

## Executive Summary

All public authorities are required to impact assess all relevant policies and functions under the Race Relations Amendment Act 2000. Under the RR(A)A 2000 a policy is assessed to ascertain if there would be any 'adverse impact' on any particular group based on, ethnicity.

Blackpool council has signed up to the national equalities benchmark, Equality Standard's in Local Government. This self-assessment benchmark requires evidence of impact assessments for gender, ethnicity and disability to progress through the five levels. As a council we have decided to include religion and belief, age and sexual orientation in preparation for forthcoming legislation. Impact assessments ensure all our policies and services are justifiable, as a result of the assessment we will be able to explain why we need the service, who needs and who accesses the service, what the service offers and how it is delivered to meet service users needs.

The toolkit attached is designed to ensure the process deals with equality and diversity issues whilst contributing to creating and evidencing quality services and policies.

We recently had some further training from an external consultant on our approach to impact assessments. The training highlighted that our current policy list is too big and it would be more beneficial for us to focus on impact assessing our main service areas and other relevant policies in the following years. The current list contains all the policies that are to have a full impact assessment however the impact assessment process should be as follows:

- 1 Check to see if the policy is relevant to the Race Relations Amendment Act (policies that affect people)
- 2 Initial assessment or screening – desktop research exercise to see if there is any potential for adverse impact on any particular group. For example do the statistics you have about who accesses your service suggest that particular groups are under –represented. If so this may require further work such as consultation with the community (stage two impact assessment)
- 3 Full impact assessment (stage two) – involves public consultation – only undertaken if stage one has highlighted a potential for adverse impact.

**The benefits of impact assessing policies and services are:**

- 1 Better understanding of service users needs
- 2 Efficient and effective service delivery based on service users needs
- 3 RR(A)A compliant (and prepared for the Disability Equality Duty and Gender Duty legislation)
- 4 Higher satisfaction rates from service users
- 5 Evidence of equitable services that comply with legislation

A template (taken from the Tower Hamlets model) has been attached to help guide you through the impact assessment process.

**The key stages are:**

- 1) Identifying the aims of the policy or function and how it is implemented
- 2) Consideration of available data and research
- 3) Assessment of impact across the different equality strands
- 4) Consideration of measures that might mitigate any adverse impact as well as alternative policies that might better achieve the promotion of equality of opportunity
- 5) Making a decision in the light of the data, alternatives and consultation
- 6) Monitoring for adverse impact in the future and publication of the results of such monitoring
- 7) Formal consultation
- 8) Publication of results of EIAs

## EQUALITY IMPACT ASSESSMENT

Name of the service, policy or function being assessed:

**Sheltered Housing letting of General Needs above Sheltered Properties**

Directorate

Housing and Social Services

Date Impact Assessment completed

6/12/2006

Is this a policy or function?

Policy

Function

Is this a new or existing policy or function?

New

Existing


**Names and roles of the people carrying out the Impact Assessment:**

*(Explain why the members of the impact assessment team were selected i.e. the knowledge and experience they bring to the process also identify lead contact).*

1.Maggie Cornall, Housing Services Manager (lead contact)

2.Denise Williams, Supported Housing Manager

3.Karen Smith, Assistant Director Housing Needs

<b>Service Head</b>	Peter Jefferson / Karen Smith
<b>Signature</b>	
<b>Date</b>	6/12/2006

Once you have filled in this document please send a copy to the Faith Equality and Diversity Team.

## **SECTION 1: AIMS AND IMPLEMENTATION OF THE POLICY**

### **Identifying the aims of the policy**

*What is the policy? **Blackpool Housing Allocation Policy***

*What is the aim, objective, or purpose of the policy?*

### **Aims and objectives**

The aim of this policy is to ensure Blackpool Council provides affordable social housing, which meets a range of housing needs, and prevents homelessness. We will do this by: -

- Assessing all housing applications fairly and accurately, taking equality and choice into account.
- Working with other providers and agencies to make the best use of all affordable housing.
- Re-letting empty properties quickly.
- Helping to build and sustain diverse and balanced communities.
- Minimising the cost of homelessness to the Council and to tax payers, and eliminating the use of Bed and Breakfast hotels for homeless families

### **Sheltered Housing**

Sheltered Housing is normally for people aged 65 or over who can live independently and are able to manage alone but would benefit from the security of an alarm system and the services of a warden in an emergency. This includes people who can live independently with the aid of a social services care package. Such applications will automatically be registered for Sheltered Housing. People below the age of 65 may be eligible for sheltered housing because of illness or vulnerability. Sheltered Housing applicants will not be listed separately in the Housing Register, but will be assessed in accordance with their housing need and placed within the appropriate band.

Only accommodation specified as Sheltered is used as Sheltered Accommodation. There are two schemes that are totally sheltered. The remaining eighteen schemes have sheltered accommodation on the ground floor, with general needs accommodation on the first floor. This means that all prospective tenants have the opportunity to bid and acquire a tenancy above these sheltered homes.

### **Local Lettings**

The Council has discretion to apply local lettings policies to support sustainable communities and will use innovative schemes to reduce the number of empty properties, and maximise rental income.

There are a number of issues with the current policy. This impact assessment relates only to Sheltered Schemes. It is partly an impact assessment of how things operate now and a predictive impact assessment of some proposals for change.

### **What we know about the current issues:**

Sheltered Scheme residents experience anti-social behaviour problems from general needs tenants above them. These are mainly caused by conflicts of lifestyles between sheltered tenants and general needs. The most severe cases have centred around younger tenants which generally lead to many tenancies ending in failure.

(Current IT system limitations mean we are unable to easily identify which individuals have been evicted due to ASB. This issue is being addressed by the IT Development Plans.

- Although the Policy criteria allows access to sheltered housing due to vulnerability or illness for people under 65, this is not as frequently taken up as expected. This might be because of a range of factors, for example:
- Need for sheltered housing is not as obviously identified during the applications and allocations process
- The image of sheltered housing (for the public and for agencies) as obtrusive to personal life, a 'done to' service rather than supported independence, only for older adults, a 'friendly neighbour' pop in service rather than professional targeted support, or 'social care', therefore not needed.

### **Rationale behind the policy and its delivery**

*(Please state the underlying policy objectives that underpin this service and what they are trying to achieve).*

*Are there associated objectives of the policy? If so, what are they?*

- Assessing all housing applications fairly and accurately, taking equality and choice into account.
- Working with other providers and agencies to make the best use of all affordable housing.
- Re-letting empty properties quickly.
- Helping to build and sustain diverse and balanced communities.
- Minimising the cost of homelessness to the Council and to tax payers, and eliminating the use of Bed and Breakfast hotels for homeless families

For Sheltered Housing, the Policy is about getting those that need it into sheltered schemes, with the appropriate level of support

#### *Predictive Impact Assessment:*

Revising this policy will assist in providing a good quality Sheltered Housing Service contributing to tenants health and well-being, resulting in fewer demands on health and social care services.

A reduction of ASB cases within these communities

Assist in a reduction of clashes of lifestyles between generations

Develop community cohesion

Increase tenant satisfaction

*What outcomes do we want to achieve from the revised policy?*

Reduce ASB cases and cost/resources incurred in dealing with these cases

Provide early intervention and the identification of need

Address issues raised by tenants currently living in sheltered accommodation

Reduce anxiety caused to vulnerable tenants

Develop community cohesion

Provide sheltered service to first floor tenants that need it

Reduce the number of failing tenancies

Develops a Strategic approach to managing this service

To provide clearer information and access to potential tenants who may wish to live on a sheltered scheme

To ensure that the needs of the sheltered tenants are fairly balanced against those people on the housing register when decisions are made to allocate new tenancies

*What factors could contribute/detract from the outcomes?*

#### Contribute –

- Extend sheltered service to those living above
- Provide value for money at no extra cost to Supporting People, increase efficiency

savings

- Joined up approach with Estate Management and Sheltered Service in managing these schemes
- Community development
- Increase in marketing these properties and service offered to social services to meet the need of low level support service users
- Marketing this service to local communities that have no insight into what can be provided
- Develop a service around service users rather than try and fit them into something
- Partnership working with Social Services

Detract –

Older people still having conflicts with lifestyles

No applications or "bids" for these properties, increase in void properties and/or length of time

No development of community activities within the sheltered schemes

No involvement from Social Services

Applicants with a physical disability may not be able to be accommodated on first floor levels though other alternatives can be provided

BME residents may have less access to information about Sheltered Service

Properties are only one bedroom this may detract from residents with carers applying

**Who is affected by the policy? Who is intended to benefit from it and how?**

*Who are the main stakeholders in relation to this policy?*

- Tenants
- Prospective tenants
- Blackpool Council
- Housing Needs
- Estate Management Staff
- ASB officers
- Police
- Fire Services
- Resident Community Associations

*What outcomes would other stakeholders want from this policy?*

- As identified above
- Fewer reports/incidents of ASB, ability to divert resources into other areas
- Community Development
- Sustained tenancies
- Reduce anxiety for Sheltered tenants

- Reduction in evictions
- Partnership working
- Meeting the needs of Social Service objectives and performance measures

*Are there any groups, which might be expected to benefit from the intended outcomes but which do not?*

Currently, people who may have support needs under the age of 65 that may have a need to live on a sheltered scheme and supported by a Scheme Manager don't benefit as often as expected, but the revised policy is intended to address that.

### **Promotion of good relations between different communities**

*(How does the policy or function contribute to better Community Cohesion?)*

*How do you promote good relations between different communities you serve based on mutual understanding and respect?*

By removing full General Needs lets and reducing the number of ASB incidents, this will assist in bringing together communities and services in meeting the needs of Older People and other Vulnerable individuals particularly those most excluded. This will assist in bringing services together around the tenants and local community. By working with the tenants of these schemes will allow involvement in the design, development and delivery of the service and improving their community. The service will be progressive, preventative and personalise reflecting the diverse needs of individuals. It will deliver a flexible and proactive service reflecting the diversity of the tenants and community, it will promote well-being and independence, services will be preventative in approach, reduce the duplication of information or services and go beyond health and social care. Developing the community with the tenants will increase mutual understanding and respect between the tenants, users of the community centres and service providers

*What opportunities are there for positive cross-cultural contact between these communities to take place e.g. between younger and older people, or between people of different religious faiths?*

The community centres are the hubs of the sheltered schemes, the Sheltered Service enables different groups within the local community to use the facilities it has to offer. Within the centres the type of activities that are provided cover education, learning new skills, information sessions, coffee mornings, craft classes and health promotions. These are delivered by local community groups, adult education service, lifelong learning, and age concern. The services also makes links with local schools and together develop intergenerational sessions that meet both the needs of the school curriculum and the tenants of the scheme. An example of this is Aysgarth Court which works with the local primary school, the schools has supported the tenants of the scheme by having a harvest festival event in the community centre, the school band/choir participated, there is also a craft event held that is run by one of the sheltered tenants who shows the pupils how to make craft cards. There are plans for the tenants to participate within the reception class and hold story time sessions and the school has also offered the use of their computer suite to develop the computer skills of the tenants.

**(Specifically identify the relevance of the aims of the policy to the equality target groups and the Council's duty to eliminate unlawful racial discrimination, promote equality of opportunity and good relations between people of different racial groups).**

- Older Person's Housing Strategy - to ensure older people secure and sustain their independence & support older people o make active and informed choices about their accommodation

- National Service Framework for Older People - promote independence and good health and set standards across health and social services
- White Paper, Independence, Well-being and Choice - giving individuals greater choice and control, enhancing the role of supported housing and a greater emphasis on prevention
- Supporting People Strategy - focus on health, housing, support and care within the context of empowerment, choice and control
- Landlord Services Strategy - creating sustainable communities, developing choice and empowerment to all tenants and those wishing to apply for council housing
- Sheltered Team Plan - to promote sustainable local communities in partnership with all stakeholders, working with our tenants to improve standards of home and the quality of housing management. To ensure that all individuals are able to be secure and sustain their independence within the Sheltered Housing Scheme and to support individuals to make active and informed choices about their accommodation by providing access to appropriate services, provide advice on these issues and deliver services which are integrated, holistic, inclusive, involving and preventative
- Children and Young Person's Strategy - partnership working
- Community Safety Strategy - to reduce instances of anti-social behaviour

**Policy Priorities:**

*(How does the policy fit in with the council's wider aims? Include Corporate and Local Strategic Partnership Priorities)*

*How does the policy relate to other policies and practices within the council?*

- There is a similar policy working at Walter Robinson Court, this has assisted in addressing the number of ASB cases, it has stabilised the local community and created sustainable tenancies
- Within the Sheltered Service there are two schemes that are totally sheltered properties, evidence in one of these shows that there has only been 1 case of ASB in the last 12mths at this scheme. There has recently been tenants transferring to this from other schemes as they expressed the desire to live in a totally sheltered scheme. This scheme is the same design as the 18 schemes we are looking at, and this contrasts quite starkly with the ASB experience in the other schemes.
- Housing Needs division have identified a requirement to implement more effectively the existing criteria for the Sheltered Service as identified by their Housing Application Improvement Plan
- Community Safety Strategy aims to reduce the number of ASB cases

*What factors/forces could contribute/detract from the outcomes?*

- Restriction on people applying for these properties might increase voids, but could well have the opposite effect in the medium / longer term of making them more desirable.
- Not accessible for individuals with mobility issues

- Could cause similar problems even with an older age tenant as the lifestyles may still not be compatible, but early intervention by the Scheme Manager will reduce the likelihood of this happening.

*How do these outcomes meet or hinder other policies, values or objectives of the council?*

They meet the values of the Council as it meets the Corporate Objectives identified, it runs in parallel to these and assists other departments to implement it's service objectives, e.g. meet low level support needs not able to be met from social services, reduction of ASB cases

It will create Social Inclusion, stabilities and harmonies communities, it will create less stress for the tenants and so reduce the need of health intervention.

Working with Mental Health Services to provide support to their clients placed within these schemes, reduce the need for health intervention. Identify solutions at an earlier stage

This approach is fully compatible with delivery of the Respect Agenda and our commitment to signing up to the Respect Housing Management Standards.

### **How the policy is implemented**

*(How is, or will, the policy be put into practice and who is, or will be, responsible for it?)*

*Who defines or defined the policy?*

The Policy is one of the Council's principal policies and is agreed by Members.

The Policy is developed by Landlord Services, Social Services, Housing Needs(Applications)

*Who implements the policy?*

Landlord Services and Housing needs

*How does the council interface with other bodies in relation to the implementation of this policy?*

Through multi agency meetings

*Is the service provided solely by the Department or in conjunction with another department, agency or contractor?*

Landlord Services and Housing needs jointly

*If external parties are involved then what are the measures in place to ensure that they comply with the Council's Equal Opportunities policy?*

## **SECTION 2: CONSIDERATION OF DATA AND RESEARCH**

**List all examples of quantitative and qualitative data available that enabled the impact assessment to be undertaken** *(include information where appropriate from other directorates, Census 2001 etc.)*

HQN indicative inspection

ASB cases

Feedback from Tenant Forum

Complaints

Survey of existing sheltered tenants

Feedback from staff delivering services and assessing applications

**Equalities profile of users or beneficiaries**

*(Use the Council's approved diversity monitoring categories and provide data by target group of users or beneficiaries to determine whether the service user profile reflects the local population or relevant target group or if there is over or under representation of these groups)*

*Subject to system limitations. This is an area under development.*

See attached  
See attached

Gender  
FEMALE  
MALE

No of Sheltered Tenants

Disability  
N  
Y  
UNKNOWN

No of Sheltered Tenants

Ethnic Origin  
WHITE - BRITISH  
WHITE - IRISH  
WHITE - OTHER  
DOES NOT WISH TO DISCLOSE  
UNKNOWN

No of Sheltered Tenants

under 18

18 - 25

26-45

46-65

65-74

Over 75

*Profile of applicants on waiting list*

Total number of singles / couples on the list at January 2007: 2328  
Number of which are over 35: 1736

### **Equalities profile of staff**

*(Indicate profile by target groups and assess relevance to policy aims and objectives e.g. Workforce to Reflect the Community. Identify staff responsible for delivering the service including where they are not directly employed by the council).*

#### Profile of all BCH staff January 2007

Gender	No of Employees
FEMALE	65
MALE	61

Disability	No of Employees
N	102
Y	2
UNKNOWN	22

Ethnic Origin	No of Employees
WHITE - BRITISH	113
WHITE - IRISH	3
WHITE - OTHER	2
DOES NOT WISH TO DISCLOSE	1
UNKNOWN	7

under 18	2
18 - 25	10
26-45	64
46-65	50
Over 65	0

### **Evidence of Complaints against the service on grounds of discrimination**

*(Is there any evidence of complaints either from customers or staff (Grievance) as to the delivery of the service, or its operation, on the equality target groups?)*

Yes. There is evidence of older people in sheltered housing complaining about the behaviour of younger people in the general needs accommodation above them. In some instances this is anti social behaviour; in others it is a clash of lifestyles.

### **Barriers**

*(What are the potential or known barriers to participation for the different equality target groups?)*

- Not aware of the availability of this service
- No understanding of role of Scheme Manager and levels of support that can be provided
- Sheltered Scheme services have changed over time, but perceptions have remained relatively static
- For some groups, there is a tendency to under-state support needs as this is perceived as being an admission of dependence, rather than a route to maintaining independence.

### **Recent consultation exercises carried out**

*(Detail consultation with relevant interest groups, other public bodies, voluntary organisations, community groups, trade unions, focus groups and other groups, surveys and questionnaires undertaken etc. Focus in particular on the findings of views expressed by the equality target groups)*

Staff surveys within area offices

Police involved in working on the Sheltered sites

Sheltered Tenants

Consultation with Housing Needs

See attached Sheltered Housing Information Gathering Survey Results



"010207 Results  
from survey.doc"

### **Identify areas where more information may be needed and the action taken to obtain this data.**

*(You will need to consider data that is monitored but not reported, data that could be monitored but is not currently collected and data that is not currently monitored and would be impossibly/extremely difficult to collect).*

**Gaps in information:**

Full equality strand profile analysis of all tenants in general needs accommodation above sheltered housing and all applicants to the waiting list.

**Action needed:**

*(Include short-term measures to be taken to provide a baseline where no or little information is available)*

Short term measure:

Run off information available from the IT system of a random sample of, say, up to 20 general needs tenants.

Random sample of 26 householders in general needs above sheltered units:

Gender	No of Tenants
FEMALE	17
MALE	9

Disability	No of Tenants
N	26
Y	0
UNKNOWN	0

Ethnic Origin	No of Tenants
WHITE - BRITISH	3
WHITE - IRISH	0
WHITE - OTHER	10
BLACK – CARIBBEAN	1
UNKNOWN or DOES NOT WISH TO DISCLOSE	12

under 18	1
18 - 25	2
26-35	6
36-55	12
56-65	5
66-75	0
OVER 75	0

Longer term measure:

Ensure requirement for analysis of information collected is part of the system specification for new IT products.

Ensure that where new products are not to be obtained within 12 months, that an alternative robust method of analysing information is developed, if necessary on a sample basis.

## SECTION 3: ASSESSMENT OF IMPACT

### Race – testing of disproportionate or adverse impact

*Identify the effect of the policy on different **race** groups from information available above.*

Existing Policy:

Existing data demonstrates inconsistency and inaccuracy in the recording of ethnicity. This issue is being addressed via further system development and work with the staff and management teams responsible for recording.

How is the race target group reflected in the take up of the service?  
See above

*From the evidence above does the policy affect, or have the potential to affect, racial groups differently and if so do any of the differences amount to adverse impact or unlawful discrimination?*

Predicted Impact of revised policy:

Neutral if successful. Would require attention to information in appropriate languages and formats and culturally sensitive discussion of potential support needs at both the housing needs assessment and service delivery stages.

*If there is an adverse impact, can it be justified on the grounds of promoting equality of opportunity for one racial group or for another legitimate reason?*

Adverse impact would not be justifiable.

*Could the policy discriminate, directly or indirectly and if so is it justifiable under legislation?*

Discrimination would not be justifiable

*(Include information on adverse impact between different racial groups)*

## Gender – testing of disproportionate or adverse impact

*Identify the effect of the policy on **gender** groups from information available above.*

Existing Policy:

*How are the gender groups reflected in the take up of the service?*

The small sample of existing tenants in general needs above sheltered shows a roughly 1/3 to 2/3 split of men over women, which is not indicative of the local population.

*From the evidence above does the policy affect, or have the potential to affect, gender groups differently and if so do any of the differences amount to adverse impact or unlawful discrimination?*

There is the potential for more women to benefit than men, given the longer life expectancy of women.

*If there is an adverse impact, can it be justified on the grounds of promoting equality of opportunity for one gender group or for another legitimate reason?*

Adverse impact would not be justifiable.

*Could the policy discriminate, directly or indirectly and if so is it justifiable under legislation?*

The above Discrimination would be justifiable

## Disability – testing of disproportionate or adverse impact

*Identify the effect of the policy on the **disability** strand from information available above.*

### Existing Policy:

Existing data demonstrates inconsistency and inaccuracy in the recording of disability. This issue is being addressed via further system development and work with the staff and management teams responsible for recording.

How are disabled people reflected in the take up of the service?  
See above

*From the evidence above does the policy affect, or have the potential to affect, disability groups differently and if so do any of the differences amount to adverse impact or unlawful discrimination?*

The policy has the potential to positively benefit disability groups by identifying vulnerability due to long term ill health or disability and providing additional housing support options as well as more sheltered living.

Properties on the first floor will not be accessible to disabled people unable to access stairs. This is neither worse nor better than currently. Ground floor accommodation is available within the schemes and elsewhere.

*If there is an adverse impact, can it be justified on the grounds of promoting equality of opportunity for one group or for another legitimate reason?*

No predicted adverse impact

*Could the policy discriminate, directly or indirectly and if so is it justifiable under legislation?*

No predicted discrimination other than identified above. This would be justifiable as there is an alternative way of meeting needs and the adjustment required would not be reasonable.

## Age – testing of disproportionate or adverse impact

*Identify the effect of the policy on different **age** groups from information available above.*

### Existing Policy:

The majority (75%) of applicants on the Housing Waiting List are over 35.

*How are young and old people reflected in the take up of the service?*

65% of the sample of general needs above sheltered were over 35; 11% were 25 or under.

*From the evidence above does the policy affect, or have the potential to affect, age groups differently and if so do any of the differences amount to adverse impact or unlawful discrimination?*

By design these services are of more benefit to older people than younger people. The proposed policy change will reduce the number of younger people living in the properties, but increase the level of support available for those that do

If there is an adverse impact, can be justified on the grounds of promoting equality of opportunity for one group or for another legitimate reason?

Adverse impact on younger people is justifiable in order to ensure that sheltered tenants can live without experiencing significant levels of ASB or lifestyle clashes.

Could the policy discriminate, directly or indirectly, and if so is it justifiable under legislation?

Direct and indirect discrimination is possible. This would be justifiable as part of the purpose of the change is to reduce the conflict caused by having vulnerable tenants and mixed general needs housing in the same building.

## Lesbian, gay bisexual – testing of disproportionate or adverse impact

*Identify the effect of the policy on **lesbian, gay and bisexual** (LGB) groups from information available above.*

No specific data from which to draw. This is an area of development.

How are LBG groups reflected in the take up of the service?

No specific data from which to draw. This is an area of development.

*From the evidence above does the policy affect, or have the potential to affect LBG groups differently and if so do any of the differences amount to adverse impact or unlawful discrimination?*

Predicted effect would be neutral as the issues relate to age and disability primarily; therefore LBG population likely to be of similar make-up in these aspects to the rest of the population.

*If there is an adverse impact which, can it be justified on the grounds of promoting equality of opportunity for one group or for another legitimate reason?*

No predicted adverse impact

*Could the policy discriminate, directly or indirectly and if so is it justifiable under legislation?*

No predicted discrimination.

## **Religion/Belief – testing of disproportionate or adverse impact**

*Identify the effect of the policy on different **religious/belief** groups from information available above.*

No predicted difference. Any differences likely to be cultural rather than around religious belief – for example in the level of identification of the need for support.

*How are the religious/belief groups reflected in the take up of the service?*

Data is too patchy to draw conclusions. This is an area of development.

*From the evidence above does the policy affect, or have the potential to affect, religious or belief groups differently and if so do any of the differences amount to adverse impact or unlawful discrimination?*

No predicted differential effect

*If there is an adverse impact, can it be justified on the grounds of promoting equality of opportunity for one group or for another legitimate reason?*

No predicted adverse impact

*Could the policy discriminate, directly or indirectly, and if so is it justifiable under legislation?*

No predicted discrimination

## **Health Impact – testing of disproportionate or adverse impact**

*Identify the effect of the policy on physical or mental **health** of service users and the wider community from any information that is available. (This might include an increased risk to health for some groups in the community, which although not intended, may have still occurred. The impact on health might include: increased mental stress, greater risk of accident or injury, reduced opportunities to have a quality diet, reduced opportunity for physical exercise, or greater incidence of diseases such as heart disease and diabetes. )*

Physical and mental health of residents affected by anti social behaviour, limited support and lifestyle clashes.

*From the evidence above does the policy affect, or have the potential to affect the health of groups differently? If so, which groups and how does the impact occur?*

Predicted impact will be beneficial to both physical and mental well-being by reducing the effects of anti social behaviour, offering early intervention and individually tailored support, widening the groups of people who can benefit from this support, and reducing the stress caused by lifestyle clashes.

## **Additional groups which may experience a disproportionate or adverse impact**

*Identify if there are groups, other than those already considered, that may be adversely affected by the policy?*

*For example those in poverty may be adversely impacted by the policy and it might be useful to consider them as a separate group in the light of the Council's overall policy objectives.*

## **Additional factors which may influence disproportionate or adverse impact**

### **Management Arrangements**

*(How is the Service managed, are there any management arrangements which may have a disproportionate impact on the equality target groups?)*

Applications Service is managed within the Council's arrangements and will deliver on a Service Contract basis to the proposed ALMO. No disproportionate impacts predicted.

Landlord Service is currently within the Council arrangements and will deliver under a management agreement under the proposed ALMO//

### **What is the custom and practice in the provision or allocation of this service?**

*(Could these have a disproportionate impact on the equality target groups?)*

Custom and practice is delivery in accordance with the Council's published Allocations Policy, using appropriately the discretions and flexibility allowed within the policy to enable the meeting of housing needs. Exceptions and reviews / appeals are dealt with within management lines and/o within multi-service panel arrangements.

### **The Process of Service Delivery**

*(In particular look at the arrangements for the service being provided).*

*As above.*

### **Operation Times**

*(When is the service provided; are there seasonal issues; are there barriers to the service based on the time and delivery of the service which may affect the target groups?)*

Office based and 'ordinary' service is provided within office hours, Monday to Friday. There is some electronic service provision in the form of information about the service. Development is underway for on line applications. Support for tenants in sheltered schemes is provided round the clock every day of the year.

### **Methods of communication to the public and internally**

*(What methods do you use to communicate this service? Include review and*

*assessment of methods, media, translations, interpretation etc. bearing in mind the extent to which these media forms are accessible to all sections of the community)*

Externally

Leaflet  
Website  
Telephone  
Face to Face discussion

Internally

Leaflet  
Website  
Telephone  
Face to Face discussion

Translations and interpreters available on request or on identification of need

**Awareness of Service by Local People**

*(Assessment of the extent to which local people are aware of the service based on available data. What measures do you undertake to reach traditionally excluded communities?)*

Some evidence of lack of understanding of the services available through sheltered housing – differences in range and intensity of services, for example.

Applications Service is actively working on improving the information available to the public and agencies about the service.

**Evidence of disproportionate or adverse impact**

*(Is there any evidence or view that suggests that different equality, or other, target groups in the community have either a disproportionately high or low take up/impact of/from this service/function?)*

yes

*If yes, what and why (State below)*

Adults under 65 in need of sheltered housing (see above)

**SECTION 4: MEASURES TO MITIGATE DISPROPORTIONATE OR ADVERSE IMPACT**

**Specify measures that can be taken to remove or minimise the disproportionate impact or adverse effect identified at the end of Section 3. If none were identified in Section 3, identify how disproportionate impact or adverse effect could be avoided in the future. (Consider measures to mitigate any adverse impact and better achieve the promotion of equality of opportunity).**

**Key Activity: To review and fully implement the lettings Policy and process for Sheltered Housing to ensure that the service is equitable.**

1. Implement more effectively the existing criteria for sheltered properties that already covers all aspects of vulnerability, not just over 65s.

*This does not require a change of policy. This is a reminder for agencies and practitioners of the existing provisions of the policy.*

2. Develop a sensitive lettings criteria for first floor non sheltered properties located within sheltered schemes to reduce the problems experienced on the ground floor and increase the sustainability of lettings on the first floor. The suggestion is to limit the lettings of these properties to applicants who are:

- > Over 35 years of age; **or**
- >In receipt of regular support from social care service(s) as the result of a Community Care Assessment; **or**
- >In receipt of regular support from tenancy related support services supplied via a Supporting People provider

*This does not require a change of Policy. The current Policy allows for the development of local lettings criteria in appropriate circumstances.*

3. To expand the Scheme Managers service (to tenants that need it) on the first floor of Sheltered schemes.

Potential Impacts: Service could expand within current staffing levels but needs dispersed alarm / telecare equipment

*This does not require a change of Policy. This is a change to the services on offer to residents on the first floor of sheltered schemes.*

4. Offer a flexible, tailored support service via the Scheme Managers to tenants on request, for example where tenants have variable support needs over time.

Potential Impacts: On Fairer Charging / Commissioning Budget, if service is commissioned via Community Care Assessment.

*This does not require a change of Policy. This is a change to the services on offer to residents of sheltered schemes, to move away from the perception of 'one size fits all' in relation to sheltered support.*

5. Continue the improvement work with partners to ensure a holistic picture of support needs and a seamless approach to meeting needs.

*This does not require a change of policy; this is about improving collaborative working to improve outcomes for tenants.*

6. Develop comprehensive information in appropriate formats for partners and the public to inform about service options.

*This does not require a change of policy; this is about improving collaborative working to improve outcomes for tenants.*

**Overarching objectives:**

To reduce the number of anti-social behaviour cases that Sheltered Housing tenants experience from neighbouring occupants

To enable individuals to sustain their tenancy, reduce the likelihood of “move on” and enable the service and community to become integrated, inclusive, involving and preventative of problems related to social care needs or tenancy issues.

## **SECTION 5 :CONCLUSIONS AND RECOMMENDATIONS**

***Does the policy comply with equalities legislation, including the duty to promote race equality? Take into account your findings from the impact assessment and consultations and explain how the policy was decided upon its intended effects and its benefits.)***

yes                       no

*In principle, yes. In practice, less so. Issues are around age and disability, rather than race.*

**What are the main areas requiring further attention?**

See information in Section 4

**Summary of recommendations for improvement**

Covered in Section 4

**How will the results of the IA feed into the performance planning process?**

This will be taken into account in the improvement plans of both the Applications Service and Landlord Services.

The predictive impact assessment will be monitored within the performance framework of the services involved to ensure that the predicted impacts were accurate and proportionate and/or to inform further service redesign.

## **Future Monitoring and Consultation**

### **How and when will the policy be monitored?**

Monthly, with the Improvement Plans

Then annually as part of the business planning process.

### **Suggested consultation for the future.**

(Identify areas for future consultation and any barriers to participation in consultation with proposals to overcome these).

## **SECTION 6 – ACTION PLAN**

Actions contained within Service Improvement Plans / Team Plans