



<b>Service area</b>	Housing
<b>Date of assessment</b>	November 2012
<b>Name of strategy/policy/function/service to be assessed</b>	Lettings Policy
<b>Is this a new or existing strategy/policy/function/service?</b>	Amendments to existing Lettings Policy
<b>Name of manager responsible for strategy/policy/function/service</b>	Julia Barber
<b>Names of people conducting the assessment</b>	Jon collen
<b>Step 1 – Description of strategy/policy/function/service</b>	
Describe the aims; objectives and purpose of the strategy/policy/function/ <b>service</b> (include how it fits in to wider aims or strategic objectives).	<p>The lettings policy aims to ensure that all people seeking social housing in Huntingdonshire are able to exercise choice in deciding where they wish to live and in the type of property they would prefer.</p> <p>The policy enables Huntingdonshire District Council to consider the individual needs of its applicants whilst making best use of the scarce resource of housing stock. The policy sets out:</p> <ol style="list-style-type: none"> <li>a) How to apply for housing.</li> <li>b) Who will qualify to be accepted onto the housing register.</li> <li>c) How priority for housing applicants will be given.</li> <li>d) What the decision-making processes are</li> <li>e) How homes will be let.</li> </ol> <p>The objectives of the Lettings Policy are:</p> <ul style="list-style-type: none"> <li>• To meet the legal requirements for letting social housing</li> </ul>



- To assist customers in the highest assessed need
- To make the best use of existing housing stock
- To provide a consistent lettings process across the sub-region, so properties are let in a fair and transparent way
- To provide increase choice and information to customers in the allocation of social housing
- To support vulnerable customers accessing available homes
- To ensure that customers are not discriminate against, whether directly or indirectly
- To provide a wider housing options approach in supporting customers to meet their housing needs
- To improve mobility across the sub-region
- To promote social inclusion and help achieve sustainable communities.

The Equality Act 2010 requires the Council to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations, the Council also needs to demonstrate its compliance with the Equality Duty. The Council therefore needs to understand how its decisions and activities impact on different people, specifically employees and how they are affected by policies and practices. An Equality Impact Assessment is the current method by which the Council can assess and keep a record of the impact of new or amended strategies, policies, functions or services.

*Definition of Adverse Impact - occurs when a decision, practice, or policy has a disproportionately negative effect on a protected group. Adverse Impact may be unintentional*

Adverse impact can be measured statistically:

Are there any (existing) equality objectives of the strategy/policy or function/**service**

See above objectives



<p>Who is intended to benefit from the strategy/policy/function/<b>service</b> and in what way?</p>	<p>Applicants on the Housing Register and those approaching the Council for advice, however potentially any resident or existing tenant in the district may apply for housing. Stakeholders include housing associations and both statutory and voluntary support agencies.</p>
<p>What are the intended outcomes of this strategy/policy/function/service?</p>	<p>See aims and objectives above</p>
<p><b>Step 2 – Data</b></p>	
<p>What baseline <b>quantitative data (statistics)</b> do you have about the strategy/policy/function/service relating to equalities groups (e.g. monitoring data on proportions of service users compared to proportions in the population), relevant to this policy?</p>	<p><i>Monitoring from the Locata IT system, which holds the Housing Register and details from previous reviews of the Home-link scheme, Subscribers lists, assisted bidders lists, bid method information, etc. 23,300 households across the Home-Link partnership (7 councils) of which 2,662 are Huntingdonshire register applicants.</i></p>
<p>What <b>qualitative data (opinions etc)</b> do you have on different groups (e.g. comments from previous consumer satisfaction surveys/consultation, feedback exercises, or evidence from other authorities undertaking similar work), relevant to this strategy/policy/function/service?</p>	<p>We have now consulted applicants and stakeholders on the proposed changes. <i>A full consultation plan was drawn up to cover the formal consultation covering a wide range of individuals including applicants, stakeholders, agencies, staff etc. A range of methods was used including individual letters to applicants, website promotions, events, etc.</i></p>



*Consultation with both customers and stakeholders was carried out between July-Sept 2012 through a questionnaire and events. Overall, the responses were positive and have helped to inform the final Lettings policy and implementation, and issues relating to access to the service and any problems with this will inform a review of the Access Strategy.*

- 72% felt that improvements to the website will improve access to information.*
- 78% felt that the personalised property list will be a suitable replacement for the printed magazine.*
- 63% agreed that only people with a local connection to the area should be able to apply for housing.*
- 48% agreed with the method of using the date in service as a fair way of prioritising applications from former armed service personnel. (Most responses of a negative nature related to the issue of former armed service personnel having priority, as opposed to the method of awarding this – and this is a legal requirement).*
- 81% agreed with additional priority being awarded for over-crowding and under-occupation.*

The Equality Act 2010 requires us to consider the impact of our services on the protected characteristics of; Age, Disability, Gender, (including Gender Reassignment), Disability, Marriage /Civil Partnership, Sexual Orientation and Religion and Belief. Click on the link below for definitions of the protected characteristics listed.  
<http://initiatives.huntsdc.gov.uk/Equality%20and%20Diversity/Equality%20Act%202010/Glossary%20of%20terms.doc>

Are there concerns that the strategy/policy/function/service could have	<b>Ethnicity:</b> <i>There appears to be a high percentage of White Other</i>
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<p>a differential impact on <b>different racial groups</b>; this refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. Gypsy/Travellers are distinct group within this category.</p> <p>What evidence do you have for your answer?</p>	<p><i>(10%) on the housing register on average across the seven authorities. This is likely to reflect the growing eastern European workers living in the area. This may highlight a need for translation services.</i></p> <p>Locally - the 2001 Census recorded nearly 4,500 Black and Minority Ethnic (BME) residents, accounting for 2.8% of the population. This was lower than the Cambridgeshire level of 4.1%, the regional level of 4.7% and the national average of 9.1%. Experimental statistics from the Office for National Statistics have estimated that the BME population more than doubled to 10,000 by mid-2007, increasing the proportion of BME residents to nearly 6% and reducing the proportion of White residents from 97.2% to 94%*. Information relating to ethnicity from 2011 Census is not yet available</p> <p><small>*Population Estimates by Ethnic Groups (experimental), © ONS, Crown Copyright 2008 <a href="http://www.statistics.gov.uk/StatBase/Product.asp?vlnk=14238">www.statistics.gov.uk/StatBase/Product.asp?vlnk=14238</a></small></p> <p>Appendix One (NINo registrations to adult overseas nationals entering the UK by Ward) indicates a higher proportion of these registrations are within the Huntingdon North Ward. Language barriers may well need to be considered as an issue for some residents in this area. However information can be made available in different formats.</p>
<p>Are there concerns that the strategy/policy/function/service could have a differential impact on <b>younger or older people</b>?</p> <p>What evidence do you have for your answer?</p>	<p><b>Age:</b> <i>There is a broad spread of ages on the housing register with most customers in the 16-49 and over 65 age groups. Fewer customers are in the age group between 50 and 65 but this is likely to reflect a more stable period in people's lives with housing not</i></p>



	<p><i>being an issue. Bidding by age shows that people under 60 are most likely to bid on-line with a range between 80% and 93%, with those over 50 bidding on-line reducing by age band from 64% at 60-69 to 44% from 90-99 years of age. Many family members are thought to bid on behalf of older relatives.</i></p> <p>Mid-2008 Population Estimates that 18.3% of residents are estimated to be of pensionable age (males 65+, females 60+), The Mid 2012 population projections – estimate that 17% of the Hunts population is aged 65+ (see Appendix One) therefore consideration of older people is essential. It is considered that:</p> <ul style="list-style-type: none"> <li>• Older people may be at an advantage as they may be offered properties with a spare bedroom as they are not subject to the LHA rules.</li> <li>• Older people will also benefit from increased priority for downsizing should they wish to move</li> <li>• Older people on the subscribers list will be sent more personalised information than before.</li> </ul> <p>However, Children may be disadvantaged by the new matching policy restricting the size of home offered.</p> <p>More officer time will be available to support people as more able customers will be able to apply on-line and information can be made available in different formats.</p>
<p>Are there concerns that the strategy/policy/function/service could have a differential impact on <b>gender, including transgender people</b>? What evidence do you have for your answer?</p>	<p>No adverse impact identified</p>



<p>Are there concerns that the strategy/policy/function/service could have a differential impact on <b>part time/full time</b> employees? What evidence do you have for your answer?</p>	<p>No adverse impact identified</p>
<p>Are there concerns that the strategy/policy/function/service could have a differential impact on <b>disabled people</b>? What evidence do you have for your answer?</p>	<p><b>Vulnerability:</b> <i>There is a broad range of vulnerabilities reflected on the register, with physical disability and mental health problems being the highest. There has been an issue with the capture of disability information on the housing register so current data is incomplete. When the housing register is reviewed the inclusion of vulnerability data will be mandatory and a clearer picture should emerge.</i></p> <p>No single figure exists to record the total number of disabled people living in the area; however, there are a range of indicators from various sources that suggest there are a significant number of residents with disabilities living in Huntingdonshire (see Appendix One) therefore consideration on people with a disability is essential. It is considered that:</p> <ul style="list-style-type: none"> <li>• <i>there will be an increased priority for people if a disability is affected by current housing</i></li> <li>• <i>there will be more accessible on line options for applicants (along with support workers and family) to find information and access Home-link 24/7</i></li> <li>• <i>If subscribe to Personalised Property list this will be a prompt to bid, and</i></li> <li>• <i>Information can be made available in different formats.</i></li> </ul> <p><i>However, children with a disability will have to justify why they require separate bedrooms making applications take longer to process.</i></p>



<p>Are there concerns that the strategy/policy/function/service could have a differential impact in terms of <b>marriage and civil partnership</b></p>	<p>No adverse impact identified</p>
<p>Are there concerns that the strategy/policy/function/service could have a differential impact in terms of <b>pregnancy and maternity</b> (e.g. pregnant or breast feeding women)</p>	<p><i>Pregnant women will not be offered accommodation including a bedroom for the child until the child is born unless any HB shortfall in the rent can be met from other sources</i></p>
<p>Are there concerns that the strategy/policy/function/service could have a differential impact on <b>lesbian, gay man, bisexual or heterosexual (straight) people</b>?What evidence do you have for your answer?</p>	<p>No adverse impact identified</p>
<p>Are there concerns that the strategy/policy/function/service could have a differential impact on grounds of <b>religion or belief</b>? What evidence do you have for your answer?</p>	<p>No adverse impact identified</p>
<p>Are there concerns that the strategy/policy/function/service could have a differential impact in terms of specific characteristics of Huntingdonshire e.g. <b>Rural isolation</b></p>	<p>Impact in terms of rural isolation have been considered for example:</p> <ul style="list-style-type: none"> <li>• <i>Increased accessibility via on-line services</i></li> <li>• <i>Personalised property sheets can be sent to individuals by post</i></li> <li>• <i>Increased communication by email</i></li> <li>• <i>Withdrawal of magazine/not available in local pick up points – this can be replaced by a personalised property sheet for those, for whom this would cause a disadvantage.</i></li> </ul>





### Findings

There are two areas where adverse impact have been identified:, one relating to children and the other, pregnant women:

- Children may be disadvantaged by the new matching policy restricting the size of home offered
- *Children with a disability will have to justify why they require separate bedrooms making applications take longer to process.*
- Pregnant women will not be offered accommodation including a bedroom for the child until the child is born unless any HB shortfall in the rent can be met from other sources

These are as a result of Government legislation. In addition the requirements for allocating social renting are the same as the size requirements for those renting privately. We can also consider how we apply Discretionary Housing Payments locally and whether or not these can be used to reduce some of the impact, at least in the short term.

### Recommendations

- Monitor impact of the changes (how?)
- FAQ leaflet?



## Appendix 1

NINo registrations to adult overseas nationals entering the UK, by year of NINO registration and ward  
2003 Ward Boundaries

Ward Name	2007/2008	2008/2009	2009/2010	2010/2011	2011/2012
Buckden	10	10	-	5	10
Earith	15	15	15	15	10
Ellington	15	10	10	15	5
Elton and Folksworth	20	5	10	5	5
Fenstanton	10	15	10	10	10
Godmanchester	35	30	15	35	30
Gransden and The Offords	20	10	10	15	20
Huntingdon East	115	95	85	90	75
Huntingdon North	305	305	235	240	260
Huntingdon West	135	140	95	110	95
Kimbolton and Staughton	15	10	5	10	10
Little Paxton	15	10	15	15	25
Ramsey	40	30	20	15	15
St Ives East	55	45	35	40	40
St Ives South	75	40	35	40	45
St Ives West	15	15	5	10	15
St Neots Eaton Ford	60	50	10	40	15
St Neots Eaton Socon	30	15	25	35	20
St Neots Eynesbury	50	60	25	50	45
St Neots Priory Park	35	50	25	70	55



Ward Name	2007/2008	2008/2009	2009/2010	2010/2011	2011/2012
Sawtry	10	10	10	5	10
Somersham	10	20	15	10	10
Stilton	10	5	5	-	-
The Hemingfords	10	20	10	15	5
Upwood and The Raveleys	5	10	5	5	10
Warboys and Bury	10	20	5	10	5
Yaxley and Farcet	15	20	10	20	15

Age

In the district, 18.3% of residents are estimated to be of pensionable age (males 65+, females 60+), which is lower than the county average of 18.7%\*. 17% of those receiving Income Support in November 2009 were aged over 50\*\*, and 45% of all Incapacity Benefit and Severe Disablement Allowance claimants were aged over 50\*\*\*.

The projections also show reduced numbers of people in younger age groups, which would mean a much older population profile by 2021

\* Mid-2008 Population Estimates, Office for National Statistics (ONS). Crown Copyright 2009 [www.statistics.gov.uk/statbase/Product.asp?vlnk=15106](http://www.statistics.gov.uk/statbase/Product.asp?vlnk=15106)

\*\* Income Support Claimants at November 2009 [www.nomisweb.co.uk](http://www.nomisweb.co.uk)

\*\*\* Incapacity Benefit / Severe Disablement Allowance at November 2009 [www.nomisweb.co.uk](http://www.nomisweb.co.uk)

Ethnicity

Locally - the 2001 Census recorded nearly 4,500 Black and Minority Ethnic (BME) residents, accounting for 2.8% of the population. This was lower than the Cambridgeshire level of 4.1%, the regional level of 4.7% and the national average of 9.1%.

Experimental statistics from the Office for National Statistics have estimated that the BME population more than doubled to 10,000 by mid-2007, increasing the proportion of BME residents to nearly 6% and reducing the proportion of White residents from 97.2% to 94%\*.

Information relating to ethnicity from 2011 Census is not yet available

\*Population Estimates by Ethnic Groups (experimental), © ONS, Crown Copyright 2008 [www.statistics.gov.uk/StatBase/Product.asp?vlnk=14238](http://www.statistics.gov.uk/StatBase/Product.asp?vlnk=14238)



### Disability

No single figure exists to record the total number of disabled people living in the district Council area; however, there are a range of indicators from various sources that suggest there are a significant number of residents with disabilities living in Huntingdonshire:

- 5,610 people were claiming Disability Living Allowance (DLA) in November 2009 (3.4% of all people in the district); this is below the national average of 5%\*
- 3,380 people were claiming Incapacity Benefit (IB) and Severe Disablement Allowance (SDA) - 2.6% of all residents aged 16 or over in the district; this is below the national average of 4.3%\*\*
- The 2001 Census results showed 13.5% (21,263) of all people in the district stated that they had a limiting long-term illness
- 6.3% of people in the district (9,820 people) reported that their general health had been 'not good' over the twelve months before the 2001 Census
- 2.9% (3,269) of people aged 16-74 in the district were recorded as being economically inactive due to permanent sickness or disability (2001 Census)

\* Disability Living Allowance Claimants at November 2009 [www.nomisweb.co.uk](http://www.nomisweb.co.uk)

\*\* Incapacity Benefit / Severe Disablement Allowance at November 2009 [www.nomisweb.co.uk](http://www.nomisweb.co.uk)