

**EQUALITY IMPACT ASSESSMENT TEMPLATE
FOR NEW/REVIEWED POLICIES & PROCEDURES**

Lead Officer: Laurette Ratcliffe

Title of Policy: Lettings Policy

Is there an associated procedure? Yes No

Title of Procedure: Voids and Lettings Joint Procedures

1. What is the purpose and main aims of the policy and its associated procedure?

Policy aims:

- a. Ensure that housing is let on the basis of need by participating fully in the Herefordshire Home Point Choice Based Lettings (CBL) scheme.
- b. Promote the achievement of balanced and sustainable communities.
- c. Make the best possible use of our housing stock in order to maximize rehousing opportunities.
- d. Let empty properties as quickly as possible, having regard to the need to let high quality accommodation in accordance with our Lettable Standard.
- e. Work with Herefordshire Council (and other RSLs) to enable it to fulfill its duties under the Housing Act 1996 and the Homelessness Act 2002.
- f. Work with the local authority and other RSLs to achieve a better understanding of housing supply and demand.
- g. Closely monitor all lettings to ensure that equality of access is being provided to those groups that can be subjected to discrimination.
- h. Value equality and diversity, in accordance with our Equality and Diversity Framework, and ensure that our lettings process complies with all relevant legislation and Housing Corporation Regulatory Guidance.

2. Who is intended to benefit from the policy and procedure and in what way?

Applicants on the Home Point Register and HHL transfer applicants will benefit from the reviewed Policy.

The availability of some types of property is extremely limited. As an Appendix to the Policy, information is now provided on the total number of properties that HHL has in its ownership and the number of properties of each type that became available to let during the previous year. This information is provided in order that applicants can make more informed choices when placing a bid for a property and to assist them in making a judgment about the extent of their rehousing opportunity with HHL.

The bedroom eligibility criteria has now been revised and the Policy specifies that:

- a. A young person over the age of 18 years is entitled to his/her own bedroom.
- b. Where there is a 10 year age gap between children of the same sex they are entitled to a bedroom each.

HHL will offer properties to young people between the ages of 16 and 18 years. However, a third party will now be required to sign the tenancy as a trustee. For some young people it can be difficult to make the transition to independent living and tenancy failure can result. Our intention in the requirement for a trustee is to ensure that the young person has the support and assistance necessary to enable successful tenancy sustainment.

As a social housing provider and an organisation with charitable status HHL will not normally offer accommodation, where there is evidence that an applicant has sufficient financial means to meet his or her own housing need. The Lettings Policy now specifies the financial criteria that will apply as being assets amounting to £60,000 and/or an annual gross income of £30,000.

3. Who are the main stakeholders in relation to the policy and procedure?

- a. Applicants on the Home Point Register
- b. HHL tenants
- c. HHL colleagues and the Board of Management
- d. Partners in the Home Point Choice Based Lettings Scheme:
 - i. Herefordshire Council
 - ii. Festival Housing Group
 - iii. Bromford Housing Group
 - iv. Kemble Housing
 - v. Marches Housing Association
 - vi. South Shropshire Housing Association
 - vii. Salvation Army Housing Association
 - viii. Two Rivers Housing

4. Who has been consulted, including colleagues on the policy and procedure?

- a. Herefordshire Council's Strategic Housing Manager
- b. Herefordshire Home Point Manager
- c. HHL Tenants through Service Review Group
- d. HHL Lettings Officer's
- e. HHL Visiting Officer

5. When you were developing the policy and procedure what conclusion did you come on how these could impact differently on people because of their race? Please indicate below:

Positive impact Adverse impact Neutral impact

Please give your reasons/evidence for this:

There is no evidence to suggest that HHL's Lettings Policy and Procedure impacts adversely on people because of their race.

As a partner in the Home Point CBL scheme, HHL has no direct control over who applies for its properties. The application of the Lettings Policy commences on receipt of a prioritised shortlist of interested applicants from Home Point.

The 2001 Census remains the definitive source of information on ethnic group, and the only source of sub-county level data. The Office for National Statistics (ONS) have however, published estimated statistics. These estimates suggest that in mid-2006, 4.0% of Herefordshire's total resident population was from an ethnic group other than 'white British'. The proportion is still very low by national (15.7%) and regional (16.4%) comparisons. (Data source – Herefordshire Council Research Team).

In order to ensure that there is no unintentional adverse impact on BME applicants a target of 5.0% p.a. of HHL lettings to BME applicants has been set for the current financial year (2008/2009).

The latest Performance information (as at 31st September 2008) shows that, with 5.9% of Lettings to BME applicants, this target has been exceeded.

The 5% target was arrived at by looking at two sets of data as follows:

- Mid-2006 estimates suggest that 4.0% of Herefordshire's total resident population was from a BME group.
- As at 31st March 2008 5.61% of applicants on the Home Point registered identified themselves as from a BME group.

There are no changes to the Lettings Policy which would impact upon the number of BME applicants being offered an HHL property.

In terms of the allocation process HHL has procedures to access interpreters and will arrange for main documents to be translated, where necessary.

Where the tenancy is accepted records of any such requirements will be logged on the Orchard database to ensure that any subsequent contact is conducted through the identified preferred method of communication.

Please identify any changes you have had to make in order to address any adverse impact or barrier:

No changes have been necessary.

6. When you were developing the policy and procedure what conclusion did you come on how these could impact differently on people because of their gender? Please indicate below:

Positive impact Adverse impact Neutral impact

Please give your reasons/evidence for this:

There are no HHL schemes or properties, which are restricted by gender.

There is no evidence to suggest that HHL's Lettings Policy and Procedure impacts adversely on people because of their gender.

Please identify any changes you have had to make in order to address any adverse impact or barrier:

No changes have been necessary.

7. When you were developing the policy and procedure what conclusion did you come to on how these could impact differently on people because of their disability? Please indicate below:

Positive impact Adverse impact Neutral impact

a. People with physical or mobility impairments

There is no evidence to suggest that HHL's Lettings Policy and Procedure impacts adversely on people with physical or mobility impairments.

A positive impact rating has been given as people with physical or mobility impairments may be entitled to consider additional housing options, as explained below.

2005 mid-year population estimates indicated that 13% of Herefordshire's population had a disability - (data source,

Herefordshire Council Research Team).

As at 30th September 2008, Home Point Quarterly Monitoring Statistics show that 413 (7.6%) of people registered with Home Point considered themselves to be disabled.

HHL has set a target of 18% of lettings to disabled applicants.¹ As at end of March 2008, this target had been exceeded with 25.9% of properties being let to disabled households during the 2007/08 financial year.

People with physical or mobility impairments may be entitled to consider additional housing options as some properties designated for older persons may be let to someone younger, where it would best meet the needs of a vulnerable person, or a disabled person.

Where the information is available, adapted properties are advertised via the Home Point Choice Based Lettings Scheme with preference being given to applicants who require specific aids and adaptations. These adaptations can include ramps, stair lifts, level access and wet-room showers.

Where minor adaptations are necessary, in order to enable a disabled person to accept a property offered, these will be completed once that person has moved into the property. The target time-scales for completing minor works costing up to £1,000 such as installing ramps is 10 working days and minor works costing over £2,000, such as installing showers over baths, is 20 working days.

All non-OAP designated bungalows are advertised with Home Point as 'preference given to those needing ground floor due to disability or medical condition.'

We are currently developing an Adapted Property Register. This will enable us to more effectively let properties with existing adaptations to disabled people who need them.

Where an applicant wishes to accept a property the tenancy sign-up process is completed at the HHL office that is most convenient for the applicant. All three HHL offices are wheel-chair accessible.

We provide a floating support service to older and disabled residents and will make a referral as part of the lettings process to enable support to be provided, where there is an identified need.

Where the tenancy is accepted, records of any specific requirements such as the necessity to allow a disabled person sufficient time to answer the door will be logged on the Orchard database system.

¹ This was based on actual data from the 2001 Census

Positive impact	<input checked="" type="checkbox"/>	Adverse impact	<input type="checkbox"/>	Neutral impact	<input type="checkbox"/>
<p>b. People with sensory impairments</p>	<p>There is no evidence to suggest that HHL's Lettings Policy and Procedure impacts adversely on people with physical or mobility impairments.</p> <p>A positive impact rating has been given, as people with sensory impairments may be entitled to consider additional housing options as explained below.</p> <p>As at 31st March 2008 there were 42 (0.79%) registered blind applicants on the Home Point Register. There is no information on the number registered who are partially sighted or who have hearing or communication impairments.</p> <p>HHL has not set separate targets for lettings to people with sensory impairments as this is incorporated in an overall target of 18% of lettings to disabled people.</p> <p>People with sensory impairments, who are in receipt of Disability Living Allowance (DLA), may be entitled to consider additional housing options. This is due to the fact that some properties, designated for older persons, may be let to someone younger, where it would best meet the needs of a vulnerable person, or a disabled person.</p> <p>In terms of the lettings process we have procedures for accessing BSL signers and will produce information and main documents in large print or Braille, where required. In addition, HHL Housing Officers have been provided with mobile hearing loops.</p> <p>Where the tenancy is accepted records of any such requirements will be logged on the Orchard database to ensure that any subsequent contact is conducted through the identified preferred method of communication.</p>				
Positive impact	<input type="checkbox"/>	Adverse impact	<input checked="" type="checkbox"/>	Neutral impact	<input type="checkbox"/>
<p>c. People with learning disabilities</p>	<p>There is some evidence to suggest that HHL's Lettings process, potentially, impacts adversely on people with learning disabilities. This is due to the current non availability of Tenancy Agreements in easy-read/pictorial format.</p> <p>There is, however, an entitlement to be considered for additional housing options as explained below.</p> <p>Learning disability affects the way someone learns, communicates or does some everyday things like getting dressed, filling in forms or going shopping and is something a person has all through their life. The type and severity of the learning disability can vary, and so does the range and kind of support needed.</p>				

HHL has not set separate targets for lettings to people with learning disabilities as this is incorporated in an overall target of 18% of lettings to disabled people.

Pre-allocation visits are generally undertaken to short-listed applicants for an HHL property. One of the main purposes of the visit is to identify any specific needs which the applicant may have in relation to the property letting process and successful tenancy sustainment. Where appropriate, referrals for the provision of support will be made to HHL's own Housing Support Service or to specialist support agencies.

Where an applicant already receives the services of a Support Worker, the Support Worker will be invited to attend the property letting, if the applicant would like him/her to do so.

People with a Learning Disability, who are in receipt of Disability Living Allowance (DLA), may be entitled to consider additional housing options. This is due to the fact that some properties, designated for older persons, may be let to someone younger, where it would best meet the needs of a vulnerable person, or a disabled person.

Positive impact	<input checked="" type="checkbox"/>	Adverse impact	<input type="checkbox"/>	Neutral impact	<input type="checkbox"/>
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People who use mental health services:

There is no evidence to suggest that HHL's Lettings Policy and Procedure impacts adversely on people as a consequence their use of mental health services.

A positive impact rating has been given because people who use mental health services may be entitled to consider additional housing options, as explained below.

HHL has not set separate targets for lettings to people who use mental health services as this is incorporated in an overall target of 18% of lettings to disabled people.

People who use mental health services, who are in receipt of Disability Living Allowance (DLA), may be entitled to consider additional housing options. This is due to the fact that some properties, designated for older persons, may be let to someone younger, where it would best meet the needs of a vulnerable person, or a disabled person.

Positive impact	<input checked="" type="checkbox"/>	Adverse impact	<input type="checkbox"/>	Neutral impact	<input type="checkbox"/>
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People who have a non-visible condition such as epilepsy or diabetes:

There is no evidence to suggest that HHL's Lettings Policy and Procedure impacts adversely on people with non-visible conditions such as epilepsy or diabetes.

A positive impact rating has been given due to the potential entitlement to as to consider additional housing options, as

explained below.

HHL has not set separate targets for lettings to people who have a non-visible condition such as epilepsy or diabetes. This is because, if they consider themselves to have a disability, they would be included in the overall target of 18% of lettings to disabled people.

People who have a non-visible condition such as epilepsy or diabetes may be entitled to consider additional housing options as some properties designated for older persons may be let to someone younger, where it would best meet the needs of a vulnerable or a disabled person.

Please identify any changes you have had to make in order to address any adverse impact or barrier identified above:

1. It will be necessary to investigate if there is a need for main documents relating to the lettings process e.g. the Tenancy Agreement to be available in easy-read/pictorial format for people with learning disabilities.

8. When you were developing the policy and procedure what conclusion did you come to and how these could impact differently on people because of their religion or belief or lack of religion or belief? Please indicate below:

Positive impact Negative impact Neutral impact

Please give your reasons/evidence for this:

There is no evidence to suggest that HHL's Lettings Policy and Procedure impacts adversely on people because of their religion or belief or lack of religion or belief.

As previously identified HHL is a partner organisation in a Choice Based Lettings Scheme, which allows applicants to bid for a particular property rather than being directly allocated one. Where, there is a specific need, such as a religious preference for a property to contain a shower, applicants can enquire if this is the case before placing a bid on the property.

Please identify any changes you have had to make in order to address any adverse impact or barrier:

No changes have been necessary.

9. When you were developing the policy and procedure what conclusion did you come to on how these could impact differently on people because of their sexual orientation? Please indicate below

Positive impact Negative impact Neutral impact

Please explain your reasons/evidence for this:

There is no evidence to suggest that HHL's Lettings Policy and Procedure impacts adversely on people because of their sexual orientation.

The bedroom eligibility criteria for couples and applicants with children apply equally irrespective of sexual orientation.

HHL's Tenancy Agreement recognises the property succession rights of same sex couples.

Please identify any changes you have had to make in order to address any adverse impact or barrier:

No changes have been necessary.

10. When you were developing the policy and procedure what conclusion did you come to on how these could impact differently on people because of their age? Please indicate below

Positive impact (1) Negative impact Neutral impact (2)

(1) Persons who are aged 60 years or over

(2) Lettings to Minors

Please give your reasons/evidence for this

There is no evidence to suggest that HHL's Lettings Policy and Procedure impacts adversely on people because of their age.

A positive impact has been given for older persons, as some properties are designated for people over the age of 60 years.

We provide a floating support service to older and disabled residents, funded through the Supporting People programme, and will make a referral as part of the lettings process to enable support to be provided, where there is an identified need.

Lettings to Minors

The Law of Property Act, 1925 prevents minors from holding a legal estate in land. However, the Act does not prevent minors from holding an 'equitable' interest in land i.e. an Equitable Tenancy, in which the legal estate is held by a trustee. HHL will, offer accommodation to young people between the ages of 16-18 years but, in order to comply with legislation, this will be an Equitable Tenancy.

In the majority of cases, where a 16-18 year old requires housing prior to his/her 18th

birthday, this will either be because the young person is a care leaver, or has been accepted as statutorily homeless with a priority need. In both cases, the Local Authority will retain a duty to the young person, either through its Social Services Aftercare Team or as a consequence of its homelessness duties.

Please identify any changes you have had to make in order to address any adverse impact or barrier:

No changes have been necessary.

11. When you were developing the policy and procedure what conclusion did you come to on how these could impact differently on people because of some other reason e.g. rural isolation, low income etc?

Positive impact Negative impact Neutral impact

Please give your reasons/evidence for this:

Other reasons:

i. Housing of potentially dangerous offenders

We reserve the right to refuse to consider individual bids under the Home Point Choice-Based Lettings Scheme from potentially dangerous offenders.

We do however, pay due regard to the Local Multi-Agency Public Protection Arrangements and, where a referral under these arrangements has been accepted by the Chief Executive or Director of Customer Services, we will make a management decision on the most appropriate location to house the particular applicant.

Please identify any changes you have had to make in order to address any adverse impact or barrier:

None have been necessary as the Local Multi-Agency Public Protection Arrangements are in place as a means of housing potentially dangerous offenders.

Please add any additional comments that you would like to make relating to the Equality Impact Assessment:

1. As a partner in the Home Point CBL scheme, HHL has no direct control over who applies for its properties. The application of the Lettings Policy commences on receipt of a prioritised shortlist of interested applicants from Home Point.
2. Pre-allocation visits are generally undertaken to short-listed applicants. One of the main purposes of the visit is to identify any specific needs, which the applicant may have in relation to the property letting process and successful tenancy sustainment. These will include those relating to race, gender, disability, religion or belief, sexual orientation and age. Where appropriate, referrals for the provision of support will be made to HHL's own Housing Support Service or to specialist support agencies.

Please add any additional comments that you would like to make relating to the Equality Impact Assessment:

3. Where an applicant already receives the services of a Support Worker, the Support Worker will be invited to attend the property letting, if the applicant would like him/her to do so.
4. Where the tenancy is accepted records of any specific needs e.g. those relating to preferred method of communication are recorded on the Orchard database.
5. We are currently in the process of collecting census data from all of our tenants to enable us to more effectively tailor the services provided to suit their individual needs.
6. Lettings targets for the financial year 2009-2010 will be set by the Diversity Working Group.