

## CABINET – 17TH JANUARY 2019

### Report of the Head of Strategic and Private Sector Housing Lead Member: Councillor Paul Mercer

#### Part A

#### ITEM 9 TENANCY STRATEGY 2019-2024

##### Purpose of Report

This report presents the proposed Tenancy Strategy 2019-2024 setting out the issues which Registered Providers with housing stock in Charnwood must have regard to in developing their Tenancy Policies.

##### Recommendation

1. That the overarching Tenancy Strategy in relation to the Borough, attached as Appendix 1 to this report, be approved.
2. That the Head of Strategic and Private Sector Housing in consultation with the Cabinet Lead Member for Housing be given delegated authority to make amendments to the Strategy in response to future legislative changes, changes at Local or Regional level, or Government Guidance, and the Constitution be amended accordingly.

##### Reason

1. To comply with the statutory requirements of the Localism Act 2011.
2. To ensure the Strategy remains fit for purpose.

##### Policy Justification and Previous Decisions

There is a statutory requirement for a local housing authority to develop a Tenancy Strategy under Section 150 of the Localism Act. The Council as a Strategic Housing Authority is required to provide clear guidance to all of its partners on the future shape and development of social housing within the Borough.

This Strategy replaces the previous Tenancy Strategy 2012-2017, Councils still have the primary responsibility to assess and meet the housing needs of the Borough.

##### Implementation Timetable including Future Decisions and Scrutiny

The proposed Tenancy Strategy covers the period 2019-2024.

##### Report Implications

The following implications have been identified for this report.

##### *Financial Implications*

There are no additional financial implications associated with this report.

### *Risk Management*

There are no risks for the Council associated with the decision Cabinet is asked to make.

### *Equality and Diversity*

An Equality and Diversity Impact Assessment has been completed – see Appendix 2.

Key Decision: Yes

Background Papers: Not applicable

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## Part B

### Background

1. There is a statutory requirement for a Local Housing Authority to develop a Tenancy Strategy under section 150 of the Localism Act. The Council as a Strategic Housing Authority is required to provide clear guidance to all of its Registered Providers (formerly known as Housing Associations) partners on the future shape and development of social housing within the Borough.
2. The Housing and Planning Act 2016 included the requirement that most new Local Authority tenancies were granted for a fixed term of between 2 and 10 years. However, the Government set out in the recently published “A New Deal for Social Housing Green Paper 2018”, the intention not to make these provisions mandatory.
3. This Strategy sets out the strategic position of the Council with regards to the use of, review of and ending of Fixed Term Tenancies, Affordable Rents, Mutual Exchanges and Succession Rights.
4. Registered Providers, including the Council, have to publish a Tenancy Policy, which gives regard to the Tenancy Strategy; it is not mandatory for them to adopt Fixed Term Tenancies.
5. Fixed Term Tenancies are only relevant to General Needs Housing and only apply to new tenants. Lifetime Tenancies remain for those in supported housing and older person’s schemes such as Sheltered Housing and Extra Care Housing.
6. One of the key objectives of Fixed Term Tenancies was to make the best use of the social housing stock by addressing under occupation and encouraging those people who can afford to do so to move to other tenures such a private rented, homeownership.
7. The table below summarises the potential Advantages and Disadvantages for the introduction of Fixed Term Tenancies:

Advantages	Disadvantages
<ul style="list-style-type: none"><li>• Makes best use of housing to meet housing needs</li><li>• Reduces under occupation</li><li>• Opportunity to review with the tenant their Tenancy Agreement and to consider whether their current property meets their needs including location</li><li>• The ending of a Tenancy can be an opportunity to tackle specific housing management issues such as anti-social behaviour and or breaches of a tenancy</li><li>• May reduce rent arrears by ensuring</li></ul>	<ul style="list-style-type: none"><li>• Tenants may take less pride in their home which may result in higher repair costs for the Landlord</li><li>• May be disruptive to families with children who have to relocate away from friends and schools</li><li>• May discourage people into work if their earning capacity is a factor in retaining a property</li><li>• Maybe a potential cost to the Landlord in reviewing Tenancies at the end of the fixed period</li></ul>

tenants can affordable to pay the rent	<ul style="list-style-type: none"> <li>Suitable properties need to be available to rehouse households.</li> </ul>
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8. Registered Providers who wish to introduce Fixed Term Tenancies must first develop a Tenancy Policy. This Policy must have regard to the Council Tenancy Strategy.

#### Position of Registered Providers across the Borough

9. A review has been undertaken with the Registered Providers operating within the Borough to determine the extent to which they are using Fixed Term Tenancies and under what circumstances. In developing the revised Tenancy Strategy a questionnaire was sent to the 15 Registered Providers with stock in the Borough, requesting information as to whether they have introduced Fixed Term Tenancies, or intend to so in the future.

10. The following 6 responses were received:

Registered Provider	Fixed Term Tenancies Offered
Midland Heart	Yes - Fixed Term Tenancies only offered to new customers of 4 plus bedrooms
NCHA	No - Introduced Fixed term tenancies for some properties but have now made the decision not to continue with Fixed Term.
EMH Homes	No
Longhurst Housing Association	No
P A Housing	No
Derwent Housing Association	No

11. The 6 responding Registered Providers manage 69% (2,176) of the Registered Provider housing stock in the Borough.
12. In July 2018 the Institute of Social Policy, Housing and Equalities Research published findings of research undertaken into the use of Fixed Term Tenancies. The table below is an extract from this research, which shows for the Midlands area, of those responding 27% of Local Authorities and 88% of the Registered Providers current Tenant Policy is to let some of their homes on a Fixed Term basis.

Broad region	Local authorities <sup>1</sup>				Housing associations <sup>2</sup>			
	Yes		No		Yes		No	
	Number	%	Number	%	Number	%	Number	%
Across broad regions	-	-	-	-	20	95	1	5
London	3	30	7	70	6	67	3	33
Midlands	3	27	8	73	7	88	1	13
North	3	33	6	67	7	47	8	53
South	12	60	8	40	19	70	8	30
Total	21	42	29	58	59	74	21	26

1. 50 LAs responded to this question. 2. 80 HAs responded to this question.

13. The most important reason for adopting Fixed Term Tenancies was to facilitate the efficient use of stock. The majority of those who responded expected to continue using Fixed Term Tenancies.

### Affordable Rents

14. Affordable Rented housing rents (inclusive of service charges) are set at a level of up to 80% of the Market Rent and are not subject to the National Rent Regime. Social Housing rents are subject to National Rent Regime and are set at a level of up to 50% of the Market Rent (plus service charges where applicable).
15. While it is recognised that Affordable Rent housing is essential for the delivery of new homes funded by the Homes England, the cost of these may reach a level which, residents of the Borough who are on benefits are unable to meet the rent payments.
16. This is especially the case where changes to the welfare system have seen benefits no longer covering the full cost of a household rent, because of the benefit cap and the spare room subsidy.
17. The Council would prefer rents to be at a Social Rent level wherever possible, but recognises that in order to secure new supply, Affordable Rent will be delivered.

### Mutual Exchanges

18. The Council recognises that for many tenants Mutual Exchanges are an important option available to them to improve their housing situation and social mobility.
19. The Localism Act 2011 created a new mechanism for Mutual Exchanges to protect certain lifetime tenants following the introduction of Fixed Term Tenancies.
20. The Council therefore would encourage Registered Providers to consider granting a degree of security equal to what is being given up, even though they are not obliged to do so to ensure that exchanges are an effective tool.

### Succession

21. The Localism Act 2011 introduced changes to the statutory regime for Succession to a Tenancy when a tenant dies.
22. It remains that there can only be 1 Succession and that when 1 joint tenant dies this counts as 1 Succession.
23. The Registered Provider can make express provision in the Tenancy agreement to expand the group of individuals and family members that can succeed.
24. Given the level of housing need in the Borough, the Council will not support significant extension to the right to succeed.

## Tenancy Policy

25. The Council would expect a Registered Provider's Tenancy Policy to cover the following areas:

- Fixed Term Tenancies
  - When they will be used
  - Review period and process
  - How a tenancy will be ended
- Affordable Rent
  - When they will be used
  - When conversions of existing properties from social to affordable will be considered
- Mutual Exchange
- Succession

## Conclusion

26. It is proposed that the Tenancy Policy for the Council's stock will be reviewed and Tenants consulted and a report brought back to Cabinet with the outcome of the review and a Tenancy Policy for approval.

## Appendices

Appendix 1 - Tenancy Strategy 2019-2024

Appendix 2 - Tenancy Strategy 2019-2024 Equality Impact Assessment



# Tenancy Strategy

2019-2022



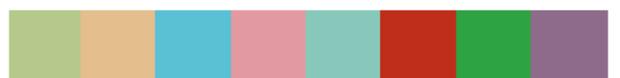


Welcome to the Council's new Tenancy Strategy 2019-2022.

The Council recognises that a secure home is an essential cornerstone to a person's life chances. Having a stable home and environment can have a positive impact on the ability to secure employment, children's education attainment, and on a person's overall health and wellbeing.

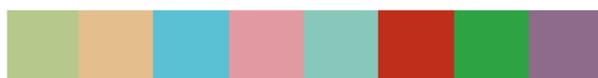
This Strategy sets out the Council's expectations of Registered Providers with housing in the Borough as to the kind of tenancies they grant which will make the best use of the social housing stock available in the Borough whilst being affordable and promoting sustainable communities.

**Councillor Paul Mercer**  
**Lead Member for Housing**



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The aim of the Tenancy Strategy is to ensure as far as possible a consistent approach to the use of Fixed Term Tenancies in the Borough and that affordable housing is genuinely affordable, to ensure that changes to tenure while making the best use of housing stock does not have an adverse impact on homelessness

The 2011 Localism Act introduced a duty on Local Authorities to prepare and publish a Tenancy Strategy. The purpose of this Strategy is to set out what Registered Providers (formerly known as Housing Associations) who own stock in the Borough need to have regard to when formulating their Policies on Tenancies and in any subsequent reviews and revisions.

This Tenancy Strategy is the second Strategy for Charnwood Borough Council and replaces the 2012-2017 Charnwood Borough Council Tenancy Strategy.

This Tenancy Strategy informs and is informed by the Council's Homelessness Strategy and Allocations Policy.

The Localism Act introduced a fundamental reform of the social housing tenure, the principal reforms were:

- That Registered Providers can offer Fixed Term Tenancies of a minimum

of 5 years, or in exceptional circumstances 2 years

- Increased flexibility for Councils to set their own Allocations Policies to meet local needs and circumstances
- The ability for Councils to place homeless households in suitable Private Rented Sector housing
- New social housing developments to include Affordable Rent model with rents of up to 80% market rent on new homes and the ability to convert vacant Social Rent homes to Affordable Rent
- Registered Providers being required to adopt and publish a Tenancy Policy
- Councils being required to consult on, adopt and publish a Tenancy Strategy
- The introduction of Affordable Rents and Fixed Term Tenancies has implications for tenants who wish to Mutual Exchange
- Changes to the rights of Succession has limited those able to succeed to a Tenancy on the death of the tenant

The introduction of both Fixed Term Tenancies and Affordable Rents has the potential to increase the number of people who can access affordable housing through an increase in supply and by more effective use of existing stock.

However, both initiatives need to be carefully monitored to ensure that any consequences can be mitigated and they do not have an impact on the levels of homelessness in the Borough.



Given the scale of the changes introduced by the Localism Act and the likely impact on a wide range of partners and stakeholders it was important to maximise the impact of the consultation during the development of the Council’s first Tenancy Strategy and Tenancy Policy in 2011.

A range of approaches were used including the holding of stakeholder events discussions at stakeholder groups and surveys of stakeholders and Housing Register applicants

The Localism Act introduced a requirement on Local Authorities to send a copy of the draft Strategy or proposed modifications, to every Registered Provider with housing in the Borough and to give the Registered Provider reasonable opportunity to comment on these proposals.

For the development of this Tenancy Strategy a questionnaire was sent to all the Registered Providers in the Borough to understand the use of both Fixed Term Tenancies and Affordable Rent across their stock and whether they intend to introduce these in the future.

The following 6 responses were received.

Registered Provider	Fixed Term Tenancies Offered
Midland Heart	Yes- Fixed Term Tenancies Offered to new tenants of properties 4 plus beds
NCHA	No- Introduced Fixed Term Tenancies but have now made the decision to discontinue with Fixed Term Tenancies
EMH Homes	No
Longhurst Housing	No
PA Housing	No
Derwent Housing	No

## Current Position of Registered Providers in the Borough

There are 15 Registered Providers letting properties in the Borough providing a total of 2,901 homes, which is 34% of the total Social and Affordable Housing Stock of 8,482.

A list of the Registered Providers operating in the Borough can be found at Appendix 1.

The Council currently owns 5,581 properties



Fixed Term Tenancies can be used to ensure social housing stock is available for those who need it most.

Where Registered Providers decide to use Fixed Term Tenancies the following factors should be taken into account.

Fixed Term Tenancies should be for a minimum of 5 years, with consideration given for longer periods of time in specific circumstances.

In particular, longer Fixed Term Tenancies should be considered for families with young children, older households and for vulnerable tenants who would benefit from the increased stability offered.

Tenants going into Sheltered or Extra Care Housing should be given Lifetime Tenancies.

Shorter Term Tenancies (2 years) should only be used in exceptional circumstances, for example:

- Where the accommodation is only intended to be short term
- Where there have been significant previous Tenancy breaches
- Where there are concerns about affordability of the Tenancy

All prospective tenants should be given clear information on the type of Tenancy, the reasons for offering that Tenancy and

how the process for reviewing the Fixed Term Tenancies.

Decisions to end a Fixed Term Tenancy by accelerated possession proceedings should be proportionate and tenants should be provided with clear, accessible guidance on the Registered Provider's internal process.

## Reviewing Fixed Term Tenancies

Registered Providers should explain in their Tenancy Policy the process for reviewing a Fixed Term Tenancy, detailing how frequently a Fixed Term Tenancy will be reviewed and what factors will be considered as part of that review.

It is expected that Fixed Term Tenancies are reviewed at least 9 months prior to the end of the Tenancy.

The Council will expect a Fixed Term Tenancy to be renewed other than when a tenant's circumstances have changed significantly, such as:

- The property is adapted and no one household member requires the adaptation
- The property is under occupied
- The property is overcrowded
- Any breaches of Tenancy or Tenancy fraud are identified during the Fixed Term Tenancy period.



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## Ending Fixed Term Tenancies

Where a Tenancy is to be ended without a breach of Tenancy, reasonable efforts should be made to offer suitable alternative accommodation and consideration given to extending the Tenancy until alternative suitable accommodation can be made available.

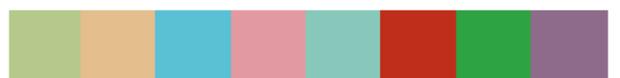
The Registered Provider must give at least 6 months written Notice to a tenant if the Tenancy is not renewed.

The reasons for ending the Tenancy should be clearly set out and information provided to the tenant on how to make an appeal. The tenant then has 21 days from the date of the Notice of nonrenewal to request a review and it is not necessary for this request to be in writing.

When carrying out the review the Registered Provider must consider whether its decision not to renew the Tenancy, is consistent with the renewal process for Fixed Term Tenancies.

The Registered Provider must notify the tenant, in writing, of its decision on review, and if the review upholds the original decision, the tenant must be given reasons for the decision.

The Registered Provider should inform the Housing Options Team at Charnwood Borough Council when a decision has been made to end a Tenancy and the reasons for ending the Tenancy.



## Affordable Rent

Affordable housing development is developed through 2 mechanisms:

- Planning obligations in Section 106 Agreements
- Grant funding from Homes England (HE)

In the Charnwood Borough, Section 106 Agreements deliver:

- Affordable Rented and Social Rented properties
- Affordable home ownership such as Shared Ownership:

HE Shared Ownership and Affordable Homes Programme provides grant funding for the following schemes:

- Help to Buy - requiring a smaller deposit
- Buying a share of a home – shared ownership
- Help to save for a deposit by paying a below market rent.

Social Rented housing has a rent level determined through the National Rent Regime

Affordable Rented housing is not subject to the new National Rent Regime and rents are set at a level of up to 80% of the Market Rent.

While it is recognise that Affordable Rent housing is essential for the delivery of new homes funded by the HE, the cost of

these may reach a level which, is unaffordable to residents of the Borough

This is especially the case where changes to the welfare system have seen benefits no longer covering the full cost of a household rent, because of the benefit cap and the spare room subsidy.

The Council would prefer rents to be at a Social Rent level wherever possible, but recognises that in order to secure new supply, Affordable Rent will be delivered.

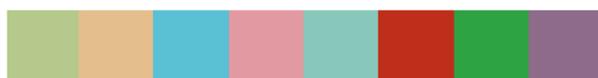
Affordable Rented and Socially Rented properties will be advertised alongside one another within the Council's Choice Based Lettings Scheme

The Council would not expect additional qualifying criteria to be attached to Affordable Rented properties. Adverts will contain sufficient information to allow applicants to make informed choices based on their individual circumstances and available properties

## Converting existing properties into Affordable Rent

Registered Providers have the ability to convert existing Social Rent properties into Affordable Rent with the additional investment being raised used for investment in new affordable housing.

The proportion of extra rent that can be charged under Affordable Rents increases along with property size, and as a result, in order to maximise income there may be a tendency for Registered



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Providers to concentrate rent conversions on their larger properties.

## Affordability

Currently all Affordable Rents across the Borough fall within the Local Housing Allowance (LHA) cap in Charnwood, although this situation will need to be monitored as it could change over the life of this Strategy.

When setting Affordable Rents the Council would expect Registered Providers to have regard to general affordability and the differential between Social Rents and Affordable Rents. This is to ensure not only Affordable Rents remain affordable for those on low incomes, but that significant differences in demand between Social Rents and Affordable Rents do not emerge that would undermine their ability to assist in meeting housing need



# mutual exchanges

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The Council recognises that for many tenants Mutual Exchanges are an important option available to them to improve their housing situation and social mobility

As a result, the Council would not want changes to the tenure legislation to impact on the effectiveness of this option.

The Council therefore would encourage Registered Providers to consider granting a degree of security equal to what is being given up, even though they are not obliged to do so to ensure that exchanges are an effective tool.

The introduction of Affordable Rents and Fixed Term Tenancies has implications for tenants who wish to exercise their right to Mutual Exchange.

Although there is some protections for existing tenants in certain circumstances these protections are not universal.

The Localism Act 2011 created a new mechanism for Mutual Exchanges to protect certain lifetime tenants following the introduction of Fixed Term Tenancies.

Assured Lifetime and Secure Lifetime tenants who were granted their Tenancy prior to 1 April 2012, whereby if they exchange with a tenant on a Fixed Term Tenancy, then a new Tenancy is issued to each and the tenant is granted another assured Tenancy.

The Fixed Term Tenant is granted a new Tenancy but there is no particular provision regarding its status so it will be a matter for the Registered Provider to decide what type of Tenancy to offer.

The legislation will only apply in a limited number of cases, but Registered Providers should ensure that, whatever the legal mechanism for Mutual Exchange, tenants are aware of the implications, including any changes in secure or assured status, any change in rent level between social and Affordable Rent, and any gain or loss of the Right to Buy, Preserved Right to Buy, or Tenancy Right to Acquire



Prior to the Localism Act 2011 a wide range of family members were able to succeed to a Tenancy on the death of a secure tenant, include spouses, partners, civil partners, parents, grandparents, children, grandchildren, aunts, uncles, nieces , nephews and adopted children.

The Localism Act 2011 introduced changes to the statutory regime for Succession to a Tenancy when a tenant dies.

It remains that there can only be 1 Succession and that when 1 joint tenant dies this counts as 1 Succession

Under the Localism Act Secure Tenancies which started after 1 April 2012 are limited to the Succession of spouses or civil partners. This is an automatic right

The Registered Provider can make express provision in the Tenancy agreement to expand the group of individuals and family members that can succeed.

Given the level of housing need in the Borough, the Council will not support significant extension to the right to succeed.

However, following the death of a tenant if there is someone residing in the home, as his or her principal residence, who is not entitled to succeed, the landlord should

- provide housing options advice and assistance to that person
- make sure that their Policies protect the interests of vulnerable people and
- where appropriate offer alternative accommodation of a size that meets that person's needs



## Resources

### Delivering the Tenancy Strategy

The key resources required to deliver this Strategy include:

- Housing Strategy and Support Manager
- Registered Providers having regard to the Tenancy Strategy when developing Tenancy Policies

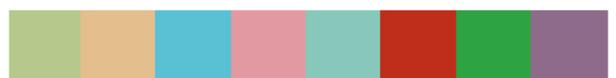
## Monitoring

### Performance Monitoring and Review

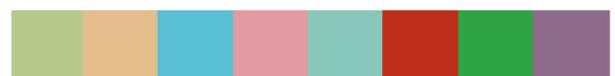
The Strategy will be monitored and reviewed on an annual basis or more frequently as changes in legislation, including benefits entitlement, may dictate.

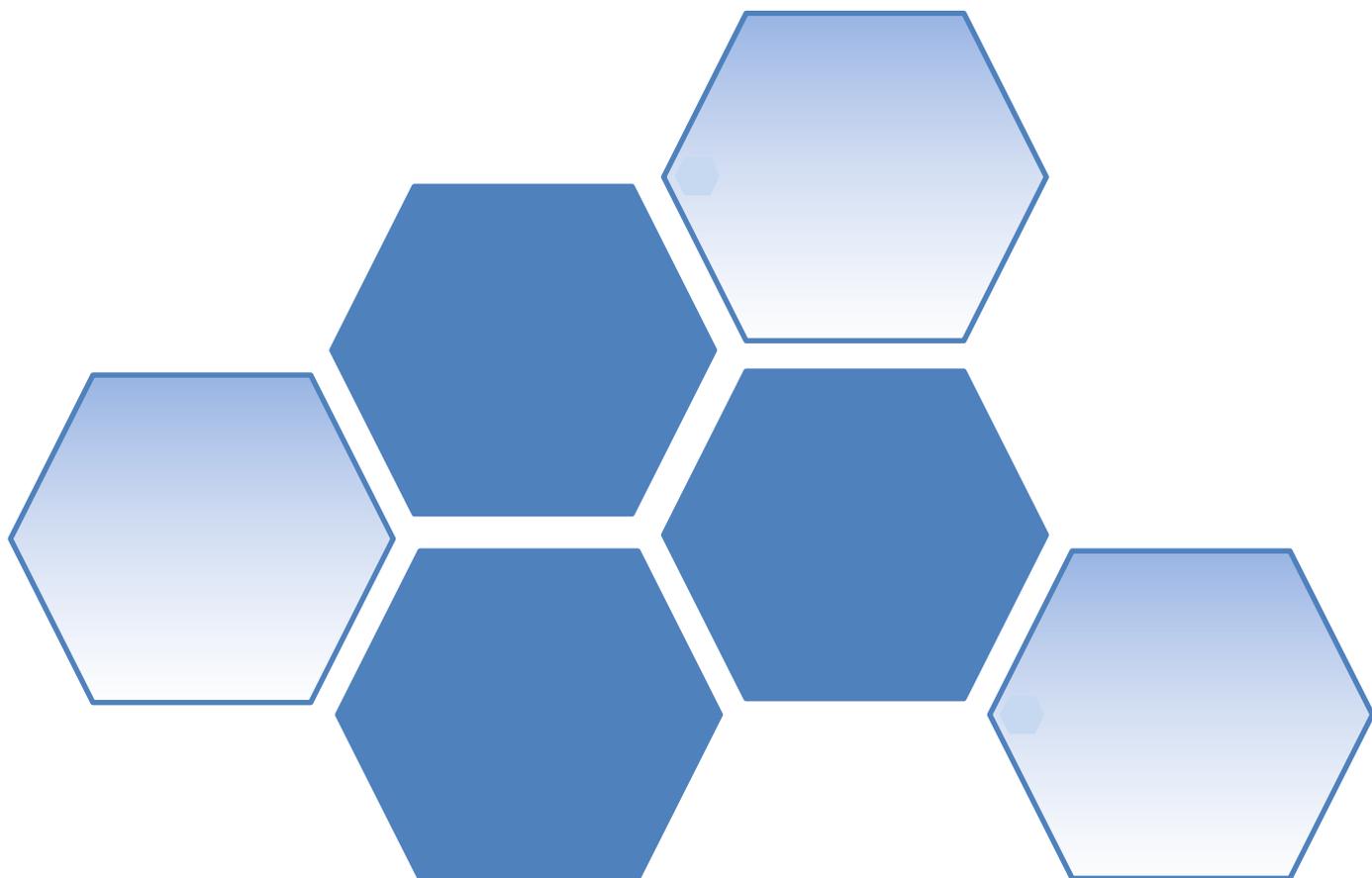
Minor changes which make no significant difference to service provision will be made to the document under delegated authority by the Head of Strategic and Private Sector Housing in consultation with the Lead Member for Housing.

Should the Policy be impacted by significant changes or financial implications, it will be taken to Cabinet for consideration.



Registered Provider Housing Stock for Rent in the Borough	
Registered Provider	Number of Properties for Rent
Abbeyfield Loughborough Society	2
Advance Housing and Support	54
Paragon ASRA Housing	225
Derwent Living	80
East Midlands Housing Group	637
Hanover Housing Association	58
Housing and Care 21	405
Longhurst Group	442
Longhurst Friendship Care and Housing	287
Metropolitan Housing	156
Midland Heart Group Limited	18
Nottingham Community Housing Association	173
Riverside Housing Association	312
Stonewater	12
TunTum Housing	2
<b>Total</b>	<b>2,901</b>





## Charnwood Borough Council

### Equality Impact Assessment 'Knowing the needs of your customers and employees'

#### ■ 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 and victimisation
- ✓ Advance Equality of Opportunity
- ✓ Foster good relations

For the following protected characteristics:

1. Age
2. Disability
3. Gender reassignment
4. Marriage and civil partnership
5. Pregnancy and maternity
6. Race
7. Religion and belief
8. Sex (Gender)
9. Sexual orientation

What is prohibited?

1. Direct Discrimination
2. Indirect Discrimination
3. Harassment
4. Victimisation
5. Discrimination by association
6. Discrimination by perception
7. Pregnancy and maternity discrimination
8. Discrimination arising from disability
9. Failing to make reasonable adjustments

**Note: Complete the action plan as you go through the questions**

### Step 1 – Introductory information

Title of the policy	Tenancy Strategy 2019-2022
Name of lead officer and others undertaking this assessment	Beverly Wagstaffe - Housing Strategy and Support Manager
Date EIA started	21 <sup>st</sup> December 2018
Date EIA completed	21 <sup>st</sup> December 2018

### Step 2 – Overview of policy/function being assessed:

<b>Outline: What is the purpose of this policy? (Specify aims and objectives)</b>
<p>The aim of the Tenancy Strategy is to ensure as far as possible a consistent approach to the use of Fixed Term Tenancies in the Borough and that affordable housing is genuinely affordable.</p> <p>The Tenancy Strategy sets out the Council's expectations should a Registered Provider wish to introduce Fixed Term Tenancies. Fixed Term Tenancies only apply to new tenants and not to those living in specialist accommodation such as Sheltered Housing/Extra Care Schemes.</p> <p>The Council's Tenancy Policy will be reviewed later in the year. This will set out the types of tenancies the Council will issue and be subject to wider consultation with tenants and residents.</p>
<b>What specific group/s is the policy designed to affect/impact and what is the intended change or outcome for them?</b>
<p>The Strategy is designed to support new and existing tenants of social housing in the Borough. The intended outcome is to the make the best use of the social housing stock whilst not resulting in an adverse impact on the homelessness.</p>
<b>Which groups have been consulted as part of the creation or review of the policy?</b>
<p>The Registered Providers (RP) with housing stock in the Borough have been consulted. Of those that responded, only 1 RP had adopted Fixed Term Tenancies offered to new tenants of 4 plus beds.</p>

### 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:

- Consultation
- Previous Equality Impact Assessments
- Demographic information
- Anecdotal and other evidence

#### Housing Register Data - December 2018

##### Age Profile

Age Band	Beds				Total
	1	2	3	4	
18-24	146	116	7	1	270
25-29	151	205	35	12	403
30-44	346	393	183	121	1043
45-59	323	165	83	28	599
60-64	99	14	5	3	121
65 & Over	334	28	4	4	370
<b>Total</b>	<b>1399</b>	<b>921</b>	<b>317</b>	<b>169</b>	<b>2806</b>

##### Ethnicity

	Total	%
Asian - Bangladeshi	87	3.10
Asian - Chinese	6	0.21
Asian - Indian	45	1.60
Asian - Other	37	1.32
Asian - Pakistani	4	0.14
Black - African	46	1.64
Black - Caribbean	14	0.50
Black - Other	5	0.18
Other	34	1.21
Other - Mixed	6	0.21
Prefer Not to Say	64	2.28
White & Asian	20	0.71
White & Black African	6	0.21
White & Black Caribb'n	24	0.86
White - British	2210	78.73
White - Irish	8	0.29
White - Other	191	6.80
	<b>2807</b>	<b>100.00</b>

What does this information / data tell you about diverse groups? 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)

The information above shows that applicants on the Housing Register aged 30-44 are more likely to be affected should an RP adopt the use of Fixed Term Tenancies. That the majority of applicants are White - British, which is a reflection of the population profile for the Borough.

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

In light of the answers you have given in Step 2, do you need to consult with specific groups to identify needs / issues? If not please explain why.

No. The Tenancy Strategy informs the RPs with social housing stock in the Borough as to the Council's expectations should they wish to introduce Fixed Term Tenancies. Each RP is required to prepare a Tenancy Policy giving regards to the Tenancy Strategy and consult with residents accordingly. The Tenancy Strategy does not change current policy.

■ **Step 5 – Assessing the impact**

In light of any data/consultation/information and your own knowledge and awareness, please identify whether the policy has a positive or negative impact on the individuals or community groups (including what barriers these individuals or groups may face) who identify with any 'protected characteristics' and provide an explanation for your decision (please refer to the general duties on the front page).

	<b>Comments</b>
<b>Age</b>	No impact/neutral impact
<b>Disability</b> (Physical, visual, hearing, learning disabilities, mental health)	No impact/neutral impact
<b>Gender Reassignment</b> (Transgender)	No impact/neutral impact
<b>Race</b>	No impact/neutral impact
<b>Religion or Belief</b> (Includes no belief)	No impact/neutral impact
<b>Sex</b> (Gender)	No impact/neutral impact

<b>Sexual Orientation</b>	No impact/neutral impact
<b>Other protected groups</b> (Pregnancy & maternity, marriage & civil partnership)	No impact/neutral impact
<b>Other socially excluded groups</b> (carers, low literacy, priority neighbourhoods, health inequalities, rural isolation, asylum seeker and refugee communities etc.)	No impact/neutral impact

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.

Please note:

- a) If you have identified adverse impact or discrimination that is illegal, you are required to take action to remedy this immediately.
- b) 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.

No

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).

The Tenancy Strategy does not discriminate against any of the protected characteristics. It sets out the Council's expectations should an RP wish to introduce Fixed Term Tenancies.

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

Are there processes in place to review the findings of this Assessment and make appropriate changes? In particular, how will you monitor potential barriers and any positive/ negative impact?

The outcome of this EIA will be monitored and reviewed alongside the Strategy

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.

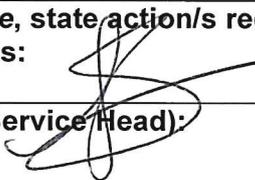
■ **Step 7- Action Plan**

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

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

	Who needs to know (Please tick)	How they will be informed (we have a legal duty to publish EIA's)
Employees		
Service users		
Partners and stakeholders		
Others		
To ensure ease of access, what other communication needs/concerns are there?		

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

Please delete as appropriate	
I agree / <del>disagree</del> with this assessment / <del>action plan</del>	
If <del>disagree</del> , state action/s required, reasons and details of who is to carry them out with timescales:	
Signed (Service Head):	 Ausan Summers Head of Strategy and Private Sector Strategy
Date:	24th December 2018

Please send completed & signed assessment to Suzanne Kinder for publishing.