

Customer Access Review – Full Assessment

Assessment details	
Assessment area	Draft Property Conversion Policy
Date of assessment	18 May 2021
Directorate and Service	Housing and Public Protection, Housing Services
Manager	Housing Development & Policy Manager
Officer conducting assessment	Housing Policy & Development Officer
Step 1: Scoping the assessment	
1. What are the aims and objectives of the activity or proposal?	<p>The draft Property Conversion Policy outlines Dartford Borough Council's approach to achieving its aim of increasing the supply of larger sized accommodation through property conversions. Where two Council owned properties located next to one another become empty (void), consideration will be given to the suitability for converting the two properties into one larger property. The policy applies to general needs properties that are owned and managed by the Council.</p> <p>To ensure consistency and transparency in the process, the policy sets out the criteria for assessing the housing need for property conversion; the types of property the Council will consider converting; and, the decision-making process for approving property conversions.</p> <p>The aims and objectives of this policy are to:</p> <ul style="list-style-type: none"> • increase the supply of four plus bedroom properties in accordance to the supply and demand for larger properties; • assist in meeting the housing needs for larger sized households; • create movement in the Council's housing stock; • reduce the time households wait for a suitable property thus reducing the time households spend living in overcrowded conditions; • have greater flexibility in reconfiguring existing properties to make the best use of the stock; • ensure all property conversions are appropriate and in accordance with planning permission requirements; • ensure property conversions are completed to a high quality standard.
2. Who will be affected by the activity or proposal?	Dartford Borough Council tenants.

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Step 1: Scoping the assessment	
<p>3. How does the activity or proposal contribute to: a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council?</p>	<p>a) Corporate Plan performance indicators:</p> <ul style="list-style-type: none"> • HPI-27: Number of applicants on the Housing Register • PI-8: Average time taken to re let Dartford Borough Council housing <p>b) The Property Conversion Policy contributes to the Corporate Plan’s strategic aims of ‘facilitating quality, choice and diversity in the housing market, assisting in meeting housing need in Dartford and delivering high quality services to service users’ and ‘creating strong and self-reliant communities. The policy also related to the strategic objective to ‘work towards meeting the housing needs of the Borough’.</p>
<p>4. Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?</p>	<p>The Property Conversion Policy is a discretionary policy to convert two Council properties into one larger property. The policy is aspirational in as much as the Council has no control over when suitable properties might become available, and are suitable for conversion, within its own stock. However, in delivering the policy, certain requirements must be met, which include obtaining planning permission; and, meeting Decent Homes Standards, the regulatory Home Standard, design standards and space standards. All properties converted under this policy will be let to existing Borough Council tenants on the Council’s housing register to ensure that the objective of this policy to create movement in the housing stock is met. In these cases, offers will be made to tenants in the highest housing need taking account of the suitability and location of the property for a family. All other criteria applied, will be in accordance with the Council’s current Housing Allocations’ Policy and Tenancy Policy.</p>
Step 2: Information collection	
<p>5. What do you know about the groups of people who will be affected? (i.e. demographic information in relation to the protected characteristic groups of age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment, marriage and civil partnership)</p>	<p>All applicants for housing or rehousing are asked to provide equality monitoring details. This is not however, a requirement for acceptance of an application. Equalities records are kept and monitored on a regular and systematic basis to ensure properties are being offered and allocated fairly and in line with The Equality Act 2010 and data protection provisions.</p> <p>Of the households on the housing register waiting for an allocation to a four plus bedroom property, the overwhelming majority of households are families with children. 79% of the households are living in overcrowded accommodation, 16% are homeless households and 5% have a medical need. 84% of the households have a high (Band A) or medium (Band B) housing need and some have been waiting for a suitable property for a significant length of time, e.g. 10+ years.</p>
<p>6. What consultation has taken place with affected groups? Please describe who was</p>	<p>Internal consultation on the draft policy has been undertaken.</p>

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Step 2: Information collection	
consulted and the key findings	The Dartford Tenants' and Leaseholders' Forum has been invited to comment on the draft policy. The Forum aims 'to ensure that the services delivered by the Council are accessible to all'. The Forum works as a group to ensure that the views and housing needs of residents are recognised and addressed by the Council, and that those needs and views are placed at the centre of housing services delivery. There were no equality issues raised regarding the draft Policy from the consultations.
7. Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?	No additional information is required.

Step 3: Assessing the equality impact

8. Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the Public Sector Equality Duty:

- a) tackling unlawful discrimination**
- b) promoting equality of opportunity**
- c) promoting good relations**

NOTES:

- The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration
- For existing activities, consider how they are working in practice for each relevant protected group
- For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group
- If there is no identified equality impact, please tick the 'No Impact' box and explain why in question 9
- If the equality impact is unclear, please tick the 'Unknown' box and explain why in question 9

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Age	Children – The overwhelming majority of households waiting for an allocation to a four plus bedroom property are families with children. Living in overcrowded accommodation can have a disproportionate and detrimental impact on physical and mental health and wellbeing. For children in particular, long-term overcrowding can also negatively impact on child development and education if there is a lack of space to play and study. The policy aims to assist to mitigate this impact by increasing the supply of larger sized properties to accommodate overcrowded families.		<input type="checkbox"/>	<input type="checkbox"/>
Disability	People with medical needs – Of the households waiting for an allocation to a four plus bedroom property and their reason to move is due to medical needs, this can have a disproportionate and detrimental impact on exacerbating health conditions, particularly if there is a lengthily wait for a property to become available. The policy aims to assist to mitigate this impact by increasing the supply of larger sized properties.		<input type="checkbox"/>	<input type="checkbox"/>
Sex			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender reassignment			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Race			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Religion/Belief			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sexual Orientation			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy/Maternity			<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Marriage and Civil Partnership*			<input checked="" type="checkbox"/>	<input type="checkbox"/>

* Regarding the protected characteristic of Marriage and Civil Partnership – public bodies need to comply with the first aim of the Public Sector Equality Duty and only in the context of employment.

Step 3: Assessing the equality impact	
9. If 'no impact' or 'unknown' was selected, please explain	<p>There are no known circumstances where the policy will have a disproportionate equality impact on people due to their gender, gender reassignment, race, religion or belief, sexual orientation or pregnancy or maternity.</p> <p>This assessment does not apply in the context of employment, therefore the protected characteristic group of marriage and civil partnership has not been subject to this assessment.</p>
10. If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups	Not applicable – there are no known circumstances.
11. Any other comments	<p>The main aim of the policy is to promote equality of opportunity for Council tenants requiring a four plus bedroom property through increasing the supply of larger homes in the Councils housing stock portfolio where there is a current shortage. However, by carrying out a property conversion, this will reduce the number of smaller units in the Council's housing stock. There has been regard to ensuring that this will not have a negative and disproportionate impact on households requiring smaller sized properties. This is mainly offset by the majority of new council homes already developed, and being built, consist of one, two and some three bedroom properties. The Council also actively acquires private properties to increase the supply of its housing stock.</p>

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Step 4: Action plan					
<p>12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:</p> <p>a) any gaps in information and consultation</p> <p>b) how any negative impacts on equality will be mitigated or eradicated</p>					
<p>a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?</p>					
Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
None					
<p>b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?</p>					
Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
None					
Step 5: Decision making and future monitoring					
13. Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?			Director of Housing & Public Protection		
14. Is the subject of the Customer Access Review going to committee? If yes, include your findings in the committee report and attach this assessment to the report			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
15. How will you continue to monitor the activity or proposal on protected characteristic groups?			<p>Every time a property conversion opportunity arises, the following information is monitored:</p> <ul style="list-style-type: none"> • Number of applicants on the housing register requiring a four plus bedroom property; • Housing need priority of the applicants; • Length of time the applicants have been on the housing register; • Current development and future planned development for four plus bedroom affordable housing. 		
16. When will you review this Customer Access Review?			The Property Conversion Policy will be reviewed every three years and a new Customer Access Review will be undertaken at the same time.		

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Step 6: Final steps

17. Once this Customer Access Review has been approved, send this assessment to the Policy & Projects Officer
18. Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded