



Shaping  
a better future



Shaping  
a sustainable future



Shaping  
better development

## Draft Lancaster District Tenancy Strategy

### Equality Impact Assessment

#### 1. Background

Lancaster City Council has prepared a Tenancy Strategy to comply with the requirements of the Localism Act 2012. The purpose of the document is to provide a broad framework which all social housing providers shall operate within having regard to the housing market and housing needs of the Lancaster district. The broad framework has been agreed by all local authorities in Lancashire, and an Equality Impact Assessment was completed as part of that process. In the light of all districts within Lancashire producing their own Tenancy Strategies, the Equality Impact Assessment has been reviewed and updated accordingly by Lancaster City Council to ensure that the Lancaster District Tenancy Strategy does not disadvantage or discriminate against any particular groups.

#### 2. Main activities of the Tenancy Strategy

The Localism Act 2011 provides greater freedom for social housing providers around the type of tenancies they can offer, and in what circumstances, and what arrangements should be in place when a tenancy comes to an end. The purpose of the Tenancy Strategy is to provide guidance to social housing providers around these issues.

### **3. Who are the main stakeholders?**

- Lancaster district residents and those who have applied, or will apply for rehousing by any social housing provider.
- People wishing to move into the Lancaster district.
- All social housing providers
- Homelessness Forum
- Commission for Racial Equality
- Other statutory organisations such as health and adult social care
- Voluntary sector organisations

### **4. Intended Outcomes of the Tenancy Strategy**

- To build and maintain sustainable communities.
- To improve the standards of new and existing homes.
- To ensure the most efficient use of the district's housing stock to meet local need, now and in the future.
- To prevent homelessness and fulfil our statutory duties when homelessness occurs.
- Enabling better health through housing and support.
- Monitoring access to housing and outcomes to ensure no discrimination against specific groups.

### **5. Impact of the Tenancy Strategy**

The table below indicates:

- (a) Where the Tenancy Strategy could have a negative impact on any of the equality target groups i.e. it could disadvantage them
- (b) Where you the tenancy strategy could have a positive impact on any of the groups or contribute to promoting equality, equal opportunities or improving relations within equality target groups.

An explanation why there is a positive/negative/no impact.

		Positive impact –	Negative impact	No impact	Unsure	Explanation
<b>Gender</b>	Women				√	It is difficult to say with certainty what impact these changes may have in relation to gender and race. No statistics are provided within the draft Tenancy Strategy to make any judgements.
	Men				√	
	Transgender				√	
<b>Race (census categories)</b>	White – English, Welsh, Scottish, Northern Irish, British				√	In our view, it is likely that other criteria are likely to have more of an impact than race and gender, in particular disability, age and income status.  Social housing providers need to regularly monitor the data they collect around the ethnicity of all housing applicants, and of those housed, and what tenancy type they have granted, to ensure that there are no particular ethnic groups that are disadvantaged and the percentage of groups who apply for housing and of those rehoused should be disproportionate.
	White – Irish				√	
	White – any other white background				√	
	Mixed – White and Black Caribbean				√	
	Mixed – White and Black African				√	
	Mixed – White and Asian				√	
	Mixed – multiple ethnic group				√	
	Asian/Asian-British - Indian				√	
	Asian/Asian-British - Pakistani				√	
	Asian/Asian-British - Bangladeshi				√	
	Asian/Asian-British – Chinese					
	Asian/Asian-British ant other Asian background				√	
Black/ African/ Caribbean/Black				√		

		Positive impact –	Negative impact	No impact	Unsure	Explanation
	British – Caribbean					
	Black/ African/ Caribbean/Black British – African				√	
	Black/ African/ Caribbean/Black British – any other				√	
	Other Ethic Group - Arab				√	
	Other Ethic Group - Chinese				√	
	Gypsies/Travellers				√	
	Any other group (write in)				√	
<b>Disability</b>	Physical	√	√			<p>Structural adaptations to assist people in their access to facilities within their homes.</p> <p>Where there is a change in circumstances and a tenant no longer requires an adapted property it is important that the tenant is re-housed and the adapted property allocated to someone requiring those adaptations to ensure best use of that property. Social housing providers may choose to grant flexible tenancies in these cases.</p> <p>Could mean a move from the family home which might have a negative impact. However, it</p>
	Sensory	√	√			

		Positive impact –	Negative impact	No impact	Unsure	Explanation
						would have a positive impact in that it would free up more adapted homes for occupation.
	Learning disabilities	√				The Tenancy Strategy recommends that fixed term tenancies are not granted to these groups.
	Mental Health issues	√				
<b>Sexual Orientation</b>	Lesbian, gay and bisexual			√		
<b>Age</b>	Older people (60 +)	√	√			The Tenancy Strategy recommends that fixed term tenancies are not granted to this group. Older people, whilst not being directly affected by the proposed welfare reforms in relation to under-occupation, will nevertheless be encouraged to move to smaller accommodation. Support will have to be provided to support a move from their home.
	Households with children (0-16)	√	√			The proposed housing benefit restrictions on bedroom size coming into force from April 2013 for working age households set out the circumstances upon which

		Positive impact –	Negative impact	No impact	Unsure	Explanation
						housing benefit will be paid for same and opposite sex children. This might free up properties but it will also adversely affect existing tenants who wish to remain in their existing home and pay the shortfall. Some tenants may need assistance to find smaller accommodation.
	Younger people (17-25)		√			Govt plans to remove Housing benefit or LHA for this client group will make it virtually impossible for non working or low income applicants to receive assistance unless they have previously been in care.
<b>Belief or Religion</b>	Faith Groups			√		
	Non faith groups			√		
<b>Language</b>	English not first language		√			Would need to ensure that language support is given to explain tenancies etc.
<b>Social inclusion</b>	Low income	√	√			The affordable rent product does present an increased risk of homelessness to those who are the most vulnerable or do not have the ability to be self sufficient financially. Measures to cope with those at risk will need to be put into place by

		Positive impact –	Negative impact	No impact	Unsure	Explanation
						the authority as there could be a greater likelihood of people being made homeless if fixed term tenancies are not renewed. This is therefore a negative impact. However, the support given to those who are working, but on a low income, may provide a positive impact particularly if they are no longer in need of social housing and are able to access intermediate or market housing.
	Rural isolation			√	.	Rural isolation is likely to remain an issue, even with the proposed changes.

**Notes:**

Faith groups cover a wide range of groupings, the most common of which are Muslims, Buddhists, Jews, Christians, Sikhs, and Hindus. Consider faith categories individually and collectively when considering positive and negative impacts. Non faith groups refer to individuals of groups not associated with organised religions such as atheists or agnostics etc.

The categories used in the Race section are those used in the 2011 census. Consideration should be given to the needs of specific communities within the broad categories, for example, Polish and Eastern European people that do not appear as separate categories in the census.

**6. Are key elements of people's lives affected by this strategy for example finance, accommodation, welfare?**

Housing has a fundamental impact on people's life and effects their wellbeing

**7. Does the strategy discriminate against any group(s) either directly or indirectly?  
If yes, please state how.**

Some negative and positive impacts have been identified in section 5 of this EqIA. We have received no comments from the consultation process as to whether or not these would result in discrimination.

**8 a) If there are any negative impacts, how could you minimise or remove any negative impact?**

The Strategy identifies a number of ways in which the negative impacts could be minimised, including:

- No longer tenancy for life due to under occupation rules. Ensure relocation of elderly close to their own network of family and friends to ease transition into smaller accommodation and have the ability to offer sheltered accommodation as a choice.
- Tenant change in circumstances, e.g. when a tenant has noticeably a high enough income to comfortably afford (i.e. purchase) market housing, then arguably the affordable house would be better used by somebody in greater need. Advise and assist with the transition at the end of a tenancy.
- Where change in circumstances of a tenant who no longer needs an adapted property for older people; people who are less able; for adults



with learning disabilities. The property will be re-allocated to another tenant that meets those needs

- Lancashire authorities recognises the need for tenants to be able to move to be closer to work, family support etc. and supports the Government's efforts to facilitate easier movement within the sector.
- The affordable rent product does present an increased risk of homelessness to those who are, the most vulnerable or do not have the ability to be self sufficient financially. Measures to cope with those at risk will need to be put into place by the authority as there now exists greater opportunity of people being made homeless if fixed term tenancies are not renewed.

**8 b) How could you improve the strategy, project or policy's positive impact?**

The Strategy was subject to consultation and we would had no suggestions for increasing its positive impact.

**9. If there is no evidence that the strategy, policy or project promotes equality, equal opportunities or improved relations – how could it be adapted so that it does?**

We would welcome the views of consultees as to whether or not the Strategy could be adapted to promote equality.

**10. What consultation has been carried out on the strategy/policy/project?  
Please include details of any equality monitoring carried out.**

Consultation has been held with RSL partners, Local authorities, other

statutory bodies and some voluntary sector across Lancashire. The Strategy was also consulted on in terms of appropriate equality monitoring.

**11. Do you have data available which monitors the impact of the policy on minority groups? If not, please explain how you intend to continue monitoring the impact of this strategy, policy or project**

Each Local authority across Lancashire monitors the impact of policies and access to services of equality groups and we are seeking to utilise that information as our collective baseline. Existing local authority statistics have historically been used to monitor the likely impact of changes to the government's housing policies.

The outcome of this strategy is to:

- monitor access to housing; and
- monitor outcomes to ensure no discrimination against specific groups.

It is suggested that this monitoring is formalised throughout the implementation of this strategy to address any negative impacts already identified, or which may emerge in the future.

**12. Has this EqIA been consulted on? Who with? What feedback was received?**

**Internal:** May June 2012 with LA / Provider working group

**External:** Completed by December 2012

**13 Next steps: Based on your assessment, what changes, if any do you need to make? Tick one of the following and provide an explanation of why this is the action you are taking.**

Action*	Tick as relevant	Explanation of action
No major change		
Adjust the policy		
Continue the policy	√	Subject to improvements suggested during consultation.
Stop and remove the Strategy		Not possible as the requirement is included in primary legislation

#### 14. Summary of findings

Please write a short summary of your findings including any recommendations for change or further actions. This summary could be included in any reports to Chief Executives and/ or Cabinet

Following the initial consultation of the Equality Impact Assessment across Lancashire, and further consultation with the proposed Lancaster District Tenancy Strategy, no comments or concerns have been raised.