

Equality Impact Assessment (EIA) – Part 1

Policy title and purpose (brief outline):	Regulation of Registered Social Landlords (Wales) Act 2018
Name of official:	Martin Davies & Kathryn Markey
Department:	RSL Sector Development & Regulation
Date:	5 June 2018

1. Please provide a brief description of the policy / decision.

The Regulation of Registered Social Landlords Act will introduce the necessary changes to the regulatory framework governing Registered Social Landlords (RSLs) in Wales that will allow them to be reclassified back into the Private Sector by the Office of National Statistics. The ultimate aim is to safeguard and maintain the supply of social housing in Wales.

At August 2017, RSLs in Wales provide around 141,000 affordable homes. Meeting the Welsh Government's target of 20,000 new affordable homes during the course of the current government is heavily dependent on a significant contribution by the RSL sector including the freedom to raise private sector funding to supplement social housing grant.

On 29th September 2016, the Office for National Statistics (ONS) published the outcome of its review of the statistical classification of Registered Social Landlords (RSLs) in Wales, Northern Ireland and Scotland.

As it did for English Housing Associations, the review concluded RSLs in Wales are public, market producers and are reclassified to the Public Non – Financial Corporations sub – sector for the purpose of national accounts and other ONS economic statistics. The reason for this conclusion is that RSLs are subject to public sector control, mainly through what are known as Regulatory Powers, set out in the Housing Act 1996.

Reclassification has significant financial implications for Welsh Government and the RSL sector. The classification of RSLs in Wales as Public Non-financial Corporations would increase Public Sector Net Borrowing because private sector market borrowings taken out by the newly reclassified public sector RSLs would score as a charge against Welsh Government budgets.

If RSLs remain classified as Public Non-financial Corporations, funding for housing would be competing with other Welsh Government priorities. It is likely this would result in fewer new affordable homes and limited options for the Welsh Government to maximise the positive contributions RSLs make to the communities in which they work, including significant local employment and economic benefits. It would also result in uncertainty for stakeholders, including funders who have made long term commitments to funding an independent RSL sector.

The Regulation of Registered Social Landlords (Wales) Act removes or amends the relevant regulatory controls (the indicators of Government control) which should enable the ONS reclassification decision to be reviewed and reversed.

Success will be measured in two ways: a) Royal Assent of the Regulation of Registered Social Landlords (Wales) Act 2018 and b) reclassification of RSLs by the ONS.

2. We have a legal duty to engage with people with protected characteristics under the Equality Act 2010 identified as being relevant to the policy. What steps have you taken to engage with stakeholders, both internally and externally.

Key stakeholders including RSLs, TPAS (Wales) a tenant representative body and Tai Pawb, the equalities housing organisation, have been engaged in the development of proposals for regulatory reform from the outset. A public consultation was held between 8 May and 3 July 2017. As it was technical in nature, there was no targeted engagement with members of the public.

3. Your decisions must be based on robust evidence. What evidence base have you used? Please list the source of this evidence e.g. National Survey for Wales. Do you consider the evidence to be strong, satisfactory or weak and are there any gaps in evidence?

There is strong evidence that a broad cross section of the population could potentially benefit from improved availability of decent, affordable social housing. Large sectors of the population (which include a significant number of those with protected characteristics) are at increased risk of homelessness, more likely to be affected by poverty and less likely to own their own home. Key sources of evidence consulted when considering the impact of the Regulation of Registered Social Landlords (Wales) Act are listed below.

Children and Young People up to 18

Child Poverty Strategy for Wales (Welsh Government 2015) -

<http://gov.wales/topics/people-and-communities/people/children-and-young-people/child-poverty/?lang=en> – Strong evidence

The UN Committee on the Rights of the Child, when making their recommendations in 2016, made a specific recommendation around ‘Standard of Living’ at paragraphs 69 & 70 <http://gov.wales/docs/dsjlg/publications/cyp/160727-final-concluding-observations-2016-en.pdf>

People 18-50

Monitoring poverty and social exclusion in Wales 2015 (Joseph Rowntree Foundation) <https://www.jrf.org.uk/report/monitoring-poverty-and-social-exclusion-wales-2015> - Strong evidence

Older People (50+)

Our Housing AGenda: meeting the housing aspirations of older people (2017), the Expert Group on Housing an Ageing Population (Welsh Government) <http://gov.wales/topics/housing-and-regeneration/housing-supply/expert-group-on-housing-an-ageing-population/?lang=en> – Strong Evidence

Visual Impairment

The Housing and Support Needs of Adults Aged 18-55 with Impaired Vision: a good practice guide The Housing Corporation, Thomas Pocklington Trust. Author - J Hanson - 2005) <http://pocklington-trust.org.uk/wp-content/uploads/2016/02/The-housing-and-support-needs-of-people-aged-18-55-with-sight-loss.pdf> - Strong evidence

Hearing Impairment

Hearing Matters, Action for Hearing Loss (2016)

<https://www.actiononhearingloss.org.uk/supporting-you/policy-research-and-influencing/research/hearing-matters.aspx>

Physically Disabled

Disability Poverty in Wales, Leonard Cheshire Disability (2011)

<https://www.leonardcheshire.org/about-us/publications/latest-publications-download/disability-poverty-wales>

No Place Like Home, Leonard Cheshire Disability (2014)

<https://www.leonardcheshire.org/sites/default/files/no-place-like-home-leonard-cheshire-disability.pdf> - Strong evidence

Learning Disability

Mencap - Housing Vision Statement (2016)

<https://www.mencap.org.uk/sites/default/files/2016-08/2016.126%20Housing%20vision%20statement%20copy.pdf>

– Strong Evidence

Mental Health Problems

NHS Confederation, Mental Health Network (2011) – *Housing and Mental Health*

http://www.nhsconfed.org/~media/Confederation/Files/Publications/Documents/Housing_MH_021211.pdf

Office for National Statistics, *Housing* (2011). Chris Randall/Editor: J Beaumont

<https://www.ons.gov.uk/ons/rel/social-trends-rd/social...41/housing-chapter.pdf>

Mental Ill Health in the Adult Single Homeless Population: A review of the literature (2009) Sian Rees, PHRU (Crisis)

<http://www.crisis.org.uk/data/files/publications/Mental%20health%20literature%20review.pdf> - Strong Evidence

Other Impairments

Independent Inquiry into Inequalities in Health Report (Department of Health 1998),

Sir Donald Acheson <https://www.gov.uk/government/publications/independent-inquiry-into-inequalities-in-health-report>

Male/Female

A Woman's Place in Housing, Chwarae Teg (2016) <https://www.cteg.org.uk/a-womans-place-in-housing/>

LGBT

There is little evidence available on the housing needs of older LGBT people. This was acknowledged in a report of the older LGBT Network into the specific needs of older lesbian, gay, bisexual and transgender people in Wales.

http://www.openingdoorslondon.org.uk/resources/Age_Concern_Cymru_Older_LGBT_Network_report_2009.pdf

There is strong evidence that younger LGBT people are more at risk of homelessness. Albert Kennedy Trust (*LGBT Youth Homelessness: A UK National Scoping of Cause, Prevalence, Response, and Outcome* (2014))
http://www.akt.org.uk/webtop/modules/repository/documents/AlbertKennedy_researchreport_FINALinteractive.pdf

Marriage/Civil Partnership

Valuable Lives: Capabilities and Resilience Amongst Single Homeless People (2008) Crisis <http://www.crisis.org.uk/publications-search.php?fullitem=219>

Pregnancy and Maternity

ALL BABIES COUNT: SPOTLIGHT ON HOMELESSNESS, NSPCC and the Anna Freud Centre (2015) <https://www.nspcc.org.uk/globalassets/documents/research-reports/all-babies-count-unstable-start.pdf>

Ethnic Minority People

Poverty rates among ethnic groups in Great Britain, Kenway and Palmer, Joseph Rowntree Foundation, 2007 <https://www.jrf.org.uk/report/poverty-rates-among-ethnic-groups-great-britain>

Homelessness amongst people from Black and Minority Ethnic populations in Wales (Shelter Cymru and Tai Pawb) (2014)

<http://www.eiapractice.wales.nhs.uk/dogfen/269919>

Gypsy Traveller

2011 Census analysis: What does the 2011 Census tell us about the characteristics of Gypsy or Irish travellers in England and Wales? ONS

<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/ethnicity/articles/whatdoesthe2011censustellusaboutthecharacteristicsofgypsyoririshtravellersinenglandandwales/2014-01-21>

Asylum Seekers and Refugees

Welsh Government. Refugee and Asylum Seeker Delivery Plan (2016)

<http://gov.wales/docs/ds/jlg/publications/equality/160316-refugee-asylum-seeker-delivery-plan-en.pdf>

Migrants

Migration and Housing in Wales (2014) Professor Heaven Crawley, Centre for Migration Policy Research (CMPR), Swansea University for the Wales Migration Partnership (WMP)

<http://www.wmp.org.uk/documents/wsmp/News%20and%20Events/Migration%20Briefings/Migration%20and%20Housing%20English%20Final%205th%20Aug.pdf>

Impact

4.1 Do you think this policy / decision / practice will have a positive or negative impact on people because of their age?

Certain sectors of the community: the elderly, the very young and those with chronic ill health, are more at risk from the adverse effects of insanitary or inadequate housing. (*Independent Inquiry into Inequalities in Health Report – “The Acheson Report”* (Department of Health 1998)) Acting in order to safeguard and maintain the supply of social housing therefore has a potentially greater beneficial impact on these age groups.

In respect of people of working age, potential beneficial impacts are largely aligned to the extent to which individuals possess additional protected characteristics (e.g. are disabled or members of minority BME communities).

Age	Positive	Negative	None / Negligible	Reasons for your decision (including evidence) / How might it impact?
Younger people (<i>Children and young people, up to 18</i>)	Yes			<p>The Child Poverty Strategy for Wales recognises the critical role which housing plays in supporting young people, describing how living in poor quality housing can be detrimental to children and young people’s health and wellbeing, with effects lasting into adulthood and asserting that improving the supply and quality of affordable housing will make an important contribution to reducing health and educational inequalities.</p> <p>Parents who are homeless or in temporary accommodation are less likely to be in permanent employment and therefore less likely to have a standard of living which meets their children’s needs.</p>

			<p>By safeguarding and maintaining the supply of social housing in Wales, the Act will help maximise outcomes within the articles of the UNCRC. The importance of a safe, secure, affordable home for children, young people and their families underpins many of the articles. A separate Children's Rights Impact Assessment is available.</p> <p>Chances of a lifetime: the impact of bad housing on children's lives (Shelter 2006) evidences how homeless children have lower levels of academic achievement that cannot be explained by differences in their levels of ability and how experience of multiple housing problems increases children's risk of ill-health and disability by up to 25 per cent during childhood and early adulthood. Bad housing is linked to debilitating and even fatal, illnesses and accidents amongst children.</p>
People 18- 50	Yes		<p>JRF's biennial monitor of poverty in Wales, compared with 10 years earlier indicates there are now more people of working age (particularly young adults) in poverty and fewer children and pensioners.</p> <p>High housing costs are the cause of poverty for an additional 100,000 people in Wales, with the security and quality of housing</p>



			<p>being significant for a family's long-term prospects.</p> <p>There is a longstanding shortage of homes in Wales. Private developers have not met demand so it falls to the social rented sector to meet need. Safeguarding and maintaining the supply of social housing in Wales therefore potentially has clear benefits for a significant number of people in this age group.</p>
Older people (50+)	Yes		<p>Wales has an ageing population and that, in the future, a greater percentage of our population will be over age 50.</p> <p>In their report, <i>Our Housing AGEnda: meeting the housing aspirations of older people</i> (2017), the Expert Group on Housing an Ageing Population established by the former Minister for Communities and Tackling Poverty in December 2015 welcomed the Welsh Government's commitment to delivering 20,000 additional affordable homes during this term of Government and made a strong case for ensuring that a significant proportion of these new homes are suitable for our ageing population.</p> <p>This aspiration will not be possible if the supply of social housing is not safeguarded and maintained.</p>



4.2 Because they are disabled?

Disabled people (including physically disabled, those with sensory impairments, learning disabilities, mental health problems and long term health conditions) are generally significantly less likely to own their own home and are more likely to live in rented or social housing. Acting in order to safeguard and maintain the supply of social housing can therefore be considered to have potentially beneficial impacts for this sector.

Impairment	Positive	Negative	None / Negligible	Reason for your decision (including evidence) / How might it impact?
Visual impairment	Yes			<p>The employment rate among people with impaired vision is lower than in the general population (44% as opposed to 75%). Adults with impaired vision are often disadvantaged with regard to labour market opportunities. This affects purchasing power, access to housing and need for support services.</p> <p>Visually impaired adults are less likely to own their own home than the population at large. An increased supply of affordable rented housing would be of benefit.</p> <p><i>(The Housing and Support Needs of Adults Aged 18-55 with Impaired Vision: a good practice guide The Housing Corporation, Thomas Pocklington Trust. Author - J Hanson - 2005)</i></p>
Hearing impairment	Yes			<p>There are a number of factors which could potentially make those with hearing impairments more vulnerable to the effects of poor housing and more reliant on social housing.</p>

			<p>The impact of mental health problems, poverty and unemployment are detailed elsewhere in this impact assessment. However, it is worth noting that 40% of the UK deaf population experiences mental health problems. A deaf or hard of hearing person is also more likely to be unemployed than a hearing person.</p> <p>Action for Hearing Loss, citing 2015 figures from the Office of National statistics state that 65% of Deaf people are in employment compared with 79% people with no long-term health issue or disability (<i>Hearing Matters</i>, 2016).</p>
Physically disabled	Yes		<p>Disabled people in Wales are significantly less likely to own their own home, and are over twice as likely to live in social housing (Disability Poverty in Wales, Leonard Cheshire Disability, quoting the Housing Association Disability Equality Scheme and Action Plan, 2006 – '09, Housing Association, 2006). 300,000 disabled people are on housing waiting lists across Great Britain (Leonard Cheshire Disability – <i>No Place Like Home</i>)</p>



Learning disability	Yes			<p>We are not aware of specific evidence relating to people with learning disabilities and social housing but, given that Mencap's Vision Statement for Housing states that 82% of local authorities say they have a shortage of suitable housing for adults with a learning disability and 67% say that it has become more difficult for adults with a learning disability to have their housing needs met, it could be argued that protecting the supply of social housing might potentially benefit this sector of the community.</p>
Mental health problem	Yes			<p>Poor or inadequate housing can be a major contributory factor to the development of mental health problems. In its report <i>Housing and mental health</i>, the NHS Confederation, Mental Health Network, 2011 asserted that good housing is critical for good mental health and also stated that compared with the general population, people with mental health conditions are one and a half times more likely to live in rented housing, with greater uncertainty about how long they can remain in their current home.</p>



Other impairments issues	Yes			<p>The role of housing as a key determinant of health has been well evidenced and is widely recognised. In his <i>Independent Inquiry into Inequalities in Health Report</i> (Department of Health 1998), Sir Donald Acheson recognised that Policies to reduce social inequalities and to promote social networks are part of a strategy to reduce inequalities in health. “These include, for instance, policieswhich improve the availability of social housing for families close to their social networks”.</p>
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4.3 Because of their gender (man or woman)?

Gender	Positive	Negative	None / Negligible	Reason for your decision (including evidence)/ How might it impact?
Male	Yes			No adverse impacts have been identified for the Regulation of Registered Social Landlords (Wales) Act.
Female	Yes			<p>No adverse impacts have been identified for the Regulation of Registered Social Landlords (Wales) Act Evidence received by the National Assembly for Wales Communities, Equality and Local Government Committee for their Inquiry into Poverty in Wales: Poverty and Inequality (June 2015) indicates that women are amongst a number of groups more likely to be affected by poverty. The same report, also indicates that lone parents (and the majority of lone parents are women) are also more likely to be affected by poverty.</p> <p>In Wales, women account for 54% of social housing tenants. A Woman's Place in Housing, a report by the charity Chwarae Teg (February 2016) asserts that women are more in need of social housing services for varied and complex reasons including the prevalence of women as single parents and recipients of housing benefit.</p>

4.4 Because they are transgender?

Transgender	Positive	Negative	None / Negligible	Reason for your decision (including evidence) / How might it impact?
	Yes			We are not aware of specific evidence relating to transgender but, LGBT young people are particularly at risk of homelessness. A report conducted by the Albert Kennedy Trust (LGBT Youth Homelessness: A UK National Scoping of Cause, Prevalence, Response, and Outcome) indicates that 24% of the UK's homeless youth are LGBT. Two out of three people who approach LGBT Charity Stonewall Housing for advice state that their housing problem is directly related to their sexual orientation or gender identity (Stonewall Housing).

4.5 Because of their marriage or civil partnership?

Marriage and Civil Partnership	Positive	Negative	None / Negligible	Reason for your decision (including evidence)/ How might it impact?
Marriage			None	No adverse impacts have been identified
Civil Partnership			None	No adverse impacts have been identified.

4.6 Because of their pregnancy or maternity?

Pregnancy and Maternity	Positive	Negative	None / Negligible	Reason for your decision (including evidence) / How might it impact?
Pregnancy	Yes			<p>Pregnant women are particularly vulnerable if they are living in unsuitable housing or are homeless.</p> <p><i>An unstable start: ALL BABIES COUNT: SPOTLIGHT ON HOMELESSNESS</i>, a report by the NSPCC and the Anna Freud Centre sets out how maternal mental and physical health during pregnancy are crucially important for babies' later wellbeing and development. It also describes how homelessness and temporary accommodation during pregnancy are associated with an increased risk of preterm birth, low birth weight, poor mental health in infants and children, and developmental delay.</p>
Maternity (the period after birth)	Yes			<p><i>An unstable start: ALL BABIES COUNT: SPOTLIGHT ON HOMELESSNESS</i>, a report by the NSPCC and the Anna Freud Centre also sets out how babies living in homeless families can be extremely vulnerable because their development is reliant on the quality of the care their parents are able to provide and for some parents who are homeless, providing this care can be difficult.</p>

4.7 Because of their race?

Race	Positive	Negative	None / Negligible	Reason for your decision (including evidence) / How might it impact?
Ethnic minority people e.g. Asian, Black,	Yes			<p>Poverty is a major factor affecting the need for social housing and is also more likely to affect certain sectors of the community such as disabled people and BME communities.</p> <p>The connection between ethnicity, poverty and exclusion has been well established in UK research literature (Poverty rates among ethnic groups in Great Britain, Kenway and Palmer, Joseph Rowntree Foundation, 2007). Higher poverty rates amongst BME populations increase their demand for social rented housing. BME groups are overrepresented in social sector housing.</p> <p>Homelessness amongst people from BME populations in Wales (Shelter Cymru and Tai Pawb) also indicates that BME people are overrepresented both in homelessness statistics and in Shelter Cymru advice caseloads, suggesting that non-white ethnic groups are facing disproportionate housing and homelessness issues in Wales compared to their White Welsh counterparts.</p>

National Origin (e.g. Welsh, English)			Yes	The Act has the potential to impact positively on people of any nationality who are eligible to be social housing tenants.
Asylum Seeker and Refugees	Yes			Welsh Government's Refugee and Asylum Seeker Delivery Plan (2016) states that Local Authorities should ensure the housing and support needs of refugees are catered for in their Local Housing Strategies and their Local and Regional Supporting People Commissioning Plans Thus, for those asylum seekers and refugees eligible for social housing, safeguarding the supply has clear potential benefits.
Gypsies and Travellers	Yes			More than 60 per cent of gypsies or Irish Travellers said they lived in a house or bungalow, according to an analysis of the 2011 England and Wales Census. They were more than twice as likely to live in social housing than the overall population of England and Wales (41 per cent compared to 16 per cent) and less likely to own their accommodation outright (21 per cent compared to 26 per cent) <i>2011 Census analysis: What does the 2011 Census tell us about the characteristics of Gypsy or Irish travellers in England and Wales?</i>

				The Act therefore has the potential to impact positively on those members of the Gypsy Traveller community who choose/need to be social housing tenants.
Migrants	Yes			<p>A large number of migrants have restricted or no access to social housing. However, for those who are eligible, studies by the Joseph Rowntree Foundation indicate that compared with the UK-born population, migrants are less likely to be home-owners, more likely to be renters and equally likely to be in social housing.</p> <p>For those migrants who are eligible for social housing, the Act has a potentially beneficial impact by safeguarding and maintaining the supply of social housing.</p>
Others			Yes	The Regulation of Registered Social Landlords (Wales) Act has the potential to impact positively on anyone eligible to be social housing tenants.



4.8 Because of their religion and belief or non-belief?

Religion and belief or non – belief	Positive	Negative	None / Negligible	Reason for your decision (including evidence)/ How might it impact?
<p>Different religious groups including Muslims, Jews, Christians, Sikhs, Buddhists, Hindus, Others (please specify)</p> <p>Belief e.g. Humanists</p> <p>Non-belief</p>			Yes	<p>No adverse impacts have been identified for the Regulation of Registered Social Landlords (Wales) Act the objective of which is Safeguarding and maintaining the supply of social housing. The extent to which the Act will benefit individuals in of different religious groups will largely depend on whether they also fall into other criteria which have been demonstrated to have greater reliance on social housing e.g. are disabled, belong to a BME community or are experiencing poverty.</p>

4.9 Because of their sexual orientation?

Sexual Orientation	Positive	Negative	None / Negligible	Reason for your decision (including evidence)/ How might it impact?
Gay men Lesbians Bi-Sexual	Yes			LGBT young people are also particularly at risk of homelessness. A report conducted by the Albert Kennedy Trust (LGBT Youth Homelessness: A UK National Scoping of Cause, Prevalence, Response, and Outcome) indicates that 24% of the UK's homeless youth are LGBT. Two out of three people who approach LGBT Charity Stonewall Housing for advice state that their housing problem is directly related to their sexual orientation or gender identity (Stonewall Housing).

4.10 Do you think that this policy will have a positive or negative impact on people's human rights?

Human Rights	Positive	Negative	None / Negligible	Reason for your decision (including evidence) / How might it impact?
Human Rights including Human Rights Act and UN Conventions	Yes			Although the right to housing is not a fundamental human right, it significantly underpins a number of Articles set out in the Human Rights Act 1998 including: <ul style="list-style-type: none"> • Article 8: The right to respect for private and family life and correspondence • Article 11: Freedom of assembly and association • Article 12: The right to marry and found a family

			<ul style="list-style-type: none">• Protocol 1 Article 1: The right to peaceful enjoyment of possessions. <p>Safeguarding and protecting the supply of can therefore be regarded as having a potentially positive impact on human rights.</p> <p>The positive impact of the Act's provisions on the UNCRC have already been described in detail at section 4.1, page 7 of this impact assessment document.</p>
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Equality Impact Assessment – Part 2

1. Building on the evidence you gathered and considered in Part 1, please consider the following:

1.1 How could, or does, the policy help advance/promote equality of opportunity?

The evidence gathered in support of this equality impact assessment indicates that a significant number of protected groups are more likely to be affected by poverty, at greater risk of homelessness, more likely to be social housing tenants and less likely to own their own home. Safeguarding and maintaining the supply of social housing (the objective of the Regulation of Registered Social Landlords (Wales) Act will have a beneficial impact on any individual who is likely to be eligible for social housing.

The Regulation of Registered Social Landlords (Wales) Act will support the delivery of Welsh Government's target of 20,000 affordable new homes. As such, it is completely aligned to Objective 7 of the Strategic Equality Plan 2016 – 2020

- *Reduce poverty, mitigate the impacts of poverty and improve living conditions for those groups most at risk of living in low income households, particularly disabled people, lone parents, certain ethnic minority groups, and families with disabled children.*

Ensuring everyone has a home which is in good condition and affordable is regarded by Welsh Government as a fundamental of a fair and supportive society. It has underpinned a significant proportion of our efforts to tackle poverty and address disadvantage (see, for example, Building Resilient Communities: Taking forward the Tackling Poverty Action Plan – Annual Report 2015).

The Child Poverty Strategy for Wales (Welsh Government 2015) is explicit in its assertion “If we can improve the supply and quality of affordable housing, we not only help prevent homelessness, we make an important contribution to reducing health and educational inequalities”.

Chances of a lifetime: the impact of bad housing on children's lives (Shelter 2006) evidences how homeless children have lower levels of academic achievement that cannot be explained by differences in their levels of ability and how experience of multiple housing problems increases children's risk of ill-health and disability by up to 2.5 per cent during childhood and early adulthood. Bad housing is linked to debilitating and even fatal, illnesses and accidents amongst children.

It also argues that the lower educational attainment and health problems associated with bad housing in childhood impact on opportunities in adulthood. Long-term health problems and low educational attainment increase the likelihood of unemployment or working in low-paid jobs. Opportunities for leisure and recreation are undermined by low income and health problems. The behavioural problems associated with bad housing in childhood can manifest themselves in later offending behaviour. In one study, nearly half of young people who had offended had experienced homelessness.

The role of housing as a key determinant of health has been well evidenced and is widely recognised. In his Independent Inquiry into Inequalities in Health Report (Department of Health 1998), Sir Donald Acheson recognised that policies to reduce social inequalities and to promote social networks are part of a strategy to reduce inequalities in health. “These include, for instance, policieswhich improve the availability of social housing for families close to their social networks”.

1.2 How could / does the policy / decision help to eliminate unlawful discrimination, harassment or victimisation?

It is worth noting that RSLs are subject to the Equalities Act 2010 and are required to act in accordance with the Community Housing Cymru Code of Practice. RSL Boards must demonstrate leadership and commitment to equality and diversity as outlined in equalities legislation through all the functions of their organisations.

Although the Act itself has not been conceived with the intention of eliminating discrimination, harassment or victimisation, it will, in effect support RSLs to increase the supply of decent homes which are available to be allocated fairly.

1.3 How could/does the policy impact on advancing / promoting good relations and wider community cohesion?

Getting On Together - a Community Cohesion Strategy for Wales (Welsh Government 2009) described how poor housing provision can be one of the most significant contributors to the development of community tensions, resulting in low levels of cohesion. As the demand for good quality affordable housing remains high community tensions can develop as people see themselves competing for the limited number of available houses.

Although a refreshed National Community Cohesion Delivery Plan 2016-17 was published in March 2016, to continue to strengthen, mainstream and sustain both local and regional community cohesion approaches across 7 outcome areas, the key messages of *Getting on Together* still hold true.

By safeguarding the supply of social housing and ensuring fair allocation, the Act has clear potential to advance good relations and wider community cohesion.

2. Strengthening the policy

2.1 If the policy is likely to have a negative effect ('adverse impact') on any of the protected groups or good relations, what are the reasons for this?

No adverse impact has been identified.

2.2 If no action is to be taken to remove or mitigate negative / adverse impact, please justify why.

No adverse impact has been identified.

3. Monitoring, evaluating and reviewing

How will you monitor the impact and effectiveness of the policy?

List details of any follow-up work that will be undertaken in relation to the policy (e.g. consultations, specific monitoring etc).

It is anticipated that the Act will enable ONS to re-classify registered social landlords in Wales, returning them to the private sector for the purposes of national accounting.

Beyond this, there will be no further follow up action.

4. Declaration

The policy has a significant impact upon equality issues

Official completing the EIA
Name:
Martin Davies & Kathryn Markey
Department:
Education and Public Services Group
Date:
5 June 2018
Head of Division (Sign-off)
Name:
Ian Williams
Job title and department:
Deputy Director, Housing and Regeneration
Date:
5 June 2018
Review Date:
No review is planned.