

# Equality Impact Assessment

**DECLASSIFICATION OF  
PROPERTIES DESIGNATED  
FOR ALLOCATION TO  
PEOPLE AGED OVER 45  
YEARS**

- **Background**

An Equality Impact Assessment is an improvement tool. It will assist you in ensuring that you have thought about the needs and impacts of your service/policy/function in relation to the protected characteristics. It enables a systematic approach to identifying and recording gaps and actions.

- **Legislation- Equality Duty**

As a local authority that provides services to the public, Charnwood Borough Council has a legal responsibility to ensure that we can demonstrate having paid due regard to the need to

- ✓ Eliminate discrimination, harassment, victimisation.
- ✓ Advance Equality of Opportunity
- ✓ Foster good relations

**For the following protected characteristics:**

- ✓ Age
- ✓ Disability
- ✓ Gender reassignment
- ✓ Marriage and civil partnership
- ✓ Pregnancy and maternity
- ✓ Race
- ✓ Religion and belief
- ✓ Sex (Gender)
- ✓ Sexual orientation
- ✓ Socially excluded groups

**What is prohibited?**

- ✓ Direct Discrimination
- ✓ Indirect Discrimination
- ✓ Harassment
- ✓ Victimisation
- ✓ Discrimination by association
- ✓ Discrimination by perception
- ✓ Pregnancy and maternity discrimination
- ✓ Discrimination arising from disability
- ✓ Failing to make reasonable adjustments

**Complete this action plan as you go through the questions**

- **Step 1 – Introductory information**

Title of the policy	DECLASSIFICATION OF PROPERTIES DESIGNATED FOR ALLOCATION TO PEOPLE AGED OVER 45 YEARS
Lead officer and others undertaking this assessment	Director of Housing and Wellbeing
Date EIA started	4.12.23
Date EIA completed	4.12.23

● **Step 2 – Overview of policy/function being assessed**

Outline: What is the purpose of this policy? (Specify aims and objectives)
To meet the housing needs of the community in a way that is consistent with equalities legislation and regulatory standards.  This will be achieved by declassifying 1071 homes (around 20% of the Council's entire stock), which are currently restricted for allocation to those applicants aged 45 years and over.  There are risks to manage in relation to the implementation of the change, including the impact on existing tenants, and the potential for increased reports of ASB and neighbourhood issues.
What specific group/s is the policy designed to affect/impact and what is the intended change or outcome for them?
Applicants on the housing waiting that are aged under 45 will be able to access general needs accommodation currently designated for people aged 45 or over. This accommodation currently comprises around 20% of the Council's entire housing stock.
Which groups have been consulted as part of the creation or review of the policy
Tenants on the Housing Management Advisory Board have considered and endorsed the draft recommendations.  A range of stakeholders were consulted in 2017 as part of the formulation of the current Allocations Policy. There was strong support for removal of the 45+ category at general needs properties.

● **Step 3 – What we already know and where there are gaps**

List any existing information/data do you have/monitor about different diverse groups in relation to this policy? Such as in relation to age, disability, gender reassignment, marriage and civil partnership, pregnancy & maternity, race, religion or belief, sex, sexual orientation etc. Data/information such as: <ul style="list-style-type: none"> <li>● Consultation</li> <li>● Previous Equality Impact Assessments</li> <li>● Demographic information</li> <li>● Anecdotal and other evidence</li> </ul>
Detailed data is contained in the Cabinet report.
What does this information / data tell you about diverse group? If you do not hold or have access to any data/information on diverse groups, what do you need to begin collating / monitoring? (Please list)
Detailed commentary is contained in the Cabinet report.

● **Step 4 – Do we need to seek the views of others? If so, who?**

Considering the answers given in Step 2, do you need to consult with specific groups to identify needs / issues? If not explain why.
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Consultation with older people around future accommodation needs, generally, is planned as part of the review of sheltered accommodation.

● **Step 5 – Assessing the impact**

Considering any data/consultation/information and your own knowledge, identify whether the policy has a positive or negative impact on the individuals or community groups who identify with any 'protected characteristics' and provide an explanation for your decision. Please refer to the general duties on the front page.

Age	<p><b>Positive impact</b> - there is currently a risk of breach of equalities legislation given there does not appear to be a proportionate current justification for a general needs 45+ age category. Removal of the 45+ age category will reduce this risk.</p> <p>There is a high demand for accommodation from people aged below 45. Declassification of properties currently designated 45+ will increase the chances of people aged below 45 of being housed.</p> <p>Whilst the change in composition at accommodation will be gradual, existing tenants, many of whom are older may be distressed and concerned about younger residents moving into accommodation,</p> <p>The reasons for declassification are to be clearly communicated, and residents provided with the opportunity to feed back any specific concerns so they may be responded to.</p>
Disability <ul style="list-style-type: none"> <li>● Physical</li> <li>● Visual</li> <li>● Hearing</li> <li>● learning disabilities</li> <li>● mental health</li> </ul>	<p><b>Positive impact</b> - More accommodation will be available for people with disabilities aged under 45 to bid for. Some of this accommodation will have adaptations present which would meet their needs, but they cannot access it due to their age.</p>
Gender Reassignment (Transgender)	<p><b>Neutral impact.</b></p>
Race	<p><b>Neutral impact.</b></p>
Religion or Belief (Includes no belief)	<p><b>Neutral impact.</b></p>
Sex (Gender)	<p><b>Neutral impact.</b></p>
Sexual Orientation	<p><b>Neutral impact.</b></p>

Other protected groups <ul style="list-style-type: none"> <li>• Pregnancy &amp; maternity</li> <li>• Marriage &amp; civil partnership</li> </ul>	<b>Neutral impact.</b>
Other socially excluded groups <ul style="list-style-type: none"> <li>• Carers</li> <li>• Low literacy</li> <li>• Priority neighbourhoods</li> <li>• Health inequalities</li> <li>• Rural isolation</li> <li>• Asylum seeker and refugee communities</li> </ul>	<b>Neutral impact.</b>

<p>Where there are potential barriers, negative impacts identified and/ or barriers or impacts are unknown, please outline how you propose to minimise all negative impact or discrimination.</p> <ul style="list-style-type: none"> <li>• If you have identified adverse impact or discrimination that is illegal, you are required to take action to remedy this immediately.</li> <li>• Additionally, if you have identified adverse impact that is justifiable or legitimate, you will need to consider what actions can be taken to mitigate its effect on those groups of people.</li> </ul>
<p>There is currently a risk of breach of equalities legislation given there does not appear to be a proportionate current justification for a general needs 45+ age category. Removal of the 45+ age category will resolve this. People aged under 45, including those with disabilities will be able to access accommodation they cannot currently bid on purely because of their age.</p> <p>Generally, the accommodation in scope does not have features which make it particularly suitable for residents aged over 45+ or for elderly people. Some stock will have adaptations present; however, this is true of all stock, irrespective of age designation.</p> <p>Existing tenants that are elderly may be distressed by the prospect of a change in tenant composition. Communication will take place with these tenants, setting out that changes will be phased and gradual. An opportunity for support with specific concerns will be provided.</p> <p>ASB and tenancy management resources will be increased for a period.</p>
<p>Summarise your findings and give an overview as to whether the policy will meet Charnwood Borough Council's responsibilities in relation to equality and diversity (please refer to the general duties on the front page).</p>
<p>The removal of the 45+ age designation at general needs accommodation will meet Charnwood Borough Council's responsibilities in relation to equality and diversity.</p>

● **Step 6- Monitoring, evaluation, review**

<p>Are there processes in place to review the findings of this Assessment and make appropriate changes? How will you monitor potential barriers and any positive/ negative impact?</p>
<p>The proposed declassification of properties will be staged, allowing for close monitoring of the process and opportunity for mitigation of negative impacts arising.</p>
<p>How will the recommendations of this assessment be built into wider planning and review processes? e.g. policy reviews, annual plans and use of performance management systems.</p>

Activity to be embedded in to Corporate and Team Plan Objectives.

- **Step 7- Action Plan**


Please include any identified concerns/actions/issues in this action plan. The issues identified should inform your Service Plan and, if appropriate, your Consultation Plan

Reference Number	Action	Responsible Officer	Target Date
	Subject to Cabinet approval, implement recommendations / actions detailed in the Cabinet report.	Director of Housing and Wellbeing.	As set out in Cabinet report.

- **Step 8- Who needs to know about the outcomes of this assessment and how will they be informed?**

	Who needs to know?	How they will be informed (we have a legal duty to publish EIA's)
Employees	Y	Staff Briefing
Service users	Y	Article in tenant magazine and direct communication with affected residents.
Partners and stakeholders	N	
Others	N	
To ensure ease of access, what other communication needs/concerns are there?		None identified

- **Step 9- Conclusion (to be completed and signed by the **Service Head**)**

Delete as appropriate
<b>I agree with this assessment</b>
If <i>disagree</i> , state action/s required, reasons and details of who is to carry them out with timescales below.
N/A
Signed (Service Head):  Peter Oliver – Director of Housing and Wellbeing
Date: 04.12.24