

## Equality Impact Assessment

Details of the assessment	
<b>Name of Function/Policy/ Service being assessed</b>	Sevenoaks District Housing Register Allocations Policy
<b>Date of assessment</b>	Commenced: 17/12/12 Completed: 21/12/12
<b>Directorate &amp; Service</b>	C&P Services/Housing Services
<b>Policy Owner</b>	Jane Ellis
<b>Name of Officer(s) carrying out assessment:</b>	Jane Ellis

Step 1	Initial Screening for:	
	<ul style="list-style-type: none"> <li>• New/revised policies/strategies</li> <li>• policy decisions</li> <li>• considering partnership working arrangements</li> <li>• procurement/commissioning activities</li> </ul> <p>(For assessments identified within the Equality Impact Assessment Timetable please go straight to Step 2).</p>	
	Key Questions	Answers/Notes

## Equality Impact Assessment

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	<ul style="list-style-type: none"> <li>New/revised policies/strategies</li> <li>policy decisions</li> <li>considering partnership working arrangements</li> <li>procurement/commissioning activities</li> </ul> <p style="margin: 0;">(For assessments identified within the Equality Impact Assessment Timetable please go straight to Step 2).</p>	
	<b>Key Questions</b>	<b>Answers/Notes</b>
1	What are you looking to achieve in this activity?	<p>To:</p> <ul style="list-style-type: none"> <li>update the existing Sevenoaks District Housing Register Allocations Policy in line with new legislation (Localism Act 2011 and Welfare Reform Act 2012) and associated guidance;</li> <li>contribute toward the introduction of a consistent methodology for assessing housing need across Kent by disbanding the existing points system and introducing a priority band system similar to other Kent Councils in order to gain strategic benefits and operational efficiencies;</li> <li>ensure a strong customer focus by introducing an Allocations Policy that is easier for all to understand and that is more transparent than the existing system;</li> <li>Promote equality of opportunity in accessing the Sevenoaks District Housing Register and social housing;</li> <li>Encourage applicants on the Sevenoaks District Housing Register to access employment or volunteering in the District.</li> </ul>
2	Who in the main will benefit?	<ul style="list-style-type: none"> <li>Those in housing need as defined by Housing Act 1996 as amended by the Homelessness Act 2002 and Localism Act 2011 who have registered an application on the Sevenoaks District Housing Register;</li> <li>Registered Providers.</li> </ul>
3	Does the activity have the	<input type="checkbox"/> Please explain:

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	<p>potential to cause adverse impact or discriminate against different groups in the community?</p>	<p>YES</p>	<p>Please explain:</p> <p>The new Allocation policy will be based on the requirements of the Housing Act 1996 as amended by the Homelessness Act 2002 and Localism Act 2011 and also the Welfare Reform Act 2012.</p> <p>There will be sections of the community who will be considered to have a greater need than others and therefore will be allocated more priority to assist them to achieve rehousing more quickly through the Choice Based Lettings process. However, this has always been the case. Everyone is subject to the Allocation policy when applying for re housing.</p> <p>The policy promotes equality of opportunity and access between groups of people with a similar housing need; the policy will guide officers and inform applicants how the process is equitably administered.</p> <p>The consequence of the revised policy is that those who are eligible to apply will be competing with smaller numbers of applicants for suitable housing and this may have a positive impact on waiting time.</p> <p>The Sevenoaks District Housing Register Allocations Policy reflects welfare reform changes which impact on the size of property people can register for and may result in some families, living in overcrowded situations for longer.</p> <p>The new policy will be applied to all register applicants equally</p>

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	Key Questions	Answers/Notes				
		Note: if the answer is 'yes' then a full equality impact assessment is required – see step 2.				
4	Does the activity have potential to make a positive contribution to equalities?	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%; padding: 5px;">Yes <input checked="" type="checkbox"/></td> <td style="padding: 5px;">Please explain:  The new policy will remove unfair and unjustified positive impacts on certain groups that existed in the previous system such as allowing those without a local connection to the District to apply to the register.  The allocations policy is a working document that has been updated dynamically to accommodate changes in legislation and equality issues since it was created and has been out for consultation.  Positive actions for certain age-related and vulnerable groups will remain.</td> </tr> <tr> <td style="padding: 5px;">No <input type="checkbox"/></td> <td style="padding: 5px;">Please explain:</td> </tr> </table>	Yes <input checked="" type="checkbox"/>	Please explain:  The new policy will remove unfair and unjustified positive impacts on certain groups that existed in the previous system such as allowing those without a local connection to the District to apply to the register.  The allocations policy is a working document that has been updated dynamically to accommodate changes in legislation and equality issues since it was created and has been out for consultation.  Positive actions for certain age-related and vulnerable groups will remain.	No <input type="checkbox"/>	Please explain:
Yes <input checked="" type="checkbox"/>	Please explain:  The new policy will remove unfair and unjustified positive impacts on certain groups that existed in the previous system such as allowing those without a local connection to the District to apply to the register.  The allocations policy is a working document that has been updated dynamically to accommodate changes in legislation and equality issues since it was created and has been out for consultation.  Positive actions for certain age-related and vulnerable groups will remain.					
No <input type="checkbox"/>	Please explain:					
		Note: if the answer is 'yes' then a full equality impact assessment is required – see step 2.				

Where the screening has identified the need for a full impact assessment, this must:

- be commenced during the drafting stages of a new policy/strategy and fully completed following any consultation period before submitting for committee approval
- carried out before any policy decision is taken
- completed in the planning stages of any procurement exercise

## Equality Impact Assessment

	Key Questions	Answers/Notes
<b>Step 2</b>	<b>Scoping the assessment</b>	
1.	What is the overall aim, or purpose of the function/ policy/service?	<ul style="list-style-type: none"> <li>• To create a single access point into all social housing in the District which complies with all relevant legislation and guidance;</li> <li>• Meet housing need locally;</li> <li>• To prevent homelessness;</li> <li>• To enable people in housing need to choose where they would like to live;</li> <li>• To make the best use of the limited social housing stock in the District;</li> <li>• Ensure that the allocation of social housing is open, fair and accountable;</li> <li>• Help create safe, mixed, sustainable and balanced communities;</li> <li>• To ensure sufficient flexibility to address specific local housing priorities;</li> <li>• To reduce the numbers of those eligible to apply so that those registered will be competing with smaller numbers of applicants for suitable housing in order to have a positive impact on waiting time.</li> </ul>
2.	What outcomes do you want to achieve with this function/ policy/service and for whom?	<ul style="list-style-type: none"> <li>• To let vacant properties via the Choice Based Lettings Scheme (Kent Homechoice) in accordance with the Council's adopted Sevenoaks District Housing Register Allocation policy;</li> <li>• To make all allocations fairly, equitably and without any unlawful discrimination based upon an individuals protected characteristics;</li> <li>• To help develop community cohesion and employment;</li> <li>• Maximise use of existing housing stock;</li> <li>• To demonstrate effective progress towards achieving locally identified priorities (e.g. under occupation);</li> </ul>
3.	Who will be affected?	<ul style="list-style-type: none"> <li>• Those in housing need as defined by Housing Act 1996 as amended by the Homelessness Act 2002 and Localism Act 2011 who have registered an application on the Sevenoaks District Housing Register;</li> </ul>

## Equality Impact Assessment

Key Questions	Answers/Notes		
	<ul style="list-style-type: none"> <li>Registered Providers.</li> </ul>		
4.	Who defines or defined the function/service/ policy?	Legislation and local strategy/policy/circumstances/demographics/consultation with the local community, Shelter. CABs and providers .	
5.	Who implements the function/service/policy?	The Council in partnership with West Kent HA which manages the Register for the Council.	
6.	How do the outcomes of the function/service/policy meet or hinder other policies, values or objectives of the public authority (if applicable)?	Please indicate which of the Councils core values / promises (as set out in the Vision) these outcomes relate to:	
		We will provide value for money	✓
		We will work in partnership to keep the District of Sevenoaks safe	
		We will continue to collect rubbish efficiently and effectively	
		We Will protect the Green Belt	✓
		We will support and develop the local economy	✓
		Fairness	✓
		Integrity	✓
	Quality	✓	
7.	What factors could contribute or detract from the outcomes identified earlier?	During the consultation applicants and partner organisations have been positive but the Council will be monitoring the arrangement.	
<b>Step 3 Consideration of data and information</b>			
8.	What do you already know about who uses this function/service/ policy?	<p>We know and understand the protected characteristics of people registered on the Sevenoaks District Housing Register who have a housing need as defined by the Housing Act 1996 as amended by the Homelessness Act 2002 and Localism Act 2011.</p> <p>A scrutiny committee has examined the issue of under occupation in socially rented homes.</p> <p>A scrutiny committee has examined the potential impact of welfare reform.</p>	

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	Key Questions	Answers/Notes
		<p>Previous EIA's undertaken for the Housing Register function.</p> <p>Qualitative information obtained through consultation.</p> <p>Quantitative data obtained through PI collation.</p>
9.	Has any consultation with service users already taken place on the function/service/ policy and if so what were the key findings?	<p>Consultation events have taken place – for example: two with key stakeholders and partners, one with residents.</p> <p>The document has been sent to other key stakeholders and partners for comments.</p> <p>The document is placed on SDC's website with links to it from West Kent Housing Associations website.</p> <p>All applicants on the Sevenoaks District Housing Register have been written to inviting their comments on the Sevenoaks District Housing Register Allocations Policy.</p>
10.	What, if any, additional information is needed to assess the impact of the function/service/policy?	Not all applicants complete all elements of the equalities monitoring data.
11.	How do you propose to gather the additional information?	Applicants will continue to be encouraged by Housing Officers to provide this information.
<b>Step 4 Assessing the Impact</b>		

## Equality Impact Assessment

	Key Questions	Answers/Notes
12.	Based on what information you already know, in relation to each of the following groups consider whether a) there is anything in the function/service/policy that could discriminate or put anyone at a disadvantage b) for an existing function/service/policy, how it is actually working in practice for each group	
a.	<b>Equality groups</b>	Age  Safeguards are in place to ensure that older people who do not have access to the internet are able to bid for vacant homes, e.g., support from a Housing Officer along with different methods of bidding. There is a Kent wide vulnerable person policy in place which sets out the support available.
b.		Disability  Safeguards are in place to ensure that physically and mentally disabled people who do not have access to the internet are able to bid for vacant homes, e.g., support from a Housing Officer and different methods of bidding. There is a Kent wide vulnerable persons policy in place which set out the support available.
c.		Carers  No identified issues.
d.		Gender  No identified issues.
e.		Race  The Council has a Housing BME strategy in place. Relevant monitoring is also in place.
f.		Religion/Belief  No identified issues.
g.		Sexual Orientation  No identified issues.
h.		Marital / Civil Partnership status  No identified issues.
i.		Pregnancy and maternity  No identified issues.
j.		Gender reassignment  No identified issues



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k.	General <i>i.e</i> affecting all of the above /other <i>e.g.</i> socio-economic	The policy is intended to support Government's intention to encourage and support people back into employment and to remove existing benefit traps.
<b>Step 5 Reviewing and scrutinising the Impact</b>		
13.	Have you identified any differential impact and does this adversely affect any groups in the community?	By undertaking widespread consultation, there is a better understanding of community needs and everyone is subject to being assessed for priority under the Sevenoaks District Housing Register Allocation policy.
14.	Can we make any changes?	No
15.	If there is nothing you can do, can the reasons be fairly justified?	While eligibility and reasonable preference categories continue to be set by central government, Localism gives Council's some flexibility to determine locally who should be housed and who should be given additional reasonable preference in addition to the centrally set requirements. These local decisions have been reached following consultation with the public, stakeholders and partners who have been empowered to make these choices through the Localism Act.
16.	Do any of the changes in relation to the adverse impact have a further adverse affect on any other group?	No.

## Equality Impact Assessment

Step 5 continued...	Actions to be inserted into Equality Action Plans			
Based on your answers in Step 5, please finalise your actions here. These actions will then be incorporated into our equality action plans.				
Equality Strand	Action	Outcome/monitoring information and targets	Date for Completion	Responsible Officer
If an adverse impact was found or unmet needs identified, which actions will you put in place to address this:				
If you did not find any evidence of unmet needs or adverse impact, list the actions you will put in place to maintain good practice:				

<b>Step 6 Decision making and future monitoring</b>		
	<b>Key questions</b>	<b>Answers / notes</b>
17.	Which decision making process do these changes need to go through i.e. do they need to be approved by a committee/Council?	The revised Sevenoaks District Housing Register Allocation Policy needs Member approval and endorsement
18.	How will you continue to monitor the impact of the function/service/ policy on diverse groups?	Regular liaison meetings with West Kent Housing Association and other Registered Providers
19.	When will you review this equality impact assessment?	In 5 years time or earlier if considered necessary.

<b>Final steps</b>
<p><b>For an existing function/service/policy:</b></p> <ul style="list-style-type: none"> <li>▪ Submit the EqlA to your Departmental Management Team for approval.</li> <li>▪ Send your assessment to the West Kent Equalities Officer for publication on the website.</li> <li>▪ Update Covalent.</li> </ul> <p><b>For a new function/service/ policy:</b></p> <ul style="list-style-type: none"> <li>▪ Summarise your findings in the committee report.</li> <li>▪ Ensure planned consultations address the findings of the impact assessment.</li> </ul>

