

Equality and Consultation Analysis Template (ECA)

Guidance for completion

- Equality analysis is a way of considering the effect on different groups protected from discrimination by the Equality Act 2010, during the Council's decision making processes. These processes are:
 - Cabinet/Cabinet Member reports
 - Fundamental Service Reviews
 - Policy and Strategy Development
 - Human Resource Policies
 - Commissioning & Procurement
 - Other Service Reviews/Restructures
- These 'protected groups' are those defined by race, age, gender, disability, sexual orientation, gender reassignment, religion or belief, pregnancy, maternity or breastfeeding and vulnerable communities for example Looked After Children, Homeless etc
- Remember to think about children and young people as a specific group that you may need to consider the impact on and engage with during this analysis.
- Equality analysis will help you to consider whether the decision you want to take:
 - Will have unintended consequences for some groups
 - If the service or policy will be fully effective for all target groups
- The Council also has a statutory duty to consult
- This ECA template will enable the Council to demonstrate how equality information and the findings from consultation with protected groups and others, have been used to understand the actual or potential effect of your service or policy on the protected groups and to inform decisions taken. Hence, it is an evidence trail to show how the Council has met statutory equality and consultation duties
- The template should summarise key issues arising from information that has been collected, analysed and included in other key documents eg. Needs Analysis, Baseline Reports etc
- This form should be completed on an on-going basis at each stage of any formal decision making process. Failure to comply with this will put the Council (and specifically the elected member or officer making the decision) at risk of judicial review.
- The Council also has a statutory duty to consider social value (Social, Economic and Environmental) when commissioning and procuring services

- A simple guide to statutory consultation and equality duties sets out what the Council needs to do to comply with the **equality and consultation duties** and will help to deliver the best possible outcome for the City Council and its stakeholders. This can be found on http://beacon.coventry.gov.uk/downloads/download/507/simple_guide_to_statutory_consultation_and_equality_duties

For further help and support please contact Helen Shankster on 7683 4371 (Consultation Advice), Sheila Bates on 7683 1432 (CLYP Consultation Advice), Jaspal Mann 7683 3112 (Equalities Advice) Mick Burn 0247683 3757 (Social Value Advice).

Equality and Consultation Analysis

Context

Name of Review	Coventry Homefinder Choice Based Lettings Policy (review and re-write 2013-14)
Service Manager	Ayaz Maqsood
Officer completing analysis	Kimberley Fawcett
Date	January 2014

Scoping area of work

1. Briefly describe the area of work this analysis relates to:

Coventry City Council no longer owns or manages council housing stock, following the large scale voluntary transfer (LSVT) of all council housing to Whitefriars Housing Group in 2000. However, the Council still has a duty to produce a policy on how social housing

is allocated in the City which sets out how applicants are prioritised and how allocations are made, and which complies with Part 6 of the Housing Act 1996 (as amended by the Housing Act 2004 and the Localism Act 2011). The Policy must have regard to the guidance document 'Allocation of Accommodation: guidance for local housing authorities in England' (DCLG 2012).

As the Council no longer holds its own housing stock, allocations under the policy are carried out through nominations from the Council to Registered Providers of social housing.

The Coventry Homefinder Choice Based Lettings Policy sets out the policies and processes by which applicants will be prioritised for an allocation of social housing, and how available social housing vacancies are advertised and let.

Public Sector Equality Duty

2. Which, if any, parts of the general equality duty is the service relevant to? Please mark with an 'X'

	Eliminate discrimination, harassment and victimisation
x	Advance equality of opportunity between people who share relevant protected characteristics and those who do not
	Foster good relations between people who share relevant protected characteristics and those who do not

Gathering Information and Data

3. Who are the key groups that could be impacted by this work/service, including service users both existing and potential and stakeholders?

The key groups who may be affected by the Coventry Homefinder Policy include:

- Applicants for social housing in Coventry (this may include applicants who currently live outside of Coventry).

- Potential applicants for social housing in Coventry (this may include newly forming households, existing households, and those that currently live outside of Coventry).
- Members/former members of the Armed Forces who wish to apply for social housing in Coventry (and certain members of their families).
- Registered Providers of social housing in Coventry.

4. From the list above, which of these constitute protected groups or vulnerable communities (e.g. those experiencing deprivation)?

Within the groups identified in section 3, there are applicants/potential applicants with specific needs who may be affected by the Homefinder Policy, including:

- Applicants or members of their households who have a disability or medical need and whose current home is not suitable to meet the medical or disability needs of the household.
- Homeless people/households.
- Care leavers
- Applicants aged 16-17.
- Older applicants requiring sheltered housing.
- Households experiencing harassment or violence.

5. Which of the key protected groups and stakeholders representatives will need to be kept informed, consulted or actively involved in this area of work?

Key Stakeholder	*Type of Involvement	Method(s) used
Applicants who are currently registered with Coventry Homefinder	Informing and consulting	Formal 8 week public consultation on the draft policy – published on the Coventry Council website and the Coventry Homefinder website. Also publicised using Facebook and Twitter. Targeted emails to applicants that are currently registered (were an email address has been given on their application).

Potential applicants not yet registered with Coventry Homefinder	Informing and consulting	Formal 8 week public consultation on the draft policy – published on the Coventry Council website and the Coventry Homefinder website. Also publicised using Facebook and Twitter.
Homeless people/households	Informing and consulting	Formal 8 week public consultation on the draft policy – published on the Coventry Council website and the Coventry Homefinder website. Also publicised using Facebook and Twitter. Targeted emails to applicants that are currently registered (where an email address has been given on their application).
Disabled people with specific housing needs	Informing and consulting	Formal 8 week public consultation on the draft policy – published on the Coventry Council website and the Coventry Homefinder website. Also publicised using Facebook and Twitter. Targeted emails and contact with partnership and representative groups.
Registered Providers (social landlords) who are partners in Coventry Homefinder	Informing, consulting and involvement	<p>Informal focus group meetings on potential policy changes carried out prior to draft being prepared for public consultation.</p> <p>Homefinder Partnership Board meetings.</p> <p>Formal 8 week public consultation on the draft policy – published on the Coventry Council website and the Coventry Homefinder website. Targeted emails informing of the consultation.</p> <p>The final draft (following public consultation) will be circulated for comment.</p>
Advice agencies	Informing and consulting	<p>Focus group meetings carried out prior to draft being prepared for public consultation.</p> <p>Formal 8 week public consultation on the draft policy – published on the Coventry Council website and the Coventry Homefinder website. Targeted emails informing of the consultation.</p>

Providers of housing and homelessness services (eg hostels,	Informing and consulting	<p>Focus group meetings carried out prior to draft being prepared for public consultation.</p> <p>Formal 8 week public consultation on the draft policy – published on the Coventry Council website and the Coventry Homefinder website. Targeted emails informing of the consultation.</p>
Other council departments (eg Housing Benefit, Community Safety, Occupational Therapy)	Informing and consulting	<p>Focus group meetings carried out prior to draft being prepared for public consultation.</p> <p>Formal 8 week public consultation on the draft policy – published on the Coventry Council website and the Coventry Homefinder website. Targeted emails informing of the consultation.</p>
Elected members - Councillors	Inform, consult and involve.	<p>Task & Finish group set up by Scrutiny Board made recommendations on changes to the policy.</p> <p>Cabinet Member heard these recommendations and instructed officers to review and re-write the policy.</p> <p>Scrutiny Board will review the final draft policy before it is presented to Cabinet for approval.</p> <p>Also informed of the 8 week public consultation through email and members' bulletin.</p>

* *Information, Consultation or Involvement*

Analysis

6. What information is currently available to be used as part of this analysis including data on current and potential service user, workforce etc?

Comprehensive data is available from the current Homefinder register including:

- Ethnic origin of main applicant.
- Age group of main applicant.
- Applicants who require properties with mobility-related adaptations.
- Applicants who consider themselves to be vulnerable.
- Applicants who are unable to use the Homefinder system and require assisted bidding.

Data is also available on applicants who have been assessed as Statutorily Homeless (under Part 7 of the Housing Act 1996) and who are owed the main housing duty – the Council must secure an offer of suitable accommodation for them. This can be done with an offer of accommodation under Part 6 of the 1996 Act (and therefore done through the Homefinder Policy). The information held about statutorily homeless households includes:

- Ethnic Origin of main applicants
- Age group of main applicant
- Whether the household contains dependent children or a pregnancy
- Household composition (including gender if the applicant is a single person or a single parent household)
- Whether the household is considered vulnerable due to a disability, due to being 16-17, due to being a former care leaver or due to old age.

7. What are the information gaps?

At the time of registration, applicants are requested to answer questions regarding:

- Their religion
- Their sexual orientation
- Their employment status and income level

However, these questions are not mandatory on the application form and many applicants choose not to complete them. As a result, the information that we hold is incomplete.

This information is not collected for Statutorily Homeless households.

There is currently no information collected about gender reassignment.

8. How are you going to address the gaps?

It would be possible to amend the application form/IT system to make the questions relating to protected characteristics mandatory. However this information is not required in order to assess an applicant's housing needs or to make an allocation of social housing. Therefore it is felt that applicants should have the option not to respond to these questions.

A further field will be added to the application form allowing applicants to identify if they have undergone gender reassignment but it is not proposed that this will be a mandatory question.

Summary of Data

9. Please provide a summary of what the data is telling you and what key issues the data is telling you.

Data from Coventry Homefinder regarding registered applicants for social housing (as at 1st April 2013):

Ethnic Origin:

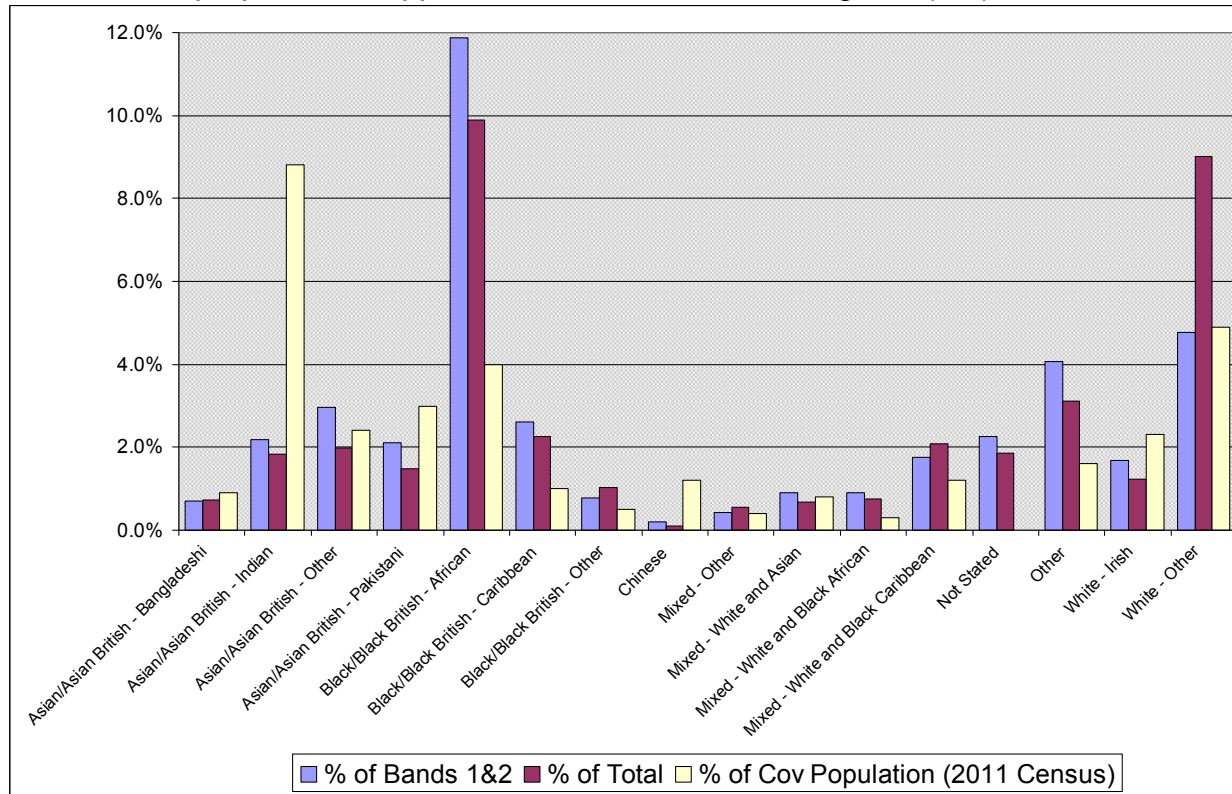
Most of the applicants on the Homefinder register (60%) identify themselves as White British. This is below the percentage of the population of Coventry who identified themselves as White British in the 2011 Census (67%).

There is considerable variation in other ethnic groups on the Homefinder register. 12% of households in priority bands, and 10% of the overall register, identify themselves as 'Black/Black British – African'. This is compared to 4% of the total city population in the 2011

Census. Other groups where the representation on Homefinder is higher than the city’s population include: the other Black/Black British groups; the Mixed groups; and ‘White – Other’.

Conversely, only 2% of applicants on the Homefinder register identify themselves as ‘Asian/Asian British – Indian’, compared to 9% of the total city population in the 2011 Census. This trend has been consistently identified in previous analysis. Other groups where the representation on Homefinder is lower than the city’s population include: the other Asian/Asian British groups, White- Irish; and Chinese.

NB – a small proportion of applicants on the Homefinder register (2%) chose not to state their ethnic origin.



Age - The majority of Homefinder applicants are aged between 18 and 45 years (77% of the total register). Those aged over 65 make up a small proportion of the overall register (3.3% of the total) but a larger proportion of those over 65 have a housing need which has resulted in them being placed in a priority band. 21% of those registered who are over 65 are in a priority need band, compared to 11.8% of the overall register in a priority need band.

Disability - Disability is recorded on the Homefinder register when an applicant requires a property with specialist adaptations. The number of applicants with a disability that requires specially adapted housing is low (less than 1% of the register). However, of those that are registered and that require adapted housing, 70% are in a priority band due to their housing needs.

Data from P1E regarding statutorily homeless households in Coventry (2012/13):

Main points:

Race - Where race was stated, 63% of statutorily homeless people were White, 16% Black, 8% Asian and 4% mixed ethnicity. The demographics of Coventry (Census 2011) show 5.6% of the city's population identify themselves as Black/Black British and 16.3% identify themselves as Asian/Asian British. This shows a complex situation where some ethnic groups are over-represented and some are under-represented in homelessness statistics compared to the general population of the city. This is a long term trend that has been identified.

Age – 29% of statutorily homeless people were aged between 16 and 24. The largest age group affected are people aged between 25 and 44, these account for 61%.

Gender - Many of the statutorily homeless households were family units, but gender is only recorded for single applicants and lone parents. There were 303 single people with dependent children – 17 of these were male applicants, 286 were female. There were 108 single people with no dependents, of which 62 were female and 46 male. 121 Households were couples with dependent children.

Disability – 8% of statutorily homeless households were in priority need due to a disability – 19 due to a physical disability and 24 due to a mental illness or disability.

Generating and evaluating options

10. What are the different options being proposed to stakeholders?

The process of developing the draft Homefinder Policy involved several stages of consultation. Some changes are necessary due to changes in legislation; some are possible due to the provisions in the Localism Act 2011. The proposed changes are detailed in the table at section 11.

11. How will the options impact protected groups or vulnerable groups e.g. those experiencing deprivation?

There are several major changes proposed as part of the Homefinder Policy re-write. These have different impacts on protected/vulnerable groups.

Applicants who have a housing need which is recognised in the legislation and in the Homefinder Policy will be positively affected by proposed changes to the Policy – this group may include applicants in any of the protected characteristic groups, but as the data in section 9 shows, certain groups are more likely to be registered with Coventry Homefinder and/or are more likely to have a housing need.

As a result of these options, the Council will be able to offer a service which is better able to meet the housing needs of applicants on the register and there will more properties available to those customers in housing need.

The tables below detail the proposed changes to the Coventry Homefinder Policy and the potential impacts:

Issue	Current Policy	Proposed Change to Policy	Impacts of implementing this change
Priority bands	See separate table below	See separate table below. CHANGES have been made to some priority bands following consultation with stakeholders, to ensure that the policy meets the legislative requirements, and also to provide greater clarity on some circumstances that result in priority bands being awarded.	Certain categories of housing need specified in legislation (Part VI of the Housing Act 1996) must be given ‘reasonable preference’ for social housing allocations. It is then for the Authority to determine relative priority between these categories.

Issue	Current Policy	Proposed Change to Policy	Impacts of implementing this change
Shortlisting priority	75% of properties have their shortlists ordered based on the priority band of the bidders who expressed an interest, 25% have their shortlists ordered based on registration date alone.	CHANGE - All properties advertised would have their shortlists ordered based on the priority band (and therefore the relative housing need) of the applicants that have bid. This would mean that applicants would not be prioritised for housing based on registration date (the amount of time they have been on the register) alone.	<p>This was recommended by the Task & Finish Group and will ensure that applicants with a housing need are prioritised for housing above those that are already adequately housed.</p> <p>Statutory guidance from DCLG states very clearly ‘we expect social homes to go to people that genuinely need them’</p> <p>This group may include applicants in any of the protected characteristic groups, but as the data in section 9 shows, certain groups are more likely to be registered with Coventry Homefinder and/or are more likely to have a housing need.</p> <p>Applicants:</p> <p>On 31st December 2013, there were a total of 14,287 applicants/households registered on Coventry Homefinder. Of these, 1857 (13%) were in priority bands 1A to 2C, and 12,430 (87%) were in Bands 3A and 3B.</p> <p>29% of applicants in Band 3A and 3B have never placed a bid. Only 48% have placed a bid in the last 6 months.</p> <p>Properties during 2013:</p> <p>Overall, 2100 properties were let during calendar year 2013 (‘offer accepted’ during 2013). 574 were shortlisted based on date alone (27%).</p> <p>The nature of the stock (almost half of properties that become available are studio or 1bed properties) means that more people from Band 3 are housed than the 25% that would be expected from the 75/25 split – not all properties shortlisted by band go to an app in a priority band. (apps in priority bands are more likely to be families, lots of singles/couples in</p>

Issue	Current Policy	Proposed Change to Policy	Impacts of implementing this change
			<p>Band3)</p> <p>During 2013, 45% of applicants that accepted a property were from Bands 3A & 3B.</p> <p>Of those that were successful from Bands 3A & 3B, 17% were already tenants of a housing association, 28% were living with family or friends, and 34% were in private rented accommodation.</p> <p>Tenants that are under-occupying and affected by the 'bedroom tax' are prioritised in the Homefinder system. A move to 100% by priority would increase the number of properties available to people who have priority due to under occupation.</p> <p>528 households were assessed as Statutorily homeless during the calendar year 2013. 358 were housed as stat homeless through Homefinder.</p> <p>There would be a negative impact on applicants who have no assessed housing need under the Policy – they would have less chance of being allocated a property as the priority for all properties would be given to those with significant housing needs. However, this needs to be balanced against the alternative negative impact on applicants with housing needs who may not receive an allocation of a property under the current policy where the property goes to someone who has been registered for longer, but is already adequately housed.</p>

Issue	Current Policy	Proposed Change to Policy	Impacts of implementing this change
Registration date/ effective date.	The original date of registration is used to prioritise shortlists where more than one person in the same band has placed a bid.	CHANGE - Shortlisted bids in the same band will be prioritised based on the 'effective date' which will be the date that the band was awarded, rather than just the date that the applicant first registered. This will reflect how long the household has been in housing need rather than just how long they have been on the register. Applicants that have been in housing need for a longer period will be prioritised.	<p>This will have a positive impact on applicants in housing need, ensuring a fair and transparent way to prioritise between applicants in the same band.</p> <p>This group may include applicants in any of the protected characteristic groups, but as the data in section 9 shows, certain groups are more likely to be registered with Coventry Homefinder and/or are more likely to have a housing need.</p> <p>On 31st December 2013, 1857 applicants were in priority bands 1A to 2C.</p>
Offers of accomm. for Statutorily Homeless households	Statutorily homeless households are placed in Band 1A for one bidding period to place their own bids. If they are unsuccessful, the Housing Assessment Officer places bids in future bidding rounds until a successful match means that the main housing duty can be discharged.	CHANGE – Statutorily homeless households would be placed in Band 1A as an extreme urgent case, but bids would be placed by the Housing Assessment Officer from the outset to maximise the chance of a successful match. Housing Assessment Officers also have the option of discharging the main housing duty with an offer of a suitable private rented property/ tenancy.	<p>This would have a positive impact in ensuring that statutorily homeless households receive an offer of suitable accommodation as soon as possible. However, there may be a perceived negative impact that stat homeless applicants no longer get one week of 'choice' where they are able to place their own bids.</p> <p>This group may include applicants in any of the protected characteristic groups, but as the data in section 9 shows, certain groups are represented to a greater extent in the number of applicants assessed as statutorily homeless (and owed the main housing duty by the Council).</p> <p>During 2012/13, 540 households were assessed as statutorily homeless and owed the main housing duty by the Council. 440 households were housed through Coventry Homefinder as their offer of accommodation to discharge the main housing duty (the others will have rejected their offer and gone on to secure housing for themselves)</p>

Issue	Current Policy	Proposed Change to Policy	Impacts of implementing this change
<p>Advertising adapted properties</p>	<p>Adapted properties are categorised based on the level of adaptation and a brief description of adaptations provided. Applicants who are eligible place bids and shortlists are created in the same way as for all other properties.</p>	<p>CHANGE – adapted properties will be offered directly to people on the register who require the specific adaptations in the property. This may mean that properties are not offered to the applicant with the highest band/earliest date, but will ensure that the best fit is found between the adaptations provided and the needs of the household.</p>	<p>This will directly affect households/applicants that have a disability or illness that means that they require properties with specific adaptations. The adaptations required are specific to the household, yet the range of adaptations in a property can be from full wheelchair accessibility to a basic stair lift.</p> <p>There will be a positive impact on these households. Currently there is only a small amount of information in the property advert about the adaptations that are provided and it is difficult for applicants to determine whether the adaptations would meet their requirements. This leads to applicants placing bids on properties that are not suitable and then having to refuse the property, and also instances where Registered Providers have been unable to let the property and have had to remove adaptations.</p> <p>Given the shortage of adapted properties and the high proportion of applicants who need an adapted property that are also in housing need/priority band, this proposal will make better use of the adapted properties that become available by ensuring that they are matched to applicants that require those types of adaptations. Applicants will benefit as they will receive more information about the adaptations in the property and be more informed as to whether the property will be suitable.</p> <p>Advice will be taken from medical professionals and an assessment will be carried out by an Occupational Therapist, where appropriate. It will be important to ensure that the records of adaptations required are kept up to date to ensure that appropriate offers are being made.</p> <p>Applicants will still be able to place bids on non-adapted</p>

Issue	Current Policy	Proposed Change to Policy	Impacts of implementing this change
			<p>properties through the Homefinder system in the same way as other applicants. If they are successful in placing a bid for a property, the landlord must then consider whether it is possible and reasonable for the property to be adapted to meet their needs.</p> <p>On 31st December 2013, there were 126 households registered on Homefinder that required a property with specific adaptations. Of these, 89 (71%) were in a priority band (Bands 1A to 2C).</p> <p>These households are also more likely to be older – 24% of the applicants that require an adapted property are over 55, compared to 9% of the overall register over 55.</p>
<p>Priority band due to health/medical needs</p>	<p>Medical priority is assessed by the Coventry Homefinder Team based on a medical assessment form and additional information from medical professionals (where appropriate)</p>	<p>CHANGE – requests for priority banding based on health/medical grounds will usually require an assessment from an Occupational Therapist (except when this is not appropriate) in addition to the medical assessment form and evidence from doctors etc.</p>	<p>This will have a positive impact on people with disabilities and older people.</p> <p>Medical priority is given when the current property is unsuitable and is having a negative impact on the medical condition of the applicant. An Occupational Therapist will be able to carry out an expert assessment of what impact the property is having on the applicant and what the requirements of the applicant's household are. The Homefinder Team will then be more informed as to whether medical priority on Homefinder is appropriate.</p> <p>The OT will also be able to carry out an assessment as to whether the applicant's situation can be alleviated with the provision of adaptations or equipment in their existing property. This will be positive as it could ensure that the applicant's needs are met in their current home and remove the requirement to move, or if this is not possible, could</p>

Issue	Current Policy	Proposed Change to Policy	Impacts of implementing this change
			<p>improve their situation whilst awaiting a move.</p> <p>On 31st December 2013, there were 16 applicants who had been placed in Band 1A due to exceptional medical needs, 3 had been placed in Band 1B due to medical needs and overcrowding, 186 had been placed in Band 2A due to urgent medical needs, and 57 had been placed in Band 2B due to low level medical needs (262 in total).</p>
Armed forces personnel	There are no additional priorities for former members of the armed forces over other applicants.	CHANGE - The Policy complies with new legislation by providing additional preference for former members of the armed forces that also have a reasonable preference housing need.	<p>This change is required by legislation. It is unclear how many applicants this will affect and whether there will be any equality impacts arising from it. This will be monitored.</p> <p>There will be a positive impact on members/former members of the Armed Forces that have housing needs arising from a disability or injury.</p>
Refusal of offers	Applicants that refuse 10 or more offers without good reason are requested to attend interview and their application may be closed	CHANGE - Applicants that refuse 5 offers may have their application suspended whilst the reasons for refusal are explored and the application may be closed if the refusals are found not to be reasonable.	<p>This group may include applicants in any of the protected characteristic groups, but as the data in section 9 shows, certain groups are more likely to be registered with Coventry Homefinder and/or are more likely to have a housing need.</p> <p>In the 12 months to 31st December 2013, 1537 applicants rejected offers of an allocation of a property. Of these, 36 rejected five or more offers within the year.</p> <p>Officers will need to be aware of particular issues or requirements arising from protected characteristics (such as a disability or medical condition) which may mean that a property is not suitable and therefore it is reasonable for the applicant to refuse. Detailed procedures and robust monitoring will ensure that applicants are not unfairly penalised for refusing properties.</p>

Issue	Current Policy	Proposed Change to Policy	Impacts of implementing this change
Eligibility and qualification	Certain applicants are not eligible to join the register based on immigration status, habitual residence, and behaviour which makes them 'unsuitable to be a tenant'.	<p>TECHNICAL CHANGE – eligibility criteria based on immigration status and/or habitual residence remains the same. The Localism Act 2011 introduced the ability for councils to decide who 'qualifies' to join the register. The draft policy considers those 'unsuitable to be a tenant' as not qualifying to join the register. Home owners do not qualify unless there are specific housing needs/ circumstances.</p> <p>The Task & Finish Group recommended keeping an 'open' register therefore no additional qualifying criteria have been included.</p>	<p>The eligibility criteria are set in legislation and are based mainly on immigration status and habitual residence in the UK. The Council has no discretion to change this.</p> <p>Keeping an 'open' register will mean that anyone who is eligible will be able to register for social housing in Coventry. This has a positive equality impact as no groups are excluded from registering.</p>
Requesting priority	Applicants are automatically registered in Band 3A or 3B, and must contact the Homefinder Team to request priority banding if they have a housing need.	NO CHANGE – applicants are still required to directly contact the Homefinder Team to request priority banding, however the process and evidence required have been clarified in the Policy.	<p>The Council has a duty to people in its area to ensure that assistance is given free of charge to those who are likely to have difficulty in making an application for housing without such assistance.</p> <p>Coventry Homefinder aims to ensure equal access to all and has developed a number of ways by which those who are unable to use the system themselves and don't have support otherwise available to them, are not disadvantaged. This includes:</p> <ul style="list-style-type: none"> • Sending details of vacant properties to people who are unable to access the property adverts through the online Homefinder system. • Contacting applicants when there is a property being advertised that matches their specific requirements. • Placing bids for vulnerable households based on pre-agreed criteria of location and property type.

Issue	Current Policy	Proposed Change to Policy	Impacts of implementing this change
			<p>To access this support applicants or their advocates, with written approval to represent them, can contact the Homefinder Team.</p> <p>The automatic registering system means that applicants can immediately access and start to use the system.</p>

Specific changes to band priorities:	
Band change	Impacts of implementing this change
<p>Applicants that need to move as part of the National Witness Mobility Scheme will be placed in Band 1A (this is an increase from Band 2B).</p>	<p>This would have a positive impact on applicants that need to move urgently due to being placed on the National Witness Mobility Scheme. The number of applicants affected by this is small and it is not clear if there are any direct equalities impacts – this would be monitored.</p>
<p>Tenants of social landlords who are under-occupying their home by three or more bedrooms will be placed in Band 1A (this is an additional category – the policy currently places those under-occupying by two bedrooms in Band 1B and those under-occupying by one bedroom in Band 2A)</p>	<p>This would have a positive impact on applicants that require a move from a large family property (4 or more bedrooms).</p> <p>It would assist those affected by the ‘bedroom tax’ welfare reforms to move to a more suitably sized property.</p> <p>This would also have a positive impact on households on the register that require large family housing which is in very short supply, as the household moving out will free up a property for a household that may be overcrowded.</p> <p>It is unclear how many applicants that this would affect but the number is likely to be small – there are 52 applicants on the Homefinder register that are in Band 1B due to under-occupation by two or more bedrooms (as at 31st December 2013).</p>
<p>People fleeing violence, harassment and abuse would be placed in Band 1B. This is an increase in priority from Band 2B.</p>	<p>This would have a positive impact by increasing the priority for people who are fleeing violence, harassment and abuse.</p> <p>This would benefit applicants with protected characteristics who may be experiencing violence, abuse or harassment based on those protected characteristics (for example, homophobic</p>

Specific changes to band priorities:	
Band change	Impacts of implementing this change
	violence/abuse, racist violence/abuse and other hate crimes).
People living in extreme unsanitary conditions causing severe health and safety hazards will be placed in Band 1B. This is an increase in priority for extreme cases – the current policy places all unsanitary condition cases in Band 2A (regardless of severity).	<p>This would have a positive impact by increasing the priority for people who need to move from extreme unsanitary conditions. There are not likely to be any equality impacts arising from this change.</p> <p>The number of applicants affected is likely to be very small.</p>
People living in short term hostels would be placed in Band 1B. This is an increase in priority from Band 2B	<p>This would have a positive impact by increasing the priority for people who are living in short term hostel accommodation. It will improve the likelihood of the applicant securing accommodation within the 12-16 week period that they are living in the hostel.</p> <p>On 31st December 2013, there were 230 applicants with hostel priority.</p> <p>Whilst there are a small number of hostel spaces for single females, the majority of hostel dwellers are single males. This group is less likely to be in a priority need group under the homelessness legislation (Part VII Housing Act 1996) therefore it is necessary to provide priority banding under the allocations policy.</p>
Households who need to move to a certain locality to avoid hardship would be placed in Band 2B. This has been separated out from other categories for clarity.	This would have a positive impact by increasing the priority for people who need to move to avoid hardship. There is considerable overlap with other housing need priority categories (especially social/welfare and medical) but the hardship category also includes people who need to move to take up or maintain employment and long term training.
Households that need to move to prevent homelessness would be placed in Band 2B (certain circumstances – see draft Policy document)	<p>This would have a positive impact by increasing the priority for households at risk of homelessness.</p> <p>This group may include applicants in any of the protected characteristic groups, but as the data in section 9 shows, certain groups are more likely to be registered with Coventry Homefinder and/or are more likely to become homeless.</p>

Specific changes to band priorities:	
Band change	Impacts of implementing this change
<p>Single non-dependent/adult children would be given the overcrowding priority banding on their own application if they are currently living in the family home and that home is overcrowded, where the overcrowding would be relieved by them moving into their own separate accommodation.</p>	<p>This would have a positive impact by increasing the options available to households that are experiencing overcrowding.</p> <p>There is a severe shortage of large family housing (especially 4+ bedrooms) and families that are overcrowded can unfortunately have to wait for a very long time for a suitable property to become available. During 2012/13, only 38 properties with 4 or more bedrooms became available, whereas on 31st December 2013 there were 454 households on the register requiring a minimum of 4 bedrooms – of these 146 were in urgent housing need (Bands 1A to 2C).</p> <p>There are 522 households who are currently in Band 2A due to overcrowding who require one additional bedroom, and 21 households in Band 1A as they require two or more additional bedrooms. A proportion of these households will contain a non-dependent adult child who may be willing to move out to relieve the overcrowding. (31st December 2013)</p>
<p>Children who have been 'looked-after' by the local authority and who are ready to move to independent accommodation will be placed in Band 2A and the effective date will be backdated to their 16th birthday.</p>	<p>This would have a positive impact by increasing the possibility for looked after children with a suitable support package to secure independent accommodation by their 18th birthday.</p> <p>There are 24 applicants that currently have priority banding due to being a looked-after child (as at 31st December 2013).</p>

12. Please detail how you could mitigate any negative impacts

There will be a negative impact on applicants who have no assessed housing need under the Policy – they will have less chance of being allocated a property as the priority for all properties will be given to those with significant housing needs. However, this needs to be balanced against the alternative negative impact on applicants with housing needs who may not receive an allocation of a property under the current policy where the property goes to someone who has been registered for longer, but is already adequately housed.

The information in section 9 shows that applicants with a housing need are more likely to be in a group with a protected characteristic.

13. Identify which stakeholders would be positively/negatively affected by the options (consider contractors/service users/employees).

Coventry Homefinder is a partnership between Coventry City Council and Registered Providers (mostly Housing Associations) and would be affected by the options put forward. Whitefriars Housing Group expressed opposition to the proposal to prioritise all property shortlists by Band rather than keep 25% of shortlists prioritised by registration date (see key findings and final option sections for more detail and response).

Formal Consultation

14. Who took part in the consultation? Please also specify representatives of any protected groups for example service users, employees, partners etc.

A Task & Finish Group was set up by the Transport and Infrastructure Development Scrutiny Board (6) The group met four times between 1st November 2012 and 31st January 2013. They heard evidence from Council officers from Housing, three housing associations in the city and two advice and support agencies that support Coventry residents in their housing needs.

The Scrutiny Board then made recommendations to the Cabinet Member arising from the Task & Finish Group. Following this, the Cabinet Member for Housing instructed officers to undertake a full review and re-write of the Coventry Homefinder Choice Based Lettings Policy.

Consultation was then carried out in July 2013 with a range of representatives in a series of focus groups, including Registered Providers, advice agencies, other Council teams (housing benefit, social care, community safety etc), outside organisations including those that work with homeless and/or vulnerable people, the Coventry Homefinder Partnership Board and the Housing Options and Coventry Homefinder teams. Questionnaires were also sent out with the main discussion points/questions to a wide range of people who were not able to attend.

Taking the recommendations from the Task & Finish Group and the focus group discussions, a draft Coventry Homefinder Policy was produced which was then released for public consultation for 8 weeks, from 21st October 2013 to 15th December 2013.

The draft Policy and an accompanying online survey were placed on the Council website. This was also advertised to the public through the Council’s Facebook and Twitter announcements. A link was also placed on the Coventry Homefinder website (the vast majority of applicants access Homefinder using the website). Applicants that have registered, have been placed in a priority band (Bands 1A to 2C), and who have provided an email address on their application were also notified by email (1029 in total). Key contacts and stakeholders, including those that were invited to the focus groups, were also notified by email. Councillors were informed of the consultation with an email and a notice in the Members weekly bulletin. Other Council staff were informed on the staff intranet site and the Beacon daily round-up email.

Applicants that were registered, in a priority need band (Bands 1A to 2C) and had provided an email address on their application were emailed to inform them of the consultation and invite them to take part. The characteristics of these applicants were:

[Please note – these are the characteristics of the applicants in priority bands that had provided an email address, it is not the characteristics of all the applicants in the priority bands]

Age group of main applicant	Percentage
18 to 25	13%
26 to 35	32%
36 to 45	26%
46 to 55	16%
56 to 65	9%
66 to 75	3%
Over 75	1%
Total	100%

Gender of Main Applicant	Percentage
Female	60%
Male	40%
Total	100%

Ethnicity of Main Applicant	Percentage
Asian/Asian British	8%
Black/Black British	17%
Chinese	0%
Mixed	4%
Not stated	1%
Other	3%
White British	61%
White Irish & Other	6%
Total	100%

Disability	Percentage
No	94%
Yes	6%
Total	100%

Sexual Orientation	Percentage
Bisexual	1.9%
Gay	1.0%
heterosexual	65.2%
Lesbian	0.4%
Not stated	31.5%
Total	100.0%

Religion	Percentage
Buddhist	0.2%
Christian	41.9%
Hindu	0.7%
Islam	12.1%
Sikh	0.4%
Not stated/Other	44.7%
Total	100.0%

In terms of **those that responded** to the public consultation by completing the online survey, many chose not to complete the equality data questions. Of the 84 responses received, 61 identified that they were responding as an individual (as well as 2 on behalf of a group/organisation, 1 as an elected member, 3 representing a Registered Provider and 17 that skipped the question).

How old are you?		
	Response Percent	Response Count
Under 16	0%	0
16 - 24	7%	4
25 - 34	18%	11
35 - 44	30%	18
45 - 54	23%	14
55 - 64	20%	12
65 - 74	2%	1
75 - 84	0%	0
85+	0%	0
answered question		60
skipped question		24

What is your gender?		
	Response Percent	Response Count
Male	25%	15
Female	75%	44
answered question		59
skipped question		25

Do you consider yourself to be a disabled person?		
	Response Percent	Response Count
Yes	18%	11
No	82%	50

What is your ethnic background?		
	Response Percent	Response Count
White - British (includes English / Welsh / Scottish / Northern Irish)	88%	52
White - Irish	2%	1
White - Gypsy/Irish Traveller	0%	0
White - Other	0%	0
Mixed - White and Black Caribbean	0%	0
Mixed - White and Black African	0%	0
Mixed - White and Asian	0%	0
Mixed - Other	2%	1
Asian/ Asian British - Indian	0%	0
Asian/ Asian British - Pakistani	3%	2
Asian/ Asian British - Bangladeshi	0%	0
Chinese	0%	0
Asian/ Asian British - Other	2%	1
Black/ Black British - African	2%	1

Black/ Black British - Caribbean	2%	1
Black/Black British - Other	0%	0
Arab	0%	0
Any other ethnic group	0%	0
answered question		59
skipped question		25

15. Are there any protected groups that you have not consulted with? If so, why not?(Some groups might not be relevant)

Invitations to participate in consultation were made with a wide range of customers including those from protected groups.

Invitations to take part in the consultation were also sent to all the contacts on the Corporate Research equalities groups and network contacts list, covering all the main protected groups.

16. What are the key findings of the consultation?

The key findings of the final 8-week public consultation were:

Consultation Question	Agree	Disagree	Additional Comments	Outcome
1. Do you agree that the shortlists for all properties should be prioritised by Band (based on housing needs)?	63%	33%	The majority of respondents agreed with this policy change, however there were concerns about balanced communities and people with no housing need still having 'a chance' to get a property.	Whitefriars Housing Group in particular was opposed to this policy change. However, there was clear direction from the Task & Finish Group and Cabinet Member that this policy change should be brought in. Following further discussion, an alternative proposal has been included in the draft Policy – that all properties have their shortlists prioritised by Band, but that Registered Providers can specify that priority will be given to their own current tenants for up to 10% of the properties that are advertised.
2. Applicants that need to move as part of the national witness mobility scheme would be placed in band 1A. This is an increase from band 2A	62%	18%		This proposed change has been included in the draft Coventry Homefinder Policy put forward for recommendation to Cabinet.
3. Tenants of social landlords who are under-occupying their home by 3 or more bedrooms would be placed in band 1A	77%	17%		This proposed change has been included in the draft Coventry Homefinder Policy put forward for recommendation to Cabinet.
4. People fleeing violence harassment and abuse would be placed in 1B, this is an increase in priority from band 2B	83%	7%		This proposed change has been included in the draft Coventry Homefinder Policy put forward for recommendation to Cabinet.
5. People living in extreme unsanitary conditions causing severe health and safety hazards would be placed in band 1B	76%	12%		This proposed change has been included in the draft Coventry Homefinder Policy put forward for recommendation to Cabinet.

Consultation Question	Agree	Disagree	Additional Comments	Outcome
6. People living in short term hostels would be placed in band 1B, this is an increase from band 2B	46%	33%	There were concerns that this level of priority was too high – particularly as this group generally requires bedsit or one-bedroomed accommodation for single people, and would receive a higher band than applicants that may be affected by the ‘bedroom tax’ welfare reforms and needing to down-size.	Following the consultation this proposal was changed. The draft Policy which will be put forward for recommendation to Cabinet will place the hostel priority in Band 2A.
7. Household who need to move to a certain locality to avoid hardship will be placed in band 2B.	37%	24%	There were a large proportion of respondents who replied ‘neither agree nor disagree’ and some comments received suggested that this category was not well understood.	This proposed change has been included in the draft Coventry Homefinder Policy put forward for recommendation to Cabinet. This is one of the priority need categories in the legislation, but there is considerable overlap with the social/welfare need category. The category has been specified separately to ensure that applicants falling into this group are assessed properly.
8. Households who need to move to prevent homelessness will be placed in band 2B	57%	16%		This proposed change has been included in the draft Coventry Homefinder Policy put forward for recommendation to Cabinet.
9. Unintentionally homeless people who are not in a priority need group will be placed in band 2B, this is an increase from band 2C	66%	13%	There are five ‘tests’ that are applied when carrying out a homelessness assessment – the ‘test’ for priority need group comes before the ‘test’ for intentionality therefore we cannot determine whether a homeless applicant without a priority need is intentionally homeless or not.	This proposed change has not been included in the draft Coventry Homefinder Policy put forward for recommendation to Cabinet. Applicants who have had a homelessness assessment/decision and have been found not to be statutorily homeless (not owed the main housing duty) will be placed in Band 2C.

Consultation Question	Agree	Disagree	Additional Comments	Outcome
10. Do you agree that the effective date should be used to prioritise applications in the same band	69%	27%		This proposed change has been included in the draft Coventry Homefinder Policy put forward for recommendation to Cabinet.
11. Do you agree with the proposed change to the way that statutorily homeless households are given access to Homefinder?	65%	22%		This proposed change has been included in the draft Coventry Homefinder Policy put forward for recommendation to Cabinet.
12. Do you agree with the proposed change to the way that adapted properties are let through Homefinder?	78%	8%		This proposed change has been included in the draft Coventry Homefinder Policy put forward for recommendation to Cabinet.
13. Do you agree that applicants who request medical priority should have an OT assessment?	76%	11%		This proposed change has been included in the draft Coventry Homefinder Policy put forward for recommendation to Cabinet.
14. Do you agree that this is an appropriate way to give additional priority to former members of the armed forces that also have a housing need?	71%	13%		This proposed change has been included in the draft Coventry Homefinder Policy put forward for recommendation to Cabinet.
15. Do you agree that children looked after by the authority should be awarded priority earlier so that they can be accommodated by their 18th birthday	66%	20%		This proposed change has been included in the draft Coventry Homefinder Policy put forward for recommendation to Cabinet.
16. Do you agree with the proposed change from 3 bids per week to 2 bids per week	53%	34%	There was some concern that it would be more difficult to secure a property with only 2 bids per week. Properties may also be more difficult to let on the first advert if there are fewer applicants on the shortlist.	This proposed change has not been included in the draft Coventry Homefinder Policy put forward for recommendation to Cabinet. The current policy of each applicant being able to bid (express an interest) on up to 3 properties per week has been retained.

Consultation Question	Agree	Disagree	Additional Comments	Outcome
17. Do you agree that applicants who refuse 5 offers should have their applications closed?	62%	25%	Comments included ensuring that the Policy is clear on what is/is not a 'reasonable' reason for refusing a property.	This proposed change has been included in the draft Coventry Homefinder Policy put forward for recommendation to Cabinet.
18. What are your views on the local connection criteria and proposed changes to government guidance?	<p>This was a free text box and 55 comments were received. 80% of respondents agreed that there should be some form of local connection test, 42% specifically stated that they agreed with the stricter Govt definition.</p> <p>The Coventry Homefinder online registration system allows automatic registration – once an applicant has completed the online registration form, they are immediately placed in Band 3A/3B, given a registration number and able to place bids on properties (provided they meet eligibility criteria). If an applicant then believes they should be placed in a higher band due to their housing needs, they contact the Homefinder Team directly. Introducing qualifying criteria based on local connection would require every application to be checked and verified before the applicant could be registered and start bidding. This would require additional resources (including staff) and would introduce a delay to the applicant before they were able to use the system.</p>		<p>Comments included ensuring that the Policy is clear on what is/is not a 'reasonable' reason for refusing a property.</p>	<p>There was clear direction from the Scrutiny Board and Cabinet Member that Homefinder should retain an 'open' register and not restrict people being able to make an application (apart from the statutory eligibility criteria).</p> <p>The Coventry Homefinder Policy gives lesser priority to applicants that do not have a local connection. The local connection definition in the Policy is the same as the definition used to assess local connection in a homelessness application assessment.</p> <p>No change has been proposed for the draft Coventry Homefinder Policy put forward for recommendation to Cabinet.</p>

17. Following the consultation, what additional equality issues have emerged (if any)?

These additional equality issues emerged:

- There must be sensitive and robust guidelines regarding the assessment of whether it is 'reasonable' for an applicant to refuse a property. There may be reasons related to a protected characteristic which mean that refusal of a particular property is reasonable. Each case will be considered on an individual basis.
- Suitable information must be available and monitoring must be put in place to ensure that applicants with a housing need are aware of the need to request priority banding by contacting the Coventry Homefinder Team, and are able to do so by ensuring that contact methods are accessible and that support is provided to those that require it.

18. Have any of the options, service models etc changed following consultation? If so, please provide details of the changes made:

Changes have been detailed in the table in section 16.

The biggest change that was proposed in the original options was for all properties to have their shortlists prioritised by band (giving priority to those in housing need) rather than the present situation that 25% of properties have their shortlists prioritised by registration date alone (regardless of housing need). This was a recommendation from the Task & Finish Group. Given the high demand for social housing, the high number of applicants on the register and the direction given in the statutory guidance, it was felt that allocating approx. 500-550 properties each year with no consideration of housing need, to households who were already adequately housed, was no longer justifiable.

However, during the consultation, concern was expressed by Whitefriars Housing Group that this would negatively affect their tenants that had an aspiration to move, and have been on the waiting list for years, but do not have an assessed housing need under the legislation. They would find it more difficult to move through the Homefinder system.

Following further discussions, it is now proposed that all properties advertised through Homefinder have their shortlists ordered by Band but that for up to 10% of properties advertised, the Partner Registered Provider can state that priority will be given to applicants that are current tenants of theirs.

This would ensure that the majority of properties are prioritised for those with housing need, but would also ensure that current tenants would have the chance to move between properties in their landlord's stock.

Equality Impact of Final Option

19. Please confirm below which option has been chosen for implementation.

The [draft] Coventry Homefinder Choice Based Lettings Policy 2014 has been produced and will be considered by Cabinet at their meeting on 15th April 2014. This draft contains all changes that have been made to the policy. The table at section 16 details the consultation outcomes and the options chosen to be put forward to Cabinet.

20. Following consultation, please indicate which of the following best describes the equality impact of this analysis.

- There will be no equality impact if the proposed option is implemented.
- There will be positive equality impact if the proposed option is implemented.
- There will be negative equality impact if the preferred option is implemented, but this can be objectively justified. Please state clearly what this justification is and what steps will be taken to ameliorate the negative impact.

21. How will the changes be monitored for equalities over the next 6 – 12 months?

Analysis of the Homefinder register and properties that have been advertised is carried out by the Housing Strategy Team each quarter. An annual report is also produced. This analysis includes monitoring equalities issues.

22. What is any will be the impact on the workforce following implementation of the final option? Please make reference to the relevant equality groups (as protected under the Equality Act).

There will be no impact on the workforce.

Social Value

23. Please state how the social value outcomes have been considered in making this decision.

The changes proposed to the Coventry Homefinder Policy will not involve the procurement of new goods or services. Changes will be required to the existing IT system which is provided by Abrisas Ltd.

Formal decision-making process

Please detail below the committees, boards or panels that have considered this analysis.

Name	Date	Chair	Decision taken
The Business, Economy and Enterprise Scrutiny Board (3)	19-03-14	Councillor Tony Skipper	
Cabinet	15-04-14	Councillor Ann Lucas	

Approval

Approval required from Director and Cabinet Member

Director Name	Signature	Date
Brian Walsh		14-03-2014
Cabinet Member Name	Portfolio	Approval Date
Ed Ruane	Housing & Heritage	14-03-2014

**Note: Failure to comply with duties on equalities and consultation will put the Council (and specifically the elected member or officer making the decision) at risk of judicial review.*

Monitoring and Review

This section should be completed 6-12 months after implementation

- a) Please summarise below the most up to date monitoring information for the newly implemented service, by reference to relevant protected groups.

Analysis of the Homefinder register at 31st July 2015 (12 months after full implementation of the new Homefinder Policy) shows:

Ethnic Origin:

Most of the applicants on the Homefinder register (58%) identify their ethnicity as White-British. This is below the percentage of the population of Coventry who identified themselves as White-British in the 2011 Census (67%) and is slightly lower than the baseline for this ECA (see section 9 above) of 60% as at 1st April 2013.

There has been little change in the proportions of other ethnic groups on the register, with the exceptions of the White-Other group, (which has increased from 10% to 12% of the overall register) and the Black-African group (overall proportion on the register still 10%, but as a proportion of the priority band/housing need, has increased from 12% to 14.5%).

Age:

The age profile of the Homefinder register is very similar to the baseline (Section 9) – the majority of applicants are aged between 18 and 45 (76%). Those aged over 65 are a small proportion of the register (3.7% of the total), but as previously identified, a higher proportion of these are in a priority need band (20% aged over 65 in housing need, compared to 11.8% overall)

Disability:

Disability is recorded on the Homefinder system only where the disability means that the applicant requires specially adapted accommodation. The number of applicants requiring specially adapted accommodation is still low (0.9% of the register) but of these, 75% are in a priority band due to their housing needs.

Gender:

Information on gender was not available previously, but analysis of the register on 31st July 2015 shows that the main applicant was female for 60% of households on the Homefinder register, and the main applicant was male for 40% of households.

Analysis of households that have been housed in the 12 months since the new policy was implemented on 31st July 2014:

Ethnicity:

The ethnicity profile of households that were housed during the 12 months since implementation is very similar to that of the profile of the register overall. 59% of households housed were White-British, 13% were Black-African, 10% were White-Other.

Age:

70% of households that were housed had a main applicant in the age range 18-45 years. 6% of those housed were over 65, which is higher than the proportion of the register who are over 65 (3.7%), but this reflects the fact that this group are more likely to be in housing need.

Gender:

58% of households that were housed had a main applicant who was female, 42% had a main applicant who was male.

Disability:

2.5% of people housed in the 12 months after implementation had been assessed as requiring specially adapted accommodation. This is higher than the proportion on the register (less than 1%) but reflects the fact that this group are more likely to be in a priority need band.

b) What has been the actual equality impact on service users following implementation?

Priority for all properties is now based on Band and Effective Date. The intention of this policy change was to ensure that applicants with the greatest housing need (in the highest band) who have been in housing need the longest (the earliest 'effective date') are prioritised for properties above other applicants.

71% of properties advertised in the 12 months after implementation were let to applicants in priority bands 1A, 1B, 2A, 2B and 2C (with an assessed housing need). In the 12 months before the implementation of this policy, only 58% of properties were let to applicants in the priority bands.

Applicants in the priority bands may be in any of the protected characteristic groups, but as the data in Section 9 and above shows, certain groups are more likely to be registered with Coventry Homefinder and/or are more likely to have a housing need.

The increase in the proportion of properties that are let to applicants in housing need is therefore a positive impact.

This does mean that applicants without a housing need (in Bands 3A and 3B) are less likely to successfully bid for a property. However, with the shortage of social housing in the city, the Policy intends to support those who are currently homeless or in unsuitable housing over those who are suitably housed but want to move. The Government's statutory guidance states: "we expect social homes to go to people who genuinely need them".

There have been operational issues regarding the use of Occupational Therapist assessments to better inform decisions on medical need priority. OT assessments have not been carried out in a timely manner for all applicants. This has not delayed or denied decisions on medical priority, but has meant that assessments are made based on the applicant's self-reported needs and where appropriate, evidence from GPs and other support workers. This has had a neutral impact in terms of the policy (this was the process prior to the policy implementation) and the services are working together to improve the assessments and ensure that the most appropriate course is taken (either re-housing or aids/adaptations being provided in the current home).

c) What have been the actual equality impacts on the workforce since implementation?

None.

Please send a copy of the completed form to your Directorate Corporate Equality Officer and a copy to the Corporate Equalities Team, Room 66, Council House, Earl Street, Coventry CV1 5RR.