
**A
BEST
PERFORMING
COUNCIL**

**EQUALITY
IMPACT ASSESSMENT
FORM**

Age Designation



INVESTOR IN PEOPLE



Appendix 1

Equality Impact Assessment

<p>What is the policy or project being assessed?</p> <p>Age Designation in light of a project to review the Lettings Policy. Age Designation of properties has been identified as a key issue and a report on the subject is to go before Scrutiny with options for comment and decision. This EIA looks at the impact of the officer recommended option, which would be to remove all 40+ age designations and reduce 60+ age designations to only specified properties, identified through comprehensive review. This requires us to further work on alternatives alongside other housing management tools to support customers.</p>	<p>Directorate:</p> <p>Communities</p>	<p>Date:</p> <p>12.04.12</p>
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1. Responsibility and Ownership

<p>Service Area: Allocations Policy Review, Strategic Housing, Communities</p>
<p>Lead Officer: Sharon Schonborn - Project Manager</p>
<p>Members of the assessment team: (if applicable)</p> <p>Allocations Policy Review Team - Sol Knights - Project Officer; Louise Cassin - Acting Up Project Officer Allocations Policy Review Project Board – Suzanne Allen - Project Sponsor; Andrea Simpson - Legal; Jasper South - Assistant Direct (Sheffield Homes); Janet Parry - Director of Housing Management (Sheffield Homes); Richard Palmer – Head of Housing Commissioning; David Molloy – Scrutiny Officer.</p>

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Are there any others involved in the assessment - peer review/external challenge e.g. Disabled people: (if applicable)

Liz Tooke - Assistant Development Manager

2. Aims of the policy or project you are assessing:

What is the purpose of this project or policy?

- To achieve a balance of provision of accommodation within Council stock for all age groups.
- To ensure the best use of Council Stock contributing to sustainable communities.
- To explore alternative mechanisms for dealing with estate issues.

These points have come out of extensive consultation already carried out in the consultation around the Lettings Policy generally and questions that were asked specifically about the age designation of properties. Please refer to the relevant EIA for details of consultation already undertaken in this respect.

What will be the expected outcomes of this project or policy?

- Contribution to sustainable communities. The removal of age banding will mean more mixed and sustainable communities.
- The removal of age banding will mean that younger people are not discriminated against.
- That there should be many less properties falling into the First Come First Served band and being allocated on an ad hoc basis leading to perceptions of unfairness and lack of clarity.
- Cost savings associated with rent loss, void times, staff costs, re-advertising costs etc.

Consideration will need to be given to the equalities legislation due to come into effect in April 2012. The Equality Act 2010 applies to organisations that provide services, including letting properties.

- The provisions of the Equality Act 2010 relating to age will come into force in April 2012 when age will become a protected characteristic. This means that a Policy that discriminates on the grounds of age will be unlawful unless it can be shown to be a proportionate means of achieving a legitimate aim.
- Age designation of stock will have to be **justifiable** which means there must be sufficient evidence to justify the continued or new Policy. Evidence must be robust. Statistical evidence such as records of complaints and cases is preferable to anecdotal evidence from housing officers, which would be open to a challenge on the grounds of objectivity.

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- Age designation must also be **proportionate** to the issue to be addressed. In order to justify age designation, it would have to demonstrate that excluding all people of a certain age from the block or street was a proportionate measure to deal with the perceived issue.
- It is also necessary to demonstrate that the age designation **pursues a legitimate aim** and, if so, that there is no other way to achieve the legitimate aim. If the purpose of the age designation is to tackle ASB then, in order to resist a legal challenge, there must be evidence that there is no other effective method of tackling the problem.
- A legal challenge could be made to an age designation on the basis of discrimination. If the Policy is found to be unlawful discrimination, the claimant could be entitled to damages.
- Local Lettings Policies that tackle a particular kind of behaviour, rather than age, would not fall foul of the legislation but would achieve the same aims, e.g., a good neighbour Local Lettings Policy.

Will this project or policy have any implications on other procedures or projects or strategies of the City Council?

- **Housing Strategy and Action Plans** – Lettings Policy review must be phased to deliver on key objectives in revised strategy.
- **Common Housing Register Project** – needs to take place in parallel with Lettings Policy Review so revised policy is compatible with a common Housing Register.
- **Choice Based Lettings Website Project** - new system to run current policy and procedures and then amend to operate new policy.
- **Ageing Population Strategy** – the Lettings Policy will contribute to delivery of this strategy by helping to meet housing needs.
- **Homeless Strategy** – sets out the City's commitment to ensure homeless prevention is prioritised and homeless people have good access to appropriate housing options.
- **Great Places to Live Strategic Outcome** – the Lettings Policy contributes to the delivery of this outcome.
- **Council Housing Delivery Action Plan** – sets out priorities of increasing people's sense of safety, belonging and their satisfaction with their home, neighbourhood and landlord. It includes reducing homelessness and actions to improve access to housing, including projects to improve sustainability of tenancies.
- **Self Financing Reform of Council Housing.** Under self-financing Councils will need to be more business-minded because we will need to ensure the long term security of council housing locally. The likely financial settlement will mean there is a funding gap over

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a 30 year period and it is even more important that the Lettings Policy contributes to efficient stock management minimising the costs of lettings and minimising any void periods.

3. This is were you would consider what impact the policy or procedure has on particular groups?

<p>Will the policy/project have positive impact for BME people?</p> <p>Yes</p>	<p>Will the policy/project have negative impact for BME people?</p> <p>No</p>	<p>How do you know this and what evidence do you have?</p> <p>Sheffield's BME population now makes up 17% of the total population of the city. This figure is higher for younger people as 19.5% of people aged 18-64 years are BME. As opposed to 5.5% of people aged 65+ are BME. In 2010/2011 26% of lets were to BME applicants. 28% of bidders for this period were from a BME background. Removing age designation will mean greater choice for the under 60's, which are 88% of bidders.</p>	<p>Is there any way that you could limit the negative or increase positive impact?</p> <p>No negative impact. The recommended change will increase the positive impact.</p>
<p>Will the policy/project have positive impact for Disabled people?</p>	<p>Will the policy/project have negative impact for Disabled people?</p>	<p>How do you know this and what evidence do you have?</p>	<p>Is there any way that you could limit the negative or increase positive impact?</p>

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Yes	No	Removing age designation will mean that all eligible disabled people will be able to apply for all available properties as they will not be restricted by age and the 'need' for that particular property i.e., ground floor for mobility needs only. Disability is more than mobility – a deaf person may have a need to be housed on the ground floor or a person with mental health issues in a 'quiet' area.	No negative impact.
Will the policy/project have positive impact for men and Women? Yes	Will the policy/project have negative impact for men and Women? No	How do you know this and what evidence do you have? The proposals will slightly improve housing options for all applicants.	Is there any way that you could limit the negative or increase positive impact? No negative impact for this group.
Will the policy/project have positive impact on Lesbian, Gay, Bisexual or Trans-sexual people?	Will the policy/project have negative impact for Lesbian, Gay, Bisexual or Trans-sexual people?	How do you know this and what evidence do you have?	Is there any way that you could limit the negative or increase positive impact?

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No	No	The proposal is neutral for lesbian, gay bisexual or transsexual people	No negative impact for this group.
Will the policy/project have positive impact on different religions/belief or faith groups	Will the policy/project have negative impact on different religions/belief or faith groups	How do you know this and what evidence do you have?	Is there any way that you could limit the negative or increase positive impact?
No	No	The proposal is neutral for faith groups	No negative impact for these groups.
Will the policy/project have positive impact on people of different age groups	Will the policy/project have negative impact on people of different age groups	How do you know this and what evidence do you have?	Is there any way that you could limit the negative or increase positive impact?
Yes	<p>Yes, it will have a negative impact for people over 40 and over 60 as they will have to compete now with all the age groups. They have 26% exclusivity to Council properties at the moment although they only account for 38% of those bidding for properties.</p> <p>It is known that older</p>	<p>There will be a positive impact for people under 40 as the number of properties available to this group of people increases with the removal of age banding.</p> <p>From consultation 45 people between the ages of 16-24 responded by questionnaire – 33 said we should not have any age</p>	<p>The positive impact is that any potential discrimination towards people under 40 has been removed and the playing field levelled.</p> <p>Negative impacts could be mitigated by consulting with residents in age designated accommodation, listening to their concerns and coming up with a plan to</p>

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	<p>people sometimes do not want to mix with younger people because of the perception that ASB is perpetrated by younger people and that age designation stops ASB.</p>	<p>designated properties and 6 said we should. 35 said hard to let properties should be de-designated and 4 said they should not.</p>	<p>deal with those concerns including options for residents and alternative ways of dealing with ASB.</p> <p>Consultation with older people told us that older people are worried about issues of ASB and that if we had more checks in place and better ways of dealing with ASB they would feel happier about de-designating properties.</p>
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5. What action do you need to take?

If you have indicated there is a potential negative impact for any group – please discuss with your directorate equality rep

Did you or your equality rep identify any potential discriminatory practices:

YES

NO

If your answer is **Yes** then you will need to make immediate changes to address this. Please list, what action do you propose to take to avoid discrimination in the action plan:

Please write up the action points arising from issues in this Impact Assessment using the Action Plan template on the next page.

How will you monitor the policy/project to ensure that it does not disadvantage any group?

- Through the use of base line statistical data available on OHMS.
- Include as part of any future review, amendments and recommended changes to the redesignation of properties and the Councils Lettings Policy.

- **When you are confident that all significant equality implications have been identified and considered, bring together a very brief summary of the most important aspects of your findings and add it to the report in the section titled 'Equal Opportunities Implications'.**
- **Please keep this completed form for audit purposes and forward a copy to the Directorate Equality Representative.**

Signed (officer completing the form): Sharon Schonborn

Date: 12.01.12

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Equality Impact Assessment Action Plan

Please list below any recommendations for action that you plan to take as a result of this impact assessment.

Issue	Action required	Lead officer	Timescale	Progress
Create a balance of the provision of accommodation for all age groups across the city.	Agree and implement new proposals for the changes to remove age designation of properties.	Sharon Schonborn	May	
	Consult with residents affected by any proposed changes	Sheffield Homes	Timescales to be agreed before any implementations carried out. Following Cabinet accepting a new policy there will be an implementation period agreed.	
Identify and address ASB issues/concerns for older people.	Develop alternative acceptable mechanisms for dealing with ASB.	Sharon Schonborn	May	
Contribute to sustainable communities	Agree and implement new proposals for the changes to remove age designation of properties	Sheffield Homes	To be agreed following adoption of any new Lettings Policy	Review impact in one year to assess effect on housing need and community sustainability

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Communicate the changes to customers stakeholders and staff	Develop a communication plan to communicate the changes.	Sheffield Homes	As above	
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