

HARAH Equality Impact Assessment: Business Plan and Communications Strategy

1. Introduction

This report summarises how the Equality Impact Assessment on the HARAH Business Plan and Communications Strategy was undertaken, its scope and the key findings.

The assessment was undertaken by three officers from the HARAH partnership, representing HARAH; the Local Authorities; and the development partner, HydeMartlet; a Councillor representing the Members; a 'critical friend' who has worked with the partnership but is not directly involved, and works across the Choice Based Lettings partnership, and facilitated by an external consultant, Dr Ian Barrett who designed the process of assessment. The assessment required a 4 hour meeting, including a briefing on the assessment process. In addition some time was required for research and for completion of the forms. Two of the team had undertaken assessments for their own authority before, using the same process.

2. Process

It was agreed that the whole of the Business Plan and Communications Strategy would be equality impact assessed.

The team used the questions and table 'scoping and screening' to consider whether the Business Plan and Communications Strategy had an impact on each customer group listed.

In deciding if a customer group would or might be disadvantaged by the Business Plan or Communications Strategy, we based our conclusions on the following:

- Information about housing needs and barriers to receiving housing services faced by particular groups in rural communities, drawn from national organisations and available research and guidance from governmental, academic and other sources.
- Monitoring evidence where available from parish based housing needs surveys, and data collected by the allocation and homeless services and the housing registers of the HARAH partners.
- Evidence from strategies and plans produced by the partner organisations within HARAH

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3. Findings

The assessment team agreed that the Business Plan and Communications Strategy were both relevant to all the customer groups as the main objective is provision of rural affordable housing, and housing is a fundamental requirement for everyone. The team did not find any evidence to suggest that any of the customer groups would be negatively impacted. The Plan and Strategy were considered to have a positive impact on most groups as rural housing development enables people with a local connection to a parish to choose to remain in the parish where they have social and support networks. It was acknowledged that there was insufficient evidence to decide if some groups, whilst not being discriminated against or considered to be disadvantaged, would receive a positive benefit. These were people within the sexuality strand and all groups within the religion and belief strand, for whom data is not currently collected in housing needs surveys. In addition it was felt necessary to monitor households without children and single people, and people with caring responsibilities to ensure they were not being disadvantaged. With regard to people from minority ethnic groups, further research was undertaken to consider whether the local connection preference could be challenged. It was agreed that the principle of preference based on local connection is sound for the following reasons:

- The local connection allocation policy is based on planning policy which reflects Government policy in Planning Policy Statement 3
- Counsel opinion on the Choice Based Lettings Policy of Winchester, East Hants and Havant accepts that preference can be given on the basis of local connection
- Recent case law, including Ahmad v Newham is significant as it makes clear that Local Housing Authorities have the flexibility to set their own policies alongside reasonable preference categories as long as the scheme of allocations provides for priority to go to the reasonable preference categories. Importantly, once need is established, provided the scheme of allocations permits, relative need can be set aside as a determinant in favour of other established criteria, such as local connection.

The team concluded that a detailed assessment was not required, but a number of actions would form the improvement plan. Most improvement points have been included in the Business Plan and Communications Strategy. The complete Improvement Plan is attached to this report.

4. Key Recommendations

The action points set out in the Improvement Plan apply across the HARAH partnership and link with the equality policies and duties of the partners. It is

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therefore important that the action points are considered in relation to the activities of the individual partners. The key action points are:

- To agree protocols and processes across HARAH, such as local connection criteria and the process for deciding the mix of units to reflect need
- To ensure housing provision reflects the needs of eligible households including any specific needs such as adaptations
- To improve the methods of communication to increase awareness of eligible households and increase the two way flow of information
- To establish methods for monitoring equality information of eligible households

5. Monitoring

- Each action point has a named lead officer and a target date for completion
- Most action points are included in the Business Plan and Communications Strategy which are monitored regularly by the HARAH officers and HARAH Members groups
- The Improvement Plan will be monitored on a quarterly basis and reported to the HARAH officers and Members groups.

6. Conclusions

- No detailed assessments are required
- The Improvement Plan identifies 18 action points to address the issues that arose during the assessment. These are summarised in the table below.

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Form 3. Improvement Plan

Service or Policy	Service or Business Unit		Date EqIA validated	Implementation start date	Completion date	
Business Plan and Communications Strategy	HARAH					
Actions Required to Achieve Improvement <i>Title & Brief description</i>	Ref. No	Responsibility		Timescale or Target Date	Resource Implications	Links*
		Lead	Support			
General						
Insert reference to equalities and the housing needs of vulnerable and disadvantaged households in Business Plan context. Refer to the equality policies and duties of the HARAH partners	1	Debbie Rhodes		Done		Partner equality policies. Partner Strategies
Add households in need to Communications Strategy audience and reflect in objectives, interests/benefits and core messages	2	Debbie Rhodes		Done		
To agree protocols and processes across HARAH						

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Actions Required to Achieve Improvement <i>Title & Brief description</i>	Ref. No	Responsibility		Timescale or Target Date	Resource Implications	Links*
		Lead	Support			
Clarify legal definition of 'local connection', from PPS3 to criteria set out in HARAH section 106 Heads of Terms	3	Dr Ian Barrett	Debbie Rhodes	Done		
Agree a standard menu of local connection criteria across HARAH (use NFDCs as they have been validated?)	4	Debbie Rhodes	Local Authority partners	Jan 2010		
Agree a process for deciding the mix of units to reflect need. If larger properties are requested, ensure that smaller households have equal access through under-occupation provisions.	5	Each Local Authority partner		March 2010		Scheme of Allocations for each LA
To ensure housing provision reflects the needs of eligible households						

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		Lead	Support			
<p>Improve the information available about potential households, including any special housing needs such as adaptations, to improve the fit of the properties provided.</p> <p>Ensure houses that are tailor made are pre-allocated</p>	6	Rural Housing Enablers Local Authorities	Local Authority partners	Jan 2010		Housing Needs Surveys Scheme of allocations
To establish methods for monitoring equality information of eligible households						

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Actions Required to Achieve Improvement <i>Title & Brief description</i>	Ref. No	Responsibility		Timescale or Target Date	Resource Implications	Links*
		Lead	Support			
Ensure scheme impact assessments include information on equality – profile of households housed compared to those in housing needs survey and housing register. Use local sustainability indicators (reference Lancashire)	7	Debbie Rhodes	RHEs, Local Authorities	July 2010		Housing Needs Surveys, Housing Registers
Gather equality information across HARAH (numbers are small and people could be identified if done at a District level)	8	Debbie Rhodes	RHEs, Local Authorities HydeMarlet	July 2010		
To improve the methods of communication, to increase awareness of eligible households and increase the two way flow of information						

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		Lead	Support			
Amend Communications action plan to include wider range of methods for consulting with and informing people about HARAH – website, informal networks, forums	9	Debbie Rhodes		Done		
Make the HARAH website more interactive to provide more information about HARAH and enable people to give their views and feedback e.g. feedback on exhibitions Also gather equality information on people using the website	10		Debbie Rhodes, Communications Group	July 2010		

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		Lead	Support			
Use informal networks eg WI, Royal British Legion, Care groups and support workers to get information out to people Consider drop in event for PCs, WI and other community groups. Produce a short leaflet for circulation.	11	Communications Group	Rural Housing Enablers, Local Authorities	April 2010		
Use informal marketing through links to websites eg parish councils, schools, local employers. Link HARAH website into County website.	12	Communications Group	all	April 2010		
Check website compliancy with accessibility standard using tool available on web. Look at 'engage' website on communicating with people	13	Debbie Rhodes		Jan 2010		

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		Lead	Support			
Put consultation exhibition information on website	14	Each LA	RHEs, Hyde	Jan 2010		
Put link to HomesinHants on website	15	Debbie Rhodes		Nov 2010		
Use email contact details of households in need to keep them informed of progress on projects	16	Rural Housing Enablers	Local Authorities	Jan 2010		Housing Needs Surveys
Consider drop in event for PCs, WI and other community groups	17	Communications Group		October 2010		