

Customer Access Review – Full Assessment

Assessment details	
Assessment area	Under Occupancy Policy – ‘Downsize for Cash Scheme’
Date of assessment	9 July 2024
Directorate and Service	Housing & Public Protection, Housing Services
Manager	Head of Housing
Officer conducting assessment	Housing Development and Policy Manager

Step 1: Scoping the assessment	
1. What are the aims and objectives of the activity or proposal?	<p>The Under Occupancy Policy outlines Dartford Borough Council’s approach to the ‘Downsize for Cash Scheme’. The key objectives of the policy are:</p> <ul style="list-style-type: none"> • To encourage and assist tenant’s under-occupying family accommodation to downsize into smaller general needs or Housing Scheme accommodation • To release family accommodation to maximise occupancy • To give tenants a financial incentive and support when moving home through this scheme. The financial incentive is intended to contribute towards the costs incurred as a result of moving • To be sensitive to the needs of the individual tenant or household • To be fair, efficient, effective and accountable. <p>The benefits under the current scheme include:</p> <ul style="list-style-type: none"> • A payment of £500 for each bedroom released • An additional £100 to help towards moving costs • Payment towards removal and packing expenses of up to £400. <p>A review of the scheme has been carried out with the following proposed increases/changes to the payments offered:</p> <ul style="list-style-type: none"> • A payment of £1,000 for each bedroom released • A payment of £500 for each parlour room released • An additional payment of £500 for those releasing 3 and 4 bedroom properties • An additional £1,000 for those transferring to 1 bedroom Scheme Housing for older people • Payment towards removal and packing expenses of up to £1,000. • £200 payment towards help with preparing to move

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Step 1: Scoping the assessment																										
2. Who will be affected by the activity or proposal?	The Under Occupation Policy will affect secure tenants of Dartford Borough Council who are under occupying their property and choose to downsize to a smaller property.																									
3. How does the activity or proposal contribute to: a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council?	a) There are no key performance indicators in relation to the Under Occupation Policy. b) The Under Occupation Policy contributes to the Housing ambition in the draft Corporate Plan 2024-2027 to 'provide a high quality and responsive housing service that's built on respect for aspiring and existing tenants. We want to be practical, honest and straightforward in all the information and advice we give'.																									
4. Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?	Secure tenants cannot be required to move if they are under occupying their property unless where the original tenant has died, passing on the tenancy to a member of the family (though not the spouse or civil partner) and the accommodation is larger than the successor reasonably requires (as covered under ground 15A, Schedule 2 of the Housing Act 1985, as amended). While the Downsize for Cash Scheme is a discretionary incentive scheme and voluntary for tenants to participate in, the scheme is compatible with requirements set out in the Regulator of Social Housing's Tenancy Standard. This Standard includes a specific expectation for social housing providers to develop and deliver services that seek to address under-occupation and overcrowding in their homes.																									
Step 2: Information collection																										
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)	Information in relation to profile of Council tenants (Tenant 1 data) is captured by the Council's Housing Service, as follows: <table border="1" data-bbox="772 992 2110 1396"> <tbody> <tr> <td rowspan="3">Sex</td> <td>Male</td> <td>33.85%</td> </tr> <tr> <td>Female</td> <td>66.03%</td> </tr> <tr> <td>Unknown</td> <td>0.12%</td> </tr> <tr> <td rowspan="4">Age</td> <td>18-24</td> <td>1.59%</td> </tr> <tr> <td>25-39</td> <td>20.41%</td> </tr> <tr> <td>40-59</td> <td>38.22%</td> </tr> <tr> <td>60+</td> <td>39.78%</td> </tr> <tr> <td rowspan="4">Race</td> <td>White</td> <td>67.72%</td> </tr> <tr> <td>Asian or Asian British</td> <td>1.45%</td> </tr> <tr> <td>Black or Black British</td> <td>1.47%</td> </tr> <tr> <td>Mixed</td> <td>2.00%</td> </tr> </tbody> </table>	Sex	Male	33.85%	Female	66.03%	Unknown	0.12%	Age	18-24	1.59%	25-39	20.41%	40-59	38.22%	60+	39.78%	Race	White	67.72%	Asian or Asian British	1.45%	Black or Black British	1.47%	Mixed	2.00%
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Step 2: Information collection												
	<table border="1"> <tr> <td></td> <td>Chinese or other ethnic group</td> <td>0.24%</td> </tr> <tr> <td></td> <td>Unknown/ prefer not to say</td> <td>27.12%</td> </tr> <tr> <td rowspan="2">Disability/ vulnerability</td> <td>No disability/ vulnerability</td> <td>79.16%</td> </tr> <tr> <td>Disability/ vulnerability</td> <td>20.84%</td> </tr> </table> <ul style="list-style-type: none"> • The total number of council homes currently under-occupied is 452 • There are 89 single tenants over the age of 75 living in homes with 2 or more bedrooms • There have been 24 payments made under this scheme since 2022/2023 • There are currently 2 live applications for 2024/2025 		Chinese or other ethnic group	0.24%		Unknown/ prefer not to say	27.12%	Disability/ vulnerability	No disability/ vulnerability	79.16%	Disability/ vulnerability	20.84%
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6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings	Consultation on the policy has been undertaken internally within the Housing Service.											
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>The Council is committed to ensuring the voice of its residents is heard on matters that affect them. The Regulator of Social Housing places a requirement on social housing landlords to comply with the Transparency, Influence and Accountability Standard 2024, 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 will be undertaken on the Under Occupation Policy, as follows:</p> <ol style="list-style-type: none"> 1. All Council tenants will be invited to comment on the Under Occupation Policy. 2. The Dartford Tenants' and Leaseholders' Forum (DTLF) will be invited to comment on the Under Occupation 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. 3. The Housing Advisory Board (HAB) will be invited to comment on the Under Occupation 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. 											

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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

Step 3: Assessing the equality impact

PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Age	<p>While there is no age criteria for taking part in the Downsize for Cash Scheme, the scheme may be a beneficial housing option for older tenants whose household composition has changed, for example, their children have grown up and moved out of the family home. Or, the scheme may be beneficial where there has been a relationship breakdown and a partner and some or all the children have moved away.</p> <p>The scheme may also be a beneficial housing option for working age tenants subject to under occupancy rules on their housing benefit (also commonly referred to as the 'bedroom tax').</p>		<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
	<p>The under occupancy rules mean a reduction in housing benefit for tenants where they are classed as having any spare bedrooms. Therefore, tenants who are under occupying their property are required to pay for additional rooms or consider moving to another property. This measure does not apply to tenants of pensionable age.</p> <p>For tenants aged 55 and over, an additional £1,000 will be provided under the scheme for those transferring to 1 bedroom Scheme Housing.</p>			
Disability	<p>The Council recognises that some people, for example those with a disability, may need some additional help with moving, for example by offering advice or practical help. If additional help is needed, tenants can let the Council know when they apply and the Council will let them know if it is able to help.</p> <p>In accordance with the Council's Equality & Diversity Document Framework, the Under Occupation Policy and information about the services provided under the Downsize for Cash Scheme, can be provided in alternative formats,</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
	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.			
Sex			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender reassignment			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Race	In accordance with the Council's Equality & Diversity Document Framework, the Under Occupation Policy and information about the services provided under the scheme, 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*	Not applicable as the policy does not apply in the context of employment.	Not applicable as the policy does not apply in the context of employment.	<input 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.

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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 Under Occupation Policy will have relevance to and/or a disproportionate equality impact on the protected characteristics groups of sex, gender reassignment; religion/belief; pregnancy and maternity; and, sexual orientation.</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>
<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</p>	<p>The Council is a member of the Kent Homechoice partnership, which is the choice-based lettings scheme for all council and housing association homes in Kent. The scheme uses an online platform to advertise all available council and housing association properties. Kent Homechoice has produced its own accessibility statement with regards to the website used for operating the scheme.</p>
<p>11. Any other comments</p>	<p>Supporting tenants Tenants wishing to downsize under the Under Occupation Policy will firstly need join the housing register. If tenants require assistance to join the housing register they may nominate a friend, relative or advocacy worker from an appropriate agency to apply on their behalf, by completing an advocacy form or they can contact the Council for assistance.</p> <p>Auto bidding for properties is implemented for a variety of housing register customers including tenants wishing to downsize and those that have told us they are unable to bid for themselves and have no family or friends to assist.</p> <p>Conclusion In conclusion, the Under Occupation Policy relates to the equality aim of promoting equality of opportunity for eligible tenants choosing to participate in the Downsize for Cash Scheme. The policy aims to promote transparency in the process to downsize and provide financial and practical assistance towards the move.</p>

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Step 3: Assessing the equality impact

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?

Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
Views from all Council tenants on the Under Occupation Policy	Carry out consultation with tenants	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	September 2024	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	Housing Development and Policy Manager
Views from the Dartford Tenants' and Leaseholders' Forum on the Under Occupation Policy	Carry out consultation with 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	September 2024	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	Housing Development and Policy Manager
Views from the Housing Advisory Board on the Under Occupation Policy	Carry out consultation with 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 2024	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	Housing Development and Policy Manager

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					

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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 and Head of Legal Services
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?	Equalities records of applicants on the housing register 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.
16. When will you review this Customer Access Review?	The Under Occupation Policy and Customer Access Review will be reviewed every three years or earlier to address legislative, regulatory, best practice or operational issues.

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:



1/8/24

Reviewed by Director of Housing & Public Protection:



Peter Dosad. 18.7.2024