

Equality Impact Assessment Form

Name of Strategy/Policy:	Local Housing Allowance Safeguard Policy	
Officer Name(s):	Anita Hall	
Job Title & Location:	Service Assurance Team Manager Town Centre Offices, Rawtenstall.	
Department/Service Area:	Customer Services & E Government	
Telephone & E-mail Contact:	01706 252 587 anitahall@rossendalebc.gov.uk	
Date Assessment:	Commenced: 1 st October 2007	Completed: 16 th November 2007

1. Impact Assessment – Policy and Target Outcomes

- a) Summarise the main aims/objectives of the strategy, policy, procedure or project (refer to “**Notes for Guidance**” for details).

Local Housing Allowance (LHA) is usually paid to the tenant; a tenant cannot simply request that payment is made to their landlord. To protect vulnerable tenants the council will apply discretion to pay the landlord. This policy sets out the principles to be applied by council officers when making decisions.

- b) Is the policy under review (please tick)

New/proposed Modified/adapted Existing

- c) Who will be the main beneficiaries, targets or users of this strategy, policy, project or procedure?

- Customers/citizens of the district
- Targeted/specific groups of customers/citizens (indicate below in [d]).
- Elected Members/Councillors
- Internal colleagues/customers or other public authorities e.g. government agencies
- Community Groups/voluntary sector groups or campaign/interest groups

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- Staff/employees (in their contractual position) and/or potential employees/trainees.
- Any other stakeholder e.g. trade unions, contractors, suppliers, district partners, public agencies (not directly under Council control), intermediaries representing interest groups e.g. tenants, developers, legal agencies or third parties.

Specify in box below:

- Help tenants take responsibility for managing their rent
- Vulnerable tenants – the policy will provide a safeguard for the most vulnerable tenants and reassure them that their rent benefit will be paid, help prevent rent arrears and tenants being put at risk of eviction.
- Landlords – the policy will reassure landlords that the rent will be paid if they have vulnerable tenants or are approached by vulnerable tenants

- d) Please detail below specific equality groups – for example disabled citizens, elderly or infirm/female or non-traditional users who are seen as intended beneficiaries from this policy/strategy/project/procedure (see “**Notes for Guidance**”).

Key equality groups as intended beneficiaries (where appropriate):

All benefit customers, in private rented accommodation, who may be vulnerable or potentially vulnerable and unable to manage their own affairs.

- e) To assist with the assessment you may need to consider collecting the following information you require, before completing the table in Section 2:

- NATIONAL DATA eg surveys, reports, statistics, etc which point up specific areas/issues.
- LOCAL DATA eg demographics, service mapping studies & relevant research.
- MANAGEMENT INFO eg data collected for operational/financial or other purposes.
- MONITORING DATA eg information already available or collected. For example: disability type, age band, gender, location. (ref existing BVPIs).

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- CONSULTATION/CONTACT DATA eg user group feedback, representations, specific consultation events etc.
- CUSTOMER COMPLAINT/FEEDBACK eg results of investigations, inquiries, elected member cases, normal complaints/compliments etc.
- Views of LSP Officers, independent externals, contractors/suppliers, partners and academia (if relevant).
- OTHER eg frontline employee feedback, other research, experiences of other agencies/local authorities, councillors mailbags/surgeries.

f) Is further consultation, data collection or research still required?

Yes

No

(If yes then complete Action Plan)

Key Actions (note responsible officer(s)):

The Department for Work and Pensions have issued guidance to all Local Authorities (based on the information gathered after reviewing the implementation of LHA within the pilot authorities). Based on this guidance a Safeguard Policy has been produced for use by Rossendale Borough Council.

The Service Assurance Team also met with Welfare Rights, Citizens Advice Bureau and Age Concern to discuss the proposed Safeguard Policy. Their comments were noted and where deemed appropriate the policy was amended.

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2. Impact – Evidence

- a) Using the table below please tick whether you have evidence that the policy/strategy has a negative, positive or neutral impact on any of the equality groups listed below

		Positive Impact – it could benefit	Negative Impact – it could disadvantage	Reason	Neutral Impact (Neither)
Gender	Women	√		The safeguard policy is aimed at all customers in receipt of Housing Benefit, who may be or be potentially vulnerable.	
	Men	√		Same a gender	
Race (Ethnicity or Nationality)	Asian or Asian British people	√		Same a gender	
	Black or black British people	√		Same a gender	
	Chinese or other ethnic people	√		Same a gender	
	Irish people	√		Same a gender	
	White people	√		Same a gender	
	Chinese people	√		Same a gender	

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		Positive Impact – it could benefit	Negative Impact – it could disadvantage	Reason	Neutral Impact (Neither)
	Other minority communities not listed above e.g. traveller/European (please state below):	√			
Disability	Physical/learning/mental health	√		Same a gender	
Sexuality	Lesbians, gay men and bisexuals	√		Same a gender	
Gender Identity	Transgender people	√		Same a gender	
Age	Older people (60+)	√		Same a gender	
	Younger people (17-25), and children	√		Same a gender	
Belief	Faith groups *	√		Same a gender	
Other Groups (e.g. carers, rural isolation)		√		Same a gender	
Equal opportunities and/or improving relations	Note impact on group relations <u>between</u> and any effects on social cohesion.	√		Same a gender	

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Notes:

* Faith groups cover a wide range of groupings, the most common of which are Muslims, Buddhists, Jews, Christians, Sikhs, Hindus. Consider faith categories individually and collectively when considering positive and negative impacts.

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- b) If the table above is not fully completed, what further information does the Assessor need?

- c) Based on a summary of the evidence obtained, are there specific equality groups more affected than others by this policy/project etc area? If so indicate briefly below.

3. Impact – Nature/Type

a) Could you further improve the strategy, project, policy or procedure’s positive impact?

YES NO

If “Yes”, briefly summarise below how the positive impact could be improved upon.

Key Actions:

b) If you indicated that there is neutral impact, could this be changed to become positive?

YES NO

If yes, briefly summarise below how this impact could be minimised or removed:

Key Actions:

c) You need to think about how you can mitigate any adverse or negative impact or use the policy to promote a positive impact. If the proposed policy or project has a:

High Impact – you have identified that the policy or project will have a high, negative impact i.e. that it may be or is unlawfully discriminating against some groups, you will have to take immediate action to mitigate this.

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Or:

Lower Impact – if you have identified that the policy would have a negative or adverse impact (that may not be lawful) you will also need to consider what changes you could make to remove this impact.

If you have identified adverse impact you must determine whether you will recommend that the Council should:

- Change the policy, stating what the changes should be
- Revise the policy, stating the revisions
- Consult further if you feel that you do not have enough information

Actions arising from the impact assessment should form part of the Service Planning Process.

Key Actions:

4. Impact Assessment - Summary

a) Key Findings

Please list the major outcomes/results/findings of this assessment in relation to equality which require action by the Council:

Key Findings:

Prior to the introduction of Local Housing Allowance in April 2008 the Department for Work and Pensions asked authorities to volunteer to pilot the project. There were nine authorities in the initial pilot, which commenced in April 2004 a further 9 authorities joined the pilot in April and July 2005. A policy was introduced, in each authority, to protect vulnerable tenants. The Department for Work and Pensions has reviewed the introduction of the Scheme in these authorities and provided updated guidance to all local authorities, to help them in the implementation of LHA, which goes "live" on 7th April 2008. Guidance has been issued, as a result of the work carried out in the pathfinder authorities, with regard to a "Safeguard Policy". All authorities are to develop their own safeguard policy to prevent the risk of tenants falling into arrears with their rent and being evicted from their home and allay fears that landlords may have about potentially vulnerable tenants and those who are unlikely to pay their rent.

b) "Public Duty" Issues

Refer to "**Notes for Guidance**". Given the three strands of legal duty, please identify which particular issues are essential for the Council to address:

5. Impact Assessment – Further Action

a) As a result of collecting evidence (including consultation) have any changes been made, or are planned, to this policy, strategy, procedure or project?

Yes No

(If yes then complete Action Plan)

Key Actions (note responsible officer(s) or political body as required):

b) Has a monitoring/evaluation/review process been set up to check the successful implementation of the policy/strategy including improved outcomes?

Yes No

If yes, briefly summarise below:

c) Please briefly describe how the above monitoring/evaluation will ensure the policy/strategy will be reviewed/monitored for impact (indicate timescale):

Please complete the Action Plan overleaf

d) If no further action is to be taken as a result of this assessment:

1. Are you convinced that no discriminatory action is evident in the implementation of this policy, procedure, etc?

Yes

No

2. Have you weighed up and considered any negative impact and the options to change, alter or adapt?

Yes

No

3. Do you intend/recommend a further review? If yes, indicate timescale.

Yes

No

(Timescale:.....)

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IMPACT ASSESSMENT ACTION PLAN

Please list below any recommendations for action that you plan to take as a result of this impact assessment (refer to Sections 3 & 4).

Issue	Action required	Lead officer	Timescale	Resource implications	Comments

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Checklist & Signature Sheet

Table with 2 columns: Name of Strategy/Policy, Local Housing Allowance Safeguarding Policy

Please check the following steps have been completed before signing below:

- Sections 1 to 4 completed
Action Plan completed
Notified all relevant Officers/Service Areas/Partners

Signed: Anita Hall.....

Job Title: Service Assurance Team Manager... Department: ... Service Assurance Team Customer Services and ICT.....

Date commenced Assessment:...01.10.07
Date completed: ...16.11.07.....

Date received in HR:.....

Received in HR by:.....

Please sign the EQIA as indicated above, retain a copy and send a copy of the full EQIA, including the Action Plan, to:

Liz Murphy
Head of Human Resources
Kingfisher Business Centre, Futures Park
Bacup
OL13 OBB
lizmurphy@rossendalebc.gov.uk

MANAGEMENT ACTION REQUIRED (to be completed by the Head of HR)

- Referred back to Assessor for amendment(date)
Refer to Committee (specify committee & date)
Considered by Corporate Equalities Implementation Group..... (date)
Published/made publicly available on (date)

Signed:..... (Head of HR) Date:.....

Date of Review:.....