

## Equality Impact Assessment Stage Three – Telling the Story

### Name of service area/policy/strategy reviewed

Variation of Tenancy Policy

### Who was consulted and what were the issues?

#### Consultation undertaken & who was engaged

- Tenancy Management Review Team (x3 Residents and Staff member) – Survey/Questionnaire
- Tenants who have and are currently using the service via a questionnaire
- Staff via a questionnaire

#### Feedback from The Tenancy Management Review Team

- Policy is confusing and has some conflicting information
- Not many residents would understand the policy itself, and the leaflet could be improved upon/made clearer
- Clearer section on the website FAQs on variations and who to contact
- Why do we have “other” as an equality group on questionnaires/surveys of this kind i.e. Equality Impact Assessments?.
- Granting Joint Tenancies – a reason for refusal may be due to history of relationship breakdown why? Maybe if there have been 3 or more this should be questioned not just if it has happened once.
- Ending joint tenancies – this process needs to be more open i.e. just take people off agreements if they are both in agreement.
- Leaflet accompanying the policy is very informative in its present form
- Change leaflet name from “ a guide to joint tenancies” to something more apt as it covers other issues not just joint tenancies
- Staff procedure seems very confusing
- Staff procedure and forms are fine the way they are
- Effects of succession and rent arrears – is this legal i.e. does the person succeeding have to take on responsibility for arrears if the other joint tenant died. Does the debt die with the tenant?
- Do you have copies of the acts quoted and referred to in the policy, as people may want to access?
- Do not make the assumption that everyone is “on line” as some are not
- Assignment of Tenancy Section of policy is a bit confusing and has to be re-read to understand
- Lodgers section of policy is confusing i.e. states you can take in a lodger without asking permission but Cosmopolitan Housing Association (CHA) tenancy agreements says you must ask first.
- What is a COT in staff procedure as this is not explained anywhere in procedure
- Less use of abbreviations in Staff Procedure make it more user friendly

#### Feedback from Staff

- If adaptations have been carried out for disabled family members (not tenant) living at the property and the tenant dies there may be issues with succeeding to the tenancy, this may be due to the fact that there may be no succession rights for the remaining family member/s. This would need to be managed correctly as it could lead to family members being asked to leave and there may be no suitable accommodation for them, plus we would have lost money on the cost of making adaptations

- Better interaction with BME groups, and improvements on translated documents into other languages
- Contact local community groups, attend local community groups or other local groups and use as a means of communicating with different tenant groups so as they can be more involved in ensuring the service meets their needs
- Tenant Zone on the website reads well and also has the option to translate
- Service leaflet a guide to joint tenancies needs no improvement
- The procedure does not need a follow chart to make it easier to understand
- The procedure is not over complicated
- Clear procedure/process required for translation services, not just for this service area but for all this may have negative impact on equality groups
- Identify and work with relevant partners to promote information/opportunities etc for engaging with diversity groups
- Use bullet points in a guide to joint tenancies
- Definitely include flowchart in staff procedure
- Ensure website is up to date for tenants and customers and any changes to policy & procedure are updated as well
- Possibly set up a diversity resident group who could look at services and performance
- Website page in Tenant Zone looks very “cramped” compared to other housing association sites. It could include more visuals, graphs and charts etc.

**Feedback from Tenants who have and are currently using the service**

- There should be a review of all joint tenancies granted on an annual basis to ensure tenants living arrangements are still the same, this could be achieved through an annual declaration form
- Cosmopolitan be sympathetic to request to vary tenancy and put the correct arrangements in place
- Ensure that there are no abuses of the system
- The policy and procedure needs to be easy to understand for both residents and staff and should be explained clearly to any potential or existing joint tenants
- The policy has spelling mistakes along with incorrect punctuation
- The service should be promoted in specific service leaflets and on the website in a specific section
- Have this included in the tenants pack for when they sign up
- I could not find service leaflets on the website
- I would like to know that my tenancy is secure
- The policy is easy to understand
- The service leaflet a guide to joint tenancies does not need improving
- There is no less favourable treatment of diversity groups within the Policy
- The service aims are clear and I agree with them
- The review is long winded but very informative, thank you for giving tenants the opportunity to participate.
- The service should have clear guidelines regarding tenancies which you already have

**Actions identified**

Action	Who	When
<b>1 - Carry out a full review of the Variation in Tenancy Policy.</b>	<b>Colin Croxton</b>	<b>May 2010</b>
• Carry out consultation with staff, tenants and Tenancy management Review Team	Colin Croxton	April 2010
• Benchmark policy against other top	Colin Croxton	April 2010

<p>performing Registered Providers and share/consider best practice</p> <ul style="list-style-type: none"> <li>• Write revised policy</li> <li>• Have Policy and covering report to Board ready for approval at next available board</li> <li>• Promote new policy on website, intranet and in newsletters</li> <li>• Carry out “Kick Start” Event for staff once approved by board so as correct procedures can be created/written and tested.</li> <li>• Implement new procedure, advertise where appropriate</li> </ul>	<p>Colin Croxton</p> <p>Colin Croxton</p> <p>Colin Croxton</p> <p>Colin Croxton</p> <p>Colin Croxton</p>	<p>May 2010</p> <p>May 2010</p> <p>May 2010</p> <p>May 2010</p> <p>May 2010</p>
<p><b>2 - Update Website to be more informative, interactive and easy to use.</b></p> <ul style="list-style-type: none"> <li>• Check other housing association websites for examples of best practice</li> <li>• Review any changed with Julie McNally</li> <li>• Implement Changes to tenant webpage/s</li> </ul>	<p><b>Colin Croxton</b></p> <p>Colin Croxton</p> <p>Colin Croxton</p> <p>Colin Croxton</p>	<p><b>May 2010</b></p> <p>May 2010</p> <p>May 2010</p> <p>May 2010</p>
<p><b>3 - Research and consider potential for annual tenancy updates</b></p> <ul style="list-style-type: none"> <li>• Benchmark with other housing associations and review best practice in this area</li> <li>• Discuss with staff and Tenancy Management Review Team</li> <li>• If process to be used implement</li> </ul>	<p><b>Colin Croxton</b></p> <p>Colin Croxton</p> <p>Colin Croxton</p> <p>Colin Croxton</p>	<p><b>November 2010</b></p> <p>August 2010</p> <p>Oct 2010</p> <p>Dec 2010</p>

**Outcomes for customers**

<p>A number of recommendations from tenants will be used to shape changes to the Variation Policy, which include:</p> <ul style="list-style-type: none"> <li>• Make the policy more user friendly and easier to understand for tenants</li> <li>• Make the staff guide and procedure easy to use and understand</li> <li>• Use less acronyms and abbreviations in the policy</li> <li>• Review the policy to ensure it does not contain unnecessary “red tape” which can slow up or hinder processes without having any legal standing</li> </ul>
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- Make the website more user friendly and informative
- Look at reviewing tenancies as part of a annual review/audit
- Provide the most secure form of tenure compatible with the purpose of the housing and sustainability of the community.
- Have tenancy agreements in use which meet all applicable statutory and legal requirements
- Report back to tenants how CHA are meeting obligations in relation to offering and managing tenancies
- Have clear and accessible policies for variation, the tenancy and tenancy management
- Develop services that support tenants to maintain their tenancy and to prevent unnecessary evictions
- Conduct regular tenancy audits to ensure the correct persons are occupying CHA properties

### **Conclusion**

The assessment has enabled CHA to look closer at its Variation of Tenancy Policy and how best to provide a service, which is accessible to all.

Areas of action identified through the assessment will be incorporated into a wider action plan. The Action Plan includes a full review of Variation of Tenancy service will be undertaken by April 2010 and further potentials enhancements, which will be investigated and implemented, if appropriate, by December 2010.

All actions and service improvements will be included in the CHA Service Improvement Plan.