

Equality Analysis (EIA) Form

A) Description

Name of service, function, policy (or other) being assessed

Waiver of disposal capital clawback provisions within the council's Large Scale Voluntary Transfer Agreement with Herefordshire Housing Ltd.

Directorate or organisation responsible (and service, if it is a policy)

AWB Commissioning

Date of assessment

October 2016

Names and job titles of people carrying out the assessment

Hayley Crane, Housing Development Officer

Accountable person

Martin Samuels, Director Adult and Wellbeing

What are the aims or main purpose of the service, function or policy? What does it provide and how does it provide it?**Waiver of clawback receipt**

Waivering the policy will allow Herefordshire Housing Limited (HHL) to dispose of unsustainable/ hard to let housing stock in order to develop more targeted housing for identified vulnerable groups such as learning disabilities and mental health and priority groups identified within the Housing Strategy.

Location or any other relevant information

County wide

List any key policies or procedures to be reviewed as part of this assessment.

The LSVT agreement

Who is intended to benefit from the service, function or policy?

HHL have identified potentially 25 'one-off' properties that are not meeting the organisations sustainability criteria, these include properties that are isolated and hard to let, poor energy efficiency ratings, non traditional build and those requiring a high financial investment.

Properties will only be considered when they become vacant or if the tenant agrees to be relocated into a more suitable alternative property to meet their needs.

All capital nett receipt and additional HHL financing will be invested in new affordable dwellings, typically the sale of one dwellings creates two new dwellings.

Under the current clawback agreement Herefordshire Council has the right to receive only 50% of the nett clawback, Herefordshire Council would waive the clawback to allow further new build development. This will be of great strategic value to the council as it will also enable significant increases in the availability of housing for its priority groups of vulnerable people.

There is a risk if Herefordshire Council do not support the waiver that properties may stand empty for some time, not sell or offers received may be less than HHL's valuation meaning reductions in the amount of capital available to be reinvested in development.

Who are the stakeholders? What is their interest?

Herefordshire Housing Limited
Existing tenants of HHL,
Herefordshire Council

B) Partnerships and Procurement

If you contract out services or work in partnership with other organisations, Herefordshire Council remains responsible for ensuring that the quality of provision/delivery meets the requirements of the Equality Act 2010, ie.

- Eliminates unlawful discrimination, harassment and victimisation
- Advances equality of opportunity between different groups
- Fosters good relations between different groups

What information do you give to the partner/contractor in order to ensure that they meet the requirements of the Act? What information do you monitor from the partner/contractor in order to ensure that they meet the requirements of the Act?

Herefordshire Council expects Herefordshire Housing Limited to comply with the Equality Act 2010 and have their own Equality policy available.

The Strategic Housing team within Herefordshire Council will monitor various aspects of the disposal programme including numbers, and demographics of applicants who are given their notice to quit on their existing property.

Are there any concerns at this stage that indicate the possibility of inequalities/negative impacts? For example: complaints, comments, research, and outcomes of a scrutiny review. Please describe:

A small number of tenants with protective characteristics could in principle be affected, however they can only be relocated in accordance with legislation and any applicable compensation payments. However all tenants would be treated fairly and in accordance with the requirements of the Equality Act.

Herefordshire Council would have to agree to all properties that are to be disposed of, properties that have been greatly enhanced or have received disabled facilities grant will not be considered.

The proposed disposal programme will enable HHL to resolve problematic poor quality housing and replace it with an increased number of high quality housing. The council's corporate plan identifies among its strategic priorities supporting the growth of the economy and securing better quality of life and value for money. The proposed disposal and development programme will increase the availability of housing for local people, improve the quality of life of social housing tenants through enhanced building quality and promote jobs and economic activity through a new building programme.

C) Information

What information (monitoring or consultation data) have you got and what is it telling you?

The monitoring information that we currently have is limited. We are broadly able to identify the number of properties being considered for disposal but not the household within them. However no property will be disposed of without the consent of the tenant and a new property identified to relocate them.

D) Assessment/Analysis

Describe your key findings (eg. negative, positive or neutral impacts - actual or potential). Also your assessment of risk.

Strand/community	Impact
	The rehousing of any tenants will have a positive impact on them as they will be rehoused in better quality accommodation that is suitable to meet their needs.

E) Consultation

Did you carry out any consultation?

Yes No

Who was consulted?

The housing stock is owned by HHL therefore they would carry out consultation with their tenants. HHL will also consult with Herefordshire Council before any disposal is considered.

Describe other research, studies or information used to assist with the assessment and your key findings.

An appraisal of the housing stock has been undertaken internally within HHL

Do you use diversity monitoring categories? Yes No

(if No you should use this as an action as we are required by law to monitor diversity categories)

If yes, which categories?

- X Age
- X Disability
- X Gender Reassignment
- X Marriage & Civil Partnership
- X Pregnancy & Maternity
- X Race
- X Religion & Belief
- X Sex
- X Sexual Orientation

What do you do with the diversity monitoring data you gather? Is this information published? And if so, where?

HHL monitor and make the information available on their website and in their annual report.

F) Conclusions

	Action/objective/target OR justification	Resources required	Timescale	I/R/S/J
a)	Review the impact upon tenants who have been reallocated to a new dwelling	Staff time		
b)				
c)				
d)				

(I) *Taking immediate effect.*

(R) *Recommended to Council/Directors through a Committee or other Report*.*

(S) *Added to the Service Plan.*

(J) *To be brought to the attention of the Equality Manager.*

*Summarise your findings in the report. Make the full assessment available for further information.

NB: Make sure your final document is suitable for publishing in the public domain.