Appendix 2

Equality Impact Assessment Current and Proposed Policies and Procedures

What is this form for -

The purpose of carrying out an equality impact assessment is to ensure we are providing the best services we can, fairly to people who are entitled to them. This form should be completed for existing,, reviewed or proposed policies.

In order to comply with current equalities legislation, Merton has to examine the impact of its policies and functions. The council must assess everything it does to ensure we are positively promoting equality, tackling discrimination and promoting community cohesion or good relations in the community and the workplace.

The council has broadened the impact assessment procedures to include issues relating to ethnicity, disability, gender, age, faith, deprivation, and for assessments of HR policies staff including those based outside civic and those without intranet access Staff/service user representatives eg unions, staff networks, advocacy groups etc.

The council has to reflect the results of consultation and reviews in the assessments and must publish the results of impact assessments.

The Merton is also working at level 4 the Equalities Standard for Local Government. The standard is divided into 5 levels. Level 5 is the highest level and we aim to achieve this by March 2009. Each Department/Division will assess their own progress and produce evidence whilst working towards achieving the Standard.

This will ensure we treat all people fairly and comply with current legislation such as the Disability Discrimination Act, the Sex Discrimination Act, Human Rights Act, EC Directives on Race, Sexuality and Faith, as well as proposed legislation.

Please provide quality information, as this form when completed will become a public document.

Guidance on completing this form

- The form is intended to measure the whole process undertaken by your policy or procedure. This means that we will examine the whole process, starting with the way you conducted your consultation, set targets, monitor and review progress, and how this informs the service planning.
- This form should be completed by any one who is responsible for implementing policies or procedures. This includes managers responsible for services provided by contractors, private or voluntary sector agencies acting on behalf of Merton Council.
- Use a copy of the form for each key policy or procedure. Copies are available from http://intranet/departments/ce-index/ce-who/ce-policydivision/equalitiesteam/ce_pandp_eptforms.htm on the intranet or on extension 3864.
- If you identify any gaps or weaknesses in your policy or procedure please make a note of the actions required in the improvement plan.
- If you are aware of any other forms of negative impact your policy or procedure might have due to ethnicity, disability, gender, age, faith, being looked after or vulnerable, deprivation, and for assessments of HR policies staff including those based outside civic and those without intranet access Staff/service user representatives eg unions, staff networks, advocacy groups etc that is not covered by this form please include it on an additional sheet.
- Please ensure you complete the evaluation form at the end. This will help us improve the form.
- Please pass a copy of the form to your Head of Service, retain a copy for your own use and email a copy to <u>diversityandcommunityengagement@merton.gov.uk</u> for information.
- The assessment results and improvement are owned by you, your head of service and your department.
- The next stage is for you to arrange a challenge meeting where the assessment can be discussed. The manager completing the form should invite a member of the Chief Executive's Diversity & Community Engagement Team and a member of their Departmental Equality Group to attend. Where appropriate it is acceptable to invite a community representative or service user(s) so that we can be transparent and open to external challenge.

• You then report the issues raised and improvements agreed at the challenge session, to your head of service who identifies themes and overlaps with other assessments and identifies which issues should be dealt with at DMT, CMT, at service, team or individual level.

Impact Assessment Form for Policies & Procedures

A) Strategy B) Proposed

C) Title of Policy: Housing Strategy 2008-11

Priority: Medium	Department: Community and Housing (Housing Division)
(As previously defined by your de	partment)

Head of Service: Jo Williams Officer completing assessment: Kate Luckett (Housing Strategy) Date: 28 May 2008

Brief description of Policy or Procedure aims and objectives

The draft Housing Strategy 2008-2011 is a statutory document that seeks to identify and meet the housing needs of local people, particularly vulnerable client groups*, and develop the local authority's place-shaping role by building sustainable communities and empowering local people to make decisions.

*Such as older people, ethnic minorities, young people, homeless households, people with disabilities (physical disability, sensory impairment, learning disability & mental health), clients fleeing domestic violence, ex-offenders, and Gypsies & Travellers.

The term policy is used throughout the form to reduce the number of words, it is intended to cover policies or procedures.

What are the **general equality issues** and **community cohesion issues** associated with the use of this type of function or service? This can be based on local or national research or consultation.

Equality issues

Older & Vulnerable People

- The majority of whom are owner-occupiers. There is currently limited housing choice for this client group.
- There is a need for more low-level support to help older people stay in their own homes and prevent them from having to move into care institutions.

- Many existing accommodation for older people are inappropriate.
- There is a need to deliver more accessible units or aids and adaptations for people with disabilities.

Vulnerable households in the private sector are more likely to live in poor condition housing.

Ethnic Minorities

- Ethnic minority households are more likely to be in housing need, more likely to be homeless, and more likely to be living in deprived areas.
- Ethnic minority households, in particular Asian households, are more likely to require larger homes, and likely to have to wait longer for an offer of social housing because of the shortage of larger homes.
- Some ethnic minority groups have very specific needs and would benefit from housing provided by BME RSLs.
- The need to ensure that BME communities have access to social housing owned and/or managed by BME RSLs.
- The need to support small BME RSLs and to address challenges in transferring stock to these RSLs following completions.
- Development of affordable housing has taken place mainly in East Merton, where there is already an over-representation of
 affordable housing, a high proportion of ethnic minorities, and high level of deprivation.
- With affordable housing concentrating mainly in the eastern part of the borough, the opportunities for ethnic minorities to
 integrate into the wider community are restricted.
- Population projection shows that more people from ethnic minority communities will enter retirement over the next 4 years, in
 particular people from the White Irish, Indian, Caribbean and Chinese communities. This will have an impact on the planning
 of housing and support for older people.

Gypsies & Travellers

- The need to assess and address the accommodation needs of Gypsies & Travellers.
- Homelessness amongst second generation of Gypsies & Travellers has been identified as an issue.

Young People

- There is a lack of move on accommodation for young people in supported housing with only 15 move properties available for this group.
- Young people have difficulties accessing private rented accommodation because of the restriction of Housing Benefit for under 25s.
- There is a need to support young people in maintaining tenancies.
- Increasing incidence of homelessness amongst young people, therefore homelessness prevention work is essential (mediation through housing advice & outreach)

Other Vulnerable Groups

- Rising fuel prices will have an impact on vulnerable client groups, affecting people on low income, who are more likely to be ethnic minorities, older people etc
- Sustaining the engagement of stakeholders working with disadvantaged client groups and users will be a challenge, and limited resources (e.g. limited Supporting People funding, and resources for conferences) will restrict our ability to deliver improvements and impact upon user engagement.

- The likely arrivals of new ethnic minority communities resulting from the latest EU expansion may impact community cohesion and pose new challenges to the building of sustainable communities.
- There is a lack of robust information about the needs of vulnerable client groups to feed into our planning process.
- The lack of communal space and facilities can have an impact on community cohesion.
- There is a need for more supported units for the single homeless, young people and other vulnerable groups, resettlement units for BME households newly arrived in the UK, and move-on accommodation for young people.

Other issues

In relation to issues identified above, potential problems include:

- Changes to national and regional funding policy priorities for affordable housing.
- Housing market issues such as increase in land values and limited availability of land.
- Difficulties in negotiating with developers.
- Lack of local infrastructure (e.g. faith buildings) or support network for ethnic minorities and other vulnerable client groups.

Addressing issues identified through the Housing Needs Survey, the Housing Strategy, the Neighbourhood Renewal Strategy and various local strategies, the team aims to create more mixed communities through diverting affordable housing development resources away from the eastern part of the borough, which is less affluent and where there is currently a very high proportion of BME communities, to the western part of the borough. This will enable different ethnic groups, with appropriate community support, to integrate better into the wider community as ethnic minority groups are more likely to have to rely on social housing.

1	Why is the Policy required?	The Local Government Act 2003 sets out a duty for local authorities to produce a Housing Strategy, which meets the Government's 'Fit-for- Purpose' (FFP) criteria. The Government is placing an increasing emphasis on local authorities' strategic housing role, stressing that it is at the heart of achieving the social, economic and environmental objectives that shape a community.
2	What will be the effect on end users – what are the policy objectives?	 The Housing Strategy has two strategic priorities focusing on 'people' and 'places': Meeting the housing needs of all residents Building sustainable communities The 'people' objective sets out priorities and actions that will lead to positive outcomes for end users. The Place Shaping objective will lead to

		improved quality of life that will also benefit end users.
3	How will your policy be implemented?	The Housing Strategy is the overarching policy framework for a number of
	Do you have documented procedures in place?	housing strategies, including the Homelessness, Ethnic Minority, Older People and Affordable Warmth housing strategies. The action plans contained in the various strategies are reviewed either quarterly or half- yearly and actioned through our network of housing partners (RSLs, Voluntary sector, other LBM departments, regional groups etc). They are reported to Housing Services Management Team (HSMT) monitored through the Housing Strategy Review Group and linked to the Sustainable Housing Subgroup which reports to the Merton Partnership through the Sustainable Communities Thematic Partnership.
4	What training will be available to ensure staff can implement your policy/procedure?	 Corporate training around equalities is available to all members of staff. Training that helps develop research and data analysis skills includes Census and SASPAC, focus groups and questionnaire training. Training around housing law. Conferences and seminars hosted by other authorities, partnerships and central government provide opportunities for information sharing and networking. Team meetings and One-to-ones provide opportunities for information sharing.
5	How do you disseminate your policy?	The Housing Strategy is printed and distributed to our network of partners and posted on the internet and intranet (which can be accessed in different formats). The key aims and objectives of the Housing Strategy are presented to our partners through strategy team meetings, user forums and other events.
6	Is your policy/procedure in Plain English and available in different formats?	It is a requirement that the strategy is in Plain English before it is published. People with a sensory impairment can access the strategy via the internet/intranet.
7	Does your policy/procedure compliment or link to other policies or procedures?	 When developing new objectives for the draft strategy, the Housing Service has taken into account the following: The Local Government White Paper requirement for housing strategy to align with other local plans, in particular the local Community Plan, which contains five key themes.

		 The increased focus placed by the Government on individual client groups and vulnerable people etc. The emphasis in the Local Government White Paper that local authorities should develop a place-shaping role and should empower local people to make decisions.
8	What methods have you used to consult on the impact of A) The current policy? B) The proposed policy?	 The review of the Housing Strategy involved consultation on the current and the proposed strategy. Consultation undertaken are outlined below: When formulating the draft strategy, two workshops were held involving members of the Housing Strategy Review Group and the Sustainable Communities Housing Sub Group, which included representatives from Registered Social Landlords, and council officers from Planning, Environmental Health, Supporting People, Housing Strategy, Housing Development, Service Improvement and Housing Needs.
		 External consultation of the Housing Strategy 2008-2011 took place in November 2007. A list of all organisations consulted is attached as Appendix I of this report. The development of our Housing Strategy was also assisted by the IDeA through its strategic housing programme. A 'place-shaping' workshop was held in December 2007 for officers from the Housing, Planning and the Regeneration divisions. IDeA also acted as a 'critical friend' in appraising our Housing Strategy and providing feedback which we have acted upon.
		 Consultation with the Merton Partnership is conducted through its five thematic groups. The draft strategy has already been considered by three of the thematic groups (Sustainable Communities, Children and Young People, Older People), and will shortly be presented to the other two thematic groups. Preferred partner RSLs were also consulted separately and were asked to respond to a number of key questions.
		Consultation concerning new build developments: All RSLs consult residents of new developments through

		questionnaires in the first year of occupation following completion. The Development Team consults residents on new developments at the planning stage.
9	 How have you ensured you have consulted with: Ethnic Minorities Disabled People Men and Women equally People of all ages People of all religions or faiths lesbian, gay, bisexual and transgendered people Looked After Children or other vulnerable people All staff including those based outside civic and those without intranet access (where relevant) Staff/service user representatives eg unions, staff networks, advocacy groups etc. 	Positive steps were taken to ensure that hard to reach groups were involved in our research and consultations. Different techniques have been (and will be) adopted for research on different client groups to ensure good response rate. These include direct mailings to clients (e.g. targeting housebound clients for older people's research), working with faith organisations, and organisations that represent specific clients groups (e.g. Teenage Parents research, BME Video Research for young people), meeting with different vulnerable client groups (e.g. Vulnerable Persons Housing Strategy, tailored consultation to different groups)
10	Some policies or procedures may discriminate against different groups. How have you overcome this?	The Housing Strategy covers a broad client group spectrum, covering both the private and public sector and includes new build developments and reviewing existing service arrangements. As a result, the research underpinning this work attempts to identify and understand the needs of different client groups, and review the success and difficulties of services already provided to them, the research seeks to identify gaps in need and the low-uptake of services and action to remedy those needs. The overarching and encompassing nature of this particular line of work allows for a flexible approach to the various strands and recommends how services can promote equality and community cohesion.
	Outcomes	

11	Is it making a difference - how have you identified the impact of your current policy. How does it affect people in relation to their - > Ethnicity > Disability > Gender > Age > Sexual orientation > Religion or Faith > Looked After Children or being vulnerable > Full time/ Part time status (where relevant)	 The impact of the current strategy is identified through consultation and feedback from service users and partners. Key achievements in current strategy: An Older People Housing Forum was established in 2006 involving around 60 older Merton residents. Improved advice to older people through the publication of the Housing Options Directory Gypsies and Travellers Forum established in September 2005 and government funding obtained to improve Caravan site. Multi-agency strategy teams covering issues on Older People, Ethnic Minorities and Affordable Warmth met regularly to oversee New Tenant Participation Compact launched in 2006 809 older and vulnerable people households were given advice about home maintenance and living independently in 2006-07 by Hanover <i>At</i>Home, Merton's care and repair agency, well above the target of 312. 10 new units of accommodation for people with learning disabilities developed in 2006. Rent Deposit Scheme extended to highly pointed households during 2004-05 Successful launch of BME homeless video project Challenges faced in current strategy. Partnership working: The target to direct 15% of Affordable Housing Programme to BME RSLs, and 30% towards 3-bed plus homes fell short, due to site constraints and cost implications. One of Merton's BME preferred partners had also been inactive for a considerable period during 2004-07. Economic and market pressures: There has been limited success in progressing certain initiatives targeting the private sector. For instance, no household took up the 'Houseprivat' equity-release scheme to improve their house
8 Au	ugust 2007 version	'Houseproud' equity-release scheme to improve their house condition in 2005-06 or 2006-07, although the scheme was widely publicised. It is believed that residents had concern about the loan repayment arrangements. Similarly, an initiative offering homeowners a grant to bring empty homes back into use was not well taken up.

12	 How will you measured the effect of your policy/procedure for end users. How does it affect people in relation to their - Ethnicity Disability Gender Age Sexual orientation Religion or Faith Looked After Children or being vulnerable Fulltime/part time employment status (where applicable) 	Quarterly monitoring is disseminated through User forums and strategy teams. Targets are set in consultation with service users and therefore achieving targets and gathering feedback from clients will indicate the effect of strategy on end users.
13	 Are targets for outcomes set as a result of consultation with: (for example In your Service Plan) People of all ethnic groups including ethnic Minorities Disabled people Men and Women/girls and boys People of all ages lesbian, gay, bisexual and transgendered people People of all Religions or Faiths Looked After Children or other vulnerable people 	 See box 2 – equality issues and question 8 The result of our external consultation shows that there is strong support for the two proposed objectives. We have received comments on priorities for the next three years, hence a number of changes have been made to the sections on 'priority areas' and to the Action Plan. Key issues raised are as follows: As well as the need to undertake housing market assessment to inform a dwelling mix policy, there needs to be analysis at neighbourhood level to inform dwelling mix on a site-by-site basis There is strong support for initiatives to assist households on low and middle income, but it is also necessary to ensure that intermediate housing options are affordable Whilst it is important to have ambitions when delivering the strategic housing agenda, its needs to be considered alongside resources available, particularly when setting affordable housing targets for the future The local housing authority should identify the needs of new migrant workers settled in the borough, and take a lead role in promoting community cohesion and ensure sustainability in local areas

		 Better linkages between the work of Housing and Children Schools & Families The need to increase advice and support for young people, particularly 16 and 17 year-olds who are homeless or at risk of homelessness, to enable them to live independently
14	What is the timescale for achieving targets?	See action plan
15	How are targets published?	Service users have been informed through our published housing strategies, multi-agency partnerships, user Fora, newsletters (e.g. Raising The Roof, Exchange), internet pages, conferences & launch events, radio interviews, articles in national or regional magazines, and presentations to organisations such as London Councils and HouseMark.

	Monitoring	
16	How do you monitor the effect your policy has?	Monitoring arrangements include quarterly monitoring of Housing Strategy Action Plans. Monitoring reports are considered by the Housing Services Management Team, the Housing Strategy Review Group, the Sustainable Communities Housing Sub Group and by multi-agency housing strategy partnerships.
17	 How would know from your monitoring if any one was disadvantaged as a result of your policy or function in relation to – Ethnicity Gender Disability Age Sexual orientation Religion or Faith Looked After Children or being vulnerable 	Annual equalities monitoring of housing services are undertaken to identify if the various different client groups experience any disadvantages as a result of the policy.
18	How are the results fed up to senior managers?	Quarterly monitoring reports are presented to HSMT, HSRG and partners.
19	How is monitoring information fed back to end- users?	Monitoring reports are presented to User forums and strategy teams, who disseminate the information, back to clients.

	Review	
20	What action is taken if policy outcomes are not met?	During the quarterly monitoring and annual reviews the action plan is assessed, a traffic light system indicates the status of the action and whether it has been met, partly met or unmet. The assessment determines whether unmet actions and targets are still relevant and achievable and if so are carried forward. The monitoring template of the action plan states the progress and challenges behind the different actions.
21	When was your last policy review? When is your next policy review?	We have just completed the latest review but the Housing Strategy is informally reviewed annually. The next review will take place in 2011.
22	How do you share lessons learnt with other colleagues in the Council and with the Merton Partnership, with external organisations or elsewhere?	Information is published through housing strategies, multi-agency partnerships, user Fora, newsletters (e.g. Raising The Roof, Exchange), internet pages, conferences & launch events, radio interviews, articles in national or regional magazines, and presentations to organisations such as London Councils and HouseMark.

IMPROVEMENT PLAN SUMMARY

Issue arising from impact assessment	Action required to resolve issue	Lead Officer	Time scale	Targets/PIs
There is a need to assist households on low and middle income, including key workers and first-time buyers, to access affordable home ownership options and rented homes	Analyse the take-up of home ownership initiatives, including Right- to-Buy, HomeBuy products, Key Worker Living, Intermediate Rent and Social HomeBuy, and evaluate affordability of large family shared ownership homes and set targets for future provision of Intermediate Housing accordingly	Developm ent manager	Ongoi ng	Intermediate housing is fully utilised. Performance data analysed through sub-regional Intermediate Housing Sub Group Analysis completed and recommendations made
There is a need to provide more housing choice for older people by increasing non-institutionalised housing provision, including additional Extra	Ensure all new housing to be developed to Life-Time Homes standard, subject to the suitability of sites.	Developm ent manager/s trategy manager	Ongoi ng	Delivery of Life-Time Homes maximised
Care housing, and designated housing for older people in the community	Ensure 10% of all new housing to be wheelchair accessible, subject to the suitability of sites		Ongoi ng	Delivery of wheelchair accessible units maximised
	Delivered 33 Extra Care homes		March 2009	33 Extra Care homes completed
	Identify successful models of designated housing for older people in the community		March 2009	Engaged older people in agreeing a suitable model for a new older people scheme
	Work with RSLs and developers to inform Planning Site Proposals for future housing developments		March 2010	Identified suitable site through Planning Site Proposals
There is a need to promote community cohesion through partnership working, and	Develop joint housing projects with a focus on BME groups that promote community cohesion and bid for funding	Strategy Manager/ Moat Housing	Ongoi ng	Funding bid for community cohesion projects submitted

by facilitating joint working between community		Group					
groups, particularly groups representing different ethnic minorities and faith communities	Undertake Equalities Impact Assessments on large proposed housing developments	Principal Planner	Ongoi ng	Equalities Impact Assessment completed for large housing developments			
	Implement 'Housing' actions contained in the Community Cohesion Strategies for the Council and the Merton Partnership	Strategy Manager	March 2009	Actions completed			
	Housing to implement agreed actions to reach Level 5 of the Equality Standard	Strategy Manager	March 2009	Actions completed			
There is a need to improve the understanding of the housing needs of ethnic	Assess the change in local migrant population and possible impact on housing needs	Corporate Equalities Team	By March 2010	Assessment undertaken			
minority communities, including migrant workers newly settled in Merton	Research the reasons for low take-up from the Asian community of housing services	Strategy Manager	Septe mber 2009	Research completed and results used to inform strategy development			
	Consider findings of the Pan London Gypsies & Travellers Accommodation Needs Assessment and develop actions to address needs identified by the research.	Principal Planner / Strategy Manager	Septe mber 2009	Results of research analysed and used to inform Site Proposals			
	Deliver an average of 35% new social rented homes as family units with three or more bedrooms per annum, subject to site economic consideration and funding (see Action 1)	Developm ent Manager	Ongoi ng (subje ct to period review	Delivered 35% family-sized social rented homes in 2008-2011			
	Target an average of 15% of the National Affordable Housing Programme to BME RSLs per annum	Developm ent Manager) Ongoi ng (subje	Delivered 15% of affordable housing to BME RSLs in 2008-2011			

			ct to period review)	
There is a need to understand and address the impact poor housing and poverty have on children's lives	Hold focus groups for parents and young people to investigate how poor housing affects children and the results used to inform the development of the Children and Young Persons Housing Strategy	Strategy Manager		Focus groups conducted and a research report produced
There is a need to research housing needs of vulnerable people and identify priorities for future housing provision and needs for support	Complete research into vulnerable peoples' housing needs and the results used to inform strategy development	Strategy Manager/ Supportin g People Manager	Septe mber 2009	A good understanding of the long term supported housing needs of vulnerable people which informs annual development bids
Work with partners and adopt a targeted approach to address issues such as poor health, child poverty, low educational attainment, community safety and cohesion, in deprived local areas or neighbourhoods, particularly areas with high proportion of social housing	Develop a model for monitoring sustainability in areas with high a high proportion of social housing, based on best practice models already adopted e.g. Moat Housing Group's Sustainability Index	Strategy Manager	Dece mber 2009	Model for monitoring sustainability developed through the Sustainable Communities Housing Sub Group
There is a need to identify Faith and Sexuality groups to work in partnership with and consult with.				
There is a need to monitor gender data for single homeless people There is a need to work				

cross-generation to		
promote community		
cohesion		

Impact Assessment Policies - Form Evaluation

To help us improve this questionnaire could you pleas	se ansv Low	ver the	ng questions High	
Was the aim of the form clear? How could it be improved?			3	
Was the guidance useful? How could it be improved?			3	
Were the questions clear? How could they be improved?	1	2	3	4
Was the action plan useful? How could it be improved?			3	

How much do you know about the Corporate Equality Scheme? (Please circle)

- 1. Never heard of it
- 2. Heard of it but do not know what it is about
- 3. I could explain the key points
- 4. I have a good working knowledge

How much do you know about the Equality Standard for Local Government? (please circle)

- 1. Never heard of it
- 2. Heard of it but do not know what it is about
- 3. I could explain the key points
- 4. I have a good working knowledge

Name

Department