

Equality Assessment Record

1. What is the name of the service, policy, procedure or project being assessed?

Discharging the Homeless Duty in the Private Rented Sector Policy

2. Briefly describe the aim of the service, policy, procedure or project. What needs or duties is it designed to meet?

The policy is designed to assist the Council in carrying out its statutory function towards homeless households where a duty to accommodate exists.

3. Indicate which of the following applies:-

This is a current service or policy and should be equally accessible to all sections of the community or all employees

No, this is not a current service or policy.

A decision is likely to be made to change, reduce or stop providing this service.

No

A new initiative or service is being considered or proposed.

Yes, this is a new policy.

4. List your known customers and stakeholders (e.g. partner organisations, community groups)

Customers are any households who have approached the Council's agent (bdht) as homeless and have been assessed to be homeless, eligible, in priority need and not intentional and therefore the Council has accepted a duty to accommodate.

Bdht carry out the homelessness function on behalf of the Council under a Service Level Agreement.

5. Describe simply how you know who they are?

The Council has a statutory duty to secure accommodation for households who are homeless through no fault of their own, are eligible for assistance and in 'priority need' eg: families with dependent children and those who are vulnerable for some reason. Customers are those household who approach bdht, the Councils agent and are accepted as being eligible, in priority need and not intentional.

6. How relevant is equality to this service, policy or procedure? Rate as H, M, L (high, medium or low) or No relevance. If all answers are “low” or “no” relevance go straight to question 10.

High

When considering relevance to equality for each protected group, use professional judgment and experience, previous Equality Impact Assessments, or any other information that you have to hand which demonstrates how relevant a service is to a particular protected group.

Protected Group	Indicate H/M/L or No Relevance	Evidence used	Further evidence needed Yes/No
Age	H	It is anticipated that 50% of all homeless acceptances are under 35 yrs. The majority of whom will have fewer options in the private rented sector if they rely on LHA for to meet their rental obligations as they are only entitled to the shared room rate.	Yes
Disability	H	In 2012 32.9% homeless acceptances had a physical or mental disability compared to 17.6% households in the District having day to day activities limited.	Yes
Transgender (Gender Dysphoria)	Not Known		
Marriage and Civil Partnership	L		
Pregnancy and Maternity	L	In 2012 10% of homeless acceptances are pregnant with no other children.	
Race	Not known	In 2012 7.1% of homeless acceptances were from an ethnic minority compared to 6.4% for the District. This is high than the number of ethnic minority households in the District but the actual numbers are still quite small – 5 households for the whole year.	
Religion or Belief	Not known		
Sex (Male/ Female)	H	30% of homeless acceptances in 2012 were female lone parents. 24.7% of one person	

		homeless acceptances were male and 18% female.	
Sexual Orientation	Not known		

7. Is there evidence of actual or potential unfairness for the following equality groups?

Protected Group	Indicate Yes or No	Evidence of unfairness	Further Evidence Needed Yes/No
Age	Y	<p>Currently, if a single homeless applicant is offered social rented accommodation, they could expect to receive full housing benefit on a one bedroom flat. However, single households under the age of 35 yrs are only entitled to the shared room rate in the private rented sector. The applicant is likely to be vulnerable as otherwise a Duty is unlikely to be accepted, therefore the challenge will be to find suitable accommodation in the private sector taking into account any support needs they may have. Where suitable accommodation cannot be found it will still be possible to make an offer of social rented accommodation subject to a property becoming available. This may also mean that they spend excessive time in B&B or temporary accommodation awaiting a 'suitable' offer</p>	The effect of this policy will be reviewed 12 months following implementation.
Disability	Y	<p>It may be more difficult to secure a property with the necessary adaptations for some applicants with a physical disability. This may mean that these applicants are more likely to be offered social rented accommodation. In respect of mental illness those who are under 35 years of age will only be eligible for the shared room rate of LHA and therefore it may be difficult to Discharge the homelessness duty in the PRS for these</p>	The effect of this policy will be reviewed 12 months following implementation.

		households.	
Transgender (Gender Dysphoria)	N	No known	The effect of this policy will be reviewed 12 months following implementation.
Marriage and Civil Partnership	N	Not known – however, according to anecdotal evidence this is unlikely to be an issue.	The effect of this policy will be reviewed 12 months following implementation.
Pregnancy and Maternity	N	These households may not be initially eligible for the 2 Bed LHA rate, and officers would need to arrange for DHP to be awarded to meet any initial shortfall in housing costs.	The effect of this policy will be reviewed 12 months following implementation.
Race	N	Not known – it is proposed that a landlord pack is developed which includes information around equalities and the Council’s expectations prior to working with a landlord. It is proposed that equalities will be discussed further at the private landlord’s steering group to consider opportunities to raise awareness in the sector.	The effect of this policy will be reviewed 12 months following implementation.
Religion or Belief	N	Not known. See above.	The effect of this policy will be reviewed 12 months following implementation.
Sex (Male/ Female)	Y	Homelessness affects high numbers of lone parents, the majority of whom are female. Homelessness acceptances to vulnerable young men is also high when compared to the demographics of the District.	The effect of this policy will be reviewed 12 months following implementation.
Sexual Orientation	N	Not known. See above	The effect of this policy will be reviewed 12 months following implementation.

If all answers are “No”, go straight to Question 10.

8. What is the justification for any actual or potential unfairness identified in question 7, for example, disproportionate cost? Describe briefly your reasons.

Protected Group	Justification for actual or potential unfairness
Age	A lack of social housing in the District means that supply exceeds demand and therefore, by securing suitable private rented accommodation, households will spend less time in temporary accommodation. This means that they may have a settled solution to their housing need earlier and the local authority will not have to pay for what might be expensive bed and breakfast accommodation.
Disability	See above
Transgender (Gender Dysphoria)	See above
Marriage and Civil Partnership	See above
Pregnancy and Maternity	See above
Race	See above
Religion or Belief	See above
Sex (Male/ Female)	See above
Sexual Orientation	See above

9. If you have identified any area of actual or potential unfairness that cannot be justified, can you eliminate or minimise this?

Please include actions to eliminate or minimise any unfairness answer to Question 12.

Yes – properties must be considered suitable under the Homelessness (Suitability of Accommodation) (England) Order 2012. The local authority intends to carry out inspections of the standard of the property, the landlord suitability and carry out financial assessments of applicants prior to an offer of accommodation in the private rented sector that discharges the local authority's homelessness duty.

A landlord pack will be developed to give landlords equalities issues will be discussed at the next landlords steering group with a view to providing equalities awareness raising training for landlords.

10. Describe simply or list the additional information used to complete this assessment including professional judgement and how that was used in your decisions.

Meetings have been held with specialist officers in Strategic Housing and the Private Rented Sector to discuss current practice in respect of the Step Up private tenancy scheme, current relationships with private landlords and private sector housing standards.

Meetings have also been held with the Council's agent, bdht, to consider the consequences of not adopting this policy on the number of homeless households in bed and breakfast accommodation.

The Homelessness Strategy Steering Group have been consulted on the draft document and made comments which have been identified under risks in the Cabinet Report dated 3rd April 2013.

11. What plans do you have to monitor any changes identified?

The policy will be reviewed 12 months following implementation to consider equalities and other issues and ensure that the policy meets its objectives of providing suitable accommodation for homeless households and avoids the use of expensive bed and breakfast.

12. The actions required to address these findings are set out below.

Action Required	By Whom	By When	Signed when completed	Priority	Expected outcomes
Policy Review 12 months following implementation	Amanda Glennie	June 2014		H	Greater understanding of the impact of the policy on equalities groups.
Equalities Agenda Item for landlords steering group	Jenny Delorenzo	Aug 2013		H	Greater awareness of equalities issues and local authority expectations
Equalities information to be added to the existing landlords pack.	Jenny Delorenzo	Aug 2013		H	Greater awareness of equalities issues and local authority expectations

13. Equality assessment undertaken by (name/ names) Amanda Glennie

Position in the council: Strategic Housing and Enabling Officer

Date 14th February 2013

When you have completed this assessment, retain a copy and send an electronic copy to the Equality Champion for your department and a copy to the Policy, Performance and Partnerships Officer (Equalities) attaching any supporting evidence used to carry out the assessment.

