

## Initial Equality Impact Assessment Template

Service Department: Housing	Date started: 21.11.07
Name of policy to be assessed: Demotion of Tenancy	
Is this a new or existing policy? New	
Lead Officer: Andrew Cotton	
<p>1. Briefly describe the aims, objectives or purpose of the policy. To allow NKDC a further tool in combating Anti Social Behaviour (ASB) through the option of demoting the tenancies of perpetrators.</p>	
<p>2. Who will be affected by this policy? NKDC tenants; staff implementing</p>	
<p>3. Who is intended to benefit from this policy and in what way? Tenants and residents of NKDC estates – allows efficient and effective housing management of ASB and neighbour nuisance.</p>	
<p>4. What outcomes are required from this policy and for whom? Tenants and residents – improved quality of life. NKDC – allow most efficient and appropriate housing management tool.</p>	
<p>5. Who are the main stakeholders in relation to the policy? Tenants; housing staff.</p>	
<p>6. Who implements the policy, and who is responsible for the policy? Housing Staff (Tenancy Services Team), Housing Managers, HMT, elected member with responsibility for housing</p>	
<p>7. Are there any other organisations or partners involved in the delivery of the service? Who is the lead or accountable body? No formal partnerships, but will work with other agencies in terms of information sharing and a joined-up approach to combating ASB.</p>	
<p>8 a) What monitoring data is available on the number of people who use the service or affected by the policy? Who holds this information? General monitoring data held on NKDC tenants. No other monitoring at present.</p> <p>b) If this is a new proposed policy, what information have you got on the likely number/type of people accessing or using the new policy/service? No data held at present on perpetrators of nuisance in terms of efficacy of different enforcement tools.</p> <p>c) If no monitoring has been undertaken, will this be done in the future? If so, specify what arrangements you intend to make. If you do not intend to do any monitoring, please provide your reason for this decision. The process will allow for data to be collected proactively. This will include the collation and analysis of the following data:</p> <ul style="list-style-type: none"> <li>• Monitoring of demoted households (i.e. perpetrators)</li> <li>• Monitoring of households (complainants)</li> </ul>	

d) What are the key performance indicators and targets attributed to the policy?  
None, other than the fact NKDC needs to be able to demonstrate the ability to facilitate demoted tenancies as part of the *Respect Standard for Housing Management* and the Audit Commission's *Key Lines of Enquiry in Tenancy and Estate Management*.

9. What consultation has been carried out with stakeholders and service users previously about the policy?

None, but this procedure will be reviewed by the Housing Quality Practice Group as tenant representatives.

10. Are there concerns that the policy could have a differential impact on different racial groups? If yes, please explain. What existing evidence (either presumed or otherwise) do you have for this?

Yes – possible exclusion through language barriers. However, corporate translation service is available and staff aware of importance through diversity training. Housing Officers aware of and promote the importance of support and signposting.

11. Are there concerns that the policy could have a differential impact on men and women? If yes, please explain. What existing evidence (either presumed or otherwise) do you have for this?

No concerns, as the policy applies to men and women equally. Informal feedback, review built into the procedure, and more formal corporate complaints service available if individuals are unhappy, would allow feedback into immediate review of the procedure if equality issues were evidenced in this way. Housing Officers aware of and promote the importance of support and signposting.

12. Are there concerns that the policy could have a differential impact on disabled people? If yes, please explain. What existing evidence (either presumed or otherwise) do you have for this?

Yes: - possible difficulties in accessing information/forms/letters, perhaps due to sensory impairments. Corporate access to documents procedure. Housing Officers aware of and promote the importance of support and signposting.

13. Are there concerns that the policy could have a differential impact on the grounds of sexual orientation? If yes, please explain. What existing evidence (either presumed or otherwise) do you have for this?

No concerns, as the policy applies to all groups equally. Informal feedback, review built into the procedure, and more formal corporate complaints service available if individuals are unhappy, would allow feedback into immediate review of the procedure if equality issues were evidenced in this way.

14. Are there concerns that the policy could have a differential impact on the grounds of age? If yes, please explain. What existing evidence (either presumed or otherwise) do you have for this?

No significant concerns, as the policy applies to all groups equally. Informal feedback, review built into the procedure, and more formal corporate complaints service available if individuals are unhappy, would allow feedback into immediate review of the procedure if equality issues were evidenced in this way. Housing Officers aware of and promote the importance of support and signposting.

15. Are there concerns that the policy could have a differential impact on the grounds of religious belief? If yes, please explain. What existing evidence (either presumed or otherwise) do you have for this?

No significant concerns, as the policy applies to all groups equally. Informal feedback, review

<p>built into the procedure, and more formal corporate complaints service available if individuals are unhappy, would allow feedback into immediate review of the procedure if equality issues were evidenced in this way. Housing Officers aware of and promote the importance of support and signposting and are sensitive to cultural issues, especially during home visits.</p>
<p>16. Are there concerns that the policy <u>could</u> have a differential impact on any other groups of people e.g. those with dependants/caring responsibilities, those with an offending past, those with learning difficulties, transgender or transsexual people. If yes, please explain. What existing evidence (either presumed or otherwise) do you have for this?</p> <p>No significant concerns, as the policy applies to all groups equally. Informal feedback, review built into the procedure, and more formal corporate complaints service available if individuals are unhappy, would allow feedback into immediate review of the procedure if equality issues were evidenced in this way. Housing Officers aware of and promote the importance of support and signposting. all decisions relating to the application for a demoted tenancy are reviewed by managers within the Tenancy Services team, and independently by the Legal Service.</p>
<p>17. Are there any factors that might account for differential impacts or non-achievement of the policies outcomes, such as barriers that prevent people from fully accessing the service? For instance, communication difficulties, physical access, information not being accessible, use of language, childcare responsibilities?</p> <p>Corporate translation and DDA compliant policies should prevent non-achievement. Front-line staff are trained in diversity issues and are sensitive to the need to take a proactive role in combating ASB.</p>
<p>18. Are there any unmet needs or requirements that can be identified that affect specific groups. If yes, please give details.</p> <p>The procedure involves the use of formal, legal documentation that may intimidate persons with poor literacy. Housing Officers are aware of and promote the importance of support and signposting, are sensitive to these issues and make sure independent legal and/or housing advice is recommended to perpetrators.</p>
<p>19. Is there a complaints system? Is yes, are complaints monitored by race, gender, disability, age, sexual orientation, and religious belief?</p> <p>The corporate complaints procedure allows monitoring. Staff are also expected to raise and pass on any concerns expressed by service users on an informal basis.</p>
<p>20. Have there been any concerns or feedback from front line staff, other council employees, or Councillors about the policy?</p> <p>None</p>
<p>21. Have there been any concerns or feedback from voluntary/community organisations about the policy?</p> <p>None</p>
<p>22. Is there any research or models of practice that may inform our view?</p> <p>The procedure complies with guidance from the Chartered Institute of Housing's Housing Manual.</p>
<p>23. Can any adverse impact be justified on the grounds of promoting equality of opportunity for one group? Or any other reason?</p> <p>As noted above, the grounds for refusal allowed in legislation are provided so that the Council can make best use of its housing stock and deliver an effective housing management service.</p>

24. Should the policy proceed to a full impact assessment? No
25. Date on which full assessment to be completed by: N/A
Signed (Lead Officer): .....  Date: .....

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Details of Officers involved in initial impact assessment process

Name	Job Title
Andrew Cotton	Housing Tenancy Manager

Date policy scheduled for full impact assessment: \_\_\_\_\_

Completed form sent to lead equality contact on: \_\_\_\_\_

Completed form sent to Human Resources on: \_\_\_\_\_