



Equality Impact Assessment

Vulnerable Tenant Policy

Contents

Document details	2
1.0 Purpose of the Equality Impact Assessment	3
2.0 Applicable legislation and regulations	4
3.0 Summary	5
3.1 General.....	5
3.2 Defining vulnerability.....	5
4.0 Information	5
4.1 Aim of the decision.....	5
4.2 Aim of the policy.....	6
4.3 Intended outcome(s).....	6
4.4 Consultations.....	6
4.5 Intended beneficiaries.....	6
4.6 Main stakeholders.....	6
5.0 Assessment of the decision	7
6.0 Impact and Mitigations	8

Document details

Title	Vulnerable Tenant Policy
Document type	Policy
Version submitted for decision	1.0
New or Existing document	New
If this is an existing document, is this a major or minor change?	n/a
Decision makers	Cabinet
Type of decision	Approval and implementation
Date of decision	8 April 2024

Responsible department	Housing Services
Are other departments or partners involved in delivering this strategy, policy, plan, or project? If 'Yes' please provide details.	<p>Yes</p> <p>Officers in the following teams will be involved to some extent in the Policy's implementation and delivery:</p> <ul style="list-style-type: none"> • Housing Management • Housing Options • Property Services • Legal • Corporate Services (complaints handling & equality)

Contact Officer: Perry DeSouza, Senior Housing Policy Officer (ext. 42137)

1.0 Purpose of the Equality Impact Assessment

The Equality Act 2010 replaced the previous anti-discrimination laws with a single Act simplifying the law by removing inconsistencies, making it easier to understand and therefore comply with it, and strengthens it to help tackle discrimination and inequality. The Act came into force on 1 October 2010.

The Public Sector Equality Duty (PSED) came into force on 5 April 2011. The duty ensures that all public bodies, including Dover District Council (“the Council”):

- play their part in making society fairer by tackling discrimination and providing equality of opportunity for all; and
- consider the needs of all individuals in their day-to-day work, in shaping policy, delivering services and in relation to their own employees.

PSED encourages public bodies to understand how different people will be affected by their activities so that policies and services are appropriate and accessible to all and meet the needs of different groups of people. Where activities may have an impact to one particular group of people, public bodies are required to identify mitigations that will either lessen the impact or provide an alternative solution to meet the needs of that particular group.

By understanding the effect our activities have on different groups of people, and how making our services inclusive can support and increase people’s opportunities, the Council will be better placed to deliver policies and services that are efficient and effective.

This Equality Impact Assessment (EIA) helps the Council to ensure that we fulfil our legal obligations as per the PSED and to have due regard to:

- a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

2.0 Applicable legislation and regulations

The following legislation and regulations apply to the proposed policy:

- Equality Act 2010
- Tenant Involvement and Empowerment Standard (Regulator for Social Housing)
- Complaint Handling Code 2024 (Housing Ombudsman)

The following Council documents relate to this policy:

- Tenancy Management Policy
- Disabled Adaptations Policy
- Complaints Policy
- Safeguarding Policy

3.0 Summary

3.1 General

Dover District Council (“the Council”) is committed to ensuring that housing services are easily accessible to all our residents, including those with complete and / or additional support needs because of an identified vulnerability.

The Housing Service already document and record where a tenant’s vulnerabilities may require adjustments to services or additional support. This can be recorded throughout the tenancy. Housing Management may also be made aware of vulnerabilities through the Housing Options team via homelessness applications, and from other landlords when a tenant is transferring to a Council property.

The Council does not have an established Vulnerable Tenant Policy that explains to staff, existing tenants, and prospective tenants about what reasonable adjustments Housing Management can make to support equal access to housing services. The Policy, therefore, simply codifies current operational practices.

3.2 Defining vulnerability

The Policy acknowledges that ‘vulnerability’ can (1) be changeable and influenced by various factors and experiences, and (2) may not be a constant state but can occur at different points in a person’s life that may require adjustments to be made to the services we provide.

The Council’s definition of vulnerable does not assume that entire groups of people are vulnerable (i.e., age or disability), but highlights that some residents may be vulnerable and may require adjustments to have equal access to our services to help them sustain their tenancy or home. Additionally, adjustments made may be for a short time or may be required for the entirety of the tenancy period.

Where we are required to make reasonable adjustments due to a legal duty we will do so in cooperation with the tenant.

3.3 Defining 'adjustment'

'Adjustments' pertaining to the Vulnerable Tenant Policy refer to changes made to housing-related services to enable equal access for vulnerable tenants. The Council will adhere to the Equality and Human Rights Commission guidance that adjustments must be both 'reasonable' and 'justifiable'.

4.0 Information

4.1 Aim of the decision

The aim of this decision is for Cabinet to approve the implementation of the proposed Vulnerable Tenant Policy that takes account of the Council's responsibility for ensuring that tenants have equal access to the services we provide made through reasonable adjustments.

The Policy will provide clear guidance to staff to enable them to provide a consistent approach to supporting the needs of vulnerable tenants.

4.2 Aim of the policy

The key priorities of the policy are to:

1. Ensure that existing and new tenants are supported by the Council to have equal access to services through reasonable adjustments.
2. Staff approach to identifying, recording, and supporting vulnerable tenants in a competent and consistent manner.
3. Ensure the Council complies with its regulatory and legal duties as stated in the Tenant Involvement and Empowerment Standard, the Equality Act 2010 and the Human Rights Act 1998.

4.3 Intended outcome(s)

The intended outcomes of the policy would be:

1. Tenants feel supported by the Council to access housing related services.
2. Housing staff can confidently identify, record, and make adjustments so that vulnerable tenant can access our services equally.
3. Housing staff make informed decisions regarding adjustments to services that complies with current legislation and regulation.

4.4 Consultations

Members of the Dover District Tenant Group (DDTG) were consulted on the draft content of the Policy on <>. The feedback received has been carefully assessed and used to inform the development of the Policy. In general:

- <insert comments / feedback>

4.5 Intended beneficiaries

The intended beneficiaries of this policy are existing and new Council tenants (including tenants in Temporary Accommodation), prospective tenants, and homeless applicants.

4.6 Main stakeholders

The main stakeholders in relation to this policy are:

- Existing and prospective Council residents
- Council staff
- Councillors

5.0 Assessment of the decision

The table below assesses if the decision is likely to be relevant to the three aims of the Equality Duty.

If the decision is relevant to the three aims of the Equality Duty, the Impact and Mitigations table must be completed to show how it is relevant and what the impact(s) will be.

Aim	Relevance Yes/No
Eliminate discrimination, harassment, victimisation.	Yes
Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not.	Yes
Foster good relations between persons who share relevant protected characteristics and persons who do not share it.	Yes

6.0 Impact and Mitigations

Characteristic	Relevance High/Medium/Low	Impact of the decision Positive/Neutral/ Negative	Reasons for impact	Mitigations
Age	High	Positive	The Policy will have a positive impact to existing and prospective tenants since it prescribes the use of reasonable adjustments to services where the tenant has been identified as vulnerable.	No mitigations are required currently.
Disability	High	Positive	The Policy will have a positive impact to existing and prospective tenants since it prescribes the use of reasonable adjustments to services where the tenant has been identified as vulnerable.	No mitigations are required currently.
Gender	High	Positive	The Policy will have a positive impact to existing and prospective tenants since it prescribes the use of reasonable adjustments to services where the tenant has been identified as vulnerable.	No mitigations are required currently.
Gender reassignment	High	Positive	The Policy will have a positive impact to existing and prospective tenants since it prescribes the use	No mitigations are required currently.

			of reasonable adjustments to services where the tenant has been identified as vulnerable.	
Marriage and Civil Partnership	High	Positive	The Policy will have a positive impact to existing and prospective tenants since it prescribes the use of reasonable adjustments to services where the tenant has been identified as vulnerable.	No mitigations are required currently.
Pregnancy and Maternity	High	Positive	The Policy will have a positive impact to existing and prospective tenants since it prescribes the use of reasonable adjustments to services where the tenant has been identified as vulnerable.	No mitigations are required currently.
Race	High	Positive	The Policy will have a positive impact to existing and prospective tenants since it prescribes the use of reasonable adjustments to services where the tenant has been identified as vulnerable.	No mitigations are required currently.
Religion, Belief or Lack of Belief	High	Positive	The Policy will have a positive impact to existing and prospective tenants since it prescribes the use of reasonable adjustments to services where the tenant has been identified as vulnerable.	No mitigations are required currently.

Sexual Orientation	High	Positive	The Policy will have a positive impact to existing and prospective tenants since it prescribes the use of reasonable adjustments to services where the tenant has been identified as vulnerable.	No mitigations are required currently.
--------------------	------	----------	--	--