

# EQUALITY IMPACT ASSESSMENT FORM

December 2014

## THE COUNCIL'S EQUALITIES STATEMENT

This Council recognises that people have different needs, requirements and goals and we will work actively against all forms of discrimination by promoting good relations and mutual respect within and between our communities, residents, elected members, job applicants and workforce.

We will also work to create equal access for everyone to our services, irrespective of ethnic origin, sex, age, marital status, sexual orientation, disability, gender reassignment, religious beliefs or non-belief, use of Welsh language, BSL or other languages, nationality, responsibility for any dependents or any other reason which cannot be shown to be justified.

<b>NAME OF NEW OR REVISED PROPOSAL*</b>	Rowan Place Sensitive Lettings and Introductory Tenancies
<b>DIRECTORATE</b>	Communities
<b>SERVICE AREA</b>	Caerphilly Homes
<b>CONTACT OFFICER</b>	Jane Roberts-Waite / Deb Bishop
<b>DATE FOR NEXT REVIEW OR REVISION</b>	December 2016

**\*Throughout this Equalities Impact Assessment Form, 'proposal' is used to refer to what is being assessed, and therefore includes policies, strategies, functions, procedures, practices, initiatives, projects and savings proposals.**

## INTRODUCTION

The aim of an Equality Impact Assessment (EIA) is to ensure that Equalities issues have been consciously considered throughout the decision making processes of the work undertaken by every service area in the Council and work done at a corporate level.

The form should be used if you have identified a need for a full EIA following the screening process covered in the Equalities Implications in Committee Reports Guidance document (available on the Equalities and Welsh Language Portal on the intranet).

The EIA should highlight any areas of risk and maximise the benefits of proposals in terms of Equalities. It therefore helps to ensure that the Council has considered everyone who might be affected by the proposal.

It also helps the Council to meet its legal responsibilities under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 and the Welsh Language Measure 2011. There is also a requirement under Human Rights legislation for Local Authorities to consider Human Rights in developing proposals.

The Council's work across Equalities, Welsh Language and Human Rights is covered in more detail through the Strategic Equalities Objectives and Action Plan 2012.

This approach strengthens work to promote Equalities by helping to identify and address any potential discriminatory effects before introducing something new or changing working practices, and reduces the risk of potential legal challenges.

When carrying out an EIA you should consider both the positive and negative consequences of your proposals. If a project is designed for a specific group e.g. disabled people, you also need to think about what potential effects it could have on other areas e.g. young people with a disability, BME people with a disability.

There are a number of supporting guidance documents available on the Equalities and Welsh Language Portal (the Committee report guidance mentioned above, the Consultation and Monitoring guidance) and the Council's Equalities and Welsh Language team can offer support as the EIA is being developed - the contact email is [equalities@caerphilly.gov.uk](mailto:equalities@caerphilly.gov.uk).

## PURPOSE OF THE PROPOSAL

<b>1</b>	<p><b>What is the proposal intended to achieve?</b> <i>(Please give a brief description of the purpose of the new or updated proposal by way of introduction.)</i></p> <p>Rowan Place is an area of Rhymney comprising 82 properties, 72 of which are owned by Caerphilly County Borough Council. For many years, the area has been plagued by high levels of anti social behaviour and crime. In October 2013 Cabinet approved a targeted regeneration effort aimed at tackling the root causes of poverty through improvements to housing conditions and the provision of referrals and support for tenants and residents to much needed services provided at Hafod Deg (including mental health services, drug and alcohol support services, employment advice and opportunities, healthy eating and well being).</p> <p>The sensitive lettings policy was developed with a focus on equality for existing tenants and residents as well as prospective tenants in Rowan Place. The policy should not be viewed in isolation to the multi agency approach that has been adopted and is underway in Rowan Place which seeks to support tenants with complex needs through improvements in their housing conditions and facilitating greater access to support services to help sustain tenancies and reduce anti social behaviour and crime within the area.</p> <p>An informal sensitive lettings policy has been implemented by the area housing team for some time in this area. The report intends to formalise the arrangements and make it clear to existing and prospective tenants, the circumstances in which a new tenancy within Rowan Place will be granted. Local lettings policies have also been implemented in certain areas across the county borough in order to manage anti social behaviour and create more cohesive communities.</p> <p>The use of introductory or probationary tenancies is commonplace throughout England and Wales as a means to help create safer communities. In this instance introductory tenancies will only apply to two bedroom flats within Rowan Place which traditionally have been a magnet for crime and anti social behaviour. Their introduction will assist with the management of ASB and provide the elderly, those with limited mobility and families with greater security. Introductory tenancies will only apply to new tenants seeking two bedroom accommodation in Rowan Place.</p>
<b>2</b>	<p><b>Who are the service users affected by the proposal?</b> <i>(Who will be affected by the delivery of this proposal? e.g. staff members, the public generally, or specific sections of the public i.e. youth groups, carers, road users, people using country parks, people on benefits etc.)</i></p> <p>New prospective tenants seeking 2 bedroom accommodation within flats at Rowan Place, Rhymney.</p>

## IMPACT ON THE PUBLIC AND STAFF

**3 Does the proposal ensure that everyone has an equal access to all the services available or proposed, or benefits equally from the proposed changes, or does not lose out in greater or more severe ways due to the proposals?**

*(What has been done to examine whether or not these groups have equal access to the service, or whether they need to receive the service in a different way from other people?)*

The Caerphilly Homes allocation scheme already allows for the assessment of persons with a history of the following in order to determine their suitability for an offer of tenancy:

- Persons who have been charged with or convicted of a serious sexual offence or violent crime
- Persons released from custody having served a sentence for a serious sexual offence or crime of violence (including arson and / or serious criminal damage)
- Persons being discharged from other institutional care whose history includes offences of a violent and / or sexual nature
- Persons with a history of drug, alcohol or other substance misuse who have been convicted of related offences

The proposal to introduce a sensitive lettings policy which suggests that any new applicant which meets one of the following criteria will be refused a tenancy incorporates the opportunity for people who may be considered, vulnerable to receive the necessary support and be allocated a home:

- Is known to have been involved in anti-social behaviour in the last 2 years
- Is unable to demonstrate an ability to sustain a tenancy for a minimum period of the last 12 months. References may/will be taken up which will include from private landlords/hostels.
- Has an unspent criminal conviction
- Has convictions for drug dealing
- Has been convicted of, or has been held responsible for criminal damage or arson within the last 12 months
- Has a history of chaotic behaviour
- Has drug or alcohol related support needs unless on a rehabilitation programme – continuing on the programme will be an additional condition of tenancy
- Has high support needs that may affect their ability to sustain a tenancy and is not engaging with support – if there are high support needs but support is in place, fully engaging with the support will be an additional condition of tenancy.
- Applicants or members of the household who were former tenants of the council and who have excessive outstanding rent arrears and/or recharges that makes the repayments together with current rent and other charges unaffordable.

Prospective tenants seeking two bedroom accommodation in Rowan Place and who do not meet any of the criteria above will be awarded a 12 month introductory tenancy.

The proposal ensures that everyone has the opportunity to obtain a tenancy providing they do not meet the criteria above. An affordability test will be undertaken to ensure that prospective tenants are not adversely affected by recent welfare reform changes (i.e. bedroom tax).

	<p>The proposal will impact positively on the following groups: Older people, disabled persons and those with limited mobility, families, prospective tenants who have not previously been involved in anti social behaviour and those who may be receiving support to tackle drug / alcohol dependency.</p> <p>The proposal will impact negatively on the following groups: Those who are known to have been involved in anti social behaviour in the last two years. Prospective tenants who have ben convicted of drug dealing, criminal damage, arson or who have a history of chaotic behaviour. Persons who have previously been tenants of the Council and who have excessive outstanding rent arrears or recharges that would deem the rent unaffordable.</p>
	<p><b><u>Actions required</u></b></p> <p>None</p>

<p><b>4</b></p>	<p><b>What are the consequences of the above for specific groups?</b> <i>(Has the service delivery been examined to assess if there is any indirect affect on any groups? Could the consequences of the policy or savings proposal differ dependent upon people’s disability, race, gender, sexuality, age, language, religion/belief?)</i></p> <p>The consequences of the policy will not differ according to a disability, race, gender, sexuality, age, language or religion / belief.</p> <p>If a prospective tenant meets one or more of the criteria included within the sensitive lettings policy they will be refused a tenancy within Rowan Place and will be assisted by the Area Housing Office to identify and obtain alternative, more appropriate accommodation elsewhere within the county borough via the Council’s allocation process.</p>
	<p><b><u>Actions required</u></b></p> <p>Staff involved in the allocation of properties within Rowan Place will receive training to ensure that the policy is implemented consistently and that its implementation does not differ depending on disability, race, gender, sexuality, age, language, religion or belief.</p>

## INFORMATION COLLECTION

5	<p><b>Is full information and analysis of users of the service available?</b> <i>(Is this service effectively engaging with all its potential users or is there higher or lower participation of uptake by one or more groups? If so, what has been done to address any difference in take up of the service? Does any savings proposals include an analysis of those affected?)</i></p> <p>The service is available to prospective tenants seeking two bedroom Council accommodation in Rowan Place, Rhymney. The service is actively engaging with all potential tenants through the marketing of available flats, events and the area management process.</p>
	<p><b><u>Actions required</u></b></p> <p>None</p>

## CONSULTATION

6	<p><b>What consultation has taken place?</b> <i>(What steps have been taken to ensure that people from various groups have been consulted during the development of this proposal? Have the Council's Equalities staff been consulted? Have you referred to the Equalities Consultation and Monitoring Guidance?)</i></p> <p>The refurbishment and eventual redevelopment of Rowan Place is a much wider scheme involving a targeted regeneration effort by multiple services. As a result, consultation and engagement with tenants and residents is ongoing and has been undertaken via face to face contact between the designated Tenant Liaison Officer, questionnaires and events held at the show flat.</p> <p>During conversations with local tenants and residents they have all indicated how pleased they are with the investment being made by the Council and Welsh Government and have urged the housing team in particular, not to allow the area to return to the way it was before the regeneration programme began.</p> <p>The proposal has born these requests in mind and as a result, has been designed specifically to create a cohesive and thriving community in the heart of Rhymney.</p>
	<p><b><u>Actions required</u></b></p> <p>None</p>

## MONITORING AND REVIEW

<b>7</b>	<p><b>How will the proposal be monitored?</b>  <i>(What monitoring process has been set up to assess the extent that the service is being used by all sections of the community, or that the savings proposals are achieving the intended outcomes with no adverse impact? Are comments or complaints systems set up to record issues by Equalities category to be able analyse responses from particular groups?)</i></p> <p>The allocations process will be monitored by the North area housing team to ensure compliance with the Council's allocation policy and equalities policies. The effects of the proposal will be reviewed and reported to CHTG and P&amp;R after a 12 month implementation period.</p>
	<p><b><u>Actions required</u></b></p> <p>12 month review / report to be drafted</p>

<b>8</b>	<p><b>How will the above be evaluated?</b>  <i>(What methods will be used to ensure that the needs of all sections of the community are being met?)</i></p> <p>The allocation of flats within Rowan Place will be monitored by the North area housing team as part of their standard allocation policy monitoring process and reported to CHTG and P&amp;R.</p>
	<p><b><u>Actions required</u></b></p> <p>None</p>
<b>9</b>	<p><b>Have any support / guidance / training requirements been identified?</b>  <i>(Has the EIA or consultation process shown a need for awareness raising amongst staff, or identified the need for Equality training of some sort?)</i></p> <p>Staff who are directly involved in implementing the policy will receive appropriate training to ensure that the service provided to prospective tenants with a protective characteristic does not differ.</p>
	<p><b><u>Actions required</u></b></p> <p>Training to be identified and delivered during 2015/16.</p>

<b>10</b>	<p><b>Where you have identified mitigating factors in previous answers that lessen the impact on any particular group in the community, or have identified any elsewhere, please summarise them here.</b></p> <p>None</p>
-----------	---

<b>11</b>	<p><b>What wider use will you make of this Equality Impact Assessment?</b>  <i>(What use will you make of this document i.e. as a consultation response, appendix to approval reports, publicity etc. in addition to the mandatory action shown below?)</i></p> <p>The Equality Impact Assessment will be submitted to the CHTG as an appendix to the report.</p>
-----------	---

	<p><b><u>Actions required</u></b></p> <ul style="list-style-type: none"> <li>EIA, when completed, to be returned to <a href="mailto:equalities@caerphilly.gov.uk">equalities@caerphilly.gov.uk</a> for publishing on the Council's website.</li> </ul>
--	--

<b>Completed By:</b>	Jane Roberts-Waite
<b>Date:</b>	13 <sup>th</sup> November 2015
<b>Position:</b>	Strategic Coordination Manager
<b>Name of Head of Service:</b>	Phil Davy