

Equality Analysis

**Name of policy service or function:
Lettings Policy- Change to assessment
of applicants aged 18-21 years old
(inclusive)**



Purpose

There are legal, moral and best practice reasons for ensuring that our policies do not discriminate against people and to actively promote equality of opportunity where ever possible.

This Equality Analysis (EA) should be completed for all policies, strategies and functions – when they are being developed or when they are being reviewed. It is not a one-off process however, only the start of a longer process whereby equality is embedded into the mainstream of your policy development and review.

By doing an Equality Analysis you will be able to focus on the equality issues that are the most important, plan the improvements needed and evaluate their success.

Equality analysis should help you, not restrict you; you may also wish to group several policies with a similar purpose or remit within a single EA.

What to include

Use research, customer profile information and the results of consultation and surveys to evidence your responses and comments. It is best practice to include the views and feedback from people with different characteristics and experience. If appropriate, different people should be involved in the EA process at some point.

It is **not recommended** for just one individual to carry out an EA. Where possible, the EA should involve:

- ✓ The person (or people) who are responsible for the policy or function (the 'owner')
- ✓ The people who implement the policy (officers)
- ✓ The people who the policy is for (customers, staff)

Equality requirements

The law on equality is complex and rapidly changing. **If you are in any doubt about the requirements of the legislation, or how to complete this EA, then you should seek advice from the Organisational Development Manager.**

Name of Manager responsible for completing equality analysis	Bob Cartwright
Names of other people involved in the analysis	Julie Walker, Julie Griffiths, Councillor Roya Pourali, Councillor Caroline Makinson, Debbie Ibbeson and Tracy Shaw
Is this a new policy/service or a review of an existing policy/service?	New Existing
What is the purpose of the policy/service?	<ul style="list-style-type: none"> • To contribute to the development of balanced and sustainable communities • To create and , wherever possible, maximise choice for housing applicants • To provide flexible and affordable housing options which meet expectations • To seek to promote social inclusion • To meet housing needs • To make effective use of the housing stock • To minimise relet void periods • To minimise the incidence of difficult to let property • To promote and achieve equality of opportunity • To adhere to relevant legislation and regulatory framework • To assist the local authority in meeting its' statutory and corporate responsibilities towards Barnsley residents • To ensure that the council fulfils its legal responsibility to produce a lettings policy.
Who is intended to benefit from the policy and in what way?	<p>Applicants on the Housing Register (including transfer applicants) and their households, through assessing their housing need and satisfying the need of those with the highest priority.</p> <p>Existing tenants and residents, through reducing the number of empty properties and any associated crime and disorder on estates, lessening the environmental impact of these and preventing anti-social behaviour related to these.</p> <p>The wider community by contributing to safer sustainable communities</p>

		The council in satisfying its legal duties to publish a lettings policy.	
Does the policy, service or function you are reviewing comply with relevant equality legislation?		√ Yes – fully <input type="checkbox"/> More investigation needed <input type="checkbox"/> Specific concern identified	
Has an EA been carried out previously?		√ Yes But not directly linked to the current minor amendments to the Lettings policy	
What were the main findings of the previous EA, and what actions were taken?		<p>Main Findings</p> <p>There is potential for inconsistencies in dealing with people who present with a criminal background, especially if the customer fails to declare all the relevant circumstances. The arrangement to reduce/eliminate the impact includes the Special Assessment Process and Senior Managers authorising any exclusions or suspensions. Other support agencies are aware of their role in ensuring their clients make full disclosure to enable accurate assessments to be made.</p> <p>There is little evidence to suggest that there is any discrimination under the CBL system. Although we acknowledge that customers with disabilities could be disadvantaged. We overcome this by maintaining a list of vulnerable customers who need assistance accessing the CBL service. In addition support agencies are utilised to minimise any potential disadvantages.</p> <p>We maintain a comprehensive data base of all disabled customers needs including: physical, sensory and mental health issues and what their specific property requirements are.</p> <p>Actions</p> <p>None outstanding</p>	
Date this EA commenced	3.4.2017	Date this EA completed	12.4.2017
EA Review date (+ 3 years from now)		April 2020 or sooner if Lettings Policy reviewed.	

Using the sections below, review the policy, service or function under consideration, in relation to the protected characteristics:

	<p>People with the protected characteristics below have different needs, experiences or priorities. With regard to this policy service or function please identify what might lead to (or has led to) unequal service delivery. Please indicate what steps you have taken or might take to mitigate the potential inequality. Please transfer any planned actions to the table at the end of this document.</p>
General Comments	<p>The suggested changes to the lettings policy directly relate to changes in the national welfare benefits system. Under: The Universal Credit (Housing Costs Element for claimants aged 18 to 21) (Amendment) Regulations 2017. Under these regulations the automatic right to help with housing costs under Universal Credit will end for 18years olds to under 22 year olds. The Government have announced a number of categories of individuals who will still get assistance with their housing costs _ See appendix 1 to this Equality Analysis.</p>
Age	<p>The changes in Universal Credit Regulations directly relates to people aged 18 to under 22 year old and will have a direct effect on those individuals, unless the Secretary of state has indicated that they are in an exempt category. The lettings policy will allow all 18 to under 22 year olds, looking for council housing, to join the waiting list. An assessment of the financial situation of housing applicants who are aged 18 to under 22 will have a financial assessment undertaken to determine whether an offer can go ahead. This is to ensure that any offer of accommodation is both affordable to the individual and to give the tenancy the maximum opportunity to succeed/ be sustainable.</p> <p>Existing tenants from this age group are less likely to be affected</p> <p>We will need to monitor and report on the effects of this policy on individual housing applicants.</p> <p>As of 12th April 2017 696 families are on the waiting list aged 18 to under 22. The actual number of families rehoused from this age group numbers approx. 120 per year.</p>
Race/Ethnicity	<p>There is no indication that are any qualitative or quantitative differences towards applicants in this group</p>
Gender	<p>Although the policy is not gender specific it is likely that the policy will adversely affect males more than females given one of the exemptions is for families with children/ caring responsibilities and a majority of females on the waiting list have children.</p>
Disability	<p>One of the exemptions announced by the government who will retain the right to assistance with housing costs are people in receipt of Disability Living Allowance at the middle or highest rate and people who receive the daily living component of Personal Independence Payment</p>
Religion/Belief	<p>There is no indication that are any qualitative or quantitative differences towards applicants in this group</p>
Sexual orientation	<p>There is no indication that are any qualitative or quantitative differences towards applicants in this group</p>

Gender reassignment	There is no indication that are any qualitative or quantitative differences towards applicants in this group
Pregnancy and Maternity	One of the exemptions announced by the government who will retain the right to assistance with housing costs are females who are expecting a baby within 11 weeks
Marriage and Civil partnerships	There is no indication that are any qualitative or quantitative differences towards applicants in this group
Socio-economic factors	There is no indication that are any qualitative or quantitative differences towards applicants in this group

	2 What evidence do you have, or can you get, for any comments about inequalities in section 1. For example, anecdotal evidence, reports from Northgate, customer satisfaction data or local or national reports. Any reports you need to run should be included as an action at the end of this document.
General Comments	
Age	We currently have 696 applicants on the waiting list in this age group. Although it is difficult to accurately determine how many applicants will be adversely affected because, although some of the exemptions are clear ie pregnancy, care leavers, MAPPA cases and families with children, some are not so clear and will be determined by the department for Works and Pension (DWP) eg young people who cannot live with their parents/ Domestic violence cases etc. In these examples initial indications are that the DWP will make the decision on eligibility for financial assistance towards housing costs. Indications are that DWP will determine these on a case by case basis
Race/ethnicity	There is no indication that are any qualitative or quantitative differences towards applicants in this group
Gender	Of the 112 applicants aged 18 to under 22 rehoused in 2016/7, 26 were males. This does indicate that potentially there could be inequalities between gender. Need to develop report showing effect between males and females.

Disability	Indications are that disability, depending on level, will be an exception and will still receive assistance towards housing costs as previously.
Religion/belief	There is no indication that are any qualitative or quantitative differences towards applicants in this group
Sexual orientation	There is no indication that are any qualitative or quantitative differences towards applicants in this group
Gender reassignment	There is no indication that are any qualitative or quantitative differences towards applicants in this group
Pregnancy and Maternity	One of the exemptions announced by the government who will retain the right to assistance with housing costs are females who are expecting a baby within 11 weeks
Marriage and Civil partnerships	There is no indication that are any qualitative or quantitative differences towards applicants in this group
Socio-economic factors	There is no indication that are any qualitative or quantitative differences towards applicants in this group

	3 Who are the key stakeholders in relation to this policy and how are they being consulted?
General Comments	<p>Members of the public. Staff within Berneslai Homes/ The Council, Council Members, Berneslai Homes Board Members, Support Agencies</p> <p>Senior Council and Berneslai Homes Officers Cabinet Spokesperson has been consulted on this change in policy and is in broad agreement to the proposals</p> <p>The proposals were discussed at the Customer Panel held in February 2017 at which representatives of members of the public and from The Tenants & Residents Federation were present. All were in agreement with the suggested approach</p> <p>A meeting has been arranged with Barnsley Tenants & Residents Federation for 25th April 2017.</p>

Age	We will notify all new housing applicants potentially affected by this change in policy at registration stage of the application to join the waiting list procedure, we will contact all 18 to under 22 year olds to advise on the change of approach to applicants of this age and offer advice and support at offer stage should offers be withdrawn.
Race/ethnicity	Not directly affected
Gender	Not directly affected- See General comments above
Disability	See General comments above
Religion/belief	Not directly affected- See General comments above
Sexual orientation	Not directly affected- See General comments above
Gender reassignment	Not directly affected- See General comments above
Pregnancy and Maternity	Not directly affected- See General comments above
Marriage and Civil partnerships	Not directly affected- See General comments above
Socio-economic factors	See General comments above

Using the information from the sections 1 and 2 complete the following action plan: (insert more rows if necessary)

Please ensure you keep a note of the actions you have agreed to carry out and report on progress quarterly to the Organisational Development Manager

Issues identified	Protected characteristic groups involved	Action planned or already taken to minimise discrimination/promote equality of access	Officer (s) responsible for the actions (must be identified)	Target date for completion
1. Monitor effects of this policy change	Age/ Gender/ disability	Develop reports from Northgate showing effects by these equality strands	R. Cartwright	When policy adopted by BMBC
2. Seek protocols with DWP to establish a mechanism for early identification of exempt cases	Age	Meeting between Rents Manager and DWP Manager arranged for 27 th April 2017	C Roby	TBA
3				
4.				

Name/signature of manager completing analysis	R. Cartwright
Date assessment sent to Organisational Development Manager	5.5.2017
Name/signature of Organisational Development Manager	Yasmin Henstock
Date of publication of equality analysis	

