

APPENDIX 7

Full Integrated Impact Assessment (IIA)

This Integrated Impact Assessment considers the duties and requirements of the following legislation in order to inform and ensure effective decision making and compliance:

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

Version Control

Version	Author	Job title	Date
Version 1	Gareth Evans	Commissioning Officer	14.05.21

1. Details of the initiative

	Title of the Initiative: Consultative draft NPTCBC/Tai Tarian Shared Lettings Policy 2021
1a	Service Area: CCU
1b	Directorate: SSH&H
1c	Summary of the initiative: The Shared NPTCBC/Tai Tarian Lettings Policy is due for review every two years but was last reviewed in 2015. The current review of the Policy began in early 2018 and an initial consultative draft reviewed document first produced in late 2019, but only recently finalised, because of the pandemic.
1d	Who will be directly affected by this initiative? Tai Tarian initial housing & transfer applicants
1e	When and how were people consulted? A Project group comprised of designated Tai Tarian Officers, including 1 st and 2 nd tier management, as well as Council senior staff from the SSH&H Commissioning, Housing & Homelessness, Environmental Health & Trading Standards, and Legal Services teams, met a number of times to review the 2015 Policy and agree a consultative draft reviewed document. A full three-month formal public consultation exercise will be undertaken once the final consultative draft is approved by HSC&W Cabinet Board.
1f	What were the outcomes of the consultation? The consultative draft has gone through a number of iterations as deliberations have progressed and the final consultative draft represents the consensus reached amongst members of the Project Group.

2. Evidence

What evidence was used in assessing the initiative?

All relevant applicant equalities data that Tai Tarian were able to provide was considered. However, this data only related to around 10% of the nearly 4,000 applicants, either already on the Council/Tai Tarian common Homes by Choice housing register, or awaiting the assessment of their recent application, as at 6 May 2021: that is those who opted to provide the relevant information. It therefore provides a useful indication but cannot be held to be conclusive in respect of all applicants.

The prioritisation of applicants under the banding system in the Joint Lettings Policy is not in any way affected by an applicant's gender, marital/civil partnership status, race, religion/belief, sex, or sexual orientation. Similarly, these factors have no bearing on how competing bids are treated in determining who is allocated any particular vacant property.

Age is however to some extent relevant in that "Older Person" is a category of housing-registered applicant & Tai Tarian have "Older Person Designated" housing stock. At the time of the 2011 census, 31% of the 16+ local population was over 60, as were 25% of Tai Tarian tenants (this was the year of shadow transfer of the Council's housing stock to Tai Tarian - then NPT Homes). As at 6 May 2021, however, less than 5% of Tai Tarian's total housing stock was older person designated but 10% of those on the NPTCBC/Tai Tarian Homes by Choice common housing register had been assessed as eligible for same. There is no more recent older person population estimate that includes the 60-64 age group to compare this to. However, the draft report of a recent housing need assessment exercise indicates that, although the number of persons in most groups aged under 60 is expected to reduce over the 15-year period 2018-2033, increases are projected for each group aged 65 and over.

"Disabled" is also a category of housing-registered applicant & Tai Tarian have "Disability-adapted" housing stock. At the time of the 2011 census, 28% of the local population considered themselves to be experiencing some degree of life-limiting long-term illness. As at 6 May 2021, nearly 16% of applicants who provided any equalities information similarly self-classified, but only nearly 6% considered themselves to have a physical disability that could be assumed to require adapted accommodation, whereas 10% of those on the Council/Tai Tarian Homes by Choice common housing register were in fact assessed as eligible for disability adapted accommodation.

With regard to pregnancy & maternity, a pregnant woman is afforded additional consideration in terms of the bedroom-size of vacant property for which her household is eligible to bid. There is however no wider contextual statistical information readily available and neither is it possible to readily determine to how many Tai Tarian applicants this applies. However, this is a positive factor that remains unchanged in the reviewed document.

3. Equalities

a) How does the initiative impact on people who share a **protected characteristic**?

Protected Characteristic	+	-	+/-	Why will it have this impact?
Age	X			“Older Person” is a category of housing-registered applicant & Tai Tarian have “Older Person Designated” housing stock.
Disability	X			“Disabled” is a category of housing-registered applicant & Tai Tarian have “Disability-adapted” housing stock
Gender reassignment			X	An applicant’s gender does not affect their eligibility either to get on the housing register or to bid for properties once they are.
Marriage & civil partnership			X	An applicant’s marital or civil partnership status does not affect their eligibility either to get on the housing register or to bid for properties once they are.
Pregnancy and maternity	X			A pregnant woman is afforded additional consideration in terms of the bedroom-size of vacant property for they are eligible to bid.
Race			X	An applicant’s race does not affect their eligibility either to get on the housing register or to bid for properties once they are.
Religion or belief			X	An applicant’s religion/belief does not affect their eligibility either to get on the housing register or to bid for properties once they are.
Sex			X	An applicant’s sex does not affect their eligibility either to get on the housing register or to bid for properties once they are.
Sexual orientation			X	An applicant’s sexual orientation per se does not affect their eligibility either to get on the housing register or to bid for properties once they are.

What action will be taken to improve positive or mitigate negative impacts?

There are no currently known or anticipated negative impacts on any applicant household by virtue of the protected characteristics of any household member, and the potential positive impacts appear to be maximised as far as is currently possible, but the coverage of the available equalities data is limited.

Tai Tarian will therefore continue in their efforts to improve the range and scope of equalities data collection at the initial housing application stage.

The Council's retained housing service will be mindful of the data relating to older people and people with a life-limiting illness or disability when planning for the delivery of affordable housing and housing related support services.

b) How will the initiative assist or inhibit the ability to meet the **Public Sector Equality Duty**?

Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
To eliminate discrimination, harassment and victimisation	X			The Policy in no way gives rise to or reinforces discrimination, harassment or victimisation but rather aims to prevent them in so far as it can by prioritising victims and de-prioritising (in extreme cases even potentially excluding) perpetrators.
To advance equality of opportunity between different groups	X			The policy has to afford greater priority to certain categories of applicant than it does others but it does so irrespective of their relative protected characteristics and therefore fundamentally demonstrates equality of opportunity.
To foster good relations between different groups	X			The policy fosters good relations in that it aims to create sustainable communities in which people want to live as far as is possible.

What action will be taken to improve positive or mitigate negative impacts?

There are no currently known or anticipated negative impacts and the potential positive impacts are maximised as far as is currently possible.

4. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	X			Adequate housing is acknowledged to impact positively on community cohesion.
Social Exclusion		X		Adequate housing is acknowledged to mitigate against community exclusion.
Poverty		X		Adequate housing is acknowledged to mitigate against poverty.
What action will be taken to improve positive or mitigate negative impacts?				
There are no currently known or anticipated negative impacts and the potential positive impacts are maximised as far as is currently possible.				

5. Welsh

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on:				Tai Tarian welcome correspondence in Welsh and deal with Welsh and English correspondence to the same standards and timescales.
- people's opportunities to use the Welsh language	X			
- treating the Welsh and English languages equally	X			
What action will be taken to improve positive or mitigate negative impacts?				
There are no currently known or anticipated negative impacts and the potential positive impacts are maximised as far as is currently possible.				

6. Biodiversity

How will the initiative assist or inhibit the ability to meet the **Biodiversity Duty**?

Biodiversity Duty	+	-	+/-	Why will it have this impact?
To maintain and enhance biodiversity			X	The allocation of housing association has no direct impact on biodiversity.
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			X	
What action will be taken to improve positive or mitigate negative impacts?				
There are no currently known or anticipated negative impacts and the potential positive impacts are maximised as far as is currently possible.				

7. Well-being of Future Generations

How have the five ways of working been applied in the development of the initiative?

Ways of Working	Details
i. Long term – looking at least 10 years (and up to 25 years) ahead	Adequate housing is acknowledged to be a cross-cutting theme that impacts positively on all our wellbeing objectives
ii. Prevention – preventing problems occurring or getting worse	Adequate housing is acknowledged to be a cross-cutting theme that impacts positively on all our prevention objectives
iii. Collaboration – working with other services internal or external	The Council & Tai Tarian have co-produced the final consultative draft document which will be subject to a formal comprehensive 90-day public consultation exercise
iv. Involvement – involving people, ensuring they reflect the diversity of the population	
v. Integration – making connections to maximise contribution to:	
Council's well-being objectives	Adequate housing is acknowledged to be a cross-cutting theme that impacts positively on all our wellbeing objectives
Other public bodies objectives	

8. Monitoring Arrangements

Provide information on the monitoring arrangements to:

Monitor the impact of the initiative on Equalities, Community Cohesion, the Welsh Measure, Biodiversity Duty and the Wellbeing Objectives.

The Policy will be due for a further review in two years at which point a further full IAA will be undertaken

9. Assessment Conclusions

Please provide details of the conclusions reached in relation to each element of the assessment:

	Conclusion
Equalities	There are potential gaps in the available equalities data because the data set only relates to 10% of the nearly 4,000 applicants either on the Council/Tai Tarian common Homes by Choice housing register, or awaiting the assessment of their application, as at 6 May 2021. The current document is however only a consultative draft. It will therefore in any case almost certainly be subject to further change, following the proposed 90-day consultation exercise.
Community Cohesion/ Social Exclusion/Poverty	There are no currently known or anticipated negative impacts and the potential positive impacts are maximised as far as is currently possible.
Welsh	
Biodiversity	
Well-being of Future Generations	

Overall Conclusion (please indicate the conclusion reached):

Continue - as there are no currently known or anticipated negative impacts and the potential positive impacts are maximised as far as is currently possible

X

Please provide details of the overall conclusion reached in relation to the initiative:

The document represents the consensus of all the Council & Tai Tarian officer members of the project group that developed it.

The summary assessment of those officers is that it will have no currently known or anticipated negative impacts on applicant households by virtue of the protected characteristics of any household member and that the potential positive impacts are maximised as far as is currently possible.

The recommendation to Members is therefore that the document is approved as a consultative draft which will be updated to reflect any and all consultation responses received.


The Policy itself will then be updated as Council & Tai Tarian Officers feel is required and Members will be able to consider the updated IAA when asked to approve the final version of the Policy.

10. Actions

What actions are required in relation to obtaining further data/information, to reduce or remove negative impacts or improve positive impacts?

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
The coverage of the currently-available equalities data is limited so Tai Tarian will continue in their efforts to improve the range and scope of equalities data collection at the initial housing application stage.	Tai Tarian	2022	There will be greater coverage in the equalities data available to inform the next joint Council / Tai Tarian review of the Policy.
The Council's retained housing service will be mindful of the data relating to older people and people with a life-limiting illness or disability when planning for the delivery of affordable housing and housing related support services.	The Council's Social Services Commissioning Unit and Housing & Homelessness Services	Ongoing	Commissioning arrangements in respect of affordable housing / housing related support services for older people and people with a life-limiting illness and disability will be better informed.
The policy is subjected to a formal 90-day public consultation period and Members then given the opportunity to consider an updated IAA, reflective of consultation responses received, when asked to approve the final version of the Policy.	The Council's Social Services Commissioning	September 2020	Members are additionally able to base their decision on whether or not approve the final policy document on the responses received during a formal 90-day public consultation exercise.

11. Sign-off

	Sign	Name	Position	Date
Completed by:		Gareth Evans	Commissioning Officer - Housing & Homelessness	14.05.21
Signed off by		Angela Thomas	Head of Adult Services	