



Full Equality Impact Analysis

Title of review	Tenancy Strategy 2018
Service	Thanet District Council ,Community Services
Date of review	May 2018
Date of next review	May 2019
Lead officer, Job Title and Service	Ashley Jackson, Housing Strategy and Projects, Thanet District Council
Review team	Corporate Governance
Scope of the analysis	<p>We are required under the Localism Act 2011 to publish a tenancy strategy. This allows us to have a discretionary option to consider granting flexible 'fixed term' secure tenancies as an alternative to secure 'lifetime' tenancies.</p> <p>Further legislation contained in the Housing and Planning Act 2016 introduces a mandatory secure 'fixed term' tenancy to be granted for all new tenancies, with limited exemptions. This will effectively bring to an end the current secure 'lifetime' tenancy. Regulations are yet to be issued and this policy is yet to be implemented.</p> <p>In addition, the introduction of significant welfare reforms has made an affordable, secure home an even greater priority for those people where renting is the only option available to them.</p> <p>This Strategy aims to set out how we will make best use of our housing stock to meet the needs of the districts residents.</p>
Beneficiaries	Residents of Thanet who are allocated properties.
Stakeholders	Stakeholders to include <ul style="list-style-type: none">• Residents• Councillors• East Kent Housing• Officers
Relevant data and research	The Localism Act 2011 made changes to the way people access social housing, the way homeless duty is discharged and gave powers to local authorities to provide 'fixed term' tenancies. The broad aim of these changes

	<p>was to provide local councils with the ability to respond to local needs, increase mobility and ensure that social housing is used for those in need. Restrictions to the rules regarding succession of tenancy were also introduced.</p> <p>The Housing and Planning Act 2016 announced the end of secure lifetime tenancies in local authority housing. However, the policy is expected to place a duty on authorities to grant secure 'fixed term' tenancies of between two and ten years to all new tenants, thus taking away the opportunity to grant new secure 'lifetime' tenancies, except in limited circumstances.</p> <p>The 2016 act also amended rules about succession in secure tenancies and restricted tenancy succession rights to spouses and partners only, irrespective of the original tenancy date.</p> <p>The 2016 Act also placed a duty on local authorities to consider selling our higher value empty properties in order to meet the levy payable to Government to fund the proposed extension of Right to Buy for housing association tenants. Regulations governing the implementation of this duty are still to be brought forward by government.</p>
Access complaints	<p>Complaints received from residents when tenancies are not renewed are detailed below.</p> <p>East Kent Housing, on behalf of the Council will review tenancies 6-9 months before the end of the term of tenancy. Tenants are obligated to take part in these reviews. We will seek to renew the tenancy unless there are specific grounds not to do so, these grounds must be clearly set out and published in the Allocations Policy and must include details of how to appeal against decisions.</p> <p>Where a fixed term tenancy is not to be renewed, we will write to the tenant setting out the reasons for the decision with details about how to appeal. We will provide a robust programme of support, advice and assistance to find alternative accommodation. The appeal will be heard by Thanet District Council.</p>
Consultation	Consultation has taken place within TDC. The Housing Options Manager, Allocations Department, Finance department and East Kent Housing have all input into the strategy. Members have been consulted when identifying priorities and have been consulted via email on the full strategy. Partners and agencies have also been consulted by email.
Results of consultation	No comments were made
Relevance to the Duty:	
We are required under the Localism Act 2011 to publish a tenancy strategy.	
<p>1. Eliminate unlawful discrimination – harassment, victimisation and any other conduct prohibited by the Act;</p> <p>The tenancy strategy does not harass, victimise or contradict any other conduct prohibited by the act.</p>	

2. **Advance equality of opportunity** – between people who share a protected characteristic and people who do not share it by;

The tenancy strategy is not for a specific client group and therefore suitable for all applicants.

3. **Foster good relations** – between people who share a protected characteristic and people who do not share it, by; tackling prejudice and promoting understanding between people with a protected characteristic and others.

Equality impacts raised or identified:

The tenancy strategy does not have a positive or negative effect on staff or external customers.

Protected Characteristic	Commentary	
Age	Impact	The tenancy strategy does not discriminate between ages of applicants.
	Mitigation	None needed
Gender	Impact	This tenancy strategy will have a positive outcome irrelevant of gender.
	Mitigation	None needed
Race	Impact	This tenancy strategy will have a positive outcome irrelevant of race.
	Mitigation	None needed
Disability	Impact	This tenancy strategy does not have a negative impact on customers with a disability.
	Mitigation	None Needed
Religion or belief	Impact	This tenancy strategy will have a positive outcome irrelevant to religious beliefs.
	Mitigation	None needed
Gender reassignment	Impact	This tenancy strategy will have a positive outcome irrelevant of gender reassignment.
	Mitigation	None needed
Sexual Orientation	Impact	This tenancy strategy will have a positive outcome irrelevant of sexual orientation.
	Mitigation	None needed
Marriage & Civil Partnership (Aim 1 only)	Impact	This tenancy strategy will have a positive outcome irrelevant of marriage and civil partnership.
	Mitigation	None needed

Pregnancy & Maternity (Aim 1 only)	Impact	This tenancy strategy will have a positive outcome irrelevant of pregnancy and maternity
	Mitigation	None needed

Overall conclusions and options to be put before decision maker (if contributing towards a report) or to take forward to develop your service (if reviewing a service)

The Equalities Impact Assessment has been undertaken to ensure that the proposal to implement the tenancy strategy does not have a negative impact on its existing residents, tenants and future customers. The proposal will not have a negative impact on any groups with protected characteristics. The intention to allocate the units in line with the tenancy strategy outweighs any negative impact.

Actions arising from analysis:

Action	Responsible Officer	Deadline
To undertake equality impact assessments throughout the tenancy strategy, to ensure there is not a negative impact to existing residents.	Ashley Jackson	May 2019

Acceptance

Name and signature of assessing officer and date of assessment.

Name:

Position:

Signed:

Date: