

Predictive: assessing and analysing proposed changes to services, policies and budgets

Enfield Council

Predictive Equality Impact Assessment (EQIA) - Equality Analysis



Predictive equality impact assessment/equality analysis template

Proposed change to service/policy/budget	Homelessness Private Rented Sector Investment Project
Officer completing the assessment	Hayley Coates
Extension Number	X 3087
Service	Housing
Department	Health, Housing and Adult Social Care
Date impact assessment completed	12/12/13

Section 1 – About the service, policy or budget, and proposed change

Q1. Please provide a brief description of the service/ policy/budget

Community Housing aims to promote independence and housing choice, as well as prevent homelessness and reduce the number of families in temporary accommodation. The shortage of quality housing in Enfield is placing pressure on housing supply for residents of the borough. In particular, the demand for temporary accommodation has increased significantly in recent years for a variety of reasons. In March 2013 Enfield was ranked 7th highest nationally for the number of households in temporary accommodation, which was approximately 2188 households. As demand is outstripping supply, temporary accommodation prices in the borough have increased. The service is therefore facing significant financial pressures if no management action is taken to increase the supply of more affordable accommodation and to reduce the demand for the service.

Q2. Please provide a brief description of the proposed change(s) to the service/ policy/budget

To respond to the budget pressures on the temporary accommodation service and generally to ensure that residents with housing needs can access better quality properties, it is proposed that houses are purchased via a local authority trading company, subject to market availability. These houses would then be used for those with housing needs, which may include enabling the Council to discharge its statutory duties for homelessness. Public Works Loan Board funding or from external finance would be accessed depending on the most advantageous source, and annual repayments will be made using the rental income from the properties. The rent will be set by the local authority owned company, taking into account financial viability and the constraints of the target population, for example by setting rent at a rate comparable to Local Housing Allowance if the properties are purchased for those in temporary accommodation to alleviate budget pressures. The tenants will benefit from a trusted landlord and better quality accommodation.

Q3. Does equalities monitoring of your service show that the beneficiaries in terms of the recipients of the service, policy or budget, and the proposed change, include people from the following groups?

R	Yes – the service is available to all residents with housing needs regardless of race.
D	Yes - the service is available to all residents with housing needs including those with disabilities. The model includes refurbishment costs, which will include special adaptations for those with disabilities where required.
G	Yes – the service is available to all residents with housing needs regardless of gender.
A	Yes – the service is available to residents with housing needs, which includes a range of ages.
F	Yes - the service is available to all residents with housing needs regardless of faith.

S	Yes - the service is available to all residents with housing needs regardless of sexual orientation.
T	Yes - the service is available to all residents with housing needs including members of the transgender community.
M	Yes - the service is available to all residents with housing needs, including those who are married or in a civic partnership.
P	Yes -the service is available to all residents with housing needs, including those who are pregenant.

Q4. If you answered 'no' to any of the groups listed in Q3, please state why?

N/A

Q5. How will the proposed change eliminate discrimination, promote equality of opportunity, or promote good relations between groups in the community?

The proposed change will initially develop a portfolio of two and three bedroom properties, to move people out of temporary accommodation. The portfolio will be regularly reviewed to ensure that there is an adequate mix of property sizes but initially this will be two and three bedroom properties due to high demand for this property size. The proposed change will reduce budget pressures on the temporary accommodation service, which will support the Council to continue to provide vital services to local residents. Allocations will be made in line with existing policies, taking into account individual needs.

The proposal may also involve the purchase of properties for residents with housing needs more generally, increasing the supply of quality accommodation with a trusted landlord.

A sum has been set aside within the financial model to refurbish the properties to an agreed standard. This has taken into account the requirement for some adaptations that may be necessary for tenants with physical disabilities, to ensure they are not disadvantaged.

Section 2 – Consultation and communication

Q6. Please list any recent consultation activity with disadvantaged groups carried out in relation to this proposal

R	<p>The proposal is to change the way the Council accesses more affordable, quality accommodation for those with housing need and to discharge its homelessness duty. This is a back office change that will not have an adverse impact on local residents, including those from disadvantaged groups, so a consultation has not taken place.</p>
D	
G	
A	
F	
S	
T	
M	
P	

Q7. Please state how you have publicised the results of these consultation exercises, and what action you have taken in response

R	<p>N/A as above.</p>
D	
G	
A	
F	
S	
T	
M	
P	

Section 3 – Assessment of impact

Q8. Please describe any other relevant research undertaken to determine any possible impact of the proposed change

In the development of the financial model, past trends of Local Housing Allowance rates have been analysed to ensure that the assumptions in the model about the appropriate rental amount for the tenants is reasonable. The development of the financial model has also included research into void rates, bad debts and cost inflation to test viability over the period and thus increase the security of the tenancies.

A set of key guiding principles for the purchase of properties has been developed following research on the types of properties required, for example the number of bedrooms that is preferable and the required yield to ensure the model is financially viable.

Q9. Please list any other evidence you have that the proposed change may have an adverse impact on different disadvantaged groups in the community

R	None – there is nothing to evidence that this project will have an impact on any different disadvantaged groups as it involves a proposal to access quality accommodation for those with housing needs in a different way and increase access to better quality accommodation.
D	
G	
A	
F	
S	
T	
M	
P	

Q10. Could the proposal discriminate, directly or indirectly, and if so, is it justifiable under legislation? Please refer to the guidance notes under the heading, 7. Useful Definitions

This proposal will not discriminate, either directly or indirectly. The allocations for the tenancies will be based on those in greatest needs and on the suitability of the properties for individual needs, in accordance with existing policies.

Q11. Could the proposal have an adverse impact on relations between different groups? If so, please describe

This proposal is not expected to have an adverse impact on relations between different groups.

Q12. How could this proposal affect access to your service by different groups in the community?

R	Access to the service will not be affected by different groups in the community. Rather than utilising privately owned accommodation the Council will be able to access properties owned by a local authority company, which will be more cost effective for the Council.
D	
G	
A	
F	
S	
T	
M	
P	

Q13. How could this proposal affect access to information about your service by different groups in the community?

R	This proposal will not have an impact on access to information about the service by different groups in the community.
D	
G	
A	
F	
S	
T	
M	
P	

Section 4 – Tackling socio-economic inequality

Q14. Will the proposal in any way specifically impact on communities disadvantaged through the following socio-economic factors? Please explain below. If it does not, please state how you intend to remedy this (if applicable to your service), and include it in the action plan
Communities living in deprived wards/areas

Yes, as many of the local residents who present with housing needs are from deprived wards in the borough. The proposal will contribute to a reduction in budget pressures for temporary accommodation, which will support the Council to continue to meet its statutory duties with regards to homelessness and in later stages support those with housing need more generally.

People not in employment, education or training

Yes as many of the local residents who present with housing needs are not in employment, education or training. By purchasing a number of properties to be owned by a local authority company, a number of households will benefit from quality accommodation with a trusted landlord, which may enable them to improve chances of accessing employment, training or education.

People with low academic qualifications

The proposal does not specifically impact on people with low academic qualifications unless they have housing needs.

People living in social housing

The target population is initially those in temporary accommodation, so will not impact on those currently living in social housing in the first phase, however, those in social housing may benefit as the scheme evolves and housing needs change.

Lone parents

The proposal does not specifically impact on lone parents unless they have housing needs.

People on low incomes

Yes, the proposal will impact on people on low incomes with housing needs as the financial model has taken into account Local Housing Allowance rates, to ensure the rent can be realistic for those on low incomes or unemployed.

People in poor health

The proposal does not specifically impact on people in poor health unless they have housing needs.

Any other socio-economic factor

None.

Section 5 – Impact on staff

Q15. How have you consulted, or otherwise engaged with, all relevant staff about this proposal (including any staff on sickness or maternity leave)?

This proposal will not result in a restructure. The management of the properties is yet to be finalised but there is the potential for the properties to be managed by the Community Housing team as part of their portfolio. If this is agreed, a review of resources will be undertaken to determine if any additional support is required within the team. Alternatively a management agreement will be explored with an third party organisation, in accordance with procurement regulations.

Q.16 If your proposal involves a staff restructuring, how have you discussed this with relevant trade unions?

N/A

Q17. Does job matching of existing staff against the new proposed staff structure, following any assimilation process, indicate that any particular groups of staff are adversely affected more than others?

R	N/A
D	
G	
A	
F	
S	
T	
M	
P	

Q.18 Are there any proposed changes to working hours, work locations or duties likely to have a negative impact on particular groups of staff?

R	N/A
D	
G	
A	
F	
S	
T	
M	
P	

Section 6 - Miscellaneous

Q19. Is your proposal likely to have an impact on services provided by another Council department or service? If so, have you discussed the possible impact with them?

The proposal will not have an impact on other Council services, however, it will help to respond to the temporary accommodation budget pressures but have an impact on the Council's borrowing. The proposal has been discussed with the Council's Finance team and an independent financial review has been undertaken.

Q20. Do you plan to publicise the results of this assessment? Please describe how you plan to do this

This assessment will be attached to the Cabinet report for the Homelessness Private Rented Sector project, which will be available electronically to the public.

This assessment/analysis will also be listed in the Council's Equality and Diversity Scheme Annual Report, and published on the Council website.

Q21. How and when will you monitor and review the effects of this proposal?

There will be an ongoing review of the financial viability and allocation of properties following the creation of the local authority company and the purchase of the properties. This will include consideration of the households that have been allocated on of the local authority company owned properties, to ensure that the allocation has been fair and transparent.

14. Action plan template for proposed changes to service, policy or budget

Proposed change to, or new, service, policy or budget – Homelessness Private Rented Sector Project

Team: Special Projects/Community Housing

Department: Health, Housing and Adult Social Care

Service manager: Malcolm Dabbs

Issue	Action required	Lead officer	Timescale	Costs	Comments
Obtain approval to progress	Prepare Cabinet report and attend to seek a decision	Hayley Coates	12 th February 2014	No direct costs associated with this action other than staff resources.	Item scheduled for Cabinet agenda on 12 February 2014.
Establish local authority owned company to purchase the properties	Follow legal process	Rhodri Morgan	February – March 2014 (subject to Cabinet approval)	External legal advice may be required. A quote has been requested.	
Undertake regular reviews of the property portfolio to ensure that the desired distribution of properties is achieved in terms of size and location.	Build a review process in the responsibilities of the company and Board of Directors.	Board of Directors	Ongoing following purchase of first property	Staffing costs have been factored into the financial model for the company.	

Communicate proposal to Community Housing staff.	Disseminate information about the plans to staff through team meetings, 1-2-1s and departmental news bulletins.	Malcolm Dabbs	Spring 2014 following set up of company	To be absorbed within existing budgets.	
--	---	---------------	---	---	--