

Customer Access Review – Full Assessment

Assessment details	
Assessment area	Policy on Consultation with Residents on Housing Policy/Strategy
Date of assessment	June 2023
Directorate and Service	Housing and Public Protection, Housing Services
Manager	Housing Development & Policy Manager
Officer conducting assessment	Senior Housing Policy & Performance Officer
Step 1: Scoping the assessment	
1. What are the aims and objectives of the activity or proposal?	<p>The aim of the Policy on Consultation with Residents on Housing Policy/Strategy is to set out the approach taken to consult Dartford Borough Council tenants and leaseholders in the formulation of housing policy and/or strategy.</p> <p>The objectives of the Policy are to ensure:</p> <ul style="list-style-type: none"> • That residents are given a wide range of opportunities to influence and be involved in the formulation of housing-related policies and strategic priorities of the Council’s Housing Service. • That the voice of residents is heard on policy/strategy considerations. • That there is transparency in the approach taken to consult residents.
2. Who will be affected by the activity or proposal?	The Policy will affect Dartford Borough Council tenants and leaseholders.
3. How does the activity or proposal contribute to: a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council?	<p>a) The Policy will contribute towards the Tenant Satisfaction Measure – TP06: Satisfaction that the landlord listens to tenant views and acts upon them.</p> <p>b) The Policy contributes to the Corporate Plan strategic aim of ‘facilitating quality, choice and diversity in the housing market, assist in meeting housing need in Dartford and deliver high quality services to service users’.</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?	The Regulator of Social Housing places a requirement on social housing landlords to comply with the Tenant Involvement and Empowerment Standard 2017, by ensuring that residents are given a wide range of opportunities to influence and be involved in the formulation of their landlord’s housing-related policies and strategic priorities. The Policy sets out the approach taken to meet this regulatory requirement.

Customer Access Review – Full Assessment

Step 1: Scoping the assessment	<p>The Council must adhere to the ‘Gunning Principles’, which are a set of legal rules that public bodies must follow when carrying out consultations (as originated from R v Brent LBC ex parte Gunning 1985, and later approved by R v. Devon County Council, ex parte Baker in 1995 and the Court of Appeal under R v North & East Devon Health Authority, ex parte Coughlan in 2001 and R ex parte Moseley v LB Haringey 2014). The Policy sets out how the Council will meet the Gunning Principles.</p> <p>When consulting residents, the Council must have regard to the Data Protection Act 2018 and the UK GDPR which regulates the processing of information relating to individuals, which includes the obtaining, holding, using or disclosing of such information.</p> <p>The Council, in developing policy/strategy and consulting with residents, must have regard to the Equality Act 2010 Public Sector Equality Duty to ensure that no individual is discriminated against based on their sex, sexual orientation, marital status, pregnancy and maternity, gender reassignment, race, religion, belief, disability or age.</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>The Council owns and manages 4,228 homes providing accommodation for 5,101 tenants in general needs accommodation and housing scheme accommodation for older people in 11 schemes. Information in relation to the protected characteristics of tenants is captured by the service, as follows:</p> <ul style="list-style-type: none"> • Sex– 64.01% tenants are female and 35.89% tenants are male (0.10% unknown). • Age – 1.12% tenants are aged under 25; 37.33% are aged 25 to 54 years; 15.00% are aged 55-64 years; and 46.56% are aged 65 years and over. • Race – 55.42% tenants are from a ‘White’ ethnic group; 3.65% from a ‘Black, African, Caribbean, Black British’ ethnic group; 2.14% from an ‘Asian, Asian British’ ethnic group; and 11.84% from an ‘other’ ethnic group. The ethnic group of 25.25% tenants is unknown. • Disability – 18.58% tenants have a disability. <p>There are currently 476 leasehold properties. The conveyancing process is managed by external bodies and legal transfers which do not collect personal data concerning the protected characteristics of new home owners. The Housing Service does not receive or hold any personal data regarding leaseholders other than name and address.</p>

Customer Access Review – Full Assessment

Step 2: Information collection	
<p>6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings</p>	<p>Internal consultation on the Policy has been carried out with Council officers.</p> <p>The Policy has evolved from a Code of Practice on Consultation with Residents on Housing Policy/Strategy, which was presented to the Housing Advisory Board inviting comment in October 2022. The HAB considers reports on proposed policy, strategy and performance in relation to housing issues and makes recommendations to Cabinet as appropriate. The HAB includes representation from Council officers, elected Members and DTLF members. The Policy will be presented to the HAB in July 2023.</p>
<p>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?</p>	<p>None</p>

Step 3: Assessing the equality impact	
<p>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:</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"> • 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 	

Customer Access Review – Full Assessment

Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Age	Some older people may be more digitally excluded than younger people. The Policy on Consultation with Residents on Housing Policy/Strategy recognises that consultation should not rely solely on digital methods in order to promote equality of opportunity. In addition to online methods to raise awareness of consultations, other methods will be used, such as text, the Link newsletter, and details of consultations will be communicated to Council Members who may assist to raise awareness. Hard copy versions of consultation documents are available to residents who do not have internet access. And, when feeding back views, in addition to email and online methods, residents can give their views by telephone and post.		<input type="checkbox"/>	<input type="checkbox"/>
Disability	The Policy on Consultation with Residents on Housing Policy/Strategy recognises that it is important that residents with specific communication needs have those needs met when taking part in consultations in order to promote equality of opportunity. In accordance with the Council's Equality & Diversity Document Framework, the Policy and information about policy/strategy consultations can be provided in alternative formats, including: Braille, audio tape and large print versions of documents. Sign Language interpreting services can be provided upon request. Calls can also be received via Relay UK.		<input type="checkbox"/>	<input type="checkbox"/>

Customer Access Review – Full Assessment

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	The Policy on Consultation with Residents on Housing Policy/Strategy recognises that it is important that residents with specific communication needs have those needs met when taking part in consultations in order to promote equality of opportunity. In accordance with the Council's Equality & Diversity Document Framework, the Policy and information about policy/strategy consultations can be provided in alternative formats, including: documents translated into other languages. Telephone and face-to-face language interpreting can also be provided upon request.		<input 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	
9. If 'no impact' or 'unknown' was selected, please explain	There are no known circumstances where the Policy will have relevance to or a disproportionate equality impact on the protected characteristic groups of sex, gender reassignment, religion/belief, sexual orientation, pregnancy/maternity and marriage and civil partnership.

Customer Access Review – Full Assessment

Step 3: Assessing the equality impact	
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	The Council will consult with partner organisations on housing policy/strategy, where relevant and where the policy/strategy affects them. Where possible, the policy/strategy will be peer reviewed, for example, with colleagues in the Kent Housing Group and via its relevant sub-groups. There are no known circumstances where these partnership working arrangements will have a disproportionate impact on the protected characteristic groups.
11. Any other comments	The approach to consultation with residents on housing policy/strategy has regard to the Council's Equality and Diversity Document Framework. The Council will therefore undertake Customer Access Reviews to assess the equality impact of all housing policies and strategies being consulted on. As part of the consultation, residents will have access to Customer Access Reviews and the opportunity to provide comment. Once a consultation closes, the Council will consider responses to the consultations and update the policy/strategy and the Customer Access Review if any responses necessitate amendments.

Step 4: Action plan

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?
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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					

Customer Access Review – Full Assessment

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?	Head of Legal Services and 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>All housing policy/strategy consultations will be recorded on the Council's internal Consultation and Engagement database.</p> <p>Every response received on a consultation will be recorded and considered using the Housing Policy Consultation Response Log.</p> <p>Requests for alternative format and translation services used during the consultation process will be monitored.</p>
16. When will you review this Customer Access Review?	The policy will be reviewed every three years or earlier to address legislative, regulatory, best practice or operational issues. New Customer Access Review assessments will be undertaken in conjunction with the review of the policy.
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	

Reviewed by Legal Services: Ravinder Singh Johal, Head of Legal Services & Monitoring Officer  **15 June 2023**

Reviewed by Director of Housing & Public Protection: _____  _____ **16.6.23**