

# Customer Access Review – Full Assessment

<b>Assessment details</b>	
<b>Assessment area</b>	Policy on Keeping Pets and other Animals in Council Properties
<b>Date of assessment</b>	October 2022
<b>Directorate and Service</b>	Housing and Public Protection, Housing Services
<b>Manager</b>	Tenancy Services Manager / Housing Scheme & Finance Manager
<b>Officer conducting assessment</b>	Senior Housing Policy & Performance Officer
<b>Step 1: Scoping the assessment</b>	
<b>1. What are the aims and objectives of the activity or proposal?</b>	<p>The Government acknowledges in the Charter for Social Housing Residents (Social Housing White Paper - 2020) that domestic pets bring joy, happiness and comfort to people’s lives, helping their owners through difficult times and improving their mental and physical wellbeing. The Government recognises that many social housing landlords normally give permission for tenants to keep pets depending on the location, provided they are well looked after and do not adversely affect the lives of neighbours and those living nearby. The Government encourages all social housing landlords to adopt similar policies.</p> <p>Dartford Borough Council allows tenants and leaseholders to keep pets. However, not all pets are suitable for all properties and, given this, a new Policy on Keeping Pets and other Animals in Council Properties has been drafted setting out the circumstances in which permission is required/not required to keep a pet and the conditions for allowing pets in properties, as well as what is expected of pet owners, their legal obligations, and the potential consequences if they do not comply with their pet ownership responsibilities.</p> <p>The objectives of the policy are to:</p> <ul style="list-style-type: none"> <li>• ensure that the Council adopts a fair and transparent approach to the way it deals with permissions for pets within its housing stock;</li> <li>• encourage responsible pet ownership;</li> <li>• provide a balance that ensures pet ownership does not infringe on the right of others to the peaceful enjoyment of their home;</li> <li>• provide a consistent and enforceable approach to pet ownership.</li> </ul>
<b>2. Who will be affected by the activity or proposal?</b>	The policy will affect Dartford Borough Council tenants and leaseholders.
<b>3. How does the activity or proposal contribute to: a) any key performance indicators?</b>	a) There are no key performance indicators specific to the policy, although the Housing Service will be introducing a new set of tenant satisfaction measures as part of its performance monitoring framework under the proposed new regulatory regime, as set out in the Government’s Charter for Social Housing

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<b>Step 1: Scoping the assessment</b>	
<b>b) policies, values or objectives of Dartford Borough Council?</b>	<p>Residents (Social Housing White Paper - 2020). This will include, for example, a measure on agreement that the landlord treats tenants fairly and with respect.</p> <p>b) The Pets 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>
<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>There is no legal requirement for social housing landlords to have a policy on pets in place or to allow pets in properties. Nonetheless, the Council recognises that pets can have a positive impact on the health and wellbeing of its tenants and leaseholders and does not wish to discourage pet ownership. However, irresponsible pet ownership can cause nuisance to other residents, damage to property as well as suffering to animals. Therefore, the policy aims to ensure that tenants and leaseholders understand and adhere to their responsibilities.</p> <p>The policy and its delivery is intended to be compatible with the following relevant legislation:</p> <ul style="list-style-type: none"> <li>• Animal Welfare Act 2006</li> <li>• Dangerous Dogs Act 1991 (as amended by the Anti-Social Behaviour, Crime and Policing Act 2014)</li> <li>• Anti-Social Behaviour, Crime and Policing Act 2014</li> <li>• Control of Dogs Order 1992</li> <li>• Microchipping of Cats and Dogs (England) Regulations 2023</li> <li>• Dangerous Wild Animals Act 1976</li> </ul> <p>Where there are complaints of nuisance and anti-social behaviour caused by pet ownership, the policy is also relevant to the Council’s powers under the Anti-Social Behaviour Act 2003 and Anti-Social Behaviour, Crime and Policing Act 2014.</p>

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Step 2: Information collection	
<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 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"> <li>• Sex– 64.01% tenants are female and 35.89% tenants are male (0.10% unknown).</li> <li>• 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.</li> <li>• 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.</li> <li>• Disability – 18.58% tenants have a disability.</li> </ul> <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>
<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 carried out with Council officers.</p>
<p><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></p>	<p>The Council is committed to ensuring the voice of its tenants and leaseholders is heard on matters that affect them. 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 strategies. Consultation with Council tenants and leaseholders will be undertaken, as follows:</p> <ol style="list-style-type: none"> <li>1. All Council tenants and leaseholders will be invited to comment on the draft policy.</li> <li>2. The Dartford Tenants’ and Leaseholders’ Forum (DTLF) will be invited to comment on the draft policy. The DTLF 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.</li> </ol>

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<b>Step 2: Information collection</b>	
	3. The Housing Advisory Board (HAB) will be invited to comment on the draft policy. 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.

<b>Step 3: Assessing the equality impact</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:	
<p>a) tackling unlawful discrimination</p> <p>b) promoting equality of opportunity</p> <p>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	<p><b>Assistance dogs</b></p> <p>The Council will make reasonable adjustments for disabled tenants and leaseholders with assistance dogs. The policy states that permission is not required to keep an assistance dog, such as guide dogs, medical alert dogs, hearing dogs. Tenants and leaseholders are requested to register details of their assistance dog with the Council.</p>		<input type="checkbox"/>	<input type="checkbox"/>

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p><b>Animal hoarding</b> Hoarding, including animal hoarding, is a recognised mental health disorder. The policy recognises that where the tenant or leaseholder is vulnerable with care and support needs, the Kent &amp; Medway Safeguarding Adults Board's Policy and Procedures to Support People that Self-Neglect or Demonstrate Hoarding Behaviour, will be consulted and, where appropriate a safeguarding referral will be made.</p>			
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	
<p>9. If 'no impact' or 'unknown' was selected, please explain</p>	<p>There are no known circumstances where the policy will have relevance to or a disproportionate equality impact on the protected characteristic groups of age, sex, gender reassignment, race, religion/belief, sexual orientation, pregnancy/maternity and marriage and civil partnership.</p>

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Step 3: Assessing the equality impact	
<p><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></p>	<p>In the context of dealing with animal welfare, or nuisance and anti-social behaviour caused by irresponsible pet ownership, the Housing Service works with various internal Council departments, such as the Community Safety Unit and Environmental Health, and external partners, such as the Police and animal welfare organisations.</p> <p>There are no known circumstances where these partnership working arrangements will have a disproportionate impact on the protected characteristic groups other than to positively promote responsible pet ownership and animal welfare, and reducing nuisance and anti-social behaviour, which will benefit all residents.</p>
<p><b>11. Any other comments</b></p>	<p>The policy is relevant to the Equality Act 2010 aims to eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under the Act; and to advance equality of opportunity between persons who share a protected characteristic and those who do not.</p> <p>The policy aims to provide a transparent, proportionate, fair and consistent approach to requests from tenants to keep pets in Council properties and the conditions on responsible pet ownership.</p> <p><b><u>WHERE PERMISSION IS REQUIRED/NOT REQUIRED TO KEEP A PET</u></b></p> <p>The draft policy sets out the circumstances where permission is required/not required to keep a pet.</p> <p><b>Assistance dogs</b> - For all tenants and leaseholders, permission is not required for an assistance dog.</p> <p><b>Small animals</b> - For tenants only, permission is not required to keep the following types of small animals:</p> <ul style="list-style-type: none"> <li>• Budgerigars and other similar small caged birds;</li> <li>• Small indoor caged domesticated animals such as hamsters, mice, gerbils, rats;</li> <li>• Fish suitable to be kept in small domesticated aquariums;</li> <li>• Fish suitable to be kept in garden ponds (permission is required before constructing a pond);</li> <li>• Non-poisonous insects and spiders kept in a secure environment;</li> <li>• Non-poisonous snakes and reptiles under two feet in length fully grown kept in a secure environment;</li> </ul>

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In accordance with the Lease agreement, leaseholders must request permission to keep any pets or animals (aside from assistance dogs). This includes the types of small animals listed above.

**Other animals** - The draft policy says other types of pets do need permission to keep. The types of pet allowed must be of a kind that is suitable in relation to the nature of the property at which it will be kept. These are listed in the Table 1 below.

**Table 1: Other animals that need permission to keep (tenants and leaseholders)**

Type of property	Type of pet	Can tenants/leaseholders ask for permission to keep the pet?
<b>General needs tenants</b>		
The property has a secure private garden	Cats Dogs	<b>Yes</b> Up to two cats or two dogs or one of each type may be allowed
	Small domestic caged animals - such as rabbits, guinea pigs and ferrets	<b>Yes</b>
	Aviary birds, chickens, ducks or pigeons	<b>Yes</b>
The property is a flat or maisonette that shares a single common entrance	Cats Dogs	<b>Yes</b> One cat or one dog may be allowed
	Small domestic caged animals - such as rabbits, guinea pigs and ferrets	<b>No</b> These types of pets are not allowed
	Aviary birds, chickens, ducks or pigeons	<b>No</b> These types of pets are not allowed

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<b>Housing scheme tenants</b>		
The property is in an open housing scheme which does not share a single common entrance (Meadowside bungalows and The Homestead)	Cats Dogs	<b>Yes</b> One cat or one dog may be allowed
The property is in a closed housing scheme	Cats Dogs	<b>No</b> Other than an assistance dog may be allowed
All housing scheme properties	Small domestic caged animals - such as rabbits, guinea pigs and ferrets	<b>No</b> These types of pets are not allowed
	Aviary birds, chickens, ducks or pigeons	<b>No</b> These types of pets are not allowed
<b>Leaseholders</b>		
The property is a flat or maisonette that shares a single common entrance	Cats Dogs	<b>Yes</b> One cat or one dog may be allowed
	Small domestic caged animals - such as rabbits, guinea pigs and ferrets	<b>No</b> These types of pets are not allowed
	Aviary birds, chickens, ducks or pigeons	<b>No</b> These types of pets are not allowed
<p>There is some impact on tenants living in closed housing schemes and tenants and leaseholders living in flats and maisonettes, where there are restrictions on the types of pets allowed (as outlined above). Such restrictions are relevant to property type rather than to any particular individuals or groups. Certain types of pets are not allowed due to consideration of the shared nature of such properties, their confined size in terms of living space, and the lack of private outdoor space and facilities available for the animals.</p>		

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Step 3: Assessing the equality impact	
	<p>This means certain pets are not practical in such environments, and by allowing a pet, may subsequently cause difficulties in meeting the pet's needs, as well as potentially causing nuisance and annoyance to others, subsequently impacting on the promotion of good relation between residents.</p> <p><b><u>LONELINESS AND ISOLATION</u></b></p> <p>Loneliness is a subjective, unwelcome feeling of lack or loss of companionship. It happens when we have a mismatch between the quantity and quality of social relationships that we have, and those that we want. Adults have been the focus of most of the research around loneliness, although loneliness can affect anyone regardless of their protected characteristics.</p> <p>The Council recognises that domestic pets bring joy, happiness and comfort to people's lives, helping their owners through difficult times and improving their health and wellbeing. The policy states that, where permission for keeping a pet is not granted, for example, because the pet would not be practical in that particular environment, this may impact on some tenants who experience loneliness and isolation. The tenant or leaseholder will be signposted to external help and support, for example, befriending services.</p> <p><b><u>NUISANCE AND ANTI-SOCIAL BEHAVIOUR</u></b></p> <p>The policy considers the circumstances whereby a tenant is vulnerable and there are complaints about pet and animal nuisance and anti-social behaviour. The policy recognises that following the usual procedure of enforcement action for vulnerable tenants whose pet ownership is causing nuisance and anti-social behaviour, is not always appropriate. In accordance with the Vulnerable Adults' Housing Policy, the Council will have regard to the particular circumstances and the vulnerability of tenants when considering the most appropriate form of intervention and action.</p> <p><b><u>ALTERNATIVE FORMATS AND INTERPRETING SERVICES</u></b></p> <p>In accordance with the Council's Equality &amp; Diversity Document Framework, the policy and information about the keeping of pets 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>

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Step 3: Assessing the equality impact	
	<p>The policy also states that the Council will make reasonable adjustments for tenants and leaseholders who are unable to complete an Application for Permission to Keep a Pet. This may include visiting the tenant or leaseholder to obtain the necessary information to make a decision on the application.</p> <p><b><u>RIGHT TO APPEAL</u></b> The policy includes a right to appeal a decision to refuse permission or withdraw permission to keep a pet. The investigation will be carried out by a senior officer and independent to the officer who made the original decision. This aims to increase assurance of impartiality and fairness in the process, also supported by good record keeping of the reasons/justifications for the original decision and the decision following triggering of the appeal process.</p> <p><b><u>COMPLAINTS</u></b> Any tenant or leaseholder who is not satisfied with the service they have received or who believes they have been discriminated against in respect of the application of the policy can make a formal complaint to the Council using the corporate complaints process.</p>

Step 4: Action plan
<p><b>12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:</b></p> <p>a) any gaps in information and consultation 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
Views from all Council tenants and leaseholders	Invite comment and input on the draft policy from all Council tenants and leaseholders	Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of	August 2023	Details of the consultation and any amendments made to the draft policy as a result of the consultation will be	Senior Housing Policy & Performance Officer

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Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
		seeking approval for the policy		included in the Cabinet report	
Views from the Dartford Tenants' and Leaseholders' Forum on the draft policy	Invite comment and input on the draft policy from the Dartford Tenants' and Leaseholders' Forum	Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy	August 2023	Details of the consultation and any amendments made to the draft policy as a result of the consultation will be included in the Cabinet report	Senior Housing Policy & Performance Officer
Views from the Housing Advisory Board	Invite comment and input on the draft policy from the Housing Advisory Board	Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy	October 2023	Details of the consultation and any amendments made to the draft policy as a result of the consultation will be included in the Cabinet report	Senior Housing Policy & Performance Officer

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

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

<b>13. Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?</b>	Director of Housing & Public Protection
<b>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</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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<b>Step 5: Decision making and future monitoring</b>	
<b>15. How will you continue to monitor the activity or proposal on protected characteristic groups?</b>	All requests for permission to keep pets will be recorded on an application form and on the tenancy and leaseholder file. Appeals, complaints and satisfaction survey data will be routinely monitored.
<b>16. When will you review this Customer Access Review?</b>	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.
<b>Step 6: Final steps</b>	
<b>17. Once this Customer Access Review has been approved, send this assessment to the Policy &amp; Projects Officer</b>	
<b>18. Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded</b>	

**Reviewed by Legal Services: 20 October 2022**

**Reviewed by Director of Housing & Public Protection: 1 June 2023**