

Equality Impact Assessment (EqIA) form: the initial impact assessment

1. Process and guidance

The purpose of an EqIA is to make sure that the council is meeting the needs of all our residents by ensuring we consider how different groups of people may be affected by or experience a proposal in different ways. EqIAs help us to meet our [Public Sector Equality Duty](#) and where applicable the [Armed Forces Duty](#)

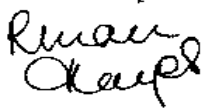
The council has a two stage EqIA process:

- Stage 1 - the initial impact assessment
- Stage 2 - the full impact assessment.

This form is for use at Stage 1 of the process. This must be completed when undertaking a project, policy change, or service change. It can form part of a business case for change and must be completed and attached to a Project Initiation Document. The findings of the initial impact assessment will determine whether a full impact assessment is needed.

Guidance and tools for council officers can be accessed on the council's [Tackling Inequality Together](#) intranet pages.

Date started:	30.05.2024	
Completed by:	Samuel Watt – Senior Strategy Officer	
Service:	Strategic Housing	
Project or policy EqIA relates to:	Proposal to re-introduce Lifetime Tenancies to the Housing Revenue Account	

Date EqIA discussed at service team meeting:	31.05.2024	
Conclusion (is a full assessment needed?):	No	
Signed off by (AD):	Rhian Hayes - Assistant Director, Economy & Housing	
Sign off date:	14.06.2024	

2. Summary of the policy, project, or service

This section should be used to summarise the project, policy, or service change (the proposal).

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What is the purpose of the proposal, what are the aims and expected outcomes, and how does it relate to service plans and the corporate plan?

To re-introduce Lifetime Tenancies to the Council's stock and stop issuing Fixed Term Tenancies. This relates to WBC's Corporate Delivery Plan by linking to Strategic Priorities 1, 2 and 4 (Enriching Lives, Providing Safe and Strong Communities and Delivering the Right Homes in the Right Places).

The proposal is to allow the Council's Fixed Term Tenancies to lapse into Lifetime Tenancies upon expiry and for all new tenancies to be Lifetime Tenancies. With no conclusive evidence that the implementation of Fixed Term Tenancies has led to an increase in the mobility of the WBC's housing stock as intended, it is proposed that WBC follow the lead of other councils and revert to the use of Lifetime Tenancies. This would increase staff capacity, resident satisfaction and create stronger communities by reducing the administrative burden of renewing Fixed Term Tenancies that reduce resident's confidence in their tenancies. Rental arrears will also be easier to collect within the legal precedent of Lifetime Tenancies as there is a clear legal process to follow.

Following approval of this recommendation, officers will sign residents up to a Lifetime Tenancies upon the expiry of their Fixed Term Tenancy as well as all new tenancies issued as Lifetime Tenancies.

How will the proposal be delivered, what governance arrangements are in place and who are the key internal stakeholders?

Consultation with residents will be conducted and the final decision will be with the Executive Leader for Housing unless the decision is called in. This proposed policy change has been tabled at the Tenant and Landlord Improvement Panel (TLIP) where it received positive feedback.

The proposal will be delivered by permitting Fixed Term Tenancies to be rolled into Lifetime Tenancies upon their expiry as well as all new tenancies issued as Lifetime Tenancies.

Who will be affected by the proposal? Think about who it is aimed at and who will deliver it.

336 residents currently on Fixed Term Tenancies would be affected in the Council's Housing Revenue Account stock. This is because upon the expiry of their Fixed Term Tenancy, they will be issued a Lifetime Tenancy. More residents will be affected as all new tenancies issued will be Lifetime Tenancies, although it is difficult to quantify this number.

This would be a positive impact as they would have greater tenancy security without the potential threat of their tenancy ending at the end of their fixed term. This would also encourage the strengthening of communities and neighbourhood with residents feeling more comfortable in their home through greater tenancy security.

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3. Data & Protected Characteristics

This section should be used to set out what data you have gathered to support the initial impact assessment.

The table below sets out the equality groups that need to be considered in the impact assessment. These comprise the nine protected characteristics set out in the Equality Act 2010 and other priority areas defined by the council.

Age	Armed Forces Communities	Care Experienced People	Disability
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Gender Reassignment	Marriage and Civil Partnership	Pregnancy/Maternity	Religious belief
Race	Sex	Sexual Orientation	Socio-economic disadvantage

The Armed Forces Act 2021 requires consideration of the [impact on Armed Forces Communities](#) when exercising certain housing, education or healthcare functions (excluding social care). Further guidance can be found [here](#).

What data and information will be used to help assess the impact of the proposal on different groups of people? A list of useful resources is available for officers on the Council’s Tackling Inequality Together intranet pages.

The information used to understand the impact of the proposal on different groups is the data and experiences of WBC in relation to social rented housing in the HRA but specifically those residents on Fixed Term Tenancies. Data has also been collated from the Housing Needs, Homelessness and Rental Income teams as well as from other Local Authorities and Housing Associations who have already completed the reinstatement of Lifetime Tenancies. Background reading on the subject has also been completed including the Welfare Conditionality Report (2016) and a study from Fitzpatrick and Watts from the Heriot Watt University (2018).

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4. Assessing & Scoring Impact

This section should be used to assess the likely impact on each equality group, consider how significant any impacts could be and explain how the data gathered supports the conclusions made.

Scoring impact for equality groups	
Positive impact	The proposal promotes equality of opportunity by meeting needs or addressing existing barriers to participation and/or promotes good community relations

Neutral or no impact	The proposal has no impact or no disproportionate impact.
Low negative	The proposal is likely to negatively impact a small number of people, be of short duration and can easily be resolved.
High negative	The proposal is likely to have a significant negative impact on many people or a severe impact on a smaller number of people.

Referring to the Scoring table above, please give an impact score for each group, explain what the likely impact will be, and briefly set out how the data supports this conclusion.

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Equality group	Impact score	Impact and supporting data
Age	Neutral	There is no substantive data to support that the protected characteristic of age affects the likelihood of someone being placed in Council housing. Therefore, there is no causal link between the effect of this policy change and a positive or negative impact on this protected characteristic.
Disability	Neutral	There is no substantive data to support that the protected characteristic of disability affects the likelihood of someone being placed in Council housing. Therefore, there is no causal link between the effect of this policy change and a positive or negative impact on this protected characteristic.
Gender reassignment	Neutral	There is no substantive data to support that the protected characteristic of gender reassignment affects the likelihood of someone being placed in Council housing. Therefore, there is no causal link between the effect of this policy change and a positive or negative impact on this protected characteristic.
Marriage and Civil Partnership	Neutral	There is no substantive data to support that the protected characteristic of marriage and civil partnership affects the likelihood of someone being placed in Council housing. Therefore, there is no causal link between the effect of this policy change and a positive or negative impact on this protected characteristic.
Pregnancy/Maternity	Neutral	There is no substantive data to support that the protected characteristic of pregnancy/maternity affects the likelihood of someone being placed in Council

		housing. Therefore, there is no causal link between the effect of this policy change and a positive or negative impact on this protected characteristic.
Religious belief	Neutral	There is no substantive data to support that the protected characteristic of religious belief affects the likelihood of someone being placed in Council housing. Therefore, there is no causal link between the effect of this policy change and a positive or negative impact on this protected characteristic.
Race	Neutral	There is no substantive data to support that the protected characteristic of race affects the likelihood of someone being placed in Council housing. Therefore, there is no causal link between the effect of this policy change and a positive or negative impact on this protected characteristic.
Sex	Neutral	There is no substantive data to support that the protected characteristic of sex affects the likelihood of someone being placed in Council housing. Therefore, there is no causal link between the effect of this policy change and a positive or negative impact on this protected characteristic.
Sexual Orientation	Neutral	There is no substantive data to support that the protected characteristic of sexual orientation affects the likelihood of someone being placed in Council housing. Therefore, there is no causal link between the effect of this policy change and a positive or negative impact on this protected characteristic.
Socio-economic disadvantage	Positive	Qualitative data from housing officers suggest that people who are at a socio-economic disadvantage are more likely to be placed in Council housing. This policy change will provide them with Lifetime Tenancies rather than 5/10 year Fixed Term Tenancies. This enables them to build stronger links to their local community and increases their housing security.
Armed Forces Communities	Neutral	There is no substantive data to support that the protected characteristic of armed forces communities affects the likelihood of someone being placed in Council housing. Therefore, there is no causal link between the effect of this policy change and a positive or negative impact on this protected characteristic.
Care Experienced People	Positive	Qualitative data from housing officers suggest that Care Leavers are more likely to be placed in Council housing. This policy change will provide them with Lifetime Tenancies rather than 5/10 year Fixed Term Tenancies. This enables them to build stronger links to their local community and increases their housing security.

5. Conclusion and next steps.

Based on your findings from your initial impact assessment, you must complete a full impact assessment if you have identified any groups as having a low or high negative impact.

If no impact, or a positive impact has been identified, you do not need to complete a full assessment. However, you must include reference to the initial assessment in any associated reports, and it must receive formal approval from the Assistant Director responsible for the project, policy, or service change.

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