

# Customer Access Review – Full Assessment

<b>Assessment details</b>	
<b>Assessment area</b>	Tenancy Policy 2021
<b>Date of assessment</b>	22 September 2021
<b>Directorate and Service</b>	Housing & Public Protection, Housing Services
<b>Manager</b>	Housing Development & Policy Manager
<b>Officer conducting assessment</b>	Housing Policy & Development Officer
<b>Step 1: Scoping the assessment</b>	
<b>1. What are the aims and objectives of the activity or proposal?</b>	<p>The Tenancy Policy explains the types of tenancies that will be offered in social housing stock owned and managed by Dartford Borough Council.</p> <p>The aim of the Tenancy Policy is to ensure that tenants and housing applicants across the Borough understand the types of tenancy available from the Council.</p>
<b>2. Who will be affected by the activity or proposal?</b>	Dartford Borough Council tenants and housing applicants.
<b>3. How does the activity or proposal contribute to: a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council?</b>	<p>a) The Housing Service monitors the number of applicants on the Housing Register (HPI-27), which is reported under the Corporate Plan.</p> <p>b) The allocation of Council housing contributes to the Corporate Plan 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’.</p>
<b>4. Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?</b>	<p>The Regulatory Framework for Social Housing in England sets out the specific standards that registered providers, including the Council, must meet. Within this Framework, the Tenancy Standard and the Tenant Involvement and Empowerment Standard – 2017 places a number of requirements on registered providers, which includes publishing clear and accessible policies, which outline their approach to tenancy management; including interventions to sustain tenancies, to prevent unnecessary evictions, and to tackle tenancy fraud. Tenancy policies should also set out:</p> <ul style="list-style-type: none"> <li>• the type of tenancies the registered provider will grant</li> <li>• where tenancies are granted on a fixed term, the length of the term and other such relevant matters regarding their use</li> </ul>

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<b>Step 1: Scoping the assessment</b>	<ul style="list-style-type: none"> <li>the policy on granting discretionary succession rights, taking account of the needs of vulnerable household members.</li> </ul> <p>The Council’s previous Tenancy Policy was published in 2013. This set out the how the Council will use its discretionary powers to grant flexible tenancies under the Localism Act 2011. Flexible tenancies are secure tenancies with a statutory minimum term of two years. At the end of the fixed term, the registered provider may decide to offer the tenant another flexible tenancy; offer a lifetime tenancy; or not renew the tenancy. The Council started issuing flexible tenancies in May 2014 with a fixed term of five years. Following a review of the flexible tenancy regime, the Council has decided to end the use of flexible tenancies and to revert to offering lifetime tenancies. The Tenancy Policy 2021 has therefore been updated to reflect this policy change.</p> <p>Under this new Tenancy Policy, where a tenancy is offered to a new tenant or a person who has previously held a council tenancy but with a break in tenure, the secure lifetime tenancy will be preceded by a 12-month introductory tenancy. All existing flexible tenancies will be transitioned to secure lifetime tenancies.</p>
<b>Step 2: Information collection</b>	<p><b>5. What do you know about the groups of people who will be affected?</b> (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>The Council currently owns 4,230 homes in the Borough. Information in relation to the protected characteristics of Council tenants is captured by the service, as follows:</p> <ul style="list-style-type: none"> <li><b>Gender</b> – 65% tenants are female and 35% tenants are male.</li> <li><b>Age</b> – 6.45% of tenants are aged up to 35 years; 35.44% are aged 35 to 55 years; 34.40% are aged 55 to 75 years; and 13.71% are aged 75 years plus.</li> <li><b>Ethnicity</b> – 61% of tenants are from a White ethnic group and 19% are from a Black Minority Ethnic (BME) group. The ethnic group of 20% of tenants is unknown. The Other ethnic group is the largest BME group with 11.89% tenants, the majority of which are within the European Non Irish group.</li> <li><b>Disability</b> – 19.95% of tenants have a disability and 80.05% do not have a disability.</li> </ul> <p><b>6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings</b></p> <p>Internal consultation has been undertaken on the Tenancy Policy.</p> <p>In modifying the Council’s Tenancy Policy, public consultation was carried out via the Council’s website and with housing register applicants and the Dartford Tenant and Leaseholders Forum. The Tenancy</p>

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<b>Step 2: Information collection</b>	
	Management sub-group of the Kent Housing Group were also invited to peer review the draft Tenancy Policy. There were no equality issues raised regarding the draft Tenancy Policy from the consultations.
<b>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?</b>	No additional research is required.

<b>Step 3: Assessing the equality impact</b>	
<p><b>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:</b></p> <p>a) tackling unlawful discrimination  b) promoting equality of opportunity  c) promoting good relations</p> <p><u>NOTES:</u></p> <ul style="list-style-type: none"> <li>• The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration</li> <li>• For existing activities, consider how they are working in practice for each relevant protected group</li> <li>• For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group</li> <li>• If there is no identified equality impact, please tick the 'No Impact' box and explain why in question 9</li> <li>• If the equality impact is unclear, please tick the 'Unknown' box and explain why in question 9</li> </ul>	

<b>Step 3: Assessing the equality impact</b>				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Age			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Disability			<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
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"/>
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	
<b>9. If 'no impact' or 'unknown' was selected, please explain</b>	This assessment does not consider the Tenancy Policy and its application will have a differential impact on any of the protected characteristic groups.
<b>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</b>	The Council works with Kent Homechoice, which is a partnership of local authorities and housing associations that provide social and affordable housing in Kent. The partnership provides the platform for applicants to apply to the Housing Register and to advertise properties available to let. There are no known circumstances where these partnership working arrangements will have a negative disproportionate impact on the protected characteristic groups in respect of the delivery of Tenancy Policy.
<b>11. Any other comments</b>	The Tenancy Policy should have a positive impact on tenants and housing applicants by assisting them to understand the types of tenancies available and what is expected in their use to ensure homes are let in a fair, transparent and efficient way. In particular, ending of the use of flexible

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<b>Step 3: Assessing the equality impact</b>	
	<p>tenancies removes certain complexities experienced by tenants. For example, if a lifetime tenant mutually exchanges with a flexible tenant, they may not be given another lifetime tenancy and would instead inherit the flexible tenancy including the remaining fixed term. This would mean that, as well as giving up their lifetime status, the tenant would not retain all of the rights enjoyed under a lifetime tenancy. By granting lifetime tenancies only, this simplifies the mutual exchange process, is easier for tenants to understand, and may encourage greater mobility in the housing stock.</p> <p>The granting of lifetime tenancies to all tenants will give security and stability to allow them to put down firm roots in the community thereby contributing towards fostering good relations and promoting strong and successful communities. It will in particular give stability to vulnerable tenants, all categories of disabled tenants and older tenants, and families and their children’s schooling.</p> <p>In accordance with the Council’s Equality &amp; Diversity Document Framework, the Tenancy Policy and information about the services provided by the Housing Service, can be provided in alternative formats, including: Braille, audio tape and large print versions of documents, and documents translated into other languages. Telephone and face-to-face language interpreting and British Sign Language interpreting services can also be provided upon request. Calls can also be received via Relay UK.</p>

<b>Step 4: Action plan</b>
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**12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:**  
 a) any gaps in information and consultation  
 b) how any negative impacts on equality will be mitigated or eradicated

**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?**

Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
None					

**b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?**

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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?	The Council will review its Tenancy Policy every three years or earlier to address legislative, regulatory, best practice or operational issues.
16. When will you review this Customer Access Review?	The Tenancy Policy will be reviewed every three years and a new Customer Access Review will be undertaken at the same time.

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	