

West Lothian Council: Equality Impact Assessment

A. About the function, service, policy, procedure, project etc

- 1 What is the name of the function/service/policy/procedure/project etc (called “policy” from this point) to be assessed?

West Lothian Housing Allocation Policy and Procedures

- 2 What were the results of the screening for relevance?

The policy has first been screened for relevance and need for a full assessment by initially looking at the all following key issues and questions:

1. Which aspects of the General Duty does it relate to?
2. Is there evidence or reason to believe that some groups could be affected differently?
Which groups?
3. How much evidence do you have?
4. Is there any public concern that functions/policies are operated in a discriminatory manner?

The policy has a high level of relevance to:

- Race Relations Act 1976 (RRA Amendment Act 2000)
- Sex Discrimination Act 1975
- Disability Discrimination Act 1995 (DDA Amendment Act 2005)
- Protection from Harassment Act 1997
- CRE Code of Practice for Rented Housing
- Recommendations of McPherson Report
- Human Rights Act 1998

3 Briefly describe the aim of the policy etc.

What needs or duties is it designed to meet? Who are the intended beneficiaries? How will it affect employees? How will it affect the community and the different groups of people within it?

Is the service contracted out or delivered under a service-level agreement or with partners? Who else is involved?

In what way will you involve any of these people in the impact assessment process?

In order to meet the statutory and legal obligations set down in the Housing (Scotland) Act 2001, West Lothian council must, through its allocations policy:

- Ensure that we let houses in a way that gives reasonable preference to those in greatest housing need, makes best use of available stock, maximises choice and helps to sustain communities
- Ensure that the policy is transparent and open and promotes a fair method of allocating houses within an equal opportunities framework
- Ensure that people have fair and open access to our housing list and the application process is accessible and easy to understand
- Ensure that the point system recognises all housing need factors
- Work in partnership with other housing providers to enhance choice and assist applicants to access all public sector housing within/outwith West Lothian
- Involve people and communities to define local priorities which lead to tenancy stability and community sustainability through a framework of community intervention planning.

B. Gathering the evidence and assessing the impact

- 4 Is there any evidence (or reason to believe) that this policy could have a different effect on some groups of people compared to others? (e.g. different needs, different experiences, different outcomes, different rates of participation, different abilities to access opportunities).

Is there an adverse impact around race, gender, disability, faith, sexual orientation, age, health, etc? What are the reasons for this adverse impact?

Due to the removal of waiting time points, there is no reason or evidence to believe that this policy will have any different or adverse effect on any particular group of people.

The needs based framework of the policy ensures that the needs of the individual are taken into account rather than grouping people into set categories then applying a one-size-fits-all approach.

Individuals have the opportunity to:

- Gain admission to the housing list (over the age of 16)
- Gain admission if they are not a West Lothian resident
- Select from different property sizes/types/locations (extended families needs will also take this into account when matching to a property)
- Choose from a wide range of housing providers
- Have a Personal Housing Plan – promoting equality of access, choice and outcome. This ensures the applicants individual needs are catered for.
- Health & Housing Needs Assessments – support, aid & adaptations can be made available through this framework.

- 5 Please describe the evidence or reasoning you have used to make your judgement. What existing data for example (qualitative or quantitative) have you used to form your judgement? Tell us about the information as it applies to different groups (e.g. by race, gender and disability etc).

- A modelling exercise which was undertaken to gauge the effect of the proposed new points framework.
- Research carried out into best practice and related inspection reports

6 Are there any unmet needs/requirements that can be identified that affect any of the specific groups?

- Minority ethnic groups are slightly under-represented on the Housing list when compared to the population of West Lothian.
- Monitoring of outcomes for disabled applicants is required

C. Making changes and promoting equality

7 If in your judgement, the policy etc does have an adverse impact, can you modify the policy to reduce/eliminate any adverse impact?

You need to think whether your modifications will:

- have a positive or negative effect on the promotion of equality of opportunity for any group
- help eliminate discrimination in any way
- encourage or hinder community relations.

Bearing in mind the current policy that this draft policy seeks to replace, adverse impact will be removed by:

- The proposed removal of waiting time points and phasing out of attained points will ensure no group is adversely impacted
- The lack of evidence allowing the impact in regards to disability to be gauged should be addressed by amendments to the application form and by implementing monitoring of outcomes for disabled applicants
- Wide promotion of the Housing list within minority groups as well as the mainstream population
- The proposal of 2 offers of housing to homeless people

8 If you cannot modify the policy to reduce adverse impact, consider if the impact can be justified and explain. (It is unlikely that you will be able to justify any impact which amounts to unlawful discrimination.)

If the impact cannot be justified, how do you intend to deal with it?

N/a

D. Consultation

8 What steps have you taken/are you taking to consult externally as part of your assessment?

Whom have you consulted? What methods did you use? How long was the consultation period?

Have you consulted any “experts”? Did you involve any people in the affected groups in some other way during the process?

The following methods of consultation have been employed in the process of producing this policy:

- Questionnaire and information leaflet to all the current applicants on the Housing List
- Questionnaire to all staff
- Questionnaire to other housing providers
- Workshops at the annual Tenants Conference
- Presentations and discussions at local Tenants and Residents Groups
- Focus groups with applicants
- Tenants Panel discussions
- Entire 4 month consultation period

E. Next steps

10 What were the results of the consultation?

What have you done with the results i.e. how do you intend to use the information gathered as part of the consultation?

The notable results from the consultation include:

- Points Framework – The majority of people who responded (88%) genuinely believed that moving to a cumulative pointing system is a fairer method of assessing housing need and allocating housing
- Waiting Time Points – There was a consensus agreement by people on the removal of waiting time points and they were satisfied that West Lothian Council ensured that existing applicants would not be disadvantaged
- Local Connection – There was an overall agreement, with the legislative requirement, of the removal of local connection points as part of the main assessment process. However, respondents still wished to have the local connection recognised as part of any future local lettings initiatives to reflect their needs and to sustain communities.
- Equal Opportunities – The majority of respondents (65%) agreed that all applicants should have 2 offers of housing. There were mixed views from respondents with regards to the number of communities a homeless person will be expected to choose
- Medical Priority (Health & Housing Needs Assessment) – The majority of respondents (93%) agreed to the introduction of an 'in-house' medical assessment process.

11 Have you published the results of that consultation? If so, where? What arrangements were made to reach specific groups affected?

The introduction of the new policy and the results of the consultation have been made available within:

- Tenants News Spring 2005

- Applicants News Autumn 2005
- Health & Care Committee Report
- Policy, Partnership & Resources Committee Report
- Housing Policy Working Group
- Tenants Conference Feedback session

12 What are your recommendations based on the conclusions of this assessment?

The recommendation based on the evidence and consultations is that this draft policy is fit for purpose and carries no risk of different or adverse effect on any group.

13 Please provide us with separate information about how you intend to monitor this policy in future. What is the review date set for this policy?

- This policy will be monitored via the performance assessment information collated on a quarterly basis.
- Profiles to be presented and discussed in April & October
- Review date for this policy is March 2008

14 How will you publish the results of this assessment? What methods will you use? What arrangements are there to reach specific groups affected?

- Via the relevant section of the Housing website
- On launching the new policy it will be made clear in all press releases, workshops and training sessions that this policy is an equal opportunities policy and does not adversely effect any group.

15 Have you conducted any other types of impact assessment on this policy? (e.g. health, financial, environmental).

- Health Impact Assessment

16 Is there anything else you wish to add?

Due to a recent spike in the local Polish population as a result of the new EU accession legislation, it is proposed that translation information be made available in Polish and that there is access to translated documents and facilities for translation.

Assessment made by:	Sarah Kelly – Quality Assurance Officer
Others involved in assessment:	Ann Marie Carr – Customer Service Manager Penny Hasling – Assessment & Review Manager
<p>Summary of assessment (this will be published).</p> <ul style="list-style-type: none"> ▪ What you did ▪ What evidence you used ▪ What you found ▪ What consultation you undertook ▪ What changes you made 	<ul style="list-style-type: none"> • Screening & full impact assessment on West Lothian Council's Housing Allocations Policy • Results of consultation with staff, partners and stakeholders. • Research material on best practice • Results of modelling exercise • No difference or adverse impact from this policy on any group • Consultation with staff, partners and stakeholders • None

<ul style="list-style-type: none"> ▪ What will happen next 	<ul style="list-style-type: none"> • Recommendations for further improvements to be carried forward into equalities action plan. • Publication of results of this assessment • Scheduling of review date of this policy • Housing List review • Training on new policy & procedure to commence for all staff & key stakeholders • All publication material to be updated to reflect the new policy and related guidelines • Redevelopment of translation box to include Polish • Launch of new policy to commence
<p>Manager's Signature</p>	
<p>Date:</p>	
<p>Service area and job title:</p>	

When you have completed this form, please take a copy and send it to your service representative on the Corporate Working Group on Equality and/or the Equality Officer.