

# Dacorum BC Community Impact Assessment (CIA) Template

Policy / service / decision

Tenancy Agreement Review

## Description of what is being impact assessed

*What are the aims of the service, proposal, project? What outcomes do you want to achieve? What are the reasons for the proposal or change? Do you need to reference/consider any related projects?*

*Stakeholders; Who will be affected? Which protected characteristics is it most relevant to? Consider the public, service users, partners, staff, Members, etc*

*It is advisable to involve at least one colleague in the preparation of the assessment, dependent on likely level of impact*

Dacorum Borough Council (DBC) is conducting a review of its Secure Tenancy Agreement, which is issued to tenants. Following the review and a statutory consultation period, the revised agreement and its conditions will apply to both existing and new tenants.

While the tenancy rights of social housing tenants are determined by legislation, the tenancy conditions allow landlords to manage their housing stock effectively and ensure compliance with regulations.

The review is designed to assess whether the current Tenancy Agreement remains fit for purpose, focusing on whether clauses need adjusting, removing, or adding. This review also offers an opportunity to engage meaningfully with our residents, in accordance with the Consumer Standards for social housing providers, allowing their views on the proposed changes to be heard.

The Tenancy Agreement governs the relationship between tenants and their landlord, outlining the roles, rights, and responsibilities of both parties. The agreement is due an update because elements are now outdated and in need of revision.

The updated tenancy agreement is designed to be inclusive and equitable, ensuring no negative impacts on protected groups or other identified factors. The neutral to positive outcomes reflect the council's commitment to promoting fairness, addressing tenant needs, and fostering cohesive communities. The formal consultation process will provide further opportunities to refine the agreement and ensure all potential impacts are considered.

## Evidence

### What data/information have you used to assess how this policy/service/decision might impact on protected groups?

*(include relevant national/local data, research, monitoring information, service user feedback, complaints, audits, consultations, CIAs from other projects or other local authorities, etc.). You should include such information in a proportionate manner to reflect the level of impact of the policy/service/decision.*

To assess the potential impact of the Tenancy Agreement Review on protected groups, the following data and information sources will be utilised:

- **National Legislation and Guidelines:**

- **Equality Act 2010:** Ensures that proposed changes comply with requirements to prevent discrimination and promote equality for protected groups.
- **Housing Act 1985** and associated legislation: Provides the framework for secure tenancy agreements and their legal implications.

- **Local Authority Data:**

- **DBC Tenant Demographics:** Local housing service records, including demographic data on age, disability, ethnicity, and other protected characteristics, will be used to identify potential areas of impact.
- **Complaints and Feedback:** Analysis of historical complaints and service user feedback to highlight any recurring issues affecting protected groups.

- **Consultations and Engagement:**

- **Tenancy & Leasehold Committee (TLC):** Feedback from the committee, representing tenants with diverse backgrounds, has helped identify concerns and areas for improvement.

- **Service User Surveys:** Input from previous tenant satisfaction surveys to capture views on tenancy conditions and their impact on various groups.
- **Best Practice and Benchmarking:**
  - **Other Local Authorities:** Review of tenancy agreements and CIAs from comparable councils to understand how similar changes have been implemented and their outcomes.
  - **National Housing Federation Guidance:** Recommendations on inclusive and equitable tenancy management practices.
- **Internal Monitoring:**
  - **Audits:** Reviews of tenancy breaches, complaints, and enforcement actions to understand whether any patterns suggest disproportionate impacts on protected groups.
  - **Periodic Tenant Reviews:** Data from regular tenancy reviews to identify any specific challenges faced by tenants with protected characteristics.

This evidence has been compiled in a proportionate manner, reflecting the potential for moderate but important impacts on protected groups due to changes in tenancy conditions and responsibilities.

**Who have you consulted with to assess possible impact on protected groups?** *If you have not consulted other people, please explain why? You should include such information in a proportionate manner to reflect the level of impact of the policy/service/decision.*

To ensure the assessment captures diverse perspectives and considers potential impacts on protected groups, the following consultations have been or will be conducted:

- **Tenancy & Leasehold Committee (TLC):** This group provided valuable insights into tenant experiences and possible unintended consequences of the proposed changes for protected groups. A follow-up questionnaire was issued to gather more detailed feedback.
- **Heads of Service (Housing and Related Teams):** Heads of Service will be asked to review the draft tenancy agreement and consider the implications for tenants, including those with protected characteristics.
- **Internal and External Legal Teams:** Legal teams will be instructed to ensure that proposed changes comply with the Equality Act 2010 and avoid introducing or perpetuating any disadvantage for protected groups.
- **Housing Senior Leadership Team (HSLT) and Portfolio Holder (PH):** Proposed revisions of tenancy agreement were presented to HSLT and PH for further review, ensuring strategic oversight of potential impacts.
- **National Benchmarks:** Best practices from other local authorities will be reviewed to understand how changes to tenancy agreements have been implemented equitably and inclusively.

**Reason for Limited External Consultation:**

A wider tenant consultation, including individuals from protected groups, will take place during the formal consultation process, as required under Section 105 of the Housing Act 1985. This ensures all tenants, particularly those from protected groups, have the opportunity to provide input. External consultation has been limited at this stage to focus on internal review and benchmarking before broader engagement begins.

## Analysis of impact on protected groups (and others)

The Public Sector Equality Duty requires Dacorum BC to eliminate discrimination, advance equality of opportunity and foster good relations with protected groups. Consider how this policy/service/decision will achieve these aims. Using the table below, detail what considerations and potential impacts against each of these using the evidence that you have collated and your own understanding. Based on this information, make an assessment of the likely outcome, **before** you have implemented any mitigation.

- The PCs of *Marriage and Civil Partnership* and *Pregnancy and Maternity* should be added if their inclusion is relevant for impact assessment.
- Use “insert below” menu layout option to insert extra rows where relevant (e.g. extra rows for different impairments within Disability).

Protected group	<b>Summary of impact</b> <i>What do you know? What do people tell you? Summary of data and feedback about service users and the wider community/public. Who uses / will use the service? Who doesn't / can't and why? Feedback/complaints?</i>	<b>Negative impact / outcome</b>	<b>Neutral impact / outcome</b>	<b>Positive impact / outcome</b>
<b>Age</b>	<ul style="list-style-type: none"> <li>• The updated tenancy agreement includes clear and accessible language, making it easier for tenants of all ages to understand their rights and responsibilities.</li> <li>• Older tenants may benefit from provisions for regular tenancy reviews, as these visits provide an opportunity to identify and address specific needs (e.g., adaptations for mobility).</li> <li>• No clauses disproportionately disadvantage tenants based on age.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Disability (physical, intellectual, mental)</b>  <i>Refer to CIA Guidance Notes and Mental Illness &amp; Learning Disability Guide</i>	<ul style="list-style-type: none"> <li>• The agreement aligns with the Equality Act 2010, ensuring reasonable adjustments are considered for tenants with disabilities.</li> <li>• Provisions to ensure properties meet habitability standards (e.g., addressing damp or heating issues) positively impact tenants with physical or mental health challenges.</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	<ul style="list-style-type: none"> <li>• Clearer clauses may reduce stress or confusion for tenants with intellectual or cognitive disabilities.</li> </ul>			
<b>Gender reassignment</b>	<ul style="list-style-type: none"> <li>• No provisions directly affect tenants undergoing or having undergone gender reassignment.</li> <li>• The agreement remains inclusive and equitable for all tenants, with no anticipated adverse impacts.</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Marriage and Civil Partnership</b>	<ul style="list-style-type: none"> <li>• The agreement applies equally to tenants regardless of their marital or civil partnership status.</li> <li>• Clauses addressing household composition are neutral and non-discriminatory.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Race and ethnicity</b>	<ul style="list-style-type: none"> <li>• The agreement's plain language approach ensures accessibility for tenants for whom English may not be their first language.</li> <li>• Engagement with diverse tenant groups during the consultation phase will ensure the agreement reflects varied cultural perspectives.</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Religion or belief</b>	<ul style="list-style-type: none"> <li>• The agreement does not contain clauses that could disadvantage tenants based on their religion or belief.</li> <li>• Provisions for communal areas and tenant responsibilities remain inclusive and do not conflict with religious practices.</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sex</b>	<ul style="list-style-type: none"> <li>• The agreement treats all tenants equitably regardless of sex, with no clauses disproportionately affecting one group.</li> <li>• Existing processes for reporting domestic abuse remain a priority and are supported by the agreement.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Sexual orientation</b>	<ul style="list-style-type: none"> <li>• The agreement ensures equality for all tenants regardless of sexual orientation, with no anticipated impacts.</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<p><b>Not protected characteristics but consider other factors, e.g. carers, veterans, homeless, low income, loneliness, rurality etc.</b></p>	<ul style="list-style-type: none"> <li>• <b>Carers:</b> Periodic tenancy reviews provide opportunities to identify and support tenants with caring responsibilities.</li> <li>• <b>Veterans:</b> Provisions for tenancy stability and anti-discrimination clauses align with support for veterans.</li> <li>• <b>Low Income:</b> Updates to clarify tenant responsibilities aim to reduce misunderstandings and associated costs for tenants on low incomes.</li> <li>• <b>Rurality:</b> The agreement's flexibility allows for considerations of rural-specific needs (e.g., access to essential services).</li> <li>• <b>Loneliness:</b> Provisions for communal area use and tenancy reviews may help reduce isolation by fostering connections within communities.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Negative impacts / outcomes action plan</b></p> <p>Where you have ascertained that there will potentially be negative impacts / outcomes, you are required to mitigate the impact of these. Please detail below the actions that you intend to take.</p>				
<p><b>Action taken/to be taken</b> <i>(copy &amp; paste the negative impact / outcome then detail action)</i></p>	<p><b>Date</b></p>	<p><b>Person responsible</b></p>	<p><b>Action complete</b></p>	
<p>n/a</p>	<p>n/a</p>	<p>n/a</p>	<p><input type="checkbox"/></p>	
<p><b>If negative impacts / outcomes remain, please provide an explanation below.</b></p>				

n/a	
<b>Completed by (all involved in CIA)</b>	<ul style="list-style-type: none"> <li>• Ryan Glanville, Assistant Head of Housing Operations</li> <li>• Oliver Jackson, Head of Housing Operations</li> <li>• Natahsa Beresford, Assistant Director – Housing Operations &amp; Safe Communities</li> </ul>
<b>Date</b>	21/11/2024
<b>Signed off by</b> <i>(AD from different Directorate if being presented to CMT / Cabinet)</i>	Matt Rawdon (Assistant Director – People)
<b>Date</b>	22 November 2024
<b>Entered onto CIA database - date</b>	[date]
<b>To be reviewed by</b> (officer name)	[name]
<b>Review date</b>	[date]