

Equality Impact Assessment Corporate Service Improvement Tool

Details of the assessment	
Name of Function/Policy/ Service being assessed:	Discharge of Duty into the Private Rented Sector
Is the activity...?	New <input checked="" type="checkbox"/> (please go to step 1) Existing <input type="checkbox"/> (please go to step 2)
Date of assessment	09.06.20
Directorate & Service	Planning, Housing and Environmental Health
Policy Owner	Eleanor Hoyle
Lead Officer	Claire Keeling

Step 1	Initial Screening for:		
	<ul style="list-style-type: none"> • new policies/strategies • revised policies/strategies • policy decisions • considering partnership working arrangements • procurement/commissioning activities 		
	Key Questions	Answers/Notes	
1	What are you looking to achieve in this activity?	By adopting this document the Council will have a place a policy which sets out how it can discharge its homelessness functions into the private rented sector. This will ensure that the Council has a policy and robust procedures in place. This will then allow the Council to discharge its homelessness function into the private rented sector lawfully and should assist in protecting it against legal challenges and help to prevent and relieve homelessness for applicants in the district.	
2	Who in the main will benefit?	Applicants who may be threatened with homelessness, those who are already homeless or households where we have accepted a duty to accommodate	
3	Does the activity have the potential to cause adverse impact or discriminate against different groups in the community?	Yes <input type="checkbox"/>	Please explain:
		No <input checked="" type="checkbox"/>	Please explain: If a homelessness duty is discharged via this route it will be based on a thorough assessment of need of the client to ensure that any offers are affordable and suitable for the household

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	Key Questions	Answers/Notes	
		Note: if the answer is 'yes' then a full equality impact assessment is required – see step 2.	
4	Does the activity make a positive contribution to equalities?	Yes <input checked="" type="checkbox"/>	Please explain: When conducting a homelessness assessment, the households needs are discussed in depth and so if there are specific housing needs in relation to the household, then this policy will ensure that any needs are considered when housing the applicants and any offers are suitable
		No <input type="checkbox"/>	Please explain:
		Note: if the answer is 'yes' then a full equality impact assessment is required – see step 2.	

Where the screening has identified the need for a full impact assessment, this must:

- be commenced during the drafting stages of a new policy/strategy and fully completed following any consultation period before submitting the committee approval
- carried out before any policy decision is taken
- completed in the planning stages of any procurement exercise

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	Key Questions	Answers/Notes
Step 2	Scoping the assessment	
1.	What is the overall aim, or purpose of the function/ policy/service?	To allow the Council to be able to discharge its homelessness duties into the private rented sector
2.	What outcomes do you want to achieve with this function/ policy/service and for whom?	<ul style="list-style-type: none"> • Meet the Council's legal obligations pursuant to the Housing Act 1996 Part VII • Ensure that we can offer a wide range of options to all applicants who the council owes a housing duty to • Protect the council in the event of any legal challenges
3.	Who is intended to benefit from the function/service/ policy?	Households who are homeless or threatened with homelessness, to prevent relieve homelessness, or to discharge the main housing duty
4.	Who defines or defined the function/service/policy?	Part 7 of the Housing Act 1996 The Homelessness (Suitability of Accommodation) Order 1996 Equality Act 2010 Homelessness (Suitability of Accommodation) (England) Order 2012 The Localism Act 2011 Homelessness Code of Guidance for Local Authorities (2018)
5.	Who implements the function/service/policy?	Housing, specifically the Housing Options and Support Service and the Private Sector Housing Service
6.	How do the outcomes of the function/service/policy meet or conflict other policies, values or objectives of the public authority (if applicable)?	Please indicate which Sustainable Community Strategy (SCS) priority these outcomes relate to:
		Safer place <input type="checkbox"/>
		Cleaner, smarter borough <input type="checkbox"/>
		Improving health & reducing inequalities <input type="checkbox"/>
		Protecting & enhancing the environment <input type="checkbox"/>
		Good local transport <input type="checkbox"/>
		Strong economy & decent housing <input type="checkbox"/>
	Any other comments: This policy also contributes to the priorities contained within the West Kent Housing and	

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	Key Questions	Answers/Notes
		<p>Homelessness Strategy which are</p> <p>Improving the availability for housing for all and preventing homelessness</p> <ul style="list-style-type: none"> • By being able to offer private rented sector accommodation to prevent and relieve homelessness <p>Improving Housing supply</p> <ul style="list-style-type: none"> • Offering private rented tenancies increases the numbers of homes available to those who have a housing need <p>Improving the standard of housing</p> <ul style="list-style-type: none"> • Properties will be inspected prior to being offered and this will allow us to work with landlords to improve standards <p>Improving the health and wellbeing of our residents</p> <ul style="list-style-type: none"> • A decent settled home which meets needs will impact positively on the health and well-being of those who we accommodate via this route
7.	Are there any factors that could contribute or detract from the outcomes identified earlier?	Lack of accommodation available to the Council in the Private Rented Sector Landlords not willing to work with the Council and the client group Affordability of the sector for many households who are on benefits
Step 3	Consideration of data and information	
8.	What do you already know about who uses this function/service/ policy?	We already use the private rented sector where applicants find properties themselves. However this will give us the ability to make offers to applicants, when a suitable property is located, to prevent or relieve their homelessness. This may also prevent households from going into more costly TA. For the period 2019 – 2020 23 gave 5 Rent Deposits for Private Sector Homes for the purpose of prevention or relief.
9.	Has any consultation with service users already taken place on the function/service/ policy and if so what were the key findings?	No service user consultation has taken place
10.	What, if any, additional information is needed to assess the impact of the function/service/policy?	No additional information required to assess the impact

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	Key Questions	Answers/Notes
11.	How do you propose to gather the additional information?	
Step 4	Assessing the Impact	
12.	Based on what information you already know, in relation to each of the following groups consider whether a) there is anything in the function/service/policy that could discriminate or put anyone at a disadvantage b) for an existing function/service/policy, how it is actually working in practice for each group	
a.	Equality groups	Age
b.		Disability
c.		Gender
d.		Race
e.		Religion/Belief
f.		Sexual Orientation
g.		General/other
		Those under the age of 18 could be at a disadvantage as they are not lawfully allowed to hold a tenancy
		Assessments will be based on need, and so it is expected this will provide a better service as we would match applicants to properties which meet their housing needs.
		Assessments are based on need and offers will be made on this basis
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		Assessments will be based on need, and so it is expected this will provide a better service as we would match applicants to properties which meet their housing needs so for example if a family needed an extra kitchen to meet religious needs then we could look for a home that would accommodate this
		Assessments are based on need and offers will be made on this basis
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Step 5	Reviewing and Scrutinising the Impact	
13.	Have you identified any differential impact and does this adversely or positively affect any groups in the community?	Assessments for an offer of private rented sector housing will be based on the needs of the family when we complete our homelessness assessment and will take into consideration the suitability and location of property. It may adversely affect those on lower incomes as properties may not be affordable in the district, given the higher than average rental prices experienced
14.	Can we make any changes or improvements?	This is a new policy but we will review it within 12 months to determine if any changes or improvements could be made
15.	If there is nothing you can do, can the reasons be fairly justified?	Yes it is a new policy so we have not had time to determine if it can be changed or improved
16.	Do any of the changes in relation to the adverse impact have a further adverse affect on any other group?	No

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Step 5 continued...		Actions to be inserted into Equality Action Plans			
Based on your answers in Step 5, please finalise your actions here. These actions will then be incorporated into our equality action plans.					
Equality Strand	Related SCS (or other) Priority	Action	Outcome/monitoring information and targets	Date for Completion	Responsible Officer
If an adverse impact was found or unmet needs identified, which actions will you put in place to address this:					
If the impact is still unclear, list the actions you will put in place to gather the information you need:					
If you did not find any evidence of unmet needs or adverse impact, list the actions you will put in place to maintain good practice:					

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Step 6	Decision making and future monitoring	
17.	Which decision making process do these changes need to go through i.e. do they need to be approved by a committee/Council?	Approved by committee
18.	How will you continue to monitor the impact of the function/service/ policy on diverse groups?	The EqIA will be reviewed and updated in line with the policy and equalities assessments are to be introduced into homelessness assessments
19.	When will you review this equality impact assessment?	In line with the Policy, so after 12 months or if there are any major changes to legislation which require this to be done sooner
Final steps		
For an existing function/service/policy:		
For a new function/service/ policy:		