

EQUALITY SCREENING

Equality impact assessment guidance should be considered when completing this form.

POLICY/FUNCTION/ACTIVITY	LEAD OFFICER
Local Lettings Policies (LLP) - Pinefields	Ian Blowers/Joan Stephens

A. What is the aim of this policy, function or activity? Why is it needed? What is it hoped to achieve and how will it be ensured it works as intended? Does it affect service users, employees or the wider community?

The aim of this policy is to ensure that new housing developments start with a balanced community. This is achieved by ensuring that a proportion of allocations are made to smaller, working, households which prevents the balance of the local community being distorted by an influx of large numbers of children and/or non-working households.

This EIA should be seen in conjunction with the EIA undertaken for the Choice Based Lettings (CBL) process, completed in May 2009, and which outlines how council property is usually allocated.

B. Is this policy, function or activity relevant to equality? Consider the following strands: race, disability, gender, religion/belief, sexual orientation and age. Does the policy relate to an area in which there are known inequalities, or where different groups have different needs or experience? Remember, it may be relevant because there are opportunities to promote equality and greater access, not just potential for adverse impacts or unlawful discrimination.

This policy is a deliberate attempt to prevent the usual CBL process from operating when new developments are first allocated. Housing allocation policies usually give additional priority to those households who cannot secure housing in the private sector, and consequently, a disproportionate number of non-working households are assisted. In addition, priority is given to overcrowded households, and so inevitably, larger households with several children score over those households with fewer children. This can result in new developments, particularly developments with family sized units, being filled on day one with households with 3 or more children and where the head of the household is not working. Research has shown that allocating properties without any control can result in unsustainable communities, and consequently legislation, whilst normally requiring 'reasonable preference' to be given to certain household types, does allow for a degree of manipulation when allocating homes for the first time. The LLP for Pinefields is an attempt to create a sustainable community at the start.

If the policy, function or activity is considered to be relevant to equality then a full equality impact assessment must be carried out.

C. If the policy is not considered to be relevant to equality, what are the reasons for this conclusion? What evidence has been used to make this decision? A simple statement of 'no relevance' or 'no data' is not sufficient.

This screening assessment must be referred to the Equality Group for challenge before sign-off.

Date completed:

Sign-off by senior manager:

EQUALITY IMPACT ASSESSMENT

SCOPING

1. Which of the equality strands is the policy relevant to and why? It may relate to one or all of the following strands: race, disability, gender, religion/belief, sexual orientation and age. Diversity within these strands should be considered.

If evidence revealed that any of these strands were more likely to be unwaged or formed part of a larger household, then the LLP would impact these groups disproportionately.

2. What aspects of the policy are particularly relevant to equality? Other aspects should not necessarily be excluded from the assessment, but attention should be focused on the most important areas.

It is felt that the initial disadvantage that larger, non-working households suffer is a price worth paying to achieve the aim of establishing a sustainable community. It must be remembered that the LLP only applies to the initial allocations of a new scheme, and that the 'normal' CBL process applies for all subsequent re-lets. It must also be remembered that only a proportion of new allocations are subject to the LLP, and so in the case of Pinefields, where only 33 family sized homes are being built, as few as 8 or 9 units (25%) will be subject to the LLP.

3. What consultation and involvement has been undertaken in relation to this (or a similar) policy, and what are the results? Data may be available from recent consultation activities on a related policy or EIA. If none has been carried out, what consultation will be needed?

4. Set out any other available evidence that will help you assess the impact of this policy on equality. This could include service-level monitoring data, analysis of complaints/enquiry records, existing user feedback, and information about the local community. You may find it useful to compare your service-user statistics against the Runnymede population profile.

The units at Pinefields will be advertised as usual through the CBL scheme. Applicants will bid for units, in the knowledge that an LLP applies. If a disproportionate number of successful applicants are larger, non-working households, the LLP will 'kick in', and a proportion of these households will be 'bypassed', (overlooked). Officers will be able to review the cases who miss out, and it is possible that we find that those households who are overlooked are from specific minority groups. If this is found to be the case then a review of the LLP policy will be undertaken, but the desire to create a sustainable community may have to override equality concerns .

5. Are there any gaps in the evidence? If so, set out how these gaps will be filled.

Not really. Whilst we know what the profile of the register is, we cannot anticipate who will bid for what vacancies under the CBL system, so cannot know in advance how the application of the LLP will impact on the final allocation of properties at Pinefields.

Where it is not possible to fill data gaps in time to inform this assessment, specific action points to address this will need to be included in the action plan section below, with a focus on monitoring the actual impact of the policy.

ASSESSING IMPACT

It is essential to consider not just the intended consequences of the policy but also any unintended consequences and barriers that might prevent it being effective for certain groups.

6. Did your consultation and involvement activities demonstrate any issues with the policy that need to be addressed?

No consultation carried out.

7. Could the implementation of the policy or its outcomes lead to a disproportionate or adverse impact on one or more groups, because of their race, disability, gender, religion/belief, sexual orientation, or age? For example, there might be evidence of higher or lower participation/uptake by different groups.

This policy will disadvantage larger households as a proportion of properties will be offered to smaller households in a deliberate attempt to reduce the number of children living on the estate. The LLP could lead to an adverse impact on one or more minority group if a disproportionate number of larger households were to be found in any of the groups. As indicated above, the Council will not be able to assess the impact until after the bidding process has been completed.

8. If there is a disproportionate or adverse impact on one or more groups, is it appropriate and consistent with the policy objective? For example, the policy may include lawful positive action or other methods to address particular needs.

Yes. This is deliberate, legal and felt to be appropriate in order to establish a sustainable community.

9. Does the policy miss potential opportunities to promote equality or positive attitudes to (and between) different groups or communities?

No. There are not really any opportunities to promote equality.

The benefit of creating a sustainable community will be felt by everyone living on and close to this new development, irrespective of race, gender, disability, religion/belief, sexual orientation or age.

ADDRESSING THE IMPACT: ACTION PLANNING, MONITORING AND REVIEW

10. Does the policy require reconsideration or amendment? If not, explain the reasons for this conclusion. If an adverse impact has been identified, you will need to set out the justification for continuing the policy, or outline measures to mitigate the impact.

No. The benefits of a sustainable community override any adverse impact an LLP might have. Officers will review the cases who miss out on housing because of the LLP, (if any do), and if those overlooked are from specific minority groups the a review of the LLP will be undertaken. However, the desire to create a sustainable community may still override equality concerns.

11. What actions have you identified as a result of this equality impact assessment? These might include: improving data collection in order to give a clearer picture of your service-users; physical adjustments to a building; arranging for information to be sent out to individuals in alternative formats or languages; or consulting with a wider group of people to understand the impact of the policy.

We will monitor the results of the LLP to establish whether or not there is an adverse impact on one or more groups. Evidence from the application of LLPs at other new developments would suggest that that any impact is likely to be negligible.

12. How will you review the actual impact of this policy to measure if expected outcomes are achieved in practice? You may have identified 'triggers' that would indicate a problem with the policy and suggest a revision is needed.

The application of the LLP is a 'one-off' activity, and so has no impact beyond the initial allocation of the new properties. As indicated in 11 above, we will monitor the outcome of the LLP when it is applied.

13. Action Plan: Who will be responsible for completing the actions identified in [11] and [12] and in what timescale?

Joan Stephens. Immediately after the properties are allocated.

This equality impact assessment must be referred to the Equality Group for challenge.

Date completed:

Sign-off by senior manager: