



DISTRICT COUNCIL
North Oxfordshire

Equality

Impact Assessment Form

Impact Assessment Form

Part I: Initial Screening

1. Persons responsible for this Assessment:

Name:	Kate Winstanley Marianne North Teresa Chapman
Service:	Housing Services (Housing Needs Team)
Directorate:	Planning, Housing and Economy
Telephone:	Ext 1648
Email:	Kate.Winstanley@Cherwell-dc.gov.uk
Date of Assessment:	July 2008

2. Name of the policy, service, strategy, procedure or function:

Name:	Allocation Policy
New or Existing:	Existing

3. Briefly describe its aims and objectives:

<p>Aim</p> <ul style="list-style-type: none">- To comply with the Housing Act 1996 and as amended by further acts and codes. This Act requires the Council to give preference to applicants for housing who are in the greatest need- To help prevent homelessness and support the council's homelessness strategy- To be transparent and easily understood by applicants, staff, members and other organisations- To make the most effective use of the housing stock in an area of high demand- To help build sustainable communities by offering choice of location of accommodation- To respond to the needs of vulnerable individuals- to increase choice for applicants- To ensure equality of opportunity in accessing the Housing Register and in the allocation of properties- To provide nominations of applicants to Housing Associations

4. Who is intended to benefit from this and in what way:

1 – Internal –

- CDC will gain efficiencies and improved value for money through a more transparent system which is clear to understand and results increased customer satisfaction and in fewer queries.
- CDC can have confidence that its statutory duties to provide and administer an allocation scheme are being met. A framework is provided to assess housing need and determine priority for housing, taking into account the reasonable preference groups and local circumstances
- The number of people accepted as statutory homeless should reduce as better housing advice and improved homelessness prevention work allows applicants to access other options.
- The clarity and transparency of the allocations scheme may lead to fewer enquiries and better use of other options being made, as public understanding of the scarcity of available housing grows.
- There should be a positive effect on the number of homeless people the council has a statutory responsibility for, as vulnerable groups should be dealt with effectively.

2 – External -
applicants

- The clarity and transparency of the system should make the system easier for applicants, and improve customer satisfaction
- The needs of those seeking housing will be better met

other stakeholders

- Registered Social Landlords should see an increased level of satisfaction with properties as applicants will have selected properties through Choice Based Lettings rather than having them assigned, in most circumstances. Void turnaround times will be improved
- low demand properties will be allocated to those who have applied for them rather than historically suffering from high turnover.
- Choice based lettings should assist the development of sustainable communities as tenants will have chosen to live there. This is of benefit to all Cherwell District Council residents
- The increase in clarity about stock which is available in the district will make it easier for Partner agencies to support their clients and to understand the rehousing situation

5. What outcomes are expected:

- Vacant properties will be let through Choice Based Lettings to applicants in the greatest need
- Allocations will be made fairly and without discrimination or disadvantage to the target groups
- The system will be easy to understand and to use for all concerned, both staff and applicants.
- Partners experience lower turnover in their properties as people are generally more satisfied with properties they have selected rather than

properties that have been allocated to them. In turn this leads to greater customer satisfaction and more sustainable communities

6. Have you consulted on this policy, service, strategy, procedure or function:

Yes / No YES

Details:

Internal and external

- There has been full consultation with all the Housing Team and relevant members. RSLs and other partner agencies are also consulted formally and informally through the RSL management group
- All applicants on the housing register were consulted on the introduction of choice based lettings
- A consultation event was held for Council members, RSLs and the voluntary sector
- The Equality and Access advisory panel have reviewed the assessment

7. What evidence has been used for this assessment:

Evidence –

- Current and historical reporting on the housing register (waiting list)
- Relevant legislation (Housing Act 1996, Homelessness Act 2002)
- Government code of Guidance on Allocations 2002
- Choice Based Lettings Code of Guidance 2008
- Cherwell District Council's equality and diversity policy
- Reports on homelessness acceptances
- Waiting list, bidding, offer and lettings reports from the CBL system
- Information on observations from the housing needs team
- Census data
- Population data (ONS, Oxfordshire data observatory)

8. Could a particular group be affected in either a negative or positive way?

	Negative	Positive	Issue	Evidence
Age	✓		There is concern that older people may not access affordable housing via the CBL system	Bidding reports
	✓		Young people (16 - 18) may not find appropriate accommodation	High levels of homelessness amongst young people was highlighted as a concern by CLG
		✓	Young people may be encouraged with appropriate support, to find	Homelessness acceptance reports Reports from partner agencies

			more suitable alternatives such as remaining with family	such as RSLs, BYHP (assertive outreach and family mediation) The Foyer, feedback from young people's schemes, the accommodation panel for young people
Disability	✓		Shortage of properties built to mobility standards, sudden disabilities	Time on waiting list Feedback from OTs Feedback from social services, and occupational therapists group Complaints consultation
Gender (including transgender)	✓		Domestic violence, vulnerability of young women	Consultation Feedback from partners National indicators
Race (including Gipsy and Traveller)	✓		Hate crimes. Intolerance, lack of suitable sites, 'Nimbyism'	Consultation Complaints Lettings reports showing the proportion of lettings to particular racial groups is equivalent to the proportion on the waiting list Census information
Religion or Belief	✓		Hate Crimes, intolerance, unsuitable property design	Consultation Feedback from landlords Waiting list Offer reports Police reports Feedback from community safety team complaints
Sexual Orientation	✓		Family rejection, hate crimes, intolerance	Data is not collected

Other Groups (see Guidance Notes) Rurality	✓		Lack of local options; scarcity	Waiting list reports Bidding reports Consultation Feedback from partners Housing needs estimates Housing needs surveys
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9.

Are there any other policies, services, strategies, procedures or functions that need to be assessed alongside this screening? If Yes, please identify which groups are affected	Yes – homelessness and temporary accommodation strategies children and young people, victims of domestic violence, disabled people and vulnerable adults
Should the policy, service, strategy, procedure or function proceed to a full Equality Impact Assessment?	Yes
If the answer is no please give reasons for this decision	N/A
Date by which full Equality Impact Assessment is to be completed	Date:

Declaration

We are satisfied that an initial screening has been carried out on this policy, service, strategy, procedure or function (delete those which do not apply) and a full Equality Impact Assessment is/is not required.

We understand that the Equality Impact Assessment is required by the Council and that we take responsibility for the completion and quality of this assessment

Responsible Officer: Marianne North Date: 31st October 2008

Role: Housing Needs Manager

Countersigned by Head of Service Date: 31st October 2008
Date for Review: November 2009

Please forward an electronic copy to the Access & Inclusion Officer by emailing it to: equalities@cherwell-dc.gov.uk

Print and sign a hard copy and store both the electronic copy and signed hard copy in a safe place. these should be available from your team for audit purposes when requested.

Part 2: Full Assessment

10. Summarise the negative impacts for each group(s) identified in section 8:

Group	Negative Impact
Age	<ul style="list-style-type: none"> • There is concern that older people may not access affordable housing via the CBL system. The Equality and Access advisory panel were particularly concerned that older applicants may not have access to or the ability to use information and communication technology • Young people (16 -18) may leave home and be unable to find appropriate accommodation • Young people may need support to develop the skills needed to sustain a tenancy • sufficient information about supported housing may not be available or may not reach the intended audience
Disability	<ul style="list-style-type: none"> • We are aware of some issues in respect of matching of suitable properties and applicants • We are aware that publicity may not reach the client group when properties do become available • Applicants may experience difficulty accessing the housing service due to a disability • Applicants may not be able to access affordable housing via the CBL system
Gender	<ul style="list-style-type: none"> • Vulnerable spouses may require supported accommodation • People in refuges may have difficulties accessing information from refuges
Race (including Gypsy and Travellers)	<ul style="list-style-type: none"> • Access to information in community languages • Housing requirements affected by cultural issues e.g. intergenerational housing • Availability of housing in areas

	<p>preferred by ethnic minorities</p> <ul style="list-style-type: none"> • We are concerned that there may be disproportionate numbers of BME applicants applying through the homeless route • Lack of provision of sites or permanent accommodation could disadvantage Gypsies & Travellers
Religion or Belief	<ul style="list-style-type: none"> • No information is collected on the housing register form • Hate crimes and harassment can lead to vulnerability • Differential impacts may relate to race issues • Housing requirements may be affected by religious/ cultural issues e.g. need for showers or particular types of cooking facilities
Sexual Orientation	No information is collected on sexual orientation
Other Groups – Rurality	<ul style="list-style-type: none"> • Lack of local options; affordability and scarcity of housing and land availability • Properties built to mobility standards may be particularly scarce • Services may not be accessible due to lack of public transport

11. What previous consultation has taken place or will take place with each equality group either externally or internally?

Numerous partner agencies including the PCT have been consulted and many of the groups above have been considered
See action plan

12. Who was consulted and/or what research material was used?

- Partner RSLs
- partner local authorities in the Oxfordshire subregional CBL partnership
- applicants on the housing register
- statutory and voluntary groups
- The Equality and Access advisory panel have reviewed the assessment

13. What does the consultation indicate about the negative impact?

- There was an acknowledgment that further guidance was to be given for issues around Domestic Violence.
- Vulnerable clients can use proxy bidding, or automatic bidding can be chosen

14. If there is still a negative impact see Guidance Notes

15. If there is a negative impact what will you do to promote equality and improve relations within equality groups?

The strategy is closely monitored and should any negative aspects be noticed this would feed into the reviews which are outlined below. See table below for initiatives which are being undertaken to promote equality; and see also the action plan

Group	Negative impact	Equality promotion
all		All staff receive compulsory diversity training
		The housing services team operates with a responsive, problem solving ethos
Age	May not be able to access affordable housing through CBL	Printed newsletters are available in a variety of locations. Vulnerable applicants can register to have the newsletter posted to them. a free phone telephone line is provided
		A dedicated team is available for advice and assistance. Bids can be placed on the applicant's behalf
		Applicants can be referred to appropriate support agencies
		Bidding reports are analysed every two months and applicants in the high bands are contacted or visited if

		they are not bidding, so that assistance can be offered
		The above measures address the concerns of the equality and access advisory panel
	Young people (16 -18) may not find appropriate accommodation, leading to high levels of homeless applications or failed tenancies	A youth foyer is provided in Banbury
		Homelessness prevention is one of the six priorities in the housing strategy
		CDC hosts in the youth homelessness forum in conjunction with the homelessness strategy
		CDC promotes and supports initiatives a clear to prevent youth homelessness and enable young people to stay at home
		Applicants can be referred to support agencies if they so wish
		CDC is trialling text bidding for the Choice Based Lettings scheme
disability	People with disabilities may not be able to access the housing service	Advice and proxy bidding are available to applicants engaged in the CBL process
		A british sign language interpreter can be arranged if needed
		The one –stop shop has a hearing loop
		The one-stop shop is DDA compliant, the new one-stops shops in Bicester and Kidlington will also be DDA compliant
		Computer terminals are provided for free public

		<p>access to the internet in CDC offices</p> <p>The Council and CBL websites have accessibility features such as text only view and text enlargement facility and can be viewed with a variety of browsers</p> <p>The Choice Based Lettings website is enabled for browsealoud. This means either a whole page or selected text can be read aloud, increasing access for applicants who have literacy difficulties and also for many ethnic minority applicants who may be able to understand spoken English better than written English. We have specifically ensured that the browsealoud service can be used in public libraries</p>
		<p>Printed newsletters are available in a variety of locations. Vulnerable applicants can register to have the newsletter posted to them a free phone telephone line is provided</p>
		<p>Adapted properties are advertised as such and clearly labeled in the Choice Based Lettings system. Preference is given to applicants whose needs match the facilities</p>
Religion or belief (including culture)		<p>CDC subscribes to language line. Housing leaflets are available in alternative</p>

		formats including Braille, large type, audio tape, and other languages
		Choice based Lettings gives applicants the choice of applying for properties which fit specific requirements (eg separate bathroom and toilet)
		A translation panel has been added to the application for housing form
Gender	Women (although not exclusively) can face domestic violence that would require them to seek a refuge	information is made available for victims of domestic violence
		Adequate provision of refuge places is made, meeting BVPI 225 and the strategic priority in the homelessness strategy
Sexual orientation		The allocation scheme considers all applicants from the position in which they present themselves to the council

16. What monitoring, evaluation or review has been set up to carry out checks on the policy, service, strategy, procedure or function?

The policy will be monitored by managers and the extended management team. The equality and diversity working group will monitor the delivery of the action plan and subsequent reviews of equality and diversity and will include the equality and diversity working group action plan

17. When will it be reviewed?

- In January 2009 as part of the subregional choice based lettings partnership work
- Quarterly progress reviews – June, September and December 2008, and March 2009
- Comprehensive review – after two years

What changes do you propose to make to the policy, service, strategy, procedure or function as a result of research and/or consultation

Negative Impact	Changes Proposed	Lead Officer	Timescale	Resource Implications	comments	evidence
Age						
Young people (16 -18) may not find appropriate accommodation	Initiatives to prevent youth homelessness	Helen Town / Marianne North	On-going	Cost of publicity and events Staff time to support applicants Staff time working with colleagues in education service the youth forum joint assessments between BYHP and Social Services achieved through joint commissioning Outcomes from Homelessness Strategy		Homelessness acceptance reports National indicators Training for housing options team Feedback from partners Feedback from applicants
	Advice from Housing Options team	Teresa Chapman	On-going	Staff training required	Part of continuous improvement of customer service	Homelessness acceptance reports National indicators Training for housing options team

						Feedback from partners Feedback from applicants Customer satisfaction surveys
	Action plan monitoring	Marianne North	On-going	Staff time		Measuring actions individually
Disability						
Shortage of disabled adapted properties/sudden events which cause unexpected life changes	Target setting for lifetime homes and work with housing providers to provide more purpose built property for disabled households	Fiona Brown	As part of SDP process	Staff time		nominations reports Offer reports Waiting list reports Affordable housing completion reports Minuted meetings Feedback from partners Feedback from OTs

	Improving matching between applicants and properties including partnership working with Occupation therapy team and categorising applicants and properties per subregional CBL scheme	Teresa Chapman / Marianne North	January 09 To fit in with subregional partnership working	Staff time		nominations reports Feedback from OTs
Disability which prevents applicants from fully participating in CBL	Investigate auto bidding for the CBL system for vulnerable applicants	Bob Garbutt/ Teresa Chapman	January 09	Staff time		Bidding reports
Further development work as a result of The findings of the equality and diversity working group Consultation with applicants on the effectiveness of our inclusion for all needs Corporate work on equality and diversity	Consult with disabled groups	Helen Town	March 2010	Strategic housing team	Will link into corporate consultation framework	More people able to maintain their own homes without needing residential care

Gender						
Women (although not exclusively) can face domestic violence that would require them to seek a refuge	Support is offered to the DV champion	Marianne North	On-going	Staff time		Minuted meetings Feedback from service users Feedback from partners Homelessness acceptance reports
	A named officer from CDC attends the DV group			Staff time		
	The housing needs manager works with the crime reduction partnership	Marianne North		Staff time		Minuted meetings Actions arising from meetings Increased customer satisfaction
	Making sure that information on CBL is available in refuges	Teresa Chapman	On-going	Staff time	Refuge is automatically included in email list for CBL publicity	Feedback from service users Feedback from partners

	All Housing Needs staff receive training on DV and child protection	Marianne North	On-going	Staff time Payment for training		Training records
	The housing needs team attend MARAC (multi agency risk assessment conference)	Marianne North	On-going	Staff time		
Hate crimes and harassment	Housing needs manager to consider collecting data on sexual orientation		April 09	Cost of redesigning and reprinting form plus staff time to collect and analyse data	Subregional CBL partnership intends to produce a common form for all partners – better use of resources to include this data at this stage	
	Housing needs manager attends joint meetings with crime reduction team and RSLs	Marianne North	Staff time			Housing register reports Minuted meetings
	Housing needs manager attends young people's antisocial behaviour action group	Marianne North	Staff time			Housing register reports Minuted meetings
Rurality						
Lack of access to	Explore effective ways to	Marianne	November 08	Staff time		Homelessness

services	reach rural residents and other isolated people eg health bus	North		Other costs may be identified		acceptance reports Feedback from service users Bidding and letting reports
	Monitor homeless apps to assess origin of applicants	Richard McIntyre	November 08	Strategic housing team; partnership working; housing needs team	Assessment of issues could lead to further work in 2009 - 2010	Homelessness reports
Potential to affect all groups						
	Consultation with recently housed applicants and other service users	Craig Knight	March 09	Staff time, cost of printed or telephone satisfaction survey		Record of responses and actions to be taken as a result
	Consultation on proposed Subregional allocation scheme changes	Bob Garbutt	January 09	Staff time, expenses Printing and distribution costs for a newsletter		Record of responses and actions to be taken as a result
Accessibility to services						
Age, disability, race	The CBL website is capable of having a "talking heads" video language service in 14 languages plus British Sign Language and English	Bob Garbutt/ Teresa Chapman	November 08	Staff time Subscription to video streaming service	Already commissioned through subregional CBL partnership, needs to be	Records of website hits Bidding and offer reports Feedback from service users Feedback from

					enabled on CBL website	partners
Age, disability	Review level of text bidding		November 08	Staff time	Part of subregional pilot of text bidding	Bidding reports

Completed by:	Kate Winstanley	Date Started:	may 08	Date completed:	October 2008
Role:	Housing Strategy Officer				

I am satisfied that a full Equality Impact Assessment has been undertaken in respect of the Temporary Accommodation Strategy 2008-2011

I understand that this Equality Impact Assessment is required by the Council and we take responsibility for its completion and quality

Gillian Greaves, Head of Housing Services

Date: 31st October 2008

Date for Review: November 2009



Guidance Notes

**Carrying out
Equality Impact Assessments**

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What is an Equality Impact Assessment?

The purpose of an Equality Impact Assessment (EqIA) is to improve the work of Cherwell District Council by making sure it does not discriminate and that, where possible, it promotes equality. It is a way to make sure individuals and teams think carefully about the likely impact of their work on equality target groups and take action to improve policies, services, strategies, procedures and functions. It involves anticipating the consequences of policies and projects on the target groups and making sure that, as far as possible, any negative consequences are eliminated or minimised and opportunities for promoting equality are maximised.

Where does an EqIA come from?

Equality Impact Assessments originate from the Race Relations (amendment) Act 2000, the Disability Discrimination Act 2005, as well as the Equality Standard for Local Government (ESLG), all of which place obligations on local authorities and public sector organisations to carry out impact assessments.

The Equality Standard is a Best Value Performance Indicator and as such is audited in the same way as any other BVPI. The Equality Standard has been developed as a tool to enable organisations to mainstream gender, race, disability, age, sexual orientation and religion or belief into policy and practice at all levels.

The Council process is therefore aimed at assessing the impact of policies, strategies, functions or projects across the six equality groups.

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The Council process is therefore aimed at assessing the impact of policies, strategies, functions or projects across the six equality groups.

What is meant by “Impact”?

The Council will look at two possible impacts in its assessment:

(a) A negative or adverse impact:

This is an impact that could disadvantage one or more equality groups. This disadvantage may be differential, where the negative impact on one particular group of individuals or one equality group is likely to be greater than on

another. The Equality Impact Assessment provides an opportunity to assess this.

For example: an event that was held in a building with no induction loop would have a negative or adverse impact on some attendees with a hearing impairment.

(b) A positive impact.

An impact that could have a positive impact on one or more equality target groups, or improve equal opportunities and/or relationships between groups. This positive impact may be differential, where the positive impact on one particular group of individuals or one equality group is likely to be greater than on another.

For example: A targeted training programme for black and minority ethnic women, would have a positive differential impact on black and minority ethnic women compared with its impact on white women and all men. It would not, however, necessarily have an adverse impact on white women or men.

When should an Equality Impact Assessment be carried out?

An equality impact assessment should be carried out when:

- (a) Developing a new policy, service, strategy, procedure or function.
- (b) Reviewing existing policies, services, strategies, procedures or functions.
- (c) A policy, procedure, function or strategy has been identified as requiring an EqIA by partnership working, directorates, Executive or elected members.

All managers are responsible for incorporating equalities into their policies, procedures, functions or strategies, and for assessing the equalities impacts. This should be a continuous cycle, starting at the very beginning of the process. If there is any doubt as to whether a policy, service, strategy, procedure or function requires initial screening, managers should contact their representative on the Equality Group.

The Equality Impact Assessment consists of two parts:

- (a) The initial screening process.
- (b) The more thorough full assessment if the initial screening has identified an adverse/negative impact.

Initial Screening

This part of the Equality Impact Assessment form should be completed during the development or review stage before approval for the policy, service, strategy, procedure or function. Once initial screening has been completed, a full assessment is only required if:

- (a) Any equality group was identified as being disadvantaged or negatively impacted by the policy, strategy, project or function.
- (b) The impact was assessed as being of high significance.
- (c) The impact was not intentional and/or illegal, i.e. discriminatory under anti discrimination legislation.

Completing an EqIA is similar to a risk assessment as it involves predicting and assessing the implications of a policy, service, strategy, procedure or function on a wide range of people with different needs. Furthermore, this should not be carried out in isolation, but with the support and advice of others. Effective consultation with stakeholders is a key ingredient in conducting EqIAs.

At the screening stage, you should be assessing obvious negative/positive impact or gaps in knowledge about likely impacts. It should be a relatively short process which makes use of previous consultation results, personal knowledge and experience, research and reports, internet searches, internal and external specialist advice, staff with previous experience of similar strategies or projects etc. In Part 7 it should be noted if there is a lack of data or information concerning a particular area, that this should not be a reason to stop the process. If the likely impact on a particular group is unknown, then action needs to be taken to acquire this information.

Full Impact

This part provides an opportunity to assess the evidence for a possible negative impact. It ensures that research and consultation with the equality target groups has been carried out and leads to an improvement plan aiming to minimise the negative impact and, where possible, maximise the positive impact. The EqIA improvement plan template (see Part 15) lists any recommendations that have been identified to improve the policy, procedure, function or strategy as a result of the EqIA along with the resources and timescales needed to achieve them.

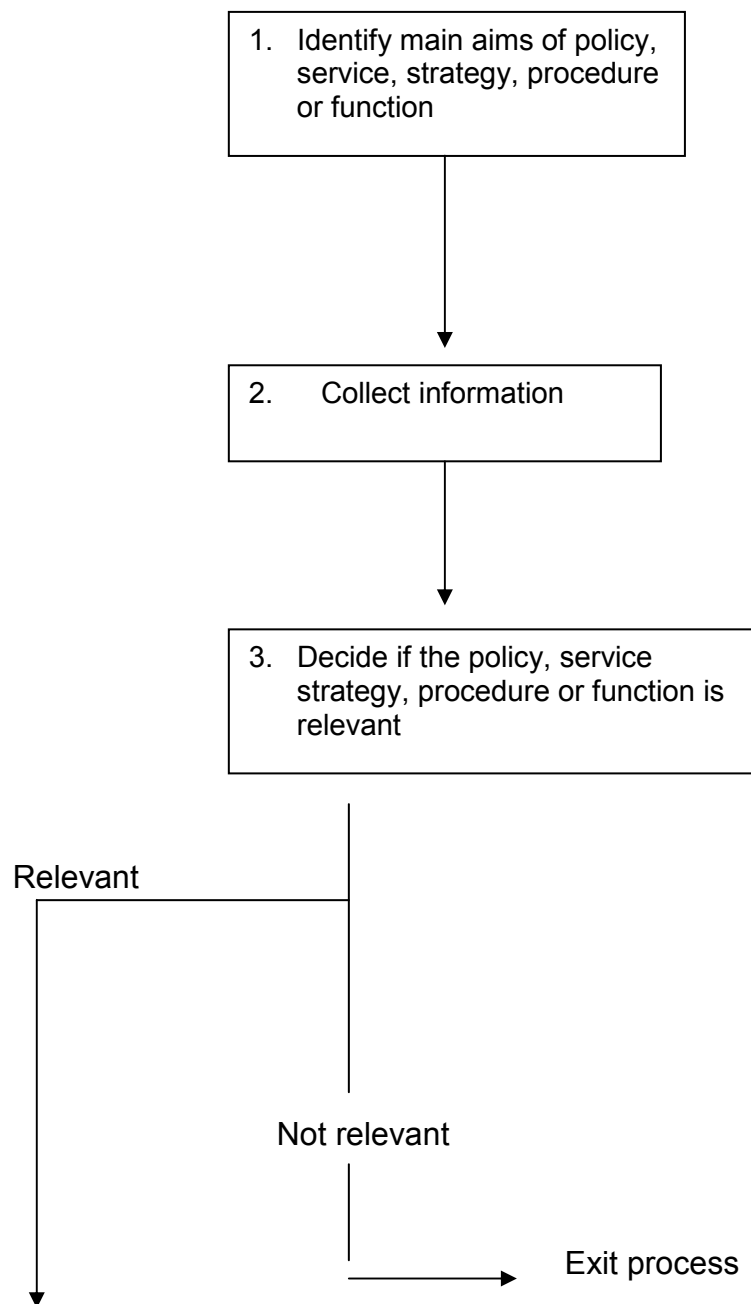
Consultation involves engaging with representatives from equality groups who are likely to be affected by the policy, strategy or project. This could include engaging with staff and members, staff networks or trade unions, other public bodies or voluntary and community groups. It is important to ensure sufficient time and resources are dedicated to the consultation process to encourage full participation, particularly by those groups we have traditionally failed to reach. For further guidance on consultation please refer to the consultation strategy. This outlines the core principles and practice for consultation and engagement with staff, partners, stakeholders and members of the public.

The public will be able to examine completed EqlAs if they request to see them and summary information about EqlAs should be made available on the council's website and staff Intranet. Publishing the results of EqlAs is key to establishing accountability and maintaining public confidence. It will demonstrate that the District Council is committed to promoting equality, monitoring, assessing and consulting on the effects of its policies, services, strategies, procedures or functions.

Flowchart: the Impact Assessment Process

Look at policy, service, strategy, procedure or function

INITIAL SCREENING



Full Assessment

