

Equality Impact Assessment Form - An Analysis of the Effects on Equality

Section 1: screening stage

Name of policy, service or strategy to be assessed:

- Greater Haven Gateway Tenancy Strategy

1. What is the main purpose of the policy, service or strategy?

The new Localism Act says that all local authorities have to develop a tenancy strategy for affordable social housing whether they have their own social housing stock or whether they have transferred it to a housing association. The aim of the strategy is to work with housing associations to maximise the opportunities for developing new affordable homes whilst at the same time maintaining a range of tenancies that most meet the housing needs of residents.

The strategy has been developed as a set of principles which nine local authorities and housing providers in the geographical area can sign up to. The advantage to this is that there is transparency and consistency across a wide area which simplifies the policies which registered providers have to 'have regard to'.

2. What main areas or activities does it cover?

- Affordability and sustainability of new tenures
- Converting Social Rents to Affordable Rents
- Length of tenancy – Fixed term tenancies
- Housing options advice
- Maintaining and enhancing housing mobility
- Disposals of homes owned by registered providers

3. Who are the main audience, users or customers who will be affected?

- Registered providers
- People living in social housing
- People in housing need applying for social housing

4. What outcomes do you want to achieve from the policy, service or strategy?

- Ensure there are a range of tenancies available for low income households
- Make the best use of existing stock
- Maintaining equitable access to housing and support to ensure that the effects of limited supply do not fall disproportionately on vulnerable households.
- Maintain and enhance housing mobility

5. Are other service areas or partner agencies involved in delivery? If so, please give details below:

- Nine local authorities: Babergh DC, Braintree DC; Colchester BC; Ipswich BC; Maldon DC; Mid Suffolk DC; Suffolk Coastal DC; Tendring DC; and Waveney DC
- Registered Providers with property within the sub region
- National Housing Federation

6. Does the policy, service or strategy help to further or facilitate to our 'general duty'¹ to:

- (a) eliminate unlawful discrimination, harassment and victimisation?
- (b) advance equality of opportunity between people who share a 'protected characteristic'² and those who do not?
- (c) foster good relations between people who share a protected characteristic and those who do not?

- Yes – see below.

If you have answered 'no', please give details of the reasons for this decision:

7. If you answered 'yes' to any of the sections in Question 6 (above), please complete the following in order to identify how the policy, practice or strategy furthers the aim of the 'general duty':

¹ these 3 points summarise the 'general duty' as it applies to public sector organisations in the Equality Act 2010

² The Equality Act's 'protected characteristics' include age, disability, gender reassignment, pregnancy and maternity, race, religion or belief and sex and sexual orientation. It also covers marriage and civil partnerships, but not for all aspects of the duty.

'Protected characteristic' group		How does it help to 'eliminate unlawful discrimination, harassment and victimisation'?	How does it help to 'advance equality of opportunity between people who share a protected characteristic and those who do not'?	How does it help to 'foster good relations between those who share a protected characteristic and those who do not'?
Age	Older people (60+)			The Tenancy Strategy encourages the use of incentive schemes to stimulate downsizing which often frees up family sized properties for younger households. This process can help to foster good relations between older and younger people.
	Younger people (17-25) and children (0-16)		Younger people with children particularly benefit from this framework as it helps to maximise the supply of appropriately sized affordable housing.	The Tenancy Strategy encourages the use of incentive schemes to stimulate downsizing which often frees up family sized properties for younger households. This process can help to foster good relations between older and younger people.
Disability	Physical			
	Sensory			
	Learning			
	Mental health issues			
	Other – <i>please specify</i>			
Ethnicity ³	White			

³ Census 2011 categories are: Bangladeshi, Indian, Pakistani, Other Asian (Asian or Asian British); African, Caribbean, Other Black (Black or Black British); White and Black African, White and Asian, White and Black Caribbean (Mixed); British, Irish; Other White (White); Chinese, Other (Other ethnic group).

'Protected characteristic' group		How does it help to 'eliminate unlawful discrimination, harassment and victimisation'?	How does it help to 'advance equality of opportunity between people who share a protected characteristic and those who do not'?	How does it help to 'foster good relations between those who share a protected characteristic and those who do not'?
	Black		There is evidence to suggest that Black Minority Ethnic (BME) households have a larger average household size. This framework may particularly benefit this group because it will ensure that the supply of larger homes is maximised.	
	Chinese			
	Mixed Ethnic Origin		There is evidence to suggest that Black Minority Ethnic (BME) households have a larger average household size. This framework may particularly benefit this group because it will ensure that supply of larger homes is maximised.	
	Gypsies/ Travellers			
	Other – <i>please state</i>			
Language	English not first language			
Pregnancy and Maternity	Women who are pregnant or have given birth in last 26 weeks			
Religion or Belief	People with a religious belief (or none) ⁴			
Sex	Men			
	Women			
	Transsexual / gender reassignment			
Sexual Orientation	Lesbian, gay and bisexual			

⁴ For example, Buddhist, Christian, Hindu, Jewish, Muslim, Sikh or no religious belief.

'Protected characteristic' group		How does it help to 'eliminate unlawful discrimination, harassment and victimisation'?	How does it help to 'advance equality of opportunity between people who share a protected characteristic and those who do not'?	How does it help to 'foster good relations between those who share a protected characteristic and those who do not'?
Marriage and Civil Partnership ⁵	People who are single, married or in a civil partnership		not applicable	not applicable

⁵ Our legal duty in respect of 'marriage or civil partnership' extends only to the need to eliminate unlawful discrimination.

8. Are there any concerns that the policy, service or strategy could have a differential impact in terms of equality?

- Yes – see below.

Please use the table below to indicate how the policy, service or strategy could have a positive or negative effect on any of the following equality groups (known under the Equality Act as ‘protected characteristics’). Include reference to any consultation, data or information that you have used in making this assessment about positive or negative effects.

‘Protected characteristic’ group		Positive Impact	Explain how it could benefit the group	Negative Impact	Explain how it could disadvantage the group
Age	Older people (60+)	X	Sheltered housing will normally continue to be let on secure or assured tenancies rather than a fixed term tenancy		
	25-60			X	A single person or couple of this age band whose household reduces in size, as a child leaves home, could be more vulnerable to losing a fixed term tenancy as a result. A single person or couple of this age band is more likely to under-occupy their home as children leave the parental home. Households on a low income in this situation are more likely to have to move due to a reduction in benefits.
	Younger people (17-25) and children (0-16)	X	Fixed term tenancies will normally be used for properties that are in the greatest demand by households so preventing future under occupation in larger properties. This may benefit children who are currently living in overcrowded situations	X	Under a fixed tenancy changes in circumstance (such as another child leaving home) could mean that the remaining household would need to move to a smaller property. This could particularly impact on any remaining children in the household.

'Protected characteristic' group		Positive Impact	Explain how it could benefit the group	Negative Impact	Explain how it could disadvantage the group
Disability	Physical	X	If supported housing is intended to meet the long term needs of people with a disability then the tenancies will normally continue to be let on secure or assured tenancies, rather than a fixed term tenancy.		
	Sensory	X			
	Learning	X			
	Mental health issues	X			
	Other – <i>please specify</i>				
Ethnicity	White				
	Black	X	There is evidence to suggest that Black Minority Ethnic (BME) households have a larger average household size. This framework may particularly benefit this group because it will ensure that supply of larger homes is maximised.		
	Chinese				
	Mixed Ethnic Origin	X	As above		
	Gypsies/ Travellers				
	Other – <i>please state</i>				
Language	English not first language				
Pregnancy and Maternity	Women who are pregnant or have given birth in last 26 weeks				
Religion or Belief	People with a religious belief (or none)				
Sex	Men				

'Protected characteristic' group		Positive Impact	Explain how it could benefit the group	Negative Impact	Explain how it could disadvantage the group
	Women	X	There are more women on the housing register than men. This framework may particularly benefit this group because it will ensure that supply of affordable housing is maximised.	X	A woman's housing status as a major carer/ single parent may be dependant upon their child which could make this group more vulnerable to losing a fixed term tenancy once that child has left home. Women are more likely to be the major carer and may be more affected by the impact of children leaving home. On average women earn a lower wage and if they under-occupy their home their benefits will be reduced which in turn makes it more likely they will have to move.
	Transsexual / gender reassignment				
Sexual Orientation	Lesbian, gay and bisexual				
Marriage and Civil Partnership	People who are single, married or in a civil partnership				

9. Could the policy, service or strategy discriminate⁶ against any 'protected characteristic', either directly or indirectly?

No.

10. If you have identified any negative impacts above, have you been able to minimise or remove them, and if so, how?

⁶ Direct discrimination occurs when a person is treated less favourably than another in a comparable situation because of their 'protected characteristic' whether on grounds of age, disability, pregnancy and maternity, ethnicity; religion or belief; sex (gender), sexual orientation, or Marriage and Civil Partnership. Indirect discrimination occurs when an apparently neutral provision or practice would nevertheless disadvantage people on the grounds of their 'protected characteristic' unless the practice can be objectively justified by a legitimate aim.

Age 25-60 - A single person or couple of this age band whose household reduces in size as a child leaves home could be more vulnerable to losing a fixed term tenancy as a result.

Housing options advice will be provided at the beginning of the fixed term tenancy and at least one year before the fixed term tenancy is due to end. Standards for this housing advice have been set to ensure consistency of service between landlords. This will help to prevent to homelessness and increase the opportunity to find suitable alternative accommodation.

Age 25-60 - A single person or couple at the older end of this age band are more likely to under-occupy their home as children leave the home. Households on a low income in this situation are more likely to have to move due to a reduction in benefits.

Although income considerations are beyond the scope of the Equalities Act it has been raised as an issue that there will be an income related impact on these households which may result in them having to move. To militate against this situation timely advice or signposting to advice will be given; including options such as lodgers.

Children (0-16) - Under a fixed tenancy changes in circumstance (such as another child leaving home) could mean that the remaining household would need to move to a smaller property. This could particularly impact on any remaining children in the household.

As above housing options advice will be provided to help the household ensure that remaining child is subject to a minimum of disruption to education and social networks.

Women - A woman's housing status as a major carer/ single parent may be dependant upon their child which could make this group more vulnerable to losing a fixed term tenancy once that child has left home.

As above housing options advice will be available at the beginning of the fixed term tenancy and at least one year before the fixed term tenancy is due to end.

Women - Women are more likely to be the major carer and may be more affected by the impact of children leaving home. On average women earn a lower wage and if they under-occupy their home their benefits will be reduced, which in turn makes it more likely they will have to move.

Again, as above with households aged 25-60 years, although income considerations are beyond the scope of the Equalities Act it has been raised as an issue that there will be an income related impact on these households which may result in them having to move. To militate against this situation timely advice or signposting to advice will be given; including options such as lodgers.

Note: By monitoring the applications and allocations of property through Choice Based Lettings (CBL) we have a better understanding of how accessible CBL is to these groups and also their specific housing requirements e.g. a small supply of larger family homes, larger adapted property and new pitches for Gypsies and Travellers. This information helps to stimulate a strategic approach which acknowledges that without actively seeking to deliver appropriate accommodation these groups of people may well not benefit from the strategy.

Summary and findings of Initial Equality Impact Assessment – screening stage

11. Please put a tick in the relevant box to confirm your findings, and what the next step is:

Findings	Action required
No likely negative impacts have been identified and this has been justified with reference to consultation, data or information. <input type="checkbox"/>	Sign off screening and finish.
Likely negative impacts have been identified but have been minimised or removed. X	Sign off screening and finish.
Likely negative impacts were identified but have not been minimised or removed. <input type="checkbox"/>	Sign off screening and complete a full impact assessment – Section 2.
There is insufficient evidence to make a judgement. <input type="checkbox"/>	Sign off screening and complete a full impact assessment – Section 2.

12. Name and job title of person completing this form:

- Joy Magna

13. Date of completion:

- 07 August 2012

14. Date for update or review of this screening:

- August 2014