



**Hyndburn Borough Council**  
**Customer First Analysis**

**What is it for?**

Our corporate values include putting the customer first, providing opportunities for bright futures and narrowing inequality across the Borough.

From 1 April 2011, a new legal duty applies to all public authorities. It covers these protected characteristics:

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- gender;
- sexual orientation; and, for some aspects,
- marriage and civil partnerships.

The duty means that – as previously - we should analyse the effect of existing and new policies and practices on equality. It does not specify how we should do this. However, legal cases on the meaning of the previous general equality duties make it clear that we must carry out the analysis **before making the relevant policy decision**, and include consideration as to whether we can reduce any detrimental impact.

The framework overleaf – our Customer First Analysis - is suggested when making a written record of the analysis. This replaces Equality Impact Assessments.

The Analysis should be **proportionate** to the policy decision being taken. In some cases the written record will be a quick set of bullet points or notes under each heading, to deal with any questions which are relevant (or briefly explain why if they aren't). Others will need to be much more detailed. A meaningful Analysis will help the Council make the best decision or formulate a policy which best meets our customers' needs.

Please return completed Customer First Analyses to Human Resources. I can guide you through the process if this would be helpful.

If you have any suggestions for improving this process, please let me know.

Kirsten Burnett  
Head of HR

## Customer First Analysis – House in Multiple Occupation (HMO) Policy

### 1. Purpose

- What are you trying to achieve with the policy / service / function?  
To ensure that:  
HMO licensing includes increased regulation of the private rented sector which should improve property condition and management standards through a cost recovery regime  
  
Who defines and manages it?  
HBC – Environmental Health.
- Who do you intend to benefit from it and how?  
Residents of Hyndburn in rented accommodation affected by poorly maintained and managed properties by enforcing the provisions contained in Housing legislation including the new provisions contained in the Housing & Planning Act 2016.
- What could prevent people from getting the most out of the policy / service / function?  
Insufficient officer capacity to enforce the provision contained in the legislation.
- How will you get your customers involved in the analysis and how will you tell people about it?  
Raise awareness e.g. informing elected members,, agency forums, internal working groups, website information & during normal day to day enforcement activities.

### 2. Evidence

- How will you know if the policy delivers its intended outcome / benefits?  
Reduction in related service requests received by the department and increased levels of satisfaction by our service users.
- How satisfied are your customers and how do you know?  
It's too early to tell.
- What existing data do you have on the people that use the service and the wider population?  
No equality data currently available. Information on the wider population comes from census data and this report analyses aspects of the latest data, in 2011:  
[http://www.hyndburnbc.gov.uk/downloads/Social\\_Economic\\_Housing\\_Intelligence\\_Report\\_2012.pdf](http://www.hyndburnbc.gov.uk/downloads/Social_Economic_Housing_Intelligence_Report_2012.pdf)
- Are you using partners, stakeholders, and councillors to get information and feedback?  
Yes.

### 3. Impact

- Are some people benefiting more – or less - than others? If so, why might this be?  
It is too early to tell but the impact of the changes will be reviewed internally.

### 4. Actions

- If the evidence suggests that the policy / service / function benefits a particular group – or disadvantages another - is there a justifiable reason for this and if so, what is it?  
No. The changes should not benefit or disadvantage any group.

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- Is it discriminatory in any way?  
There is no evidence to suggest it will be. The changes are intended to benefit residents by helping to ensure better quality housing provision.
- Is there a possible impact in relationships or perceptions between different parts of the community?  
This isn't envisaged but if the evidences suggests otherwise then it will be reviewed.
- What measures can you put in place to reduce disadvantages?  
Provision of clear information and ensure awareness raising applies to all sections of the community
- Do you need to consult further?  
No.
- Have you identified any potential improvements to customer service?  
Yes – informing members and service users of the powers available and the circumstances in which they can be used.
- Who should you tell about the outcomes of this analysis?  
Members and general public
- Have you built the actions into your Business Plan with a clear timescale?  
N/A
- When will this assessment need to be repeated?  
When the policy is reviewed.

**Name: Phil Stacey**  
**Service Area: Environmental Health Housing Standards**

**Signed:**   
**Dated: 09 November 2022**

**If applicable, please attach copy of – or website link to - the cabinet report for reference.**

**Don't forget to return your written record to HR.**