

As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality, diversity, cohesion and integration. In all appropriate instances we will need to carry out an equality, diversity, cohesion and integration impact assessment.

This form:

- can be used to prompt discussion when carrying out your impact assessment
- should be completed either during the assessment process or following completion of the assessment
- should include a brief explanation where a section is not applicable

Directorate: Environment and Housing	Service area: Housing Management
Lead person: Kath Bramall	Contact number: 0113 224 3296
Date of the equality, diversity, cohesion and integration impact assessment: 23 June 2014	

1. Title: Local Lettings Policy for new build homes in the Beeston Hill and Holbeck Regeneration Area
Is this a:
<input type="checkbox"/> Strategy /Policy <input type="checkbox"/> Service / Function <input type="checkbox"/> Other
If other, please specify

2. Members of the assessment team:

Name	Organisation	Role on assessment team e.g. service user, manager of service, specialist
Kath Bramall	Leeds City Council	Housing Tenure Manager

3. Summary of strategy, policy, service or function that was assessed:
<p>This report outlines the framework for the Local Lettings Policy developed for the new build council homes in the Holbeck area.</p> <p>The development will consist of 76 properties, available to rent from September 2014. The breakdown is as follows:</p> <p>12 x 2 bedroom flats 19 x 2 bedroom houses 33 x 3 bedroom houses</p>

9 x 4 bedroom houses
 2 x 5 bedroom houses

The Local Lettings Policy has been developed to create sustainable communities and rewarding existing council tenants within the regeneration areas.

4. Scope of the equality, diversity, cohesion and integration impact assessment
 (complete - 4a. if you are assessing a strategy, policy or plan and 4b. if you are assessing a service, function or event)

4a. Strategy, policy or plan
 (please tick the appropriate box below)

The vision and themes, objectives or outcomes	<input type="checkbox"/>
The vision and themes, objectives or outcomes and the supporting guidance	<input type="checkbox"/>
A specific section within the strategy, policy or plan	<input type="checkbox"/>

Please provide detail:
 The Local Lettings Policy for Holbeck properties at Coupland Place, Coupland Road, Folly Lane, Malvern Road and St Luke's Green.

4b. Service, function, event
 please tick the appropriate box below

The whole service (including service provision and employment)	<input type="checkbox"/>
A specific part of the service (including service provision or employment or a specific section of the service)	<input type="checkbox"/>
Procuring of a service (by contract or grant)	<input type="checkbox"/>

Please provide detail:

5. Fact finding – what do we already know
 Make a note here of all information you will be using to carry out this assessment. This could include: previous consultation, involvement, research, results from perception surveys, equality monitoring and customer/ staff feedback.
 (priority should be given to equality, diversity, cohesion and integration related information)

- information held on the Leeds Homes Register on demand for housing in the Beeston Hill and Holbeck area
- consultation responses by equality groups

Are there any gaps in equality and diversity information
Please provide detail:

Action required:

6. Wider involvement – have you involved groups of people who are most likely to be affected or interested

Yes

No

Please provide detail:

The council has consulted with local Ward members and the local community in developing the proposals for the local lettings policy. This included a mailshot being set to local residents and customers on the waiting list and a local community event. People who responded to the consultation were asked to provide information about their background.

Action required:

7. Who may be affected by this activity?

please tick all relevant and significant equality characteristics, stakeholders and barriers that apply to your strategy, policy, service or function

Equality characteristics

Age

Carers

Disability

Gender reassignment

Race

Religion
or Belief

Sex (male or female)

Sexual orientation

Other

(for example – marriage and civil partnership, pregnancy and maternity, social class, income, unemployment, residential location or family background, education or skills level)

Please specify:

People who are unable to meet the criteria for all the preference categories:

- people who are not currently council tenants

- people with no local connection to the two Ward areas
- people without an excellent tenancy record, including vulnerable customers with unmet support needs
- people who do not fall into any of the other preference groups.

Stakeholders

- | | | |
|---|------------------------------------|---------------------------------------|
| <input type="checkbox"/> Services users | <input type="checkbox"/> Employees | <input type="checkbox"/> Trade Unions |
| <input type="checkbox"/> Partners | <input type="checkbox"/> Members | <input type="checkbox"/> Suppliers |
| <input type="checkbox"/> Other please specify | | |

Potential barriers.

- | | |
|--|--|
| <input type="checkbox"/> Built environment | <input type="checkbox"/> Location of premises and services |
| <input type="checkbox"/> Information and communication | <input type="checkbox"/> Customer care |
| <input type="checkbox"/> Timing | <input type="checkbox"/> Stereotypes and assumptions |
| <input type="checkbox"/> Cost | <input type="checkbox"/> Consultation and involvement |
| <input type="checkbox"/> specific barriers to the strategy, policy, services or function | |

Please specify

- The demand for the new properties is likely to outstrip the supply, meaning the council's local lettings policy will determine which households are offered accommodation.
- The properties will be advertised through the Leeds Homes choice based letting system, and some customers may have face barriers accessing information about the properties.

8. Positive and negative impact

Think about what you are assessing (scope), the fact finding information, the potential positive and negative impact on equality characteristics, stakeholders and the effect of the barriers

8a. Positive impact:

The LLP gives preference to council tenants living in the area who can demonstrate an excellent tenancy record. This will contribute towards community cohesion and integration by rewarding local tenants who have kept to the terms of their tenancy agreement and community responsibilities of paying their rent, not engaging in any acts of antisocial

behaviour or nuisance, and maintaining the condition of their property and environment, including their garden area.

The LLP gives preference to customers with a local connection. This will benefit people living or working in the area, or with close family living in the area and will contribute towards community cohesion and integration.

The LLP gives preference to tenants and residents who have a good tenancy record, taking into account any rent arrears, the condition of the property and any antisocial behaviour. This will make the development sustainable and contribute towards community cohesion and integration.

The LLP gives preference to customers in employment or people undertaking recognised vocation for a key worker profession. This will assist working households to access affordable housing, and support the local economy.

The LLP gives preference to overcrowded households, who are more likely to come from BME communities. Additionally these customers may free up social housing if they are moving from another council or housing association property, which will be available to let to other customers on the housing waiting list.

The LLP gives preference to households with dependent children who are living in high rise /multi story flats. This will help increase tenant satisfaction with their accommodation and environment.

The LLP gives preference to disabled people who need accessible ground floor accommodation, and where a property can be adapted reasonably and practicably to meet their needs

The LLP gives preference to members and former members of HM Armed Forces which will benefit a group who face barriers in accessible appropriate accommodation, and can have difficulty in establishing a local connection due to their service.

Action required:

- Leeds City Council to monitor lettings outcomes

8b. Negative impact:

The LLP gives preference to council tenants with an excellent tenancy record. This will disadvantage council tenants who have not met their responsibilities under their tenancy agreement as well as other customers who are not council tenants.

The LLP gives preference to customers with a local connection which disadvantages customers with and urgent housing need and no local connection to the area.

The LLP gives preference to customers with a good tenancy record which may disadvantage customers who have accrued arrears or committed anti-social behaviour due to unmet support needs.

The LLP gives preference to customers in work, which disadvantages customers who can't

work due to disability or caring responsibilities.

The LLP gives preference to overcrowded customers, which will disadvantage customers with an urgent housing need who are currently living in a property which meets their needs in terms of size or who are under occupied.

Giving preference to households with dependent children who are living in high rise /multi story flats may result in increased transfers from council accommodation, with associated void costs. In addition, customers in other property types may be disadvantaged.

Giving preference to disabled people who need an accessible or adapted home may disadvantage other customer groups.

Giving preference to members and former members of HM Armed Forces may disadvantage other customer groups.

Action required:

Giving preference to council tenants with an excellent tenancy record will release properties to let for other customers on the housing waiting list. By conducting checks on the tenancy conduct prior to giving permission to transfer, the council will minimise costs of repairs and void works.

The local connection definition is wide enough to encompass residence, employment, family and other reasons. To mitigate any adverse equality impacts, the council has the discretion to waive the local connection requirement in exceptional circumstances where undue hardship would otherwise result.

In exceptional circumstances, customers with minor tenancy breaches who have demonstrated a change in behaviour to be exempted from the requirement for an excellent tenancy record. In addition, the council will also consider whether the breach has arisen because the customer required a support package.

Customers with a disability or caring responsibilities who are unable to work to be exempted from the requirement to be working.

In exceptional circumstances, customers in urgent housing need for a reason other than being overcrowded or in medical need will be considered.

9. Will this activity promote strong and positive relationships between the groups/communities identified?

Yes

No

Please provide detail:

Under the LLP, council tenants and other customers will have to demonstrate a good tenancy record and a local connection to the area. This will contribute towards community cohesion and sustainable tenancies, increase tenant satisfaction, reduce turnover and help create a balanced community.

Action required:

The council will monitor the outcome of lettings.

10. Does this activity bring groups/communities into increased contact with each other? (e.g. in schools, neighbourhood, workplace)

Yes

No

Please provide detail: See point 9 above.

Action required:

11. Could this activity be perceived as benefiting one group at the expense of another? (e.g. where your activity/decision is aimed at adults could it have an impact on children and young people)

Yes

No

Please provide detail:

The demand for the new properties is likely to outstrip the supply, meaning the council's local lettings policy will determine which households are offered accommodation. Customers who do not receive preference may perceive the LLP to be unfair.

Action required:

The council wishes to overcome the perception that the current lettings policy is unfair to tenants who have been on the housing register for a long time who feel they have little hope of being rehoused ahead of other customers in housing need. Giving preference to local council tenants with an excellent tenancy record will be viewed as a fair way to allocate the new build properties. This will contribute towards community cohesion and sustainable tenancies, increase tenant satisfaction, reduce turnover and help create a balanced community.

This approach will have the benefit of releasing additional council properties for rent, which will be relet to other customers on the housing waiting list.

The local connection definition is wide enough to encompass residence, employment, family and other reasons. To mitigate any adverse equality impacts, the council has the discretion to waive the local connection requirement in exceptional circumstances where undue hardship would otherwise result.

In exceptional circumstances, customers with minor tenancy breaches who have demonstrated a change in behaviour to be exempted from the requirement for an excellent tenancy record. In addition, the council will also consider whether the breach has arisen because the customer required a support package.

Customers with a disability or caring responsibilities who are unable to work to be exempted from the requirement to be working.

In exceptional circumstances, customers in urgent housing need for a reason other than being overcrowded or in medical need will be considered.

LCC to ensure that new properties are publicised and that the property adverts in the Leeds Homes website and flyer include clear details about the LLP criteria.

12. Equality, diversity, cohesion and integration action plan

(insert all your actions from your assessment here, set timescales, measures and identify a lead person for each action)

Action	Timescale	Measure	Lead person
Leeds City Council to monitor lettings outcomes	By March 2015	Project Team to review outcome of first lettings	Mike Camponi, Leeds Homes
To mitigate any adverse equality impacts, the council has the discretion to waive the local connection requirement in exceptional circumstances where undue hardship would otherwise result.	As properties are offered	LCC to consider whether exemptions apply to customers in the order they appear on the shortlist	South Lettings Team
In exceptional circumstances, customers with minor tenancy breaches who have demonstrated a change in behaviour to be exempted from the requirement for an excellent tenancy record. In addition, the council will also consider whether the breach has arisen because the customer required a support package.	As properties are offered	LCC to consider whether exemptions apply to customers in the order they appear on the shortlist	South Lettings Team
Customers with a disability or caring responsibilities who are unable to work to be exempted	As properties are offered	LCC to consider whether exemptions apply to customers in the order they appear on the	South Lettings Team

Action	Timescale	Measure	Lead person
from the requirement to be working.		shortlist	
In exceptional circumstances, customers in urgent housing need for a reason other than being overcrowded or in medical need will be considered.	As properties are offered	LCC to consider whether exemptions apply to customers in the order they appear on the shortlist	South Lettings Team
LCC to ensure that new properties are publicised and that the property adverts in the Leeds Homes website and flyer include clear details about the LLP criteria.	From June 2014		LCC Comms Team, South Lettings Team and Leeds Homes Team

13. Governance, ownership and approval

State here who has approved the actions and outcomes from the equality, diversity, cohesion and integration impact assessment

Name	Job Title	Date
Kath Bramall	Housing Tenure Manager	6 June 2014

14. Monitoring progress for equality, diversity, cohesion and integration actions (please tick)

- As part of Service Planning performance monitoring
- As part of Project monitoring
- Update report will be agreed and provided to the appropriate board
Please specify which board
- Other (please specify)

15. Publishing

This Equality, Diversity, Cohesion and Integration impact assessment will act as evidence that due regard to equality and diversity has been given.

If this impact assessment relates to a **Key Delegated Decision, Executive Board, full Council** or a **Significant Operational Decision** a copy should be emailed to Corporate Governance and will be published along with the relevant report.

A copy of **all other** Equality and Diversity, Cohesion and Integration impact assessment's should be sent to equalityteam@leeds.gov.uk. For record keeping purposes it will be kept on file (but not published).

Date impact assessment completed**23 June 2014**

If relates to a Key Decision – **date sent to Corporate Governance**

Any other decision – **date sent to Equality Team (equalityteam@leeds.gov.uk)**