## **Equality Impact Assessment**

**Changes in circumstances for Council Tenants** 

# Signing off when assessment is completed

Sign off by GM Cohesion and Equalities		Date
Sign off by OMT/Chair Departmental Equality Date published on the internet	Group	Date

#### **Review**

Review date	Please indicate date below
A date for review is required for this EIA to be refreshed and	
reviewed.	
This date will be	
captured corporately	
<ul> <li>You must ensure that</li> </ul>	
this review is carried	
out in time to meet	
this date	

## Stage 1 - Scope of the equality Impact Assessments about your piece of work

1 Directorate	Housing Management
2. Policy / Strategy / Service to be assessed:	Changes in Circumstances for Council Tenants  Management Transfers Relationship breakdown Succession of Tenancy
3. Lead Officer:	Hakeem Osinaike
Equality Impact Assessment Person / Team:	Andrew Walkinshaw
5. Date of Assessment:	22 September 2015
6. The main purpose and outcomes of	The council is committed to re-assessing its

policy/strategy / service to be assessed policies, strategies, functions and services, usually within a three year cycle, and it is committed to publishing its findings. A review of key housing management policy and procedures in relation to changes in circumstances for Council tenants started in 2014. The purpose and outcomes to be achieved in this assessment is to ensure all functions and business processes of the council are able to demonstrate the way in which they promote equality. 7. Groups who the piece of work should This equality impact assessment should benefit or benefit and apply to the following groups: apply to, for example: - Service users Council tenants - Staff Housing Officers - Other internal or external stakeholder • Support Service Officers (Will the piece of work be delivered in Adults & Childrens Services partnership with another agency?) Metropolitan Police Service 8. Any associated strategies or guidelines The statutory legislation associated with this i.e. legal/ national /statutory review includes: Matrimonial Causes Act 1973 Housing Act 1985 The Children Act 1989 Family Law Act 1996 The Civil Partnership Act 2004 Localism Act 2011 Associated startegies include .....

#### Step 2. Gathering Information

1. Who should be served by the policy / strategy / piece of work?

The policies assessed in this report contribute to helping all Council tenants to have more opportunities in life. It may also improve relationships in communities as the actions detailed aim to achieve better awareness of these policies so that Council tenants are able to seek help at the earliest stage to prevent avoidable rent arrears and achieve tenancy sustainment objectives. The purpose of this equality impact assessment is to draw attention to this positive effect and see if it can be strengthened so that other groups in the community may benefit.

2 .What relevant information do you have about the people who this piece of work is aimed at? (Please complete the boxes below )

Equality Groups	Information (research / data)	Known or potential inequalities
Ethnicity	Analysis of the housing management system found 51% of those requesting a service were White British. Approximately 24% did not state their ethnicity. Succession of tenancy cases had the highest proportion of White British (57%) and for management transfer cases this was lower (52%). No disproportionate trends were found in the analysis when comparing this with the profiling data of all council tenants and leaseholders (49% White British)	Awareness of policy limited in all community groups as historic complaints data shows that customers often appeal when a decision does meet their original expectations. Therefore, additional training for housing officers and proactive approach to advertise policy with wider community (web, marketing materials) to be considered in the action plan.
Gender (including Transgender)	Analysis of the housing management system found that of those experiencing a breakdown in relationship, 57% of applicants were female and 43% male. For succession of tenancy cases 48% of cases were female and 52% male.  However, 71% of those whose succession of tenancy request was approved were female which is high considering only 48% of applicants are female. For management transfer cases 79% of applicants were female and 21% were male.	Awareness of policy limited in all community groups as historic complaints data shows that customers often appeal when a decision does meet their original expectations. Therefore, additional training for housing officers and proactive approach to advertsie policy with wider community (web, marketing materials) to be considered in the action plan.  Potential inequality with gender data not being available to analyse those who were accepted as a management transfer request because "Start Reason" field in system does not have option of "Management Transfer". Recommend ICT to update field options in system.
Disability	No disability data/information available.	Awareness of policy could be limited in wider community.

Age	Analysis of the housing management system found that for succession of tenancy cases 69% of applicants were over 60 whereas for management transfers this was only 4% and Relationship Breakdowns was also lower at 18%. For management transfer requests 59% were in the age category 26-44.	There are no known inequalities identified in the analysis of system data. However, awareness of policy could be limited in wider community and understanding that a large majority of management transfer cases (59%) are in the 26-44 age category, targeted approach could be taken.
Religion and Belief	Analysis of the housing management system found that for succession of tenancy cases 45% of applicants are Christian whereas for management transfers this was 28% and relationship breakdowns this was 25%. On all cases approximately 27% declined to state their religion.  No disproportionate trends were found in the analysis when comparing this with the profiling data of all council tenants and leaseholders (65% Christian).	Awareness of policy limited in all community groups as historic complaints data shows that customers often appeal when a decision does meet their original expectations. Therefore, additional training for housing officers and proactive approach to advertise policy with wider community (web, marketing materials) to be considered in the action plan.
Sexual Orientation	Analysis of the housing management system found that for succession of tenancy and management transfer cases between 63 and 69% of applicants are heterosexual with the remaining applicants declining to say. For relationship breakdowns 62% are heterosexual, 1% homosexual with the remaining declining to say. No disproportionate trends were found in the analysis when comparing this with the	Awareness of policy and procedures limited in LGBTQ forum?

	profiling data of all council tenants and leaseholders (88% heterosexual).	
Maternity and Nursing Mothers	Not available	None known
You may also wish to consider Carers	Not available	None known

Do you have enough information about the different groups to inform an equality impact assessment? **Yes/ No** 

If not, this area should be addressed in your action plan

- 3 . Do you have monitoring data or consultation findings specific to your area of work? If yes list the sources of evidence here & go to Step 3, if No list the actions required to get more data.( which should be included in the action plan)
  - BI Query Analysis Report available on SharePoint via Andrew Walkinshaw, Business Officer, Housing Business Services

What consultation activity has taken place / will be taking place on this piece of work and the Equality Impact Assessment?

- Action plan to address need to undertake consultation with community groups to increase awareness of exisiting policies.
- Consultation and policy changes to follow with resident groups.

### Step 3. Assessing Impact

1.	What does your monitoring data on your service users tell you?	
	Are any groups under or over represen see. Please give details below.	ted compared to what you would expect to
	Ethnicity	No groups under or over represented in monitoring data.
	Gender (including transgender)	71% of those whose succession of tenancy request was approved were female which is high considering only 48% of applicants are female. No transgender data available.

	Age	No groups under or over represented in monitoring data.
	Disability	Limited data available to make assessment.
	Sexual Orientation	Approximately 30% of respondents declined to record their sexual orientation. Comparisons have been made with national figures and this is consistent.
	Religion and belief	No groups under or over represented in monitoring data.
	Pregnant and Nursing Mothers	No data available to make assessment.
	Socio economic	No socio-economic impact
	You may also wish to consider Carers	No data available to make assessment.
2.	Based on the evidence gathered have you identified any potential differential	

Based on the evidence gathered have you identified any potential differential impact for any of the equality groups?
Step 2. What are the potential access issues or barriers for people in each of the

equality groups

	Positive	Negative
Ethnicity	No groups under or over represented in monitoring data.	Awareness of policy could be limited in wider community.
Gender (including transgender)	No groups under or over represented in monitoring data.	Potential inequality with gender data not being available to analyse those who were accepted as a management transfer.
Disability	No groups under or over represented in monitoring data.	Awareness of policy could be limited in wider community.
Age	No groups under or over represented in monitoring data.	Awareness of policy could be limited in wider community.
Religion and Belief	No groups under or over represented in monitoring data.	Awareness of policy could be limited in wider community.

Sexual Orientation	No groups under or over represented in monitoring data.	Awareness of policy could be limited in wider community.
Pregnant and nursing mothers	N/A	N/A
Socio economic	N/A	N/A
You may also wish to consider Carers	N/A	N/A

Is the differential impact as a result of indirect or direct discrimination? Yes...../

Can any differential impact be justified or proportionate in meeting a legitimate aim if yes please provide details

# 4. Promoting Equality

1.	What has been done to promote equality in this piece of work?			
	This includes any measures you've put in place to:			
	·	□□Improve the accessibility of your service		
		of outcomes for people from different groups		
		olicy/strategy more inclusive		
	□□Ensure staff are train	ned appropriately		
	□ □ Promote community	cohesion or good relationships between different groups of		
	people.			
	(Think about physical ac working)	ccess, communications needs, staff awareness, partnership		
	Ethnicity	Policy documentation is available in a number of formats		
	,	(e.g. Web, Conditions of Tenancy). Policy applies to all Council tenants regardless of ethnicity.		
	Gender	Policy applies to all Council tenants regardless of gender.		
	Disability	Housing Officers communicate with tenants in a variety of formats (visits, email, telephone) and ensure accessibility of service is not adversely affected. Policy documentation is available in a number of formats (e.g. Web, Conditions of Tenancy).		
	Age	Policy applies to all Council tenants regardless of age.		
	Religion and belief	Policy applies to all Council tenants regardless of religious belief.		

	Sexual orientation	Policy applies to all Council tenants regardless of sexual orientation.
	Socio economic	N/A
	Pregnant and Nursing Mothers	N/A
	You may also wish to consider Carers	N/A
2.	What further actions are required? please ensure that these are None	
3.	How have you consulted on this Equality Impact Assessment? Internal resources consulted.	
4.	How will the outcomes from this EIA be managed and monitored - all of the proposed equality outcome should be managed through the service plans  To be managed and monitored in service plans	
	To be managed and mor	nitored in service plans

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# Action plan template

Improvement Required	Priority	Key Actions	Timescale	Outputs demonstrating progress	Resources	Outcome	Lead
Improving awareness of Management Transfers policy	High	Frontline Staff briefing to increase policy knowledge  FAQ's page to be	31 October 2015	Less appeals on refusals  Increase in web page hits	TBC	Reduced number of appeals	твс
Improving awareness of Relationship Breakdown policy	High	developed for web Frontline Staff briefing to increase policy knowledge  FAQ's page to be developed for web	31 October 2015	Less appeals on refusals  Increase in web page hits	ТВС	Reduced number of appeals	ТВС
Imrpoving awareness of Succession of Tenancy policy	High	Frontline Staff briefing to increase policy knowledge  FAQ's page to be developed for web	31 October 2015	Less appeals on refusals Increase in web page hits	ТВС	Reduced number of appeals	ТВС
Improving data collection and evidence	Medium	"Start Reason" field in Capita does not have option of "Management Transfer". ICT to update field options in system	15 October 2015	Better reporting on management transfer outcomes.	ICT	Better reporting on management transfer outcomes.	ТВС

#### **Summary**

Please provide a summary document / storyboard of the findings of your EIA (including best practice what we do well, our challenges, our opportunities and what we planned to do This will be used for publication on the internet

The policies assessed in this EIA will contribute to helping all Council tenants to have more opportunities in life.

The action plan will improve relationships in communities as the actions aim to achieve better awareness of these policies so that Council tenants are able to seek help at the earliest stage to prevent avoidable rent arrears and achieve tenancy sustainment objectives.

Although there were no disproportionate trends found in the analysis, challenges include ensuring that the wider community is aware of these policies so that they can seek assistance when required.