



Localism Bill: abolition of the Tenant Services
Authority and transfer of its regulatory functions
Equalities impact assessment



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DCLG Full Equality Impact Assessment: abolition of the Tenant Services Authority and transfer of its regulatory functions

(Before you complete an EqlA please read the guidance notes)

1. Which group(s) of people has been identified as being disadvantaged by your proposals? What are the equality impacts?

The proposal to abolish the Tenant Services Authority and transfer its regulatory operations into the Homes and Communities Agency will impact all Tenant Services Authority staff. Even without the proposal to merge operations into the Homes and Communities Agency the Tenant Services Authority would have needed to restructure due to changes in the regulatory remit resulting from the review of social housing regulation and in response to the outcome of the comprehensive spending review. Equality impacts are being monitored from a base date of 30 September 2010 when there were 222 staff.

While it is anticipated that the organisation will reduce by at least 25 per cent - 30 per cent in headcount, this reduction is not solely due to the abolition of the Tenant Services Authority. The absolute size of the organisation that transfers to the Homes and Communities Agency on 31 March 2012 will be subject to further work with the Homes and Communities Agency, the receiving organisation, and staff consultation.

Using baseline data of 30 September 2010 the Tenant Services Authority's staff included the following percentages for each monitored diversity strand:

Female	130 staff	59%
Male	92 staff	41%
BAME	38 staff	17%
Disability	14 staff	6%
LGBT	13 staff	6%

Age profile:

18 – 24	1	0.5%
25 – 34	39	18%
35 – 44	76	34%
45 - 54	77	34%
55 – 64	28	13%
65 +	1	0.5%

Contractual Home-workers	41 staff	18%
Part time staff	19 staff	9%

There is some concern that the Homes and Communities Agency does not have contractual home-workers and that this would potentially disadvantage the home-working group (this group is 71 per cent female, 7 per cent disabled staff and 10 per cent black, Asian and minority ethnic staff). This will be subject to further discussions with the Homes and Communities Agency during the transition period.

We would anticipate that staff groups may reduce across the board in proportion to the overall staff reductions therefore we do not expect disproportionate impacts on any particular group however will monitor this at key stages.

2. **In brief, what changes are you planning to make to your current or proposed new or changed policy, strategy, procedure, project or service to minimise or eliminate the adverse equality impacts? Please provide further details of the proposed actions, timetable for making the changes and the person(s) responsible for making the changes on the resultant Action Plan.**

The change process is being planned in three phases;

Phase 1, Sept 2010 to March 2011, restructuring of Corporate Services. The purpose is to restructure corporate service functions to align with new organisational priorities, cease certain activities and reduce support costs. This will result in a reduction of 22 posts.

Phase 2, December 2010 to June 2011, restructuring of regulation. The purpose is to restructure the regulatory functions to align to new government priorities and policy changes and to prepare a fit for purpose regulatory organisation to transfer into the Homes and Communities Agency. It is anticipated this will result in a reduction of 32 posts.

Phase 3, 2011 – April 2012 (exact dates to be confirmed), transition to the Homes and Communities Agency. This phase is not yet planned in detail but will address areas of potential overlap or duplication in the transition of the Tenant Services Authority into the Homes and Communities Agency.

For each phase and at key stages of each phase we will monitor the impact on each diversity strand. We have already monitored staff put at risk of redundancy in Phases 1 and 2 and no significant adverse impact on any particular group is apparent. We will undertake further monitoring as the change progresses in order to respond to any risks of disproportionate impacts.

Under our Redeployment Policy we are committed to mitigating the need for compulsory redundancy therefore we will seek to make the staff reductions through natural wastage and voluntary redundancy where possible.

- 3. Please provide details of whom you will consult on the proposed changes and if you do not plan to consult, please provide the rationale behind that decision. Please note that you are required to involve disabled people in decisions that impact on them**

As the changes involve putting staff at risk of redundancy formal consultation will take place with staff representatives including the recognised unions, elected representatives for senior staff, the Tenant Services Authority Staff Forum as well as individual consultation meetings with affected staff.

We regularly meet with FRESH, (Forum for Representation of Ethnic Staff in Housing) to review progress and discuss monitoring data.

The Tenant Services Authority Diversity Working Group, which is chaired by the Chief Executive and consists of a range of staff representing various diverse interests will also be involved in reviewing the process.

DCLG and Homes and Communities Agency management will be consulted throughout the process.

- 4. Can the adverse impacts you identified during the initial screening be justified without making any adjustments to the existing or new policy, strategy, procedure, project or service? Please set out the basis on which you justify making no adjustments.**

We do not anticipate any disproportionate impacts on any group. However job reductions will obviously impact a significant number of staff generally and we are providing support and assistance with internal counselling, training in CV preparation, interviewing skills, and personal change management. We are encouraging staff to use 1:1 consultation meetings and the development support services to raise any issues that may be specific to them so we can respond as necessary. We will also pick up any group issues through this and general consultation procedures.

- 5. You are legally required to monitor and review the proposed changes after implementation to check they work as planned and to screen for unexpected equality impacts.**

Please provide details of how you will monitor/evaluate or review your proposals and when the review will take place.

We will undertake a monitoring exercise, assessing data on the impact of changes on each diversity strand, at each key stage of each phase, and undertake final assessments as follows; Phase 1 in April 2011, Phase 2 in July 2011 and Phase 3 after April 2012 (after April 2012 the responsibility being with the Homes and Communities Agency).

6. **The Full Equality Impact Assessment Form should be signed off by one of the following: a Deputy Director, Director or Director General.**

Name of Person Signing Off the Full Equality Impact Assessment: **Kevin Williamson**

Role: **Deputy Director**

Date: **January 2011**

Note: Equality Impact Assessments should be published with detailed publication arrangements agreed with the Directorate of Communication. In most cases this will be as part of a broader impact assessment or consultation exercise which will ensure the requisite clearance from the relevant Minister.

A copy of the Full Equality Impact Assessment Form should be retained by the originator for audit purposes.

Full Equality Impact Assessment - Action Plan

Actions taken or proposed	Rationale for the Action	Beneficiaries of the Action	Timing	Responsibility
Changes made: Changes that have been made to policy as a result of the Equality Impact Assessment.				
None				
Mitigation: For areas where a policy may have a differential impact on certain groups, what arrangements are in place or proposed to mitigate these effects?				
No differential impact anticipated, monitoring will keep this under review.	Monitoring will assess impacts during the process.	Identification of differential impacts	On going to April 2012	Tenant Services Authority HR
Review the case for taking positive action as allowed by the 2010 Equalities Act from April 2011	To address under representation in senior roles	May increase under represented groups	Post April 2011	Tenant Services Authority Executive
Justification: For areas where a policy may impact negatively (but not illegally) on certain groups but mitigation is not possible (e.g. an overriding societal driver) there needs to be a strategy for handling issues of unfairness.				
Not applicable				

Actions taken or proposed	Rationale for the Action	Beneficiaries of the Action	Timing	Responsibility
Opportunities: Please state actions designed to maximise positive effects, i.e. opportunities identified for: promoting equality, good relations or knowledge about groups; increasing civic & democratic participation; or addressing inequalities.				
Tenant Services Authority Diversity Action Plan being developed and monitored	To maintain focus on diversity through the period of change	Actions to advance diversity continue	To April 2012	Tenant Services Authority Executive
Monitor: how will you monitor the impact and effectiveness of the new policy?				
Regular analysis of staff diversity data and impacts of change.	To highlight areas where action may be needed	Ensure the change process does not have disproportionate impact on any group	See section 5 above	Tenant Services Authority HR
Publish: give details of how the results of the Equalities Impact Assessment will be published.				
Full Equality Impact Assessment to be published on the DCLG website.	In the interests of transparency.	Members of the public, local authorities, external partners, MPs and other interested parties.	January 2011 (alongside 2 nd Reading of the Localism Bill).	DCLG

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