

West Lothian Council

Equality Impact Assessment Electronic Template

June 2008

1. Policy details	
Policy Title	Allocations Policy for New Build Properties
Policy Lead Officer	Ann Marie Carr
Date Relevance Assessment Conducted	15 th June 2009
2. Discretion?	
YES <input checked="" type="checkbox"/> NO <input checked="" type="checkbox"/>	
3. Which groups of people do you think will be, or potentially can be, impacted upon by the implementation of this policy?	
People from black and minority ethnic communities and different racial backgrounds	<input checked="" type="checkbox"/>
Women and men (boys and girls)	<input checked="" type="checkbox"/>
People with disabilities	<input checked="" type="checkbox"/>
Older people, children and young people	<input checked="" type="checkbox"/>
Lesbian, gay and bisexual people (including transgender people)	<input checked="" type="checkbox"/>
People of different religions or beliefs	<input checked="" type="checkbox"/>

4. Do you have evidence or reason to believe that this policy will, or may potentially:	
General Duties	Level of impact (high , medium or low)
Eliminate discrimination faced by particular groups	Low
Impact upon the promotion of equality of opportunity between particular groups	High
Impact upon good relations between particular groups	Medium
Promote positive attitudes towards different groups	Medium
Increase participation of particular groups in public life	High
Overall relevance to equality	Medium
5. Equality impact assessment required? (<i>N.B. All high and medium policies must be impact assessed</i>)	
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
6. Decision rationale	
<p>This policy will impact upon all people applying for a new build property, regardless of their status, therefore it can potentially have an impact on any of the minority groups within the community. With there is no demonstrable evidence to believe that there is or may be any negative impact, it was felt that as this is a highly visable and core aspect of the service, a full assessment was warranted to ensure that no issues exist at policy formation stage. This is also a policy that staff and the general public are interested in and they must have confidence that the process is transparent and fair in order for it to operate successfully.</p>	

1. Policy details	
Policy Title	New Build Allocations Policy
Policy Lead Officer	Ann Marie Carr
Others Involved	Lesley Constance, Sarah Kelly, Ian Treger
Date Assessment Completed	15/06/09
2. Results of equality relevance process	
<p>This policy will impact upon all people applying for a new build property, regardless of their status, therefore it can potentially have an impact on any of the minority groups within the community. With there is no demonstrable evidence to believe that there is or may be any negative impact, it was felt that as this is a highly visable and core aspect of the service, a full assessment was warranted to ensure that no issues exist at policy formation stage. This is also a policy that staff and the general public are interested in and they must have confidence that the process is transparent and fair in order for it to operate successfully.</p> <p>It was felt that due to this level of public interest and the importance of the policy, that a full impact assessment was necessary to build trust and demonstrate equality of service provision and accountability.</p>	
3. Aims of the policy	
<p>The aim of this poilicy is to:</p> <ul style="list-style-type: none"> Maximise turnover, while making best use of resources and improve opportunities to meet need on the housing list. Meet all legislative requirements while minimising risk Recognising equality requirements Ensuring all statutory and local housing needs (reasonableness) factors are included and considered Minimising any applicant groupings being disadvantaged while improving turnover availability and consideration for offer Increase the opprtunity for more needs to be met across all applicant categories Promotion of balanced and sustainable communities through the distribution of lets across all three groupings - the applicants list, the homeless list and the transfer list 	

4. What data, research or other evidence has been used to inform this assessment?

Existing policy and procedures for Allocations
Performance reports
Annual Equality performance reports (08 & 09)
Statutory guidance
Guidance from Housing Regulator
Queens Council report on transfer led allocations policy
Internal legal advice
Public consultation of 21,000 tenants and members of the housing list
Benchmarking exercises
Modelling exercise/demand analysis
Discussions and outcomes from steering group
Comments from stakeholders and the general public

5. Details of consultation and involvement

Public questionnaire - issued to all tenants and members of the housing list, this explained frequently asked questions and asked direct questions on opinions on the proposals. This also had the effect of raising any issues of understanding over the contents of the leaflet and allowed us to hone future public information accordingly.

Customer hotline set up to comments/feedback and suggestions

Housing Networks - we have used our existing established tenant participation framework to elicit feedback and opinion during the formation of the policy, we have gone out, via these networks, into the community and laid out the proposals and discussed this with tenants. This allowed us to obtain direct feedback on the policy.

Steering Group - specific multi discipline policy steering group established 2 years ago and is still ongoing to guide the formation of all policy and procedures.

6. Impact of policy on particular groups

6.1. Disability equality

There will be 17 specially adapted flats included in the build specifications of the new builds, this ensures that at least 6% of the properties are immediately available to those with physical disabilities. All other properties are also open to anyone with a disability who does not require an adapted property.

It was felt that due to the highly technical nature of the policy, added to the importance of everyone understanding what the policy is stating, that upon final publication, we ensure the needs of those with learning difficulties are met, and that we work with Disability West Lothian to produce supporting guidance to ensure clarity and equality of access.

It was also felt that we should consult with Disability West Lothian on how best to make disabled applicants aware of the transfer list and how to apply for it.

6.2. Race equality

Due to the needs based nature of the policy, there were no issues over race equality that the group could envisage. All applicants are allocated points due to their circumstances and our evidence shows that currently we do not have any concerns over homelessness within any one racial grouping.

New interpretation and translation service has seen a vast improvement on the time taken to translate applications so the same service is received by all applicants and no disadvantage is allowed to happen.

There have been no complaints or concerns raised within this area by staff or the public.

There have been some public concerns in the past that applicants from A8 accession countries such as Poland are being allocated council tenancies as a priority - this is not possible under our existing allocations policy as it too is needs based. The work done on advising the public of how we operate and this, combined with the evidence in the annual equalities report showing that the majority of economic migrants take up privately rented accommodation has helped to dispell this perception.

6.3. Gender equality

There were no equality issues for concern found within this grouping.

Any person fleeing domestic violence from another person is given the opportunity to disclose this information at any point during the process of applying and afterwards while they are on the housing list. If this is disclosed at a later date, the application will be amended accordingly immediately with the appropriate support and assistance made available at all times.

6.4. Age equality

There were no equality issues for concern found within this grouping. The policy does not have an age limit and can be utilised by any adult from the age of 16+. There is a vast array of support available both for those in the lower age ranges to ensure they can sustain a successful tenancy and for older tenants who require assistance and support to maintain and stay in their tenancy. This will extend to any tenant, including those in new build properties.

6.5. Religion or belief equality

There were no equality issues for concern raised within this grouping.

6.6. Sexual orientation equality

The needs based nature of the policy ensures that decisions are based on the needs of the applicant and the sexual orientation of the applicant is of no relevance.

However, if an applicant has circumstances that are causing them distress and their sexual orientation is a factor in this, the needs of vulnerable people have been considered in our existing allocations policy and will extend to this one. The extensive assessment carried out when we are contacted by anyone wishing to apply for housing is designed to identify need, including those in need of support for any reason.

Anyone suffering from discrimination, aggression, intimidation or anti-social behaviour would be put in touch with the relevant support, from both internal, external and 3rd sector sources. This also includes anyone who requires support and advice on their circumstances and legal rights.

6.7. Transgender equality

The needs based nature of the policy ensures that decisions are based on the needs of the applicant and the sexual orientation or gender status of the applicant is of no relevance.

However, if an applicant has circumstances that are causing them distress and their sexual orientation is a factor in this, the needs of vulnerable people have been considered in our existing allocations policy and will extend to this one. The extensive assessment carried out when we are contacted by anyone wishing to apply for housing is designed to identify need, including those in need of support for any reason.

Anyone suffering from discrimination, aggression, intimidation or anti-social behaviour would be put in touch with the relevant support, from both internal, external and 3rd sector sources. This also includes anyone who requires support and advice on their circumstances and legal rights.

6.8. Crosscutting equality (multiple discrimination)

There is a variety of support from both internal and external sources, and from the 3rd (voluntary) sector which is designed to cope with the complex needs of those our service comes into contact with. Any need identified by our contact with the applicants or via recommendation from an external source would ensure that instigation of an introduction to those support systems.

7. Consultation and involvement feedback

The need to clarify the operation and steps of the policy were highlighted by the service equalities officer, with the suggestion that we use the existing community groups such as Disability West Lothian to aim our future publications correctly.

The feedback from tenants confirmed that we need to involve them at each stage of the process of producing this policy and that this ensures they understand the aims of the policy.

8. Monitoring and review arrangements

The functions of this policy will be subject to the rolling programme of Assessment & Review currently in operation within Housing & Building Services, this includes full scrutiny of the policy and procedures, with an intensive deployment check.

Regular reporting on performance will continue within the service.

Elements of this performance reporting will be fed through the Corporate Working Group on Equality in order to comply with the required outcomes of the Integrated Equality Scheme.

The policy itself allows for the opportunity to go back and review any areas that require improvement.

9. Publication of assessment results

This assessment will be published online via the intranet and internet and made available for public comment through our equalities officer.

The public will be made aware of the assessment via the Tenants News and Applicants News, with all staff informed of its existence. They will be directed to where this can be found, with the option to contact the equalities officer for questions or alternative copies.

Community groups and key equalities contacts will also be made aware of the opportunity for comment.

10. Recommendations and implementation

Contact to be made with Disability West Lothian to ensure publication and guidance on this policy are accessible to all potential applicants. Advice also to be sought on how to ensure any disabled tenants in the new builds can become and stay involved in tenant participation.

Research conducted by Stonewall Scotland on the housing needs of the LGBT community to be made available to the steering group for consideration and possible identification of any areas for future development.

Equality impact assessment completed

