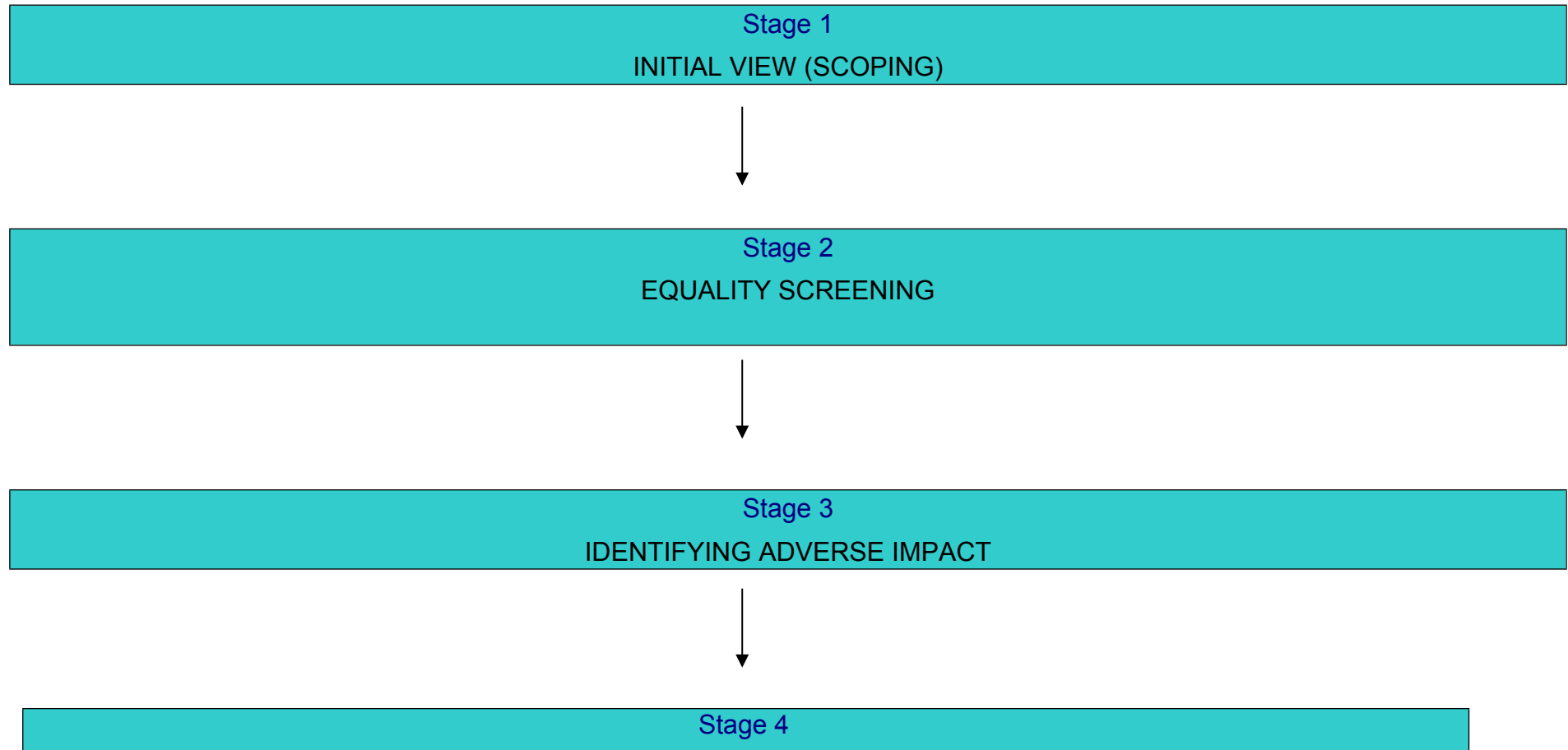


SPELTHORNE BOROUGH COUNCIL'S

EQUALITY IMPACT ASSESSMENT TOOLKIT

6. EQUALITY IMPACT ASSESSMENT FLOWCHART



IMPLEMENTING PROPORTIONATE EQUALITY – EQUALITY ACTION PLAN

STAGE 1 – SCOPING

Scoping is the initial planning stage of the assessment. The aim of this scoping is to identify how the EIA will be conducted and assessing at this early stage:

AGREEING WHO WILL LEAD AND CARRY OUT THE ASSESSMENT

Establishing responsibility and ownership has been identified as a critical part of making the assessments a meaningful exercise.

1.1 Policy, Practice, Functions or Service being assessed	<i>Please state policy or service being assessed</i>
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Housing Allocations Policy

1.2 Lead Officer	<i>Please state name and contact details of lead officer who will be conducting the review.</i>
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Elaine Stuart Office: 01784 446381 Email: e.stuart@spelthorne.gov.uk
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1.3 What do you think are the main issues relating to diversity within your policy or service area?

It is suggested that it would be helpful for those who carry out the assessment to begin by offering an initial view of what they think are the main issues relating to diversity for the policy or service being assessed. This can then help shape the questions that will form the basis of the assessment and ensure that the assessments are tailored to the specifics of the service, rather than just working through a set of standard questions.

Some things you may wish to consider.

- ***How do you think that your policy or service currently meets the needs of different communities in Spelthorne?***
Equality Scheme
- ***Do you think that your policy/service specifically contributes to promoting Equality and Diversity in Spelthorne? if so, in what way?***
Yes through Corporate Priority of Housing
- ***Do you think that your policy or service presents any barriers to any community or group? if so please provide evidence.***
Consultation feedback suggests no barriers
- ***How can your service or policy tackle these barriers ((gender, disability and race at least) age, religion/faith and sexuality))***

	<ul style="list-style-type: none">• <i>Are there any equality objectives that are ongoing or planned for the future, if so please state.(These could be included in your Equality Action Plans (Stage 4)</i>• <i>Please list our proposed equality objectives, at this stage, if any?</i>
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STAGE 2: EQUALITY SCREENING PROCESS (Risk Assessment)

1. Introduction

Stage 2 consists on undertaking a screening (or equalities risk assessment). Key areas to consider are?

- **What are the key policies, functions and services which may have 'Relevance' to equality and diversity?**
- **How will you rank these?**
- **Will you consider individual policies**

The outlined Equality Screening Process (ESP) should be used where Service areas are conducting Service based Equality Impact Assessments (EIAs) and/or Policy based EIAs. The purpose of this screening process is to identify policies or practices we believe have a 'Relevance' to disadvantaged groups e.g. BME communities, people with disabilities, women or men, etc. This process should enable the lead officer to identify what are the key equality issues in their respective service area and to identify policies or practices believed to could have an adverse impact on disadvantaged groups.

2. How to use the Equality Screening Process

Each Lead Officer is asked to identify which services, functions, policies or practices that have a 'Relevance' on service delivery in relation to the six diversity themes using the scoring sheet. Points should be provided on the basis of actual or presumed 'Relevance' based on the information provided in section 1. By the end of the exercise you should have added all the points and given a score. The next stage is to identify which policies/practices have a high/medium or low adverse impact.

2a. Points

- 5 – This policy or practice could have a very high relevance on our service delivery
- 4 – This policy or practice could have a relatively relevance on our service delivery
- 3 – This policy or practice could have a medium relevance on our service delivery
- 2 – This policy or practice could have a relatively low relevance on our service delivery

1 – This policy or practice could have a very low relevance on our service delivery

2b. Scoring

1-10 points – Low Relevance

11 – 20 points – Medium Relevance

21 and above – High Relevance

Please see example below:

2. Equality Screening Process

Service, Function, Policy, Practice.	Age	Disability	Sex	Gender Reassignment	Marriage / Civil partnership	Pregnancy	Race	Religion / Belief	Sexual Orientation	Total Points	Impact H/M/L
Allocations Policy	3	3	3	1	1	1	4	3	1	20	MED

4. Conclusion – Policy or Service EIA?

If a policy/practice has a score of 25 or over, it is advisable that a Policy based EIA is undertaken. If most policies score below 25, it would be advisable to conduct a service based EIA, which will involve an EIA that overviews all policies or practices in your respective service area.

STAGE 3. IDENTIFYING ADVERSE IMPACT

The aim of an assessment is to identify whether the service or policy has an adverse impact upon people with disabilities, black and minority ethnic communities, men and women, heterosexual, gay, bisexual and lesbian communities, older and younger people and faith communities. The assessment should ultimately produce proportionate equality objectives, which help remove barriers and link into service plans. The end result must, at least, produce one equality objective for each of the three equality themes listed by the Local Government Equality Standard, namely gender, disability and race.

Stage three comprises of two sections.

- Concentration on the aims of the service, policy, function or practice.
- Focuses on the practical delivery of the policy or service.

Assessing the Aims and Criteria of the Policy or Service

This section will determine whether the underlying aims, policies and procedures of the policy or service comply with the Disability Discrimination Act 1995, and Disability Discrimination Act 1995 and (Amendment) 2005, Sex Discriminations Act 1977, and Single Equality Act 2005, Equal Pay Act 1970, Employment Directive (Religion/belief) 2003, Employment Directive (Sexual Orientation) 2003, Employment Directive (Age Discrimination) 2006 and the Local Government Equality Standard. In addition to the key questions below, you may wish to include any specific issues that were identified during the scoping stage of the assessment.

Key Questions	Issues to consider
<p>3.1 What are the aims of the policy, practice, function or service?</p> <p>See Service Plan (cut & past in)</p>	<p><i>What needs is the policy/service designed to meet?</i></p> <p><i>What are the current priorities?</i></p> <p><i>You could also refer to your current Service Plans</i></p>
<p>Spelthorne Borough Council (SBC), Elmbridge Borough Council (EBC) and PA Housing (PA) are partners in the Search Moves Choice Based Lettings scheme. Under this scheme these partners have now agreed to have separate Allocation Policies, instead of the current Common Allocation Policy. Under the Common Allocation Policy 30% of vacancies were advertised under a Cross Partner section covering the sub-regional five partner areas and were available to all households on the partners' housing registers. Under the separate policy arrangements there will no longer be a Cross Partner element. Existing tenants of local Registered Providers will also be eligible to join the Spelthorne Housing Register.</p> <p>The overall aim of the new policy is to ensure that all social housing in the Borough of Spelthorne continues to be allocated fairly and objectively, having regard to any legislative requirements, regulations or Codes of Guidance issued by Department of Communities and Local Government, and homelessness and tenancy strategies.</p>	

Key Questions	Issues to consider
<p>3.2 What does available data and the results of any consultations show about the take up of services?</p> <p>What is the impact on different groups? (qualitative and quantitative)</p>	<p><i>You could look at:</i></p> <ul style="list-style-type: none"> • <i>previous community consultation exercises,</i> • <i>customer service reviews and analysis.</i> • <i>Census data</i> • <i>What are the experiences of front-line staff in relation to the provision of the service?</i> • <i>location of facilities.</i> • <i>lack of access to translation/interpretation or access to building or services,</i> • <i>eligibility rules could be a barrier?</i>

Spelthorne Housing Options Team ran a consultation period which ran from Monday 22nd May 2017 – 30th June 2017. There were 65 responses received. In the main, the results reported here are done so in percentage terms and relate to the overall response.

The responses breakdown as follows:

- 98% (64) responses received on behalf of households and 2% (1) received back from partner organisations.
- 42% of household responses indicated that they had a housing application in place with the SEARCH Moves scheme and 55% did not, with 3% not knowing
- Of those with a housing application, 28% (18) indicated that their application was with Spelthorne BC, 12% (8) with A2Dominion and 2% (1) being registered with Elmbridge BC.
- 89% of households responding were resident in Spelthorne, 9% elsewhere and 2% did not know.

In respect of equalities the consultation stakeholders were asked the following question:

“Do you think any of the proposed changes will have a negative impact on any particular group of people, e.g. due to their age, gender, disability, race, relationship status, religion, sexuality and pregnancy and maternity?”

This question was posed to help inform the Equality Impact Assessment (EIA) and identify any potential negative impacts that had not been previously considered or identified when formulating the changes.

57% of the respondents answered “no”, 28% said “yes” and 15% answered “don’t know”

In response to the survey, two comments were made with regard to applicants who are victims of domestic violence who may need to move out of the Spelthorne Borough, which could previously have been achieved through Cross Partner lettings, and how this would now be achieved. However, it is still possible for existing social housing tenants to arrange a mutual exchange using the Homeswapper scheme, which is a national scheme for social housing tenants to set up their own “swap” of their existing property for one in another area. Assistance may also be offered under Part VII of the Housing Act 1996 (Homelessness).

A further comment was that disabled applicants should have priority for properties that already have disabled adaptations. This is a procedure that is already followed when considering applicants for such properties.

Others identified that:

- priority should be given to those in work and those who are considered to be “net contributors”, over those who they considered to be dependent on benefits and not working
- consideration should be given to long term privately renting applicants, both in terms of cost and the ability to “set roots” in the community without the worry of being evicted.
- Homeseekers (someone not already a social housing tenant) should get priority over transfer tenants, as they already had a social housing tenancy.
- the CBL system was fair, but everyone should have a fair chance, whether a social housing tenant or not. It was also felt that priority should be given to those applicants who live within the Borough of Spelthorne.

<p>3.3 Can you identify any gaps? What are the reasons for this? (Please note: If you do not have any data, you may wish to develop service based monitoring mechanisms that collate data on under-represented groups)</p>	<p><input type="checkbox"/> Are communities or service users aware of this policy or service?</p> <p><input type="checkbox"/> Are there any accessibility issues?</p> <p><input type="checkbox"/> Is service provision monitored, if so how?</p> <p><input type="checkbox"/> Is there a lack diversity awareness amongst staff?</p>
<p>Race</p>	<p>Geographical distribution of different racial groups across the stock is monitored in an attempt to ensure that choice does not lead to segregation. However, as the system is based on choice this can be a difficult area to confront.</p> <p>Segregated pockets can and do become created because certain groups choose to live together and are able to do this where the voids become available. Unfortunately this can be in the least popular areas.</p> <p>As far as can be determined all applicants, regardless of racial group, are given access to the same information about lettings with translations being available on request.</p> <p>All lettings are monitored by ethnicity and steps can be taken to make sure that the system for 'bidding' for properties under 'choice-based' lettings schemes does not put a particular racial group (or groups) at a disadvantage.</p> <p>There is no evidence to suggest that the nomination system for referring housing applicants to other social landlords puts those from any particular racial group (or groups) at a disadvantage (for example, by disproportionately transferring applicants from a particular racial group to housing association properties, which are perceived to be 'better) and housing applicants from all racial groups appear to be fairly represented among the nominations</p>

	<p>Larger properties with three or four bedrooms are often a requirement of some racial groups and lack of availability could disadvantage some families. However, within the Allocation Scheme the Council has in the emergency band applicants who are statutorily overcrowded as defined by the Housing Act 2004.</p> <p>Local Lettings policies have the potential to impact the housing options of disadvantage groups and much has been written nationally on this. Ethnic communities often choose to live in close proximity. Reasons include being close to family and other cultural spaces such as religious and retail facilities. Local lettings schemes will therefore benefit those members of ethnic minority communities who are working and who wish to exercise choice to remain within their communities. This also supports the local economy.</p> <p>Nationally there is widespread concern about the allocation of scarce public housing resources across many ethnic groups. This can be damaging to community cohesion as a result of community perceptions of unfairness relating to the allocation of social housing. The Allocation scheme contains specific rules about eligibility that are enforced for all applicants. The scheme incentivises voluntary work and employment that can both help to build community cohesion. It is also more transparent which in itself will help to communicate fairness.</p> <p>Applicants made homeless through a hate crime would be placed into emergency band and therefore achieve the highest banding under the scheme.</p>
Sex	Applicants subject to MAPPA (Multi-agency Public

	<p>Protection Arrangements) will be subject to risk assessment and may be by-passed for properties based on that risk assessment. There are more males subject to MAPPA than females, and therefore this will impact on men more than women. This negative impact is necessary in order to ensure wider protection of the public.</p> <p>The policy gives priority to households who have dependent children living or expected to live with them on a permanent basis. This is due to the shortage of family sized social rented homes. This may have a negative impact on men who have staying access to children from a previous relationship.</p>
Disability	<p>The policy allows the applicant to provide a self-assessment of their medical condition or impairment and explain how this is affected by current housing conditions and how it could be improved by re-housing. Specialist supported accommodation can be accessed through relevant multiagency panels.</p> <p>Applicants made homeless through a hate crime would be placed into emergency band and therefore achieve the highest banding under the scheme.</p>
Age	<p>Young people under the age of 18 can join the Common Housing Register (from the age of 16) but may not be considered for a tenancy unless they have a Guarantor.</p> <p>Spelthorne's Allocations Policies determines how a young person would be treated if they were top of a shortlist. The Housing Service would work with the young person, and other relevant agencies, to assist them in putting appropriate support in place and/or to consider wider housing options.</p>

	<p>Households who apply to join the register are treated equally without reference to age, however older persons who are aged 55 or older may have the ability to consider additional housing options such as older person's homes and sheltered housing.</p> <p>Under occupation is awarded a high priority where there are a number of bedrooms that are not used and this would largely be a positive measure to older households where their children have left a family sized property.</p> <p>Tenants may express concerns that older applicants may be forced to leave their accommodation if they are under occupying. This is not the case.</p>
Religion/Belief	<p>There little or no evidence that there is any likely negative impact in respect of applicants.</p> <p>Applicants made homeless through a hate crime would be placed into emergency band and therefore achieve the highest banding under the scheme</p>
Sexual Orientation	<p>While many people identify as heterosexual, many people do not in the wider community. The Government estimates that approximately 6% of the population are either gay men, lesbians or bisexuals.</p> <p>There little or no evidence that there is any likely negative impact in respect of applicants. It is also acknowledged that data on residents` sexual orientation is unlikely to be accurate. Applicants made homeless through a hate crime would be placed into emergency band and therefore achieve the highest banding under the scheme.</p>

Marital Status	There are no specific issues which are felt could discriminate or disadvantage married couples or those in civil partnerships
Pregnancy/Maternity	Bedroom spaces are not allocated until a baby is born. This does not prevent a pregnant woman from accessing social housing, or other housing options, and ensure that all households are treated fairly in assessing bedroom need based on current circumstances and household make-up.
Gender Reassignment	<p>Transgender people may be particularly at risk of housing crisis and homelessness arising from transphobic reaction by family, neighbours and members of the local community. This may make it difficult to obtain work or undertake formal voluntary work.</p> <p>Applicants made homeless through a hate crime would be placed into emergency band and therefore achieve the highest banding under the scheme.</p>
3.4 What would be the benefits of making the above changes and are there any negative impacts that such an action would have on different communities?	<i>You may want to consider the benefits and consequences for the group(s) concerned, other communities and the Council, if we were not to make the suggested changes?</i>
<p>Given a limited supply of housing, any increase in priority for one group is inevitably associated with another group having lower priority.</p> <p>There are no disproportionate impacts, and what impacts there are identified are justified in order to make the scheme simpler to understand and fairer across all groups.</p> <p>As there is a limited supply of housing, any increase in priority for one group is inevitably associated with another group having lower priority. Therefore there are no disproportionate impacts, and what possible impacts that have been identified within the consultation are considered justified in order to make the scheme fairer and accessible to all groups.</p>	
STAGE 4. IMPLEMENTING PROPORTIONATE EQUALITY OBJECTIVES & MAINSTREAMING DIVERSITY – THE EQUALITY ACTION PLAN	

4.1 Referring to **Stages 1** (Scoping), **Stage 2** (Screening) and **Stage 3** (Adverse Impact) please list what objectives you will implement to mainstream diversity in your service area.
Please complete your Equality Action Plan ensuring that you have listed at least objectives in regards to disability, gender and race/ethnicity.

Outcome Objectives Lead Resources Deadline Progress

As there are no identified unjustifiable negative impacts, no actions have been identified.

As a result of the EA, equality objectives identified to implement added diversity in our area includes looking at further quantifying how much help we provide to applicants on the existing Housing Register. This would include (for example)

- What percentage of lets to worker only properties were made to those with protected characteristics compared to lets to non-workers
- What percentage of clients have particular protected characteristics and what policy help is given to those applicants eg most DV victims are women. How does the policy assist this
- What percentage of lettings are prioritised for those with mobility needs compared to the percentage from the overall register than have mobility needs.

These examples are not exhaustive however the overarching objective would be to consider potential discrimination and quantify potential impacts and justifications