

EQUALITY IMPACT ASSESSMENT

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|---|-------------------------------------|--|--------------------------------------|------------------------------------|--------------------------|
| Name of activity: | Tenancy Strategy 2019 - 2024 | Date Completed: | 6th September 2019 | | |
| Directorate / Division responsible for activity: | Strategic Housing | Lead Officer: | Hannah Edwards and Nick Hobbs | | |
| Existing Activity | <input type="checkbox"/> | Existing service, new / proposed strategy | x | Changing / Updated Activity | <input type="checkbox"/> |

What are the aims / main purposes of the activity?

Section 150(1) of the Localism Act 2011 imposes a legal duty on all local authorities to prepare and publish a Tenancy Strategy that sets out matters to which registered providers are to have regard to when formulating their tenancy policies. Section 150(5) of the Localism Act 2011 states that local housing authorities must keep their Tenancy Strategy under review and may modify or replace it from time to time. The Council's existing Tenancy Strategy was published in 2012 and a review carried out in 2014. It was subject to a further review in 2018 and as the local housing market and national economic climate have changed considerably since 2012, it was felt that rewriting it was the most appropriate way forward.

It is the Tenancy Strategy itself that is the subject of the equalities impact assessment, not the housing needs service provided by the Council.

What are the main actions and processes involved?

Section 150(1) of the Localism Act 2011 specifies that the Tenancy Strategy must have regard to:

- The kind of tenancies registered providers grant
- The circumstances in which they will grant a tenancy of a particular kind
- Where registered providers grant tenancies for a fixed term, the length of the term, and
- The circumstances in which they will renew tenancy

Who is intended to benefit & who are the main stakeholders?

The strategy is relevant for prospective and existing tenants of social housing.

The main stakeholders are staff in the Housing Needs Team, and the registered providers who have housing stock in Crawley. Crawley Homes should also have regard to the Tenancy Strategy when formulating their tenancy policy and procedures.

Have you already consulted on / researched the activity?

A review of the Tenancy Strategy was carried out at the end of 2018 and found that the wider environment in which social housing is built and allocated had changed significantly since the strategy was originally drafted, therefore it was felt that rewriting the strategy was the most appropriate way forward. A consultation exercise was carried out to help guide the direction of the Strategy. Further consultation was undertaken upon completion of the draft Strategy and the feedback helped shape the final document.

Impact on people with a protected characteristic

| Protected characteristics / groups | Is there an impact (Yes / No) | If Yes, what is it and identify whether it is positive or negative |
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| Age | No | Neutral – The focus of the strategy is to outline what registered providers are to have regard to when creating, modifying or replacing their tenancy policies, and is not restricted to, or directed at, any particular group of people. As a statutory document, most criteria is set down by statute, the implementation and comprehension of statute is supported by case law and guidance |
| Disability | No | Neutral – The focus of the strategy is to outline what registered providers are to have regard to when creating, modifying or replacing their tenancy policies, and is not restricted to, or directed at, any particular group of people. As a statutory document, most criteria is set down by statute, the implementation and comprehension of statute is supported by case law and guidance |
| Gender reassignment | No | Neutral – The focus of the strategy is to outline what registered providers are to have regard to when creating, modifying or replacing their tenancy policies, and is not restricted to, or directed at, any particular group of people. As a statutory document, most criteria is set down by statute, the implementation and comprehension of statute is supported by case law and guidance |
| Marriage & civil partnership | No | Neutral – The focus of the strategy is to outline what registered providers are to have regard to when creating, modifying or replacing their tenancy policies, and is not restricted to, or directed at, any particular group of people. As a statutory document, most criteria is set down by statute, the implementation and comprehension of statute is supported by case law and guidance |
| Pregnancy & maternity | No | Neutral – The focus of the strategy is to outline what registered providers are to have regard to when creating, modifying or replacing their tenancy policies, and is not restricted to, or directed at, any particular group of people. As a statutory document, most criteria is set down by statute, the implementation and comprehension of statute is supported by case law and guidance |

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| Race | No | Neutral – The focus of the strategy is to outline what registered providers are to have regard to when creating, modifying or replacing their tenancy policies, and is not restricted to, or directed at, any particular group of people. As a statutory document, most criteria is set down by statute, the implementation and comprehension of statute is supported by case law and guidance |
| Religion & belief | No | Neutral – The focus of the strategy is to outline what registered providers are to have regard to when creating, modifying or replacing their tenancy policies, and is not restricted to, or directed at, any particular group of people. As a statutory document, most criteria is set down by statute, the implementation and comprehension of statute is supported by case law and guidance |
| Sex | No | Neutral – The focus of the strategy is to outline what registered providers are to have regard to when creating, modifying or replacing their tenancy policies, and is not restricted to, or directed at, any particular group of people. As a statutory document, most criteria is set down by statute, the implementation and comprehension of statute is supported by case law and guidance |
| Sexual orientation | No | Neutral – The focus of the strategy is to outline what registered providers are to have regard to when creating, modifying or replacing their tenancy policies, and is not restricted to, or directed at, any particular group of people. As a statutory document, most criteria is set down by statute, the implementation and comprehension of statute is supported by case law and guidance |
| Whilst Socio economic disadvantage that people may face is not a protected characteristic; the potential impact on this group should be also considered | Yes | Positive – The proposed Tenancy Strategy encourages registered providers to take steps that would allow those who do not have the up-front funds often required for accessing social housing to pay via a payment plan. This does not put those households at an advantage nor does it put others (who have made one payment) at a disadvantage. If payment is required to enable a social tenancy to proceed, recommending the use of payment plans makes accessing social housing equitable for all, regardless of income or savings. |

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| What evidence has been used to assess the likely impacts? |
| A review of the Tenancy Strategy was carried out and evidenced the need to replace the existing tenancy strategy. |
| What resource implications are there to deliver actions from this EIA? |
| None above and beyond what already exists to provide the service. |

| Outcome following initial assessment | | |
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| Does the activity have a positive impact on any of the protected groups or contribute to promoting equality, equal opportunities and improving relations within target groups? | Yes | The Strategy recommends that registered providers take steps to ensure those on low incomes or with insufficient savings are able to make the upfront payment required to enable the tenancy offer to proceed. |
| Does the activity have a negative impact on any of the protected groups, i.e. disadvantage them in any way. | No | |

| Decision following initial assessment | | | |
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| Continue with existing or introduce new / planned activity | Yes | Amend activity based on identified actions | No |

| Action Plan | | | |
|--|--|--------------------------------------|--------------------------------|
| Impact identified | Action required | Lead Officer | Deadline |
| Changes to service delivery that result from implementing the strategy should themselves be assessed for their impact on people with protected characteristics | As and when changes are to be introduced, a preliminary assessment may need to be carried out to determine whether a full equalities impact assessment is required | Hannah Edwards and Nick Hobbs | Before changes are implemented |

| Monitoring & Review | |
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| Date of last review or Impact Assessment: | n/a |
| Date of next 12 month review: | n/a – review as and when changes made to strategy |
| Date of next 3 year Impact Assessment (from the date of this EIA): | n/a – review as and when changes made to strategy |

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| Signed by Person Completing: | Hannah Edwards |
| Date Sent to HR and Equalities Team: | 2 nd September 2019 |
| Approved by Head of Service: | Diana Maughan |

Crawley Borough Council Equality Impact Assessment



| Completed Equality Impact Assessment | Key findings | Future actions |
|--|--|-----------------------|
| Directorate / Division: Function or policy name: Officer completing assessment (Job title): Date of assessment: | Strategic Housing Tenancy Strategy 2019 – 2024 Hannah Edwards Strategic Housing Performance, Policy and Project Officer 6 th September 2019 | |