statement of the impacts so that decision-makers can understand the effects of the decision that is being recommended.

What does the review of the information show?	
a)	No negative impact on people because of their Protected Characteristics - continue with the activity and monitor progress on implementation
<b>b)</b>	<b>Negative impact identified – recommend continuing with the activity; clearly specify the people affected and the impacts, and providing reasons and supporting evidence for the decision to continue</b>
c)	Negative impact identified - adjust the activity in light of the identified impact to avoid, minimise or mitigate the impact
d)	Negative impact identified - stop activity and provide an explanation why

## Section 9 – Action Plan and Performance Management

What is the negative impact?	Actions required to reduce/eliminate the negative impact (if applicable)	Who will lead on action	Target completion date
Noise and nuisance	Vet prospective tenants:  Take up references and consider circumstances of the area/block into which they will move	Hazel Neasham Head of Housing	At change in policy
Noise and nuisance	Identify tenants who may be at greater risk of breaching Tenancy agreement and offer Housing Plus service	Hazel Neasham Head of Housing	At change in policy
Noise and nuisance	Ensure strong action is taken to deal with any breach of Tenancy Agreement making use of the Tenancy Enforcement team where necessary	Hazel Neasham Head of Housing	Already introduced
Sound insulation	Review property designs and history of complaints to identify any specific problems	Hazel Neasham Head of Housing	At change in policy
<b>Performance Management</b>			
<b>Date of the next review of the EIA</b>	Three years or when there is a change in the Allocations Policy		
<b>How often will the EIA action plan be reviewed?</b>	Whenever there is a change to the Allocations Policy otherwise in line with the review process in the Compass Choice Based Lettings Allocations Policy		

<b>Who will carry out this review?</b>	This may be carried out by the Compass Partnership as part of the review of the Choice Based Lettings Allocations Policy or it will be carried out by Housing Services if this is a review of a Local Lettings Policy
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