

EQUALITY IMPACT ASSESSMENT TOWARDS THE 08 BID ROUND
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Responsibilities

Department/Division carrying out the Assessment	Please state if external partners are involved in writing, reviewing or approving the policy and carrying out the equality assessment
Investment Division	

Policy (strategy or project) being assessed	Please state the duration for the Policy and any planned review period
Towards the 08 Bid round	June 2007 – November 2007

Policy Lead carrying out the assessment	Name, title, division & telephone number
Michael Clegg	Head of Investment Policy, Analysis and Planning – 0845 230 7000

Others to be involved in the process – internal to the organisation	External partners/consultees
Pacian Andrews, Fiona MacGregor & David Carrigan	

POLICY SREENING

Stage 1: Early phase thinking

Policy description and background	In your response consider	Response	Actions
<ul style="list-style-type: none"> • Aims/objectives and purpose of the policy. • Who is intended to benefit from the policy? • What outcomes are wanted from the policy? • What interface is there with other bodies/depts in relation to the implementation of the policy? 	<ul style="list-style-type: none"> • Rationale behind the policy and its delivery. • How is the policy consistent with the HC RES/BME Action Plan 2005-2008? • Who are the main stakeholders in relation to the policy? • What factors could contribute/detract from the outcome? 	<ul style="list-style-type: none"> • In 2007-08, the Housing Corporation is helping to provide affordable homes through our investment partners. In future years we are seeking to deliver even more homes. In preparation for this we have held a pre-qualification process to select and widen the number of investment partners through whom the Corporation will deliver its National Affordable Housing programme 2008-11. • Continuing the investment approach to the NAHP 06-08 programme we will ensure that where associations with an investment programme, and in particular Programme Partner associations, are operating within geographical areas with significant BME communities, we will expect to see them bring 	

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		<p>forward initiatives to work with and through BME associations in order to ensure that they reflect the communities they work in and meet their needs.</p> <ul style="list-style-type: none">• For the 2008-11 programme the Corporation has extended the number of organisations that we're working with – and now have agreed partnership status with a more diverse range of providers. Including extending the number of private developers, opening for the first time the bidding round to 3 star Arms Length Management Organisations and to their sponsor local authorities, to local authorities directly using special purpose vehicles and finally we have increased the number of housing association partners.• By extending the range and number of partners, the Corporation and Government will benefit from new and innovative proposals for delivery.	
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		<p>Increased competition amongst partners will also lead to greater efficiency. Increased capacity will help to meet the challenge of increased growth in supply. Ultimately the tax payer and beneficiaries of affordable housing (Social tenants, Key Workers and priority first time buyers) will benefit.</p> <ul style="list-style-type: none">• Outcomes will include; more affordable homes; greater efficiency in the delivery of these homes; better designed affordable homes achieving higher eco standards; increased numbers of people regardless of background assisted; an increase in the number of key workers recruited and retained; urban and rural renewal; increased community cohesion in failing estates and communities; more mixed and sustainable communities.• The Corporation will be seeking the approval of its Investment programme from both the Department	
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		<p>for Communities and Local Government and from the Regional Assemblies and the London Mayor. The Corporation is also keeping key stakeholders updated on developments with the programme.</p> <ul style="list-style-type: none">• To accompany the launch of the 08 bid round the Corporation is publishing a Prospectus. The Corporation's NAHP 08-11 Prospectus is not just targeted at its investment partners' it is designed to be read by specialist providers, prospective partners, Regional Assemblies, the London Mayor and local authorities. The Corporation has published a Design and Quality strategy which sets out the standards that Investment Partners must meet in the delivery of Government funded affordable homes. Factors that could contribute and detract from the outcome include; Retention of the specialist route with a specific BME housing provision criteria	
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		<p>that is where the housing is specifically designed to meet the needs of an ethnic minority community and the bid is accompanied by an appropriate method statement describing this; Alignment with the HC BME strategy; Alignment with the Vulnerable People Strategy; Continuation of the Home Ownership for people with Long term Disabilities and Shared Ownership for the Elderly schemes; The NAHP 08-11 Prospectus requires bidders to supply a BME method statement, explaining how proposals will meet the needs and aspirations of all members of the community. A project in a local authority where more than 10% of the population is from a BME community. A project in an area identified by the bidder as having significant housing needs for minority communities or challenges for community cohesion, or which is identified by the Regional Housing Strategy</p>	
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		<p>as such (this includes Havering and Hounslow in London); or a project whose local or regional strategic fit is premised on meeting the needs of a BME community.</p> <ul style="list-style-type: none"> • Loss of BME Investment partners; Removal of a London target for Housing Investment in BME Housing Associations. 	
Stakeholder affected by the policy	In your response consider		
<ul style="list-style-type: none"> • Which groups might be expected to benefit from the intended outcomes? • Which groups might not benefit? • What do other stakeholders (internal and external) think about the policy you have developed? • How have you consulted with stakeholders (internal and external in the process of developing the policy)? 	<ul style="list-style-type: none"> • What outcomes would stakeholders want from the policy? • Which groups of the population will be affected (e.g. disabled people, older people, children and young people, women and men minority ethnic people including gypsy/travellers, faith groups, lesbian, gay, bisexual and transgender), people involved in criminal justice system, any other groups? • What is your evidence based on? 	<ul style="list-style-type: none"> • Anyone in housing need will ultimately benefit from the delivery of more efficient and increased numbers of affordable homes. Investment Partners will benefit from access to Social Housing Grant leading to an increase their housing stock. Government / Housing Corporation will benefit from helping greater numbers of people. • People in housing need with disabilities / learning difficulties will benefit from the inclusion of the HOLD product. This allows people in housing need to 	

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		<p>part purchase a home on the open market, suited to their needs. The remainder is purchased by a housing provider, who has the option to charge rent on the un-owned share.</p> <ul style="list-style-type: none">• The Corporation has set out the standards required for accommodation for wheelchair users in its Design and Quality standards. We have encouraged Investment Partners in the Prospectus to build new homes to Lifetime Homes Standards and to ensure that 10 per cent of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.• Groups that will not benefit are organisations who have been rejected by the pre-qualification process from being able to bid for Social Housing Grant. Organisations that have been rejected by the pre-qualification process have been done	
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		<p>so on the basis of a fair and undiscriminating process which assessed all applicants on the basis of technical ability and financial capacity. Existing partners who have not met their 2006-07 targets were given the opportunity to present a case for their continued involvement as an Investment Partner. On the basis that it failed to meet its 2006-07 targets, one existing partner, Ujima, a BME Housing Association has had Partnership Status withdrawn.</p> <ul style="list-style-type: none">• The Corporation has widely trailed the new processes for pre-qualification and the standards for design and environmental sustainability, in its Future Approaches to Investment discussion process. During this process the Corporation consulted widely with stakeholders both internally and externally. In the main stakeholders have been	
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		supportive of our direction of travel.	
Main equality issues (race) within your policy?	In your response consider:	Response	Actions
<ul style="list-style-type: none"> • What issues of race equality are addressed by this policy? 	<ul style="list-style-type: none"> • Are there any obvious barriers in terms of equality/diversity in the aim of the policy or in the way it is implemented? • How the policy contributes to better cohesion? 	<ul style="list-style-type: none"> • There are no grounds to suspect that this Investment programme will impact negatively on any group or minority grouping of people. Continuing and developing the approach taken in the construction of the NAHP 06-08 programme we expect that a greater and more diverse range of delivery organisations will benefit all people who are in housing need. All Investment Partners where BME communities account for 10% of the total population are required to produce a BME method statement. The method statement sets out how Investment Partners will consider appropriate tenures to meet the aspirations of communities and how they will meet the needs of small and emerging communities. 	

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Stage 2: Screening for impact – in relation to race equality

Pinpointing impact - collect relevant information	In your response consider	Response	Actions
<ul style="list-style-type: none"> • Describe the evidence you have used to formulate your answers to questions. • What additional information is required? 	<ul style="list-style-type: none"> • The data available to help the policy screening exercise. • What existing qualitative and/or quantitative data have you used? • It is important to have as much up-to-date and reliable information as possible about the different groups the proposed policy is likely to affect. • Existing data. 	<ul style="list-style-type: none"> • Policy documentation, NAHP Prospectus, Design and Quality Strategy, Delivering affordable housing (Investment Partners announcement document) and bids assessment manual (see attached at Annex A) and process documentation. • Feedback from prospective applicants rejected by the PQQ process. The opportunity was extended to all Investment partners to comment on their performance against 06-07 targets. Discussions including the Policy Manager for Diversity were held with the Housing Corporation's regional investment teams. Feedback from stakeholders about how they perceive the bid round has been operated. • The Regional Housing Boards have yet to publish their priorities for the 08-11 programme. However the indications are that they will 	

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		continue to stress the importance of increased supply of homes. It is anticipated that Regional Strategies will continue to pay due regard to equality and where appropriate and relevant this has been a theme that the HC has input into the process.	
Judge likely impact	In your response consider	Response	Actions
<ul style="list-style-type: none"> • Will the policy affect different groups in dissimilar ways? • Who might be positively affected? • Who might be adversely affected? • Is there any evidence that the policy could discriminate unlawfully directly or indirectly? 	<ul style="list-style-type: none"> • Do different groups have different needs, experiences, issues and priorities in relation to this policy? • Have consultations with relevant groups, organisation or individuals indicated that the policy could have different consequences for specific groups? • Could these consequences differ according to people's racial group? • Reasons to believe that people could be affected differently by the proposed policy. 	<ul style="list-style-type: none"> • Prospective and existing partners have been treated equally and fairly. No one group will be negatively affected. • We have consulted with the Housing Corporation BME Advisory Group and asked for comment on the BME sections of the Prospectus. We have involved the HC internal equalities and diversity group. The Director for London, the Policy managers for Equality and Vulnerable people have been involved in the drafting of the relevant sections of the Prospectus. • Organisations previously excluded from the bid round process will benefit. 3 star ALMOs and local authorities in particular will benefit this time 	

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		<p>around.</p> <ul style="list-style-type: none"> Investment partners who have not met their 06-07 targets and prospective partners who have not met our standards for technical expertise and financial capacity. None known. 	
Eliminating discrimination	In your response consider	Response	Actions
<ul style="list-style-type: none"> Summarise what the policy contributes to the meeting of HC's statutory duty in relation to the above. 	<ul style="list-style-type: none"> Are there any specifically designed measures in the policy that will eliminate discrimination? 	<ul style="list-style-type: none"> The opening up of the 08 bid round to a greater number and a more diverse range of organisations will ensure that the Corporation is able to assist even greater numbers of people in housing need. Increased capacity and diversity of organisations will help to eliminate any groups at risk from exclusion or discrimination. Nominations to grant funded properties are covered by the relevant regulatory circular this is mirrored in the Grant Agreement for un-registered bodies. 	
Promoting equality of opportunity Promoting good race relations	In your response consider	Response	Actions
<ul style="list-style-type: none"> Summarise what the 	<ul style="list-style-type: none"> Are there any 	<ul style="list-style-type: none"> The requirement of a BME 	

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<p>policy contributes to the meeting of HC's statutory duty in relation to the above.</p>	<p>specifically designed measures in the policy which will promote equality of opportunity and good race relations?</p>	<p>method statement from all Investment Partners serving a population where the 10% or more is comprised of BME communities helps to ensure that all groups receive equal and fair treatment. Increased supply and therefore increased opportunity for Investment Partners to meet need will help to deliver mixed and sustainable communities.</p> <ul style="list-style-type: none">• We have explicit assessment criteria and have requested relevant data as supporting information on BME and vulnerable people.	
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Stage 3: Initial conclusions

Initial Conclusions	In your response consider:	Response	Actions
<ul style="list-style-type: none"> • What are your conclusions as to the impact of the proposed policy (strategy or project) on different equalities groups? • If there is no evidence that the proposed policy promotes equality or opportunity could it be altered to do so? 	<ul style="list-style-type: none"> • Areas where more information may be needed. • Whether further consultation is necessary. • How the policy impacts on the HC's statutory duty. 	<ul style="list-style-type: none"> • We conclude that the Investment programme and process will impact positively on all organisations applying to participate in the 08 bid round. The policy will help to ensure that all groups in housing need have access to decent affordable homes at a price they can afford and in places they want to live. • We have removed a universal requirement to provide data on the ethnicity of expected tenants. The quality of this data was so poor and replaced this with data collection from those projects deemed to be of particular relevance to BME communities. • We will conduct an analysis of patterns and method statements received from the bid round. 	
Impact level	In your response consider	Response	Actions
<ul style="list-style-type: none"> • Based on your analysis and answers to 	<ul style="list-style-type: none"> • How the decision that has been reached can 	<ul style="list-style-type: none"> • Low • No concerns for race or 	

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<p>questions above what is the proposed impact assessment level (low, medium or high)?</p> <ul style="list-style-type: none"> From the outcome of the screening exercise, have adverse impacts been identified for race? If NO, proceed to identify any recommendations and future monitoring requirements. If YES, proceed to full impact assessment. 	<p>be substantiated in the event of a challenge.</p> <ul style="list-style-type: none"> Any concerns which have emerged from the exercise. Key learning from the exercise. Recommended actions, publication of the screening results, etc Resource implications for the full impact assessment. 	<p>disability have emerged from this exercise.</p> <ul style="list-style-type: none"> No adverse impacts have been identified for race, disability or for any other groups. The screening will be published on the Corporation's website. No full impact assessment is required as the impact on equality issues is low. 	
<p>Progression</p>	<p>In your response consider:</p>	<p>Response</p>	<p>Actions</p>
<ul style="list-style-type: none"> On the basis of answers to questions for the policy screening stage, do you recommend Phase 2 – a full impact assessment should be carried out? No 	<ul style="list-style-type: none"> The rationale for this decision? Who else needs to be involved in this decision? 	<p>No. The 08 bid round is intended to increase the range and diversity of organisations engaged in the delivery of affordable housing. An increase in the capacity and efficiency of the organisations delivering the programme will benefit all groups, equally, in housing need. Our processes have locked in equalities issues in to the assessment process.</p>	

RECOMMENDED ACTIONS

Recommended actions	Recommendations	Key activity	Time frame	Lead Officer
At this stage an action/improvement plan should be developed to address any concerns or issues related to equality in the proposed policy. Include in the Plan the arrangements for monitoring, review and feedback so that the exercise becomes a cyclical part of decision-making.	Housing Corporation Investment Division will continue to monitor the 08 bid round and assess the effectiveness of the policy against the quality of bids.			
Policy Screening undertaken by (Lead officer) Date				
List of others involved Date				
Director Date				