



## Equality Impact Assessment Record Form

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

<b>Title of activity:</b>	<b>LOCAL LETTINGS POLICY FOR NEW BUILD COUNCIL HOUSING</b>
<b>Lead Officer responsible for this EIA:</b>	Ken Davies
<b>Telephone:</b>	01325 405955
<b>Service Group:</b>	Neighbourhood Services and Resources
<b>Service or Team:</b>	Housing and Building Services
<b>Assistant Director accountable for this EIA</b>	Pauline Mitchell
<b>Who else will be involved in carrying out the EIA:</b>	Income Management Team Housing Management Team Housing Options Team Customer Panel
<b>Stage</b>	<b>Summary of position</b>
<b>Stage 1: Initial Officer Assessment. Whole Population likely to be affected identified</b>	The introduction of a local lettings policy is intended to ensure that a strong mixed community will develop. It gives more priority to those households where nobody is employed (defined for the purposes of this report as those with a permanent employment contract, a long-term temporary contract, self-employed, those working more than 16 hours per weeks and those on zero hours contracts) who apply for a newly built Council homes. This is being done to ensure that new communities are balanced between those who are employed and those who are not in order to promote strong, resilient neighbourhoods.
<b>Stage 2: Further Assessment. Target Population likely to be</b>	The change reduces the opportunities for those households where nobody is employed, according to the above definition, and want to access newly built Council housing but it does not change access for these households to the

<b>affected identified</b>	<p>general stock.</p> <p>About two thirds (1068) of the waiting list (1549) does not have a primary applicant who is in employment. However, 855 applicants will only require one bed accommodation. As there is a good supply of one bed accommodation within the existing stock this size of property has not been prioritised in the new build programme. Consequently there will be little to no impact on households requiring a one bed property, therefore the pool of applicants who could be affected by the change will be significantly smaller than the 1068 households identified above.</p>
<b>Stage 3: Further Assessment. Individuals likely to be affected identified</b>	<p>The Allocations process is based on applicants choosing to bid for properties as they become available. Although they can register an interest in an area it is not until a property is advertised and bids are made that it becomes clear who is interested in particular properties including new build. In general terms people with mobility issues are less likely to be interested in family accommodation or upstairs flats. Also older people are less likely to be interested in this type of property. However, there are exceptions and in these cases housing and occupational therapy work closely with applicants to find a suitable solution. It is therefore difficult to quantify the specific impacts other than to say that the change affects employment status.</p> <p>It should also be noted that older people and those with mobility problems have priority for newly built ground floor flats that are designed to mobility standards and designated for these groups</p>
<b>Stage 4: Analysis of Findings</b>	The impact of the change will have a very limited impact on those with protected characteristics
<b>Stage 5: Sign-Off</b>	<p>Ken Davies</p> <p>Pauline Mitchell</p>
<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>A Local Lettings Policy creates the opportunity to set the foundation for a new community. It can establish the mix of tenants who will move in to the new homes. Consequently the policy seeks to ensure that a mix of family types is prioritised to ensure that a sustainable and stable community are established. The policy sets out to ensure that people who are economically active form a strong part of these new communities.</p> <p>The Egan Review identified the modern principles of building sustainable communities</p>

“Sustainability may be defined as a dynamic balance among three mutually interdependent elements:  
 1 protection and enhancement of natural ecosystems and resources;  
 2 economic productivity; and  
 3 provision of social infrastructure such as jobs, housing, education, medical care and cultural opportunities”  
 A key challenge was to tackle the impacts of communities where a minority of people were in employment.

**Who will be affected by the activity? (groups and numbers)**

**Whole population**

There are approximately 1549 people on the waiting list for Council Housing.

**Target population**

There are 694 applicants on the waiting list who can apply for the types of property available through the new build programme (i.e. not a one bed property). Of these, 246 applications have a primary applicant who is in employment. This is 35% of the pool of applications who are eligible to apply for new housing. Some of the remaining 448 may also have another member of the household who meets the employment criteria and therefore would not be disadvantaged. Of the remaining households who would not be eligible to apply following implementation of the new criteria, not all would necessarily be interested in applying for new properties. Therefore it is not possible to identify the overall number who could be disadvantaged by the new criteria but, relative to the overall waiting list, will be small.

**Individuals**

The change will affect newly built houses and upstairs flats in particular and reduce the opportunities to be allocated these properties for people who are not employed to 40% of this stock. Households where at least one member meet the definition of employed will not be affected, while those who do not meet this definition but are eligible to apply for new accommodation may have their opportunities for allocation of a new build reduced.

**What data, research and other evidence or information is available which is relevant to the EIA?**

- Information is available about building sustainable communities including the Egan Report
- Information is available on those who are registered on the Council’s waiting list
- More limited Information is available about applicants’ protected characteristics
- Information on the financial consequences of housing benefit not fully covering the cost of rent are available from the impact of the “Bedroom Tax” together with information from areas where Universal Credit has been rolled out

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 Positive/Negative/ Not Applicable			Potential level of impact			Summary of Impact
Age		N	N/A			L	<p>Older people, while more likely to not meet the definition of employed, are unlikely to be impacted as this criteria will not apply to ground floor new build properties, which are the most popular properties for older people.</p> <p>Young people are also more likely to not meet the definition of employed, however they are most likely to apply for one bed council properties, which are not affected by this new criteria.</p>
Race		N	N/A			L	<p>The employment rate for ethnic minority groups in Darlington, at 58.7%, is below the borough average of 75.7%. The likelihood of an ethnic minority household being affected by this change in criteria is therefore slightly higher than average, however – due to the small numbers of ethnic minority residents across the borough – the number of individuals likely to be affected is minimal.</p> <p>In terms of the level of impact, there are no specific negative impacts identified as a result of this change on race as a protected characteristic group.</p>
Sex		N	N/A			L	<p>The employment rate for women in Darlington, at 71.8%, is below the rate for men, at 78.5%. The likelihood of women being affected by this change in criteria therefore may be slightly</p>

							<p>higher, however unemployed women in households where another member is working will not be impacted.</p> <p>In terms of the level of impact, there are no specific negative impacts identified as a result of this change on women as a protected characteristic group.</p>
<b>Gender Reassignment</b>			N/A			<b>nil</b>	There are no specific disproportionate negative impacts identified for this group
<b>Disability (summary of detail on next page)</b>			N/A			<b>nil</b>	<p>Residents with disabilities, while more likely to not meet the definition of employed, are unlikely to be impacted as this criteria will not apply to accessible, ground floor new build properties, which are often the most popular properties for people with disabilities. In addition, applicants with disabilities are in general more likely to be in a higher band for allocation, than those without, therefore more likely to be considered (and ultimately accepted) for council housing.</p> <p>Were an applicant with disabilities to be affected by the change in criteria, housing and occupational therapy would – as is standard practice - work closely with that applicant to find a suitable solution.</p>
<b>Religion or belief</b>			N/A			<b>nil</b>	There are no specific disproportionate negative impacts identified for this group
<b>Sexual Orientation</b>			N/A			<b>nil</b>	There are no specific disproportionate negative impacts identified for this group

<b>Pregnancy or maternity</b>			N/A				<b>nil</b>	There are no specific disproportionate negative impacts identified for this group
<b>Marriage/ Civil Partnership</b>			N/A				<b>nil</b>	There are no specific disproportionate negative impacts identified for this group

Section 3: Officer Assessment - continued

<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>								
<b>Mobility Impairment</b>			N/A				<b>nil</b>	<p>Employment data for people with a mobility impairment is not available, however they are more likely to be in a higher band for allocation, than those without, and therefore more likely to be considered (and ultimately accepted) for council and specialist housing. In addition, they are unlikely to be impacted as this criteria will not apply to ground floor new build properties, which are the most popular properties for people with a mobility impairment.</p> <p>Were an applicant with a mobility impairment to be affected by the change in criteria, housing and occupational therapy would – as is standard practice - work closely with that applicant to find a suitable solution.</p>
<b>Visual impairment</b>			N/A				<b>nil</b>	Employment data for people with a visual impairment is not available, however they are more likely to be in a higher band for

							<p>allocation, than those without, and therefore more likely to be considered (and ultimately accepted) for council and specialist housing. In addition, they are unlikely to be impacted as this criteria will not apply to ground floor new build properties, which are the most popular properties for people with an acute visual impairment.</p> <p>Were an applicant with a mobility impairment to be affected by the change in criteria, housing and occupational therapy would – as is standard practice - work closely with that applicant to find a suitable solution.</p>
<b>Hearing impairment</b>			N/A			<b>nil</b>	<p>Employment data for people with a hearing impairment is not available, however they are more likely to be in a higher band for allocation, than those without, and therefore more likely to be considered (and ultimately accepted) for council and specialist housing.</p> <p>Were an applicant with a mobility impairment to be affected by the change in criteria, housing and occupational therapy would – as is standard practice - work closely with that applicant to find a suitable solution.</p>
<b>Learning Disability</b>			N/A			<b>nil</b>	<p>The employment gap between residents with a learning disability in Darlington and those without is 68%. The likelihood of an applicant with a learning disability being affected by this change in criteria is therefore slightly higher than average,</p>

							<p>however they are also more likely to be in a higher band for allocation, than those without, and therefore more likely to be considered (and ultimately accepted) for council housing.</p> <p>Were an applicant with a learning disability to be affected by the change in criteria, housing and adult social care would – as is standard practice - work closely with that applicant to find a suitable solution.</p>
<b>Mental Health</b>			N/A			nil	<p>The employment gap between residents in contact with a secondary mental health services in Darlington and the overall employment rate is 27%. The likelihood of an applicant with a mental health issue being affected by this change in criteria is therefore slightly higher than average. However applicants with a diagnosed serious mental health condition (i.e. those less likely to be employed) are more likely to be in a higher band for allocation, than those without, and therefore more likely to be considered (and ultimately accepted) for council housing.</p> <p>Were an applicant with acute mental health issues to be affected by the change in criteria, housing and adult social care would – as is standard practice - work closely with that applicant to find a suitable solution.</p>
<b>Long Term Limiting Illness</b>			N/A			nil	<p>The employment gap between residents with a long term health condition in Darlington and those without is 27%. The likelihood of</p>



							<p>an applicant with a long term health condition being affected by this change in criteria is therefore slightly higher than average, however they are also more likely to be in a higher band for allocation, than those without, and therefore more likely to be considered (and ultimately accepted) for council housing.</p> <p>Were an applicant with a long term health condition to be affected by the change in criteria, housing and adult social care would – as is standard practice - work closely with that applicant to find a suitable solution.</p>
<b>Multiple Impairments</b>			N/A				<p><b>nil</b></p> <p>There are no specific disproportionate negative impacts identified for multiple impairments, in addition to those identified for specific ones above.</p>
<b>Other - Specify</b>			N/A				<p><b>nil</b></p> <p>There are no specific disproportionate negative impacts</p>
<b>Cumulative Impacts</b>							
<b>Change activities</b>				<b>Potential cumulative impacts</b>			
<p>An additional lettings policy criteria, that 60% of the first allocation of new build properties (excluding ground floor flats) will be allocated to households meeting the definition of in employment, will be implemented. For all relets, the normal Allocations Policy will apply.</p>				<p>No potential cumulative impacts as a result of this change in criteria have been identified. The Allocations Policy will continue to be needs based and, therefore, people with higher level needs – which are often from protected characteristic groups – will continue to be prioritised.</p>			

Section 4: Engagement Decision

<b>Is engagement with affected people with Protected Characteristics required, now or during the</b>	<b>No</b>
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<b>further development of the activity?</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>	
<p>Because the likely impact on protected characteristic groups of this proposed change has been identified as minimal and it has been very difficult to identify any applicants with protected characteristics that may be impacted as a result of this change – i.e. those that are interested in new build accommodation and do not meet the definition of employed – particularly as 40% of new build will continue to be available to these groups, consultation with protected characteristic groups has not been undertaken. However, to ensure that any potential impacts which have not been identified are picked up, monitoring will be put in place as part of the allocations process to identify any adverse effects and these will be reported as part of the scrutiny process.</p>	

#### Section 5 - Sign-off when assessment is completed

<b>Officer Completing the Form:</b>		
<b>Signed</b>	<b>Name:</b>	Ken Davies
	<b>Date:</b>	30 October 2017
	<b>Job Title:</b>	Housing strategy Officer
<b>Assistant Director:</b>		
<b>Signed</b>	<b>Name:</b>	Pauline Mitchell
	<b>Date:</b>	30 October 2017
	<b>Service:</b>	Assistant Director- Housing and Building Services

#### Section 6 – 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.**

<b>What does the review of the information show?</b>
<p>There will be some reduction in opportunities to be allocated a newly built Council property on first let for those households which do not meet the definition of employed but it will not reduce overall access to Council properties, including subsequent letting of new properties. In addition, the allocations policy will not change for those who apply for new ground floor flats which is specially designed for those who may</p>

have mobility difficulties, such as older people and those with disabilities. The EIA has identified a slightly higher likelihood of impact for some protected characteristic groups however, the likely level of impact is negligible.

#### Section 7 – Action Plan and Performance Management

<b>What is the negative impact?</b>	<b>Actions required to reduce/eliminate the negative impact (if applicable)</b>	<b>Who will lead on action</b>	<b>Target completion date</b>
Some reduction in opportunities to be allocated new council homes for households who have protected characteristics and do not meet the definition of employed	In new build developments 40% of properties will be allocated through the normal allocations process and all other properties will be allocated as normal	Veruta Barlow	On-going throughout the new build programme

<b>Performance Management</b>	
<b>Date of the next review of the EIA</b>	January 2021
<b>How often will the EIA action plan be reviewed?</b>	Every three years
<b>Who will carry out this review?</b>	Housing and Building Services