

Equality Impact Assessment Form

Please ensure that you refer to the 'Equality Impact Assessment Guidance' while completing this form. If you would like further guidance please contact the Equalities Officer or Equalities Team

Details
Name of Initiative to be assessed: <i>Living Merthyr Tydfil – Common Housing Allocations Policy (new)</i>
Name of responsible officer: Julian Pike
Group/Directorate: Place and Transformation
Service Area: Public Protection & Housing
Date: 13 th March 2017

(a) WHAT ARE YOU ASSESSING FOR IMPACT ?

Service/ Function	Policy/ Procedure	Project	Strategy	Plan	Proposal	Information/ Position statement
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(b) Please name and describe below

Common Allocations Policy

(c) IS THE DELIVERY OF THIS INITIATIVE AFFECTED BY LEGISLATION OR OTHER DRIVERS SUCH AS CODES OF PRACTICE?

If so, please identify what and how?

Part VI Housing Act 1996 - Allocation of Accommodation

Part 1 Code of Guidance for Local Authorities on the Allocation of Accommodation & Homelessness (updated 2016)

(d) Does the initiative directly affect service users, employees or the wider community?

Yes Continue assessment
 No No need to continue screening or carry out an EqIA

Screening/Relevance Test: Is an equality impact assessment required?

Screening is used to decide whether the initiative you are responsible for has a high or medium negative impact on any of the protected groups and will require a full EqIA. Please highlight the positive impact the decision will have on the protected characteristics.

What will be the effect on :-

Protected Characteristic	Impact? <i>Include Positive and Negative</i>
Age	<p>i) Families who have children under ten and live in a first floor or higher flat will have their priority reduced. This will affect approximately ten households within the Borough.</p> <p>Such cases under former policy were awarded Silver Band. Under this new Policy they shall be awarded Band 3 – Low Priority.</p>

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	<p>As the new Policy is entirely Choice Based – families with young children could decide not to apply for first or second storey accommodation.</p> <p>ii) Those applicants 50+ and seeking sheltered accommodation will have their priority reduced unless there are significant medical, disability or welfare issues. This will affect approximately 45 Households.</p> <p>Such cases under former policy were awarded Silver Plus Band. Under this new Policy they shall be awarded Band 3 – Low Priority.</p> <p>This policy decision has been made to take into account that only persons requiring significant support should access Sheltered Housing Schemes, which was not the case under the former policy.</p>
Disability	<p>Priority will remain the same. Those applicants who need adapted accommodation will be allocated properties based upon the adaptations they need to live more independently. This Policy will improve the availability of information and choice to disabled applicants. The Policy does not prevent any disabled person from applying for a general needs property, however any future adaptations to said property require explicit permission of the landlord organisation (RSL).</p>
Gender Reassignment	Negligible Impact
Marriage & Civil Partnership	<p>Both are awarded the same rights.</p> <p>Individuals that experience relationship breakdown will be considered as adequately housed and hence Band 3 – low priority (unless it is unsafe to do so). This is a less beneficial priority award than the former policy.</p>
Pregnancy and Maternity	<p>Applicants who are pregnant and within 12 weeks of their expected due date (EDD) will be credited with an extra bed space requirement (as if the child was now born). The 12 weeks is in line with DWP guidelines for statutory maternity pay. This is a significant improvement for pregnant persons, as current policy does not consider the unborn child in any regard.</p>
Race	<p>Language Line service available for customers, where required.</p> <p>Cultural sensitivities and norms are considered within the Urgent Management Transfer section of the Policy.</p>

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Religion or Belief	Negligible Impact
Sex	Negligible Impact
Sexual orientation	Negligible Impact
Carers	Support Hardship is considered in the new Policy. Households required to move to provide or receive substantial and ongoing support will receive Band 2 – Medium Priority award. This is the same relative priority as the former policy.
Welsh Language	Living Merthyr Tydfil website will use software to translate the website information into Welsh (and a range of other languages). Information posted by the MTCBC will be bilingual.

If after completing the EqlA screening/relevance test you determine that this service/function/policy/project is not relevant for an EqlA you must provide adequate explanation below (Please use additional pages if necessary).

Are you happy that you have sufficient evidence to justify your decision?

Yes

Signed: *J Pike*

Position: Housing & Community Safety Manager

N.B. If the initial screening process has identified actual or potential high or medium negative impact on a particular group or groups then you **MUST carry out a full EqlA.**

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Full Equality Impact Assessment

In terms of any disproportionate / negative / adverse impact that the proposal may have on a protected group, what steps (if any) could be taken to reduce that impact for each group identified. Attach a separate action plan if necessary.

Age

- i) For families who are in a first floor or above flat with a child under ten the Housing Solutions Team will also consider whether or not this adversely affects the welfare of the family. If it does, the appropriate banding will be allocated.
- ii) When considering those applicants 50+ the majority of these are applying to move to sheltered accommodation or a bungalow to assist with medical issues. The Housing Solutions Team when verifying these applications will also evaluate whether the applicant has medical or welfare issues that would be improved by them moving to older persons accommodation. Higher priority is likely to be awarded to the applicant, where their ill health may be significantly improved by moving home.

Marriage/Civil Partnership

Applicants which experience relationship breakdowns will typically receive Band 3 – Low Priority, unless it is unsafe for them to remain in the property. However, if there are overcrowding issues due to needing to be in a separate bedroom until they can move out, then their priority will be reassessed on an overcrowding basis.

If ways of reducing the impact have been identified but are not possible, please explain why they are not possible.

n/a

Please highlight positive impacts and actions that have been identified as a result of the assessment process.

Disability

There will be more choice and greater transparency for disabled applicants who will be able to apply for a property that they feel best suits their needs, as property adverts will contain explicit information (and photos) relating to the adaptations within the property.

However, any allocation of a property with significant adaptations (Category A) will be subject to a COTT's assessment to ensure it is suitable. The Policy does not prevent any disabled person from applying for a general needs property, however any future adaptations to said property require explicit permission of the landlord organisation (RSL).

Pregnancy and Maternity

When a pregnant applicant is within 12 weeks of their 'EXPECTED DUE DATE' (EDD) the unborn child will be counted as part of the household and requiring a bed space. Twelve weeks is consistent with DWP timescales for awarding pregnancy and maternity benefits. Therefore if a single mother is living with

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parents, they will be allocated a suitable sized property before the birth of the child. If the applicant already has children, the unborn child will count towards any overcrowding calculations. The unborn child is not counted as part of the household until it is born in the former Allocations Policy. This Policy therefore represents a significant improvement in this regard.

Evidence Sources

(i) Give details of any data or research that has led to your reasoning above, in particular, the sources used for establishing the demographics of service users.

The banding reasons for current applicants were analysed (reviewing 2 years of data). These were then allocated a banding according to the new policy. The graphs outlining the results are included in Appendix 1.

This exercise provided practitioners with assurances that the new Policy would not disproportionately disadvantage any persons with protected characteristics. The exercise also stimulated significant debate amongst officers, which allowed us to consider mitigation strategies (as outlined in this assessment). The new Policy is considered to be fairer and more equitable to persons with protected characteristics and the wider population.

(ii) Give details of how you have engaged with service users on the proposals and steps to avoid any disproportionate impact on a protected group and how you have used any feedback to influence your decision.

Prior to the new policy being drafted a full consultation process was undertaken with members of the public and stakeholders. Views were sought on what worked with the existing policy and what did not work. Views were also sought about what improvements they would like to see in the policy.

Consultation responses were directly responsible for the following features of the new policy:

- i) Local connection criteria
- ii) Allowing a bed space for expectant mothers (within 12 weeks of EDD)
- iii) Sanctions for persons who do not pay rent or cause antisocial behaviour
- iv) A simpler banding system
- v) Greater choice

Are you satisfied that the engagement process complies with the requirements of the Statutory Equality duties?

Yes

Decision Log – (detail how Elected Members and Senior Managers have been involved in the decision process (give dates of key meetings and decisions made))

- 01.12.15 – Approval sought from cabinet to review former Common Housing Allocations Policy
- 01.12.15 – EQIA undertaken in respect to the review of former Common Housing Allocations Policy
- April & May 2016 - consultation on former Common Housing Allocations

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Policy undertaken

- May 2016 – Jan 2017: Regular stakeholder meetings held to discuss amendments to Common Housing Allocations Policy.
- 14.02.17 Report and presentation to Regeneration, Planning and Countryside Scrutiny undertaken
- 08.03.17 Final version of Common Housing Allocations Policy drafted
- 13.03.17 Meeting held with Senior Leadership Team

Review

Date of Next Review:

12 months from Implementation (likely to be November 2018), however the Local Housing Panel will monitor its implementation on a monthly basis.

If review is not required, explain why.

n/a

Approved by:

Signature: *J Pike & K O'Donovan & C Clark*

Job Title: Housing & Community Safety Manager & Equalities Lead Officer & Housing Strategy Officer

Approval date: 13th March 2017

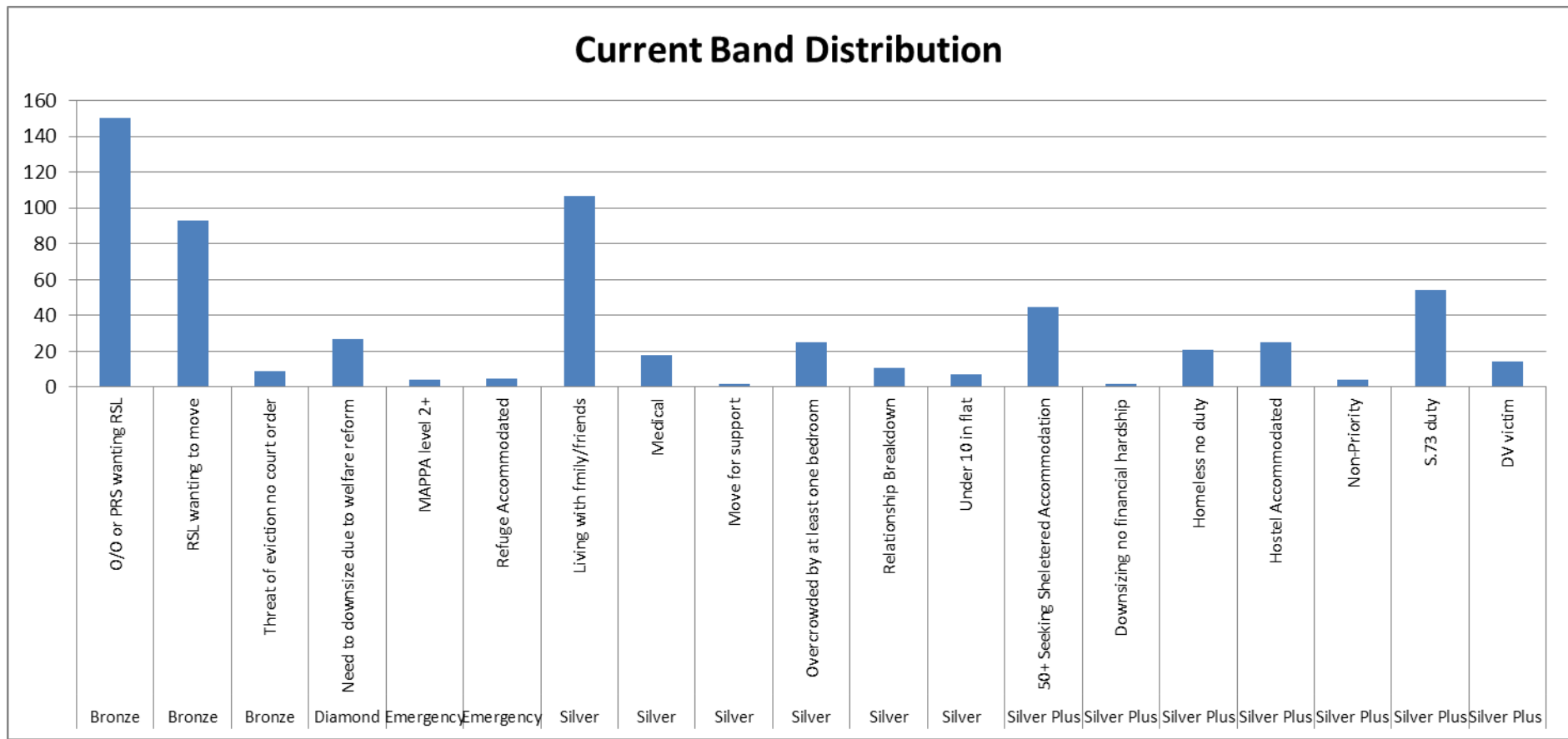
Date of Update:

Update recording

NOTE: The Appendices below track how household applications are likely to be treated and the priority band awarded in typical circumstances.

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Appendix 1 – Former Policy



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Appendix 2 – New Policy

