



## EQUALITY IMPACT ASSESSMENT INITIAL SCREENING

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

Transfer Policy

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

- To have an open and transparent transfer process
- To provide clarity over who is eligible for a transfer and who is not
- To eradicate overt and hidden discrimination against transfer applicants
- To improve the time taken to let empty properties and reducing void costs
- To improve the match of transfer applicants to their chosen area

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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*

The Transfer Policy has been reviewed in light of the new lettings procedure and the introduction of a simple banding system in order that Chevin can make a more accurate assessment of an applicant’s needs. Whilst the majority of our lettings will be based on priority decided by the new banding system, we will be introducing a second access ‘stream’ by virtue of a transfer applicant’s wish to live in a particular area for community or financial reasons.

As with the new Lettings Policy, we anticipate that all transfer applicants will benefit from the initiative and we expect to demonstrate positive outcomes including a reduction in the number of empty properties, an improvement in re-let times, an improved match of transfer applicants to their chosen area and a reduction in complaints about anti-social behaviour. It is clear that many residents will remain Chevin tenants if we can offer them a move into a property that they feel will be better suited to them. This will prevent the unnecessary movement of tenants between different social landlords, bringing more stability to an area. We anticipate an increase in overall levels of satisfaction for all groups / communities with a positive effect on all groups. Transfer applicants who have an urgent need will generally receive priority over all other applicants – this

will include transfer applicants who are experiencing domestic violence, those in urgent medical need or who have to move for support reasons, for example, in order to be close to a particular hospital or family members. Transfer 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. Transfer applicants will be encouraged and to a certain extent will receive priority when vacancies occur. The new banding system will deliver a more transparent, fairer system and will ensure that those in genuine housing need are awarded priority for transfer.

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 a transfer application form. It also addresses exceptional cases when transfers are granted despite having rent arrears, a record of anti-social behaviour and poor condition of property.

**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 conduct of the existing tenancy and property condition is taken into account when considering a transfer request. In addition, tenants with rent arrears, those who have letters on file relating to anti-social behaviour or with domestic standards not considered acceptable by the majority of prospective applicants will not automatically qualify for a transfer. However, this condition is lifted once a solution to the problem has been agreed with the housing officer. Each transfer application is assessed individually on its own merit and there may be some occasions when transfers are granted despite the tenant having rent arrears, anti-social behaviour and a property in poor condition, for example, those transfer applicants in urgent need, as outlined in Q1, or where a tenant with a disability or long-term health problem has been unable to attend to gardening or cleaning jobs around the home. Housing Officers will visit a tenant's home in order to discuss the tenant's current circumstances and in order to make an assessment.

**Transfer application** figures for the period January to March '09 (inclusive) demonstrate that there was a 40%:60% male / female split between transfer applications. There are no anomalies here as these figures correspond with the general Chevin gender profile (39%:61%). There were a high number of transfer applications from tenants in the 16-24 year age group (16% against an overall 4% of Chevin tenants falling into this age group.) Likewise, 27% of transfer applications were received from tenants in the 25-34 year age group, against an overall 17% of Chevin tenants overall falling into this age group.) This is contrasted with the low number of transfer applications received from the 75 years plus age group (2% of applications against an overall 13% of Chevin tenants falling in this age group.) **It may be necessary to assess the longer term applications from the 16 – 34 year age group to assess whether this is a longer term trend and to look at reasons for requesting a transfer.** Transfer applications by ethnicity show that 12% of transfer applications were received from BME tenants. There are no anomalies here as these figures correspond with the general Chevin ethnicity profile (10% of our tenants are BME.) The number of transfer applications received from tenants with a disability or long-term illness (21%) also closely fits the Chevin overall total falling into this group (23%). At the moment, we are aware that 11% of tenants requesting a transfer are heterosexual, however at the moment so little data is held in this area, it makes it difficult to draw conclusions (94% overall unknown for Chevin as a whole). Likewise we hold data on the religion of 56% of our tenants,

with only an overall 4% (of the 56%) of Chevin tenants as non-Christian. The current Census project will boost the level of data held relating to religion and sexuality.

There were 25 **actual transfers** between January to March '09 (inclusive). This is a small number – **it may be necessary to look at actual transfers over a minimum of a six month period following introduction of the policy, as the number of overall transfers is so small.**

21% of the transfer offers were made to BME residents (Chevin overall population 10%) so this is a higher proportion compared to the Chevin overall population and compared to the % of applications received (12%). Only one transfer offer was made to somebody in the 16 to 24 year age range despite 16% of overall transfer applications received from this age group – **this may need further investigation over a longer timescale to assess trends.** Six offers were made to residents in the 25-34 year age group. Slightly more transfer offers were made to female residents than male (52%:48%). 23% of transfer offers were made to residents with a long term illness or disability, which closely matches the applications received (21%).

Chevin will continue to assess these figures over time to identify medium and longer term trends in order that any anomalies can be looked into.

Those staff members helping applicants complete transfer application forms will continue to use Language Line interpretation facilities to assist any applicants who do not speak English as their first language. 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 / transfer 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 a transfer application form. The transfer application form is also available on our website.

**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.**

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Not applicable.

**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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Transfer data is recorded on the IBS system (applications and actual transfers) and can be reported upon for monitoring purposes. Figures relating to transfers will be analysed across a longer term (i.e. 6 monthly and annually) to compare overall trends in transfers for all diversity strands in order that any anomalies can be highlighted.

When the new lettings system has been implemented, figures for applications / lettings / transfers 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 Transfer 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 policy 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.

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### **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.