



## EQUALITY IMPACT ASSESSMENT INITIAL SCREENING

Name of policy / strategy / project (the “initiative”):

Lettings Policy and revised housing application procedure

Provide a brief summary of the aims and main activities of the initiative: (bullet points)

- To have an open and transparent system of letting property
- To provide clarity over who is eligible for housing and who is not
- To eradicate overt and hidden discrimination against applicants who are eligible for housing
- To provide customers with security, stability and safety in their homes and surroundings by using this policy as a tool to contribute to the fight against anti-social and disruptive behaviour

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### STAGE 1: SCREENING

This stage establishes whether a proposed initiative will have an impact from an equality perspective on any particular group of people or community – i.e. on the grounds of race, religion/faith/belief, gender (including transgender), sexual orientation, age, disability, or whether it is “equality neutral” (i.e. have no effect either positive or negative).

**Q 1. Who will benefit from this initiative?** Is there likely to be a positive impact on specific groups/communities (whether or not they are the intended beneficiaries), and if so, how? Or is it clear at this stage that it will be equality ‘neutral’ i.e. will have no particular effect on any group?  
*Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

Part of the new lettings procedure will be the introduction of a simple banding system in order that Chevin can make a more accurate assessment of an applicant’s needs. This will replace the existing points system. Matching an applicant’s needs to their preferences for area will be a key factor in the Policy. The new system will make the application process easier for all applicants, with application forms completed verbally over the telephone which will eliminate the need for forms to be returned to applicants due to missing information. The whole process will be quicker and more accurate, with applicants able to discuss housing availability with staff.

We anticipate that all applicants will benefit from the initiative and we expect to demonstrate positive outcomes including:

A reduction in the number of empty properties, a reduction in the number of refusals of offers of property, an improvement in re-let times, improved match of applicants to their chosen area, reduction in complaints about anti-social behaviour. We anticipate an increase in overall levels of satisfaction for all groups / communities with a positive effect on all groups. Applicants who have an urgent need will generally receive priority over all other applicants – this will include applicants who expect to be made homeless within the next 28 days or who are sleeping rough, those who are experiencing domestic violence or who are in urgent medical need. Applicants in urgent need will also include those experiencing harassment – this would encompass hate crime based on age, disability, gender / transgender, race / ethnicity, religion, or sexuality.

**Q 2. Is there likely to be an adverse impact on one or more minority/under-represented or community group as a result of this initiative?** If so, who may be affected and why: Or is it clear at this stage that it will be equality 'neutral'?  
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There is no suggestion of an adverse impact on one or more minority or under-represented group. The current points based system has been open to abuse in the past in the form of applicants 'point chasing'. The new banding system will deliver a more transparent, fairer system and will ensure that those in genuine housing need are awarded priority for housing. Q 3 addresses actions that will help those customers who do not speak English as their first language, those who are hearing or voice impaired, or with a learning disability, who may struggle to complete an application form over the telephone.

**Q 3. Is there sufficient data on the target beneficiary groups/communities?** Are any of these groups under or over represented? Do they have access to the same resources? What are your sources of data and are there any gaps?  
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The new system of working brings together elements of good practice from other landlords who have undertaken pilot schemes. The pilots indicate that banding systems are less prone to abuse than traditional points systems making them fairer to applicants. Figures relating to applications for the period October to December 2008 demonstrate an increase in the number of applications received from males (49% against overall 39%), a high rate of applications from those in the 16 to 24 age bracket (25%) and a high number of applications from BME applicants (21%). 47% of lettings were made to male applicants, 13% to people in the 16 to 24 age bracket and 10% lettings to BME applicants. We will be analysing this data over time, with a comparison made with figures last year. Satisfaction data for new applicants is collected and analysed twice yearly (last data relates to May 2008) and demonstrates a lower satisfaction with the application process from males than for females (63%:77%), 73% satisfaction for applicants in the 16 to 24 year age group and a high satisfaction score of 83% for BME applicants. Chevin will continue to assess these figures over time to identify medium term trends in order that any anomalies can be looked into. In addition, housing management staff will be contacting those applicants already on the waiting list to discuss their requirements. There are currently 5,000 applicants on Chevin's waiting list with only 350 lettings of our own made annually (i.e., excluding nominations.) Every applicant on the waiting list will be contacted in order to reband their application. Where it becomes apparent

that we are unable to offer a suitable property to an applicant, we will signpost them to other housing providers in the area. Those staff members helping applicants complete application forms via telephone will continue to use Language Line interpretation facilities to assist any applicants who do not speak English as their first language. Due to issues highlighted in past Mystery Shopping exercises, all front line staff have received training on using Language Line. Staff will continue to use Typetalk facilities for those customers who are hearing / voice impaired or who have a learning disability. We are working with our website developers so that we can analyse use of and satisfaction with the online application process. We will continue to use alternative methods of communication for those customers who prefer other methods of contact, e.g. face to face meetings at a local office or at home in order to complete an application form. The application form will still be available on our website and CABs and other agencies will be made aware how they can use the telephone or online services on behalf of their clients.

**Q 4. Outsourced services – if the initiative is partly or wholly provided by external organisations / agencies, please list any arrangements you plan to ensure that they promote equality and diversity.**

*Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

Nominations to local authorities account for approximately 50% of all our lettings. Like ourselves, local authorities operate within statutory regulations and guidelines in respect of lettings in order to ensure equality of opportunity to housing. Nominations will also be subject to the new bandings system.

**Q 5. Is the impact of the initiative (whether positive or negative) significant enough to warrant a full impact assessment – see guidance? If not, will there be monitoring and review to assess the level of impact over a period of time?**

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Lettings are monitored and will continue to be so to ensure quality of opportunity to housing. Data is recorded on the IBS system and can be reported upon for monitoring purposes. Data is also collected by CORE who's role is to monitor lettings in the social housing sector. Figures relating to applications / lettings and analysed quarterly and across a longer term (i.e. annually) to compare overall trends in applications / lettings for all diversity strands in order that any anomalies can be highlighted.

When the new system has been implemented, figures for applications and lettings will be analysed over time in order to draw comparisons between the old and new systems.

Residents have had an opportunity to comment on the content of the new Lettings Policy via the four Resident Panels and the policy has been amended in line with comments received. At this stage, we do not intend to undertake a full impact assessment based on evidence to date. However, We will continue to monitor and review the impact of the new policy, particularly the new banding system, once the system is up and running.

**Q 6. To be completed at six monthly review Detail actions taken to assess the level of impact over a period of time, or to address any gaps in data.**

*Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity,*

The review date has been set at March 2010. This follows introduction of the new lettings procedure at the end of November 2009.

**Guidelines: Things to consider**

- Where a negative (i.e. adverse) impact is identified, it may be appropriate to make a full EIA (see Stage 2), or, as important, take early action to redress this – e.g. by abandoning or modifying the initiative. **NB** If the initiative contravenes equality legislation, it **must** be abandoned or modified.
- Where an initiative has a positive impact on groups/community relations, the EIA should make this explicit, to enable the outcomes to be monitored over its lifespan.
- Where there is a positive impact on particular groups, does this mean there could be an adverse impact on others, and if so can this be justified? - e.g. Are there other existing or planned initiatives which redress this?
- It may not be possible to provide detailed answers to some of these questions at the start of the initiative. The EIA may identify a lack of relevant data, and that data-gathering is a specific action required to inform the initiative as it develops, and also to form part of a continuing evaluation and review process.
- It is envisaged that it will be rare for full impact assessments to be required. Usually, where there are particular problems identified in the screening stage, it is envisaged that changing the approach at this stage, and/or setting up a monitoring/evaluation system to review a policy's impact over time will tackle the problem.