

**NEATH PORT TALBOT COUNTY BOROUGH COUNCIL  
REGENERATION AND SUSTAINABLE DEVELOPMENT  
CABINET BOARD**

**18<sup>th</sup> January 2019**

**Head of Adult Services - A. Thomas**

**SECTION A - MATTER FOR DECISION**

**WARDS AFFECTED - NEATH EAST**

**NEATH PORT TALBOT COUNTY BOROUGH COUNCIL & TAI TARIAN  
SHARED LETTINGS POLICY: LOCAL LETTINGS AGREEMENT - BUSH ROW**

**Purpose of the Report**

To seek approval of the Local Lettings Agreement - Bush Row (see Appendix 1) which will supplement and come within the remit of the overarching Neath Port Talbot County Borough Council (Council) and Tai Tarian Shared Lettings Policy 2015.

**Executive Summary**

Tai Tarian have proposed a local lettings agreement. This is the first time they have done so since the housing stock transfer in 2011. Tai Tarian's overarching shared lettings policy with Neath Port Talbot County Borough Council ("the Council") allows for such local lettings agreements but it does not set out the Council's governance arrangements in respect of them. It is therefore necessary to obtain Member approval prior to its implementation by Tai Tarian.

**Background**

The Council and Tai Tarian's 2015 Shared Lettings Policy allows for the Council and Tai Tarian to develop and agree local lettings agreements to meet specific local issues.

In the absence of any detail in the Shared Lettings Policy around the necessary governance arrangements, the default position is that such agreements require Member approval prior to their implementation by Tai Tarian.

In considering a previous report on this matter, Scrutiny Committee has expressed concern that the implementation of such agreements may be counter-productive to the Council's efforts in meeting its homelessness duties.

This report responds to the issues raised by the Regeneration and Sustainable Development Scrutiny Committee of 26<sup>th</sup> October 2018 and provides further information as detailed in the Cabinet Board minutes of 26 October 2018, that being:

- a full Equality Impact Assessment;
- additional information around the Council's statutory homelessness duties;
- figures relating to homelessness;
- an assessment of the impact of the Bush Row policy on the wider community; and
- the removal of the recommendation that ongoing power to approve such policies be delegated to the Head of Adult Services.

## **Bush Row**

Bush Row consists of thirty two apartments contained within two buildings. There are sixteen one-bed and sixteen two-bed apartments over three storeys. It is located in the Melyncrythan area of Neath and the buildings have recently undergone an external works programme, with an internal works programme planned to commence shortly.

There is evidence of drug dealing and heavy drug use in the blocks, with numerous visitors frequenting the blocks, particularly in the evenings. There is suspected drug dealing taking place in five properties, resulting in the recent entry and search of two properties by the police. Other residents are reporting being fearful for their safety and some have requested transfers out of Bush Row, due to the apparent drugs problems. It is also an area where the police have identified that potential 'cuckooing' is taking place.

The block has consequently gained a reputation which is making vacancies increasingly difficult to let. Tai Tarian are therefore already pursuing a number of initiatives to positively influence perceptions and ensure residents are safe and secure in their homes; these involve the following block-management proposals:

- regular visits and presence in the blocks to ensure all residents are meeting their tenancy obligations;
- utilising a currently vacant apartment as an office, in the short-term, for use by officers of Tai Tarian, local PCSOs and contractors;
- installation of CCTV, externally and in internal communal areas;
- close working with the police to ensure information is exchanged and the appropriate action taken;
- upgrades to the security of the blocks with new doors, door entry system, removal of the trade button facility, plus additional lighting and fencing, to secure the rear garden areas; and

- advice and support offered to those tenants who require additional help to manage their tenancies.

Tai Tarian believe that in order for the above measures to succeed, it is necessary to make every reasonable effort to ensure no further perpetrators, or potential vulnerable victims, of anti-social behaviour or unlawful activity are housed at Bush Row; until the situation improves sufficiently to justify reverting to the status quo. This is the purpose of this proposed local lettings agreement.

In terms of the impact this may have on allocations more generally, it should be noted that, on average, less than 10 properties per annum become available for letting at Bush Row. There will therefore be very little impact on other allocations generally and the other development in the Melyn area (Furnace Place) will be unaffected because it generally caters for those downsizing due to the impact of the “bedroom tax”.

### **Reason for proposed local lettings schemes**

The general justification is the need to create a balanced and sustainable community, in an instance where this may not otherwise be the case. However, Scrutiny Committee has previously expressed concern that the implementation of such an agreement may be counter-productive to the Council’s efforts in meeting its homelessness duties.

Part 2 of the Housing (Wales) Act 2014 places duties on the Council to take steps to help homeless households find suitable accommodation. The Council’s Housing Options Service has a number of means at its disposal, by which this is achieved, and one of these is securing the offer of suitable accommodation, by a housing association.

During 2017/18, the Council successfully discharged 339 duties to secure or help secure accommodation for a homeless household and in 153 (45%) of these instances it was as a result of securing a housing association allocation. This compares extremely favourably to the pan-Wales % of successful discharges of duty, by housing association allocation, of 17%.

By way of contribution to the above, in excess of 40% of all Tai Tarian allocations are to households in a Homelessness Lead Need category. Again, by way of pan-Wales comparison, over the last 7-8 years, the annually assessed overall level of social housing provider homelessness allocation has gradually decreased from 25% to 18%.

In this context, officers are satisfied that, on balance, the reasons given for the proposed implementation of the local lettings policy are valid and the measures proposed are both reasonable and proportionate. Officers do not therefore object to their implementation from a Strategic Housing Authority perspective.

Furthermore, the agreement provides that anyone not offered a particular allocation, because of its implementation, who otherwise would have been, will be concurrently considered for an equally suitable allocation elsewhere, in accordance with the overarching Joint Lettings Policy. Officers are therefore also satisfied there is no apparent reason to believe that successful ongoing joint working between Tai Tarian and operational Council teams, in fulfilling their statutory duties to meet accommodation need, will be adversely affected.

### **Financial Impact**

There are no anticipated financial impacts arising from this report.

### **Equality Impact Assessment**

The Equality Act 2010 requires public bodies to assess the likely impact of proposed policies and practices on its ability to comply with the general duty (to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity and foster good relations between different groups) for all people with protected characteristics.

The proposed local lettings agreement has undergone a full EIA and the outcome of the EIA is that Officers recommend the agreement is approved by Members.

This is because it will contribute to the creation of a balanced and sustainable community, in an instance when this would not otherwise necessarily occur, without impacting adversely on any housing applicant, notwithstanding their protected characteristics.

Further information relating to the detail of the EIA of the agreement is attached at Appendix 2.

### **Workforce Impacts**

There are no anticipated Council workforce impacts arising from this report.

### **Legal Impacts**

Section 167(2e) of the Housing Act 1996 enables a Council to allocate accommodation to people of a particular description, whether or not they fall within the generally prevailing reasonable preference categories, provided that overall, it is able to demonstrate compliance with the requirements in relation to such categories.

Section 2.9 of the Shared Lettings Policy 2015 relies on the above to state that nothing contained therein shall prevent the Council and Tai Tarian from

implementing local lettings agreements, subject to following clearly stated caveats:

- Any such agreement will be published;
- prior to being implemented and upon review, it will be equality impact assessed;
- it must have clear aims and be linked to creating balanced and sustainable communities;
- it will be based upon evidence which demonstrates a need for the intended approach; and
- it will be monitored to ensure that, overall, the overarching Shared Lettings Policy continues to give reasonable preference to applicants in the reasonable preference categories set out in Section 167(2) of the Housing Act 1996.

All but the last bullet-pointed requirement are addressed elsewhere in this report or in the local lettings agreement itself.

As to the effect it will have on the continued overall legal compliance of the Shared Lettings Policy, it should be noted that the proposed local lettings agreement relates to only 32 of the in excess of 9,000 units of accommodation in Tai Tarian's portfolio. Consequently, ongoing allocations in respect of over 99% of Tai Tarian's stock will be unaffected by the action proposed in the agreement.

Furthermore, the alternative accommodation consideration provisions therein, mitigate sufficiently against any potential adverse impact of the proposed local lettings agreement, on the Council's ability to discharge its homelessness duties, under Part 2 of the Housing (Wales) Act 2014.

## **Risk Management**

There are no risk management issues associated with this report.

## **Consultation**

There is no requirement under the Constitution for external consultation on this item.

## **Recommendations**

It is recommended that Members approve the Local Lettings Policy - Bush Row, as proposed by Tai Tarian and appended to this report.

## **Reasons for Proposed Decision**

To enable Tai Tarian to implement the local lettings agreement required to create a balanced and sustainable community in the given instance where this may not otherwise occur.

## **Implementation of Decision**

The decision is proposed for implementation after the three day call in period.

## **Appendices**

Appendix 1: Local Lettings Policy - Bush Row

Appendix 2: Equality Impact Assessment

## **List of Background Papers**

None

## **Officer Contact**

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## **Local Lettings Policy**

### **Bush Row**

#### **Purpose**

To produce a local lettings agreement with the aim of creating a balanced and sustainable community at Bush Row.

#### **Background**

This agreement sets out the criteria for the letting of properties at Bush Row, Melyn.

#### **Reason for the Local Lettings Agreement:**

To prevent applicants with a history of anti-social or behaviour or criminal activity from routinely being offered housing in the area. This measure is intended to support the settlement of existing tenants and residents as well as encouraging prospective tenants to Bush Row and neighbouring communities. This will contribute to wider efforts to facilitate the development of a sustainable community, in which households will feel safe and secure and so want to remain.

#### **Application requirements:**

For future vacancies it is proposed that we will only consider applicants who meet the following criteria:

- Applicants with no current drug addictions or substance misuse;
- applicants with no criminal convictions in the last 5 years that would affect a tenancy (eg, violent offences, drug related offences, theft or other serious offences) or being investigated for an offence of this nature;
- applicants with no drug convictions (possession/supply);
- applicants with no or low level support needs;
- applicants who can evidence that they have conducted a tenancy satisfactorily or, if they had not held a previous tenancy, can supply satisfactory references; and
- applicants who have not been involved in anti-social behaviour in the last 2 years;

## **The Process for letting:**

Tai Tarian will invite expressions of interest for available properties through the Homes by Choice scheme in the first instance.

If any applicant who expresses an interest for a property has involvement with the Council's Housing Options Team (HOT) then discussions will take place between Tai Tarian and HOT on the suitability of the applicant

Anyone expressing an interest in the scheme or being nominated by HOT directly outside the Homes by Choice scheme must have a 'live' application with Tai Tarian. This means that the applicant has to be considered eligible for allocation in line with the Shared Lettings Policy

Applicants who express an interest in the scheme will be considered in accordance with the banding scheme and within that in date of application order. Consideration overall however will be to the sustainability of the scheme so that some vacancies may be advertised as suitable only for persons currently employed on a part-time or full time basis.

Expressions of interest will be open to all live housing applicants – waiting list and transfer however Tai Tarian will decide whether there will be a cap on transfer cases, this is to ensure there is a mix of applicants in each scheme, for sustainability and meeting housing need.

For any applicant who has an open case with HOT, a full background information on the prospective applicant is required from HOT.

The decision on any allocation will be made by Tai Tarian based on the facts of the application and how the allocation would assist with the sustainability of the community at Bush Row.

## **Review of agreement:**

Tai Tarian and HOT review the arrangements for any future vacancies after a period of 12 months. This will involve an analysis of allocations made during the period and how those tenancies have been conducted.

If the Council's responsible Principal Officer & Tai Tarian's responsible Assistant Director agree that there have been insufficient allocations made to demonstrate the successful outcome of the local lettings agreement, then the period of its implementation may be extended for periods totalling a maximum of a further 24 months.



**Equality Impact Assessment (EIA) Report Form**

This form should be completed for each Equality Impact Assessment on a new or existing function, a reduction or closure of service, any policy, procedure, strategy, plan or project which has been screened and found relevant to Equality and Diversity.

**Please refer to the ‘Equality Impact Assessment Guidance’ while completing this form. If you would like further guidance please contact the Corporate Strategy Team or your directorate Heads of Service Equality Champion.**

<b>Where do you work?</b>
<b>Service Area:</b> Adult Services / Commissioning
<b>Directorate:</b> Social Services Health & Housing

**(a) This EIA is being completed for a...**

Service / Function	Policy / Procedure	Project	Strategy	Plan	Proposal
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**(b) Please name and describe below...**

Local lettings Agreement - Bush Row

**(c) It was initially screened for relevance to Equality and Diversity in**

29 November 2019

**(d) It was found to be relevant to...**

Age .....

Disability .....

Gender reassignment .....

Marriage & civil partnership .....

Pregnancy and maternity .....

Race.....

Religion or belief .....

Sex.....

Sexual orientation.....

Welsh language .....

**(e) Lead Officer  
Service**

**(f) Approved by Head of**

**Name:** Chele Howard

Angela Thomas

**Job title:** Principal Officer Commissioning

Head of Adult Services

## Section 1 - Aims (See guidance):

Briefly describe the aims of the function, service, policy, procedure, strategy, plan, proposal or project:

### What are the aims?

Implementing a local lettings agreement to create a balanced and sustainable community in a Tai Tarian housing development where this may not otherwise occur.

### Who has responsibility

Tai Tarian

### Who are the stakeholders

- Neath Port Talbot County Borough Council;
- current & future Tai Tarian housing applicants;
- current & future homeless households; and
- current Tai Tarian tenants.

## Section 2 - Information

### (a) Service Users

Please tick what information you know about your service users and provide details / evidence of how this information is collected.

Age .....	<input checked="" type="checkbox"/>	Race.....	<input checked="" type="checkbox"/>
Disability .....	<input type="checkbox"/>	Religion or belief .....	<input type="checkbox"/>
Gender reassignment .....	<input type="checkbox"/>	Sex.....	<input checked="" type="checkbox"/>
Marriage & civil partnership .....	<input type="checkbox"/>	Sexual orientation.....	<input type="checkbox"/>
Pregnancy and maternity .....	<input type="checkbox"/>	Welsh language.....	<input type="checkbox"/>

**What information do you know and how is this information collected?**

- Applicants for housing have historically only disclosed their age, sex, and information about their immigration status, as part of the initial application process;
- Tai Tarian currently estimate having equality data for approximately a third of their tenants and no comprehensive dataset for applicants over any particular period of time;
- Equalities information is not accessible to the Council as this is Tai Tarian's data.
- It is consequently not possible for Council Officers to include comprehensive data on protected characteristics in this EIA.

Officers from Tai Tarian and the Council's Housing & Homelessness Service will work together to improve joint equalities data monitoring processes.

**(b) General**

**What information do you know and how is this information collected?**

Census 2011 information remains the most comprehensive data for Neath Port Talbot and a summary thereof is set out in the table overleaf.

This data does not however tell us anything specifically about those who would be affected by these local lettings policies.

Officers from Tai Tarian and the Council's Housing & Homelessness Service will work together to improve joint equalities data monitoring processes.

## Section 3 - Impact

### (a) Impact on Protected Characteristics

Please consider the possible impact on people with different protected characteristics. This could be based on service user information, data, consultation and research or professional experience (e.g. comments and complaints).

investigation	Positive	Negative	Neutral	Needs further
Age	➔ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Disability	➔ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Gender reassignment	➔ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Marriage/civil partnership	➔ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pregnancy/maternity	➔ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Race	➔ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Religion or belief	➔ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sex	➔ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sexual orientation	➔ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Welsh language	➔ <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

# Neath Port Talbot 2011 Census Summary Factsheet



## 1 Resident population

Total	139,812
Male	68,450
Female	71,362
Area (hectares)	44,126
Density*	3.2

## 2 Resident population age structure

	No.	%
0 - 4 year olds	7,599	5.4
5 - 15 year olds	17,038	12.2
16 - 24 year olds	14,930	10.7
25 - 44 year olds	35,312	25.3
45 - 59 year olds	29,399	21.0
60 - 64 year olds	9,483	6.8
65 - 74 year olds	13,862	9.9
75 - 89 year olds	11,032	7.9
90+ year olds	1,157	0.8

## 3 Ethnic group population

	No.	%
White	137,087	98.1
Mixed	910	0.7
Asian or Asian British	1,369	1.0
Black or Black British	299	0.2
Other	147	0.1

## 4 Religion

	No.	%
Christian	80,646	57.7
Buddhist	312	0.2
Hindu	144	0.1
Jewish	39	0.0
Muslim	573	0.4
Sikh	113	0.1
Other	533	0.4
No religion	47,265	33.8
Not stated	10,187	7.3

## 5 Residents with limiting long-term illness (LLTI) & general health of all

	No.	%
People with LLTI (Lot & little)	39,112	28.0
<b>General Health</b>		
Very good/good	102,543	73.4
Fair	22,640	16.2
Very bad/bad	14,629	10.5

## 6 Residents in communal establishments

	No.	%
Total	1,130	0.8

## 7 Households

60,393

## 8 Central heating (households)

No central heating	674
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## 9 Dwellings

Total number of dwellings	63,978
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## 10 Household and family types %

One person	30.2
One person (aged 65+)	13.9
One person (other)	16.3
Couple – no children	16.8
Couple & non-dependent children	12.9
Lone parent & non-dep. children	4.6
All households with dep. children	28.3
Couple & dependent children	18.3
Lone parent & dependent children	7.7

## 11 Housing tenure

	No.	%
Owner occupied	41,479	68.7
Shared ownership	111	0.2
Social rented	11,545	19.1
Private rented	6,186	10.2
Other/Rent free	1,072	1.8

## 12 Household spaces

Household spaces	64,017
At least one usual resident	60,393
No usual residents	3,624

## 13 Dwelling type %

Whole house or bungalow	89.2
Flat, maisonette or apartment	10.6

## 14 Car ownership %

Households with no car/van	25.5
Households with one car/van	43.3
Households with 2+ cars/vans	31.1

## 15 Economic activity (% of all aged 16-74)

	Male	Female
Economically active**	67.2	57.4
Economically inactive	32.8	42.6

\*\*i.e. economic-activity rate

## 16 Economically active (% of all aged 16-74)

	Male	Female
Working full-time	45.5	26.5
Working part-time	5.6	22.1
Self-employed	8.4	3.1
Unemployed	5.9	3.1
Full-time student	1.8	2.6

## 17 Economically inactive (% of all aged 16-74)

	Male	Female
Perm. sick/disabled	9.5	9.6
Retired	15.5	19.1
Looking after home/family	1.3	7.3
Students	4.5	4.1

## 18 Employed residents

Total	57,220
Male	30,365
Female	26,855

## 19 Weekly hours worked (main job) %

	Male	Female
15 hours & under	1,445	3,243
16 - 30 hours	2,736	9,923
31 - 48 hours	22,351	13,683
49+ hours	4,501	1,098

## 20 Self-employed

Total	5,908
Male	4,286
Female	1,622

## 21 Qualified residents (% of all aged 16+)

Highest qualification attained level 4	18.8
Highest qualification attained level 3	11.0
Highest qualification attained level 1/2	30.4
No qualifications	30.9

## 22 National identity

Welsh only	71.8
Welsh & British	8.2
British only	11.2
No Welsh identity	19.0
No British identity	79.6

## 23 Industries (% of all aged 16-74 in work)

Energy, water, agriculture, fishing, mining & quarrying, etc	2.7
Manufacturing	14.5
Construction	8.6
Hotels & catering	4.7
Transport, storage & communication	4.1
Wholesale & retail, repair of motor vehicles	14.7
Financial intermediation	3.1
Real estate, renting & business activities	1.2
Public admin & defence	9.8
Education	8.6
Health & social work	14.7
Other	4.3

## 24 Occupations (% of all aged 16-74 in work)

Managerial	7.0
Professional, technical	13.7
Admin & secretarial	13.3
Skilled trades	12.9
Services & sales	10.4
Process plant & machine operatives	10.0
Elementary occupations	9.9

## 25 Welsh Language skills %

	NPT	Wales
No skills in Welsh	75.2	73.3
Can understand spoken Welsh only	6.4	5.3
Can speak Welsh	15.3	19.0
Can speak, but cannot read or write Welsh	2.7	2.7
Can speak and read but cannot write Welsh	1.6	1.5
Can speak, read and write Welsh	10.8	14.6
Can speak and other combinations of skills in Welsh	3.3	2.5

### Notes

All % rounded to 1 decimal place; not all will add to 100. Section 10 will usually add to more than 100%; percentages in other sections will be at most 100%, they may exclude some groups e.g. 'category unknown'. \* Density is the number of people per hectare.

Source: Office for National Statistics - 2011 Census © Crown Copyright

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**Thinking about your answers above, please explain (in detail) why this is the case.**

**Include details of any consultation (and/or other information) which has been undertaken to support your view.**

Under the local lettings agreement, allocations will continue to generally conform to the provisions of the overarching Shared Lettings Policy, which means that they will be made based on the severity and urgency of housing need, notwithstanding the protected characteristics of bidding applicants.

The impact of both on any applicant, notwithstanding their protected characteristics, is therefore anticipated by Council officers to be neutral or low impact, for the following reasons.

Age – allocations continue to be made in accordance with the Shared lettings Policy applicant category criteria. The properties at Bush Row are considered suitable for General Needs applicants (aged 16-55 years) because of the nature of the accommodation. They are not considered suitable for Older persons and are not advertised for this applicant category. Therefore there would be no change to the way in which they are allocated in respect of age.

Disability - if a vacant property has benefitted from adaptations that make it suitable for a disabled person this would be advertised for applicants who require disabled facilities. In the case of mental health and learning disability, where the applicant has no mobility requirements their applicant category would allow for them to bid for a general needs property. If the applicant who bids for the property and would normally be successful in being offered a property has particular vulnerabilities which require a high level of support then because of the particular problems at Bush Row, which could adversely affect an applicant with high level support needs, more suitable alternative accommodation would be offered to promote a positive impact on the individual.

Gender Reassignment - the Lettings agreement conforms to the provisions of the Shared Lettings Policy which means that the housing register is open to all persons aged 16 and over regardless of gender reassignment. The Lettings agreement does not detract from this so that all applicants who are eligible can apply for accommodation at Bush Row.

Marriage and Civil partnership - again whatever the status of the relationship this would not be considered in assessing an application for accommodation

Pregnancy and maternity - this is considered both in housing need factors and in the applicant category award and an applicant would not be refused accommodation on the basis of any pregnancy or having a child

Race - the Lettings agreement conforms to the provisions of the Shared Lettings Policy which means that the housing register is open to all persons aged 16 and over regardless of ethnicity. This is subject to immigration rules as defined in the Housing Act 1996. The Lettings agreement does not detract from this so that all applicants who are eligible can apply for accommodation at Bush Row.

Religion or belief - the Lettings agreement conforms to the provisions of the Shared Lettings Policy which means that the housing register is open to all persons aged 16 and over regardless of religion or belief. The Lettings agreement does not detract from this so that all applicants who are eligible can apply for accommodation at Bush Row.

Sex - the Lettings agreement conforms to the provisions of the Shared Lettings Policy which means that the housing register is open to all persons aged 16 and over regardless of sex. The Lettings agreement does not detract from this so that all applicants who are eligible can apply for accommodation at Bush Row.

Sexual Orientation - the Lettings agreement conforms to the provisions of the Shared Lettings Policy which means that the housing register is open to all persons aged 16 and over regardless of sexual orientation. The Lettings agreement does not detract from this so that all applicants who are eligible can apply for accommodation at Bush Row.

Welsh Language - the Lettings agreement conforms to provisions of the Shared Lettings Policy which means that the housing register is open to all persons aged 16 and over regardless of Welsh Language preference. The Lettings agreement does not detract from this so that all applicants who are eligible can apply for accommodation at Bush Row.

The anonymised information below demonstrates the effect on applicants, when a sensitive let of a property at Bush Row was previously undertaken:

Applicant 1

Refused as had a dog (not allowed under the Pets policy due to shared access)

Applicant 2

Vulnerable adult high support needs (offered alternative accommodation)

Applicant 3

Former Tenant Arrears so not eligible for accommodation (Unreasonable behaviour as per the Shared Lettings Policy)



#### Applicant 4

Previous convictions and unreasonable behaviour while at interim accommodation provided by Housing Options so considered ineligible

#### Applicant 5

Bid for and Matched to another property

#### Applicant 6

Application cancelled by applicant

#### Applicant 7

Assessed as eligible and offered the property - applicant was homeless of no fixed abode.

Eligible applicants will continue to benefit from being considered and matched to properties which become available for letting at Bush Row. The eligibility criteria together with the block management arrangements will help create a balanced and sustainable community.

Applicants will be considered in accordance with NPTCBC's current Shared Lettings Policy/Homes By Choice Scheme. This ensures account is taken of the Reasonable Preference categories in the Housing Need Bands. Partnership working will be maintained by Tai Tarian working directly with NPTCBC's Housing Options Team, to monitor this on a day-to-day basis.

To put the impact into context, Tai Tarian let on average 550 to 600 properties per annum in accordance with the Policy/Homes By Choice Scheme. On average 5-6 properties per annum are likely to become available for letting at Bush Row, which equates to less than 1% of all annual lettings by Tai Tarian.

As stated in the agreement, Council and Tai Tarian officers will monitor compliance in meeting the reasonable preference categories.

#### **Actions (to increase positive/mitigate adverse impact).**

Officers from Tai Tarian and the Council's Housing & Homelessness Service will work together to improve joint equalities data monitoring processes.

(b) Impact on the Welsh Language

<p><b>What is the likely impact of the policy on:</b></p> <ul style="list-style-type: none"><li>• <b>Opportunities for people to use Welsh</b></li><li>• <b>The equal treatment of the Welsh and English languages</b></li></ul> <p><b>Please give details</b></p> <p><b>Could the policy be developed to improve positive impacts or lessen negative impacts? Please give details</b></p> <ul style="list-style-type: none"><li>• Under the local lettings agreement, allocations will continue to generally conform to the rules of the overarching Shared Lettings Policy which means that they will be made based on the severity and urgency of housing need, notwithstanding applicants' language preference.</li><li>• In this context, the overall impact is therefore anticipated to be neutral.</li></ul>
<p><b>Actions (to increase positive/mitigate adverse impact).</b></p> <p>N/A</p>

**Section 4 - Other Impacts:**

Please consider how the initiative might address the following issues.

You could base this on service user information, data, consultation and research or professional experience (e.g. comments and complaints).

**(a) Equalities**

Public Sector Equality Duty (PSED)

- to eliminate discrimination, harassment and victimisation;
- to advance equality of opportunity between different groups; and
- to foster good relations between different groups.

**Please explain any possible impact on meeting the Public Sector Equality Duty**

Implementing the local lettings agreement to create a balanced and sustainable communities in a Tai Tarian housing complex where this may not otherwise occur will have a positive impact on PSED.

**What work have you already done to improve the above?**

N/A

**Actions (to mitigate adverse impact or to address identified gaps in knowledge).**

N/A

(b) Reduce Social Exclusion and Poverty

**Please explain any possible impact**

The Agreement conforms to the requirements of the overarching Shared Lettings Policy which has been assessed to impact positively.

**What work have you already done to improve the above?**

N/A

**Actions (to mitigate adverse impact or to address identified gaps in knowledge).**

N/A

(c) Community Cohesion

<p><b>Is the initiative likely to have an impact on Community Cohesion?</b></p> <p>The Agreement conforms to the requirements of the Shared Lettings Policy which has been assessed to impact positively.</p>
<p><b>Actions (to mitigate adverse impact or to address identified gaps in knowledge).</b></p> <p>N/A</p>

**Section 5 - Consultation**

<p><b>What consultation and engagement has been undertaken (e.g. with the public and/or members of protected groups) to support the views in section 3 and 4?</b></p> <p>There is no requirement to specifically consult on the Agreement because it is permitted under the provisions of the overarching Shared Lettings Policy, subject to agreement between the Council and Tai Tarian.</p>
<p><b>Any actions required (to mitigate adverse impact or to address identified gaps in knowledge)</b></p> <p>N/A</p>

**Section 6 - Post Consultation**

What was the outcome of the consultation?

<p>N/A</p>
<p><b>Any actions required (to mitigate adverse impact or to address identified gaps in knowledge)</b></p> <p>N/A</p>

## Section 7 - Monitoring arrangements:

Please explain the arrangements in place (or those which will be put in place) to monitor the impact of this function, service, policy, procedure, strategy, plan or project:

### Monitoring arrangements:

**The implementation of these Agreements will be monitored jointly by Council and Tai Tarian Officers, as detailed in the agreements themselves.**

### Actions:

N/A

## Section 8 - Outcomes:

Having completed sections 1-5, please indicate which of the outcomes listed below applies to your initiative (refer to guidance for further information on this section).

Outcome 1: Continue the initiative...

Outcome 2: Adjust the initiative...

Outcome 3: Justify the initiative...

Outcome 4: Stop and remove the initiative...

**Action Plan:**

<p><b>Objective</b> (What are we going to do and why?)</p>	<p><b>Who</b> will be responsible for ensuring it is done?</p>	<p><b>When</b> will it be done by?</p>	<p><b>Outcome</b> (How will we know we have achieved our objective?)</p>
<p>Officers from Tai Tarian and the Council's Housing &amp; Homelessness Service will work together to improve equalities data collation and monitoring processes.</p>	<p>Tai Tarian &amp; the Council's Housing &amp; Homelessness Service</p>	<p>Joint work will begin by the end of the current financial year.</p>	<p>Council Housing &amp; Homelessness Service officers will be able to routinely undertake comprehensive EIAs in respect of the Shared Lettings Policy and Common Homes by Choice Register.</p>