

## Appendix 2

### Equality, Diversity, Cohesion and Integration Impact Assessment



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

<b>Directorate: Environment and Neighbourhoods</b>	<b>Service area: Housing Partnerships</b>
<b>Lead person: Mike Camponi</b>	<b>Contact number: 0113 3781069</b>
<b>Date of the equality, diversity, cohesion and integration impact assessment:</b> 4 <sup>th</sup> November 2014	

<b>1. Title:</b> Accent development LLP for the properties on Middleton Park Grove Middleton, Leeds.
Is this a:
<input checked="" type="checkbox"/> <b>Strategy /Policy</b> <input type="checkbox"/> <b>Service / Function</b> <input type="checkbox"/> <b>Other</b>
<b>If other, please specify</b>

#### 2. Members of the assessment team:

<b>Name</b>	<b>Organisation</b>	<b>Role on assessment team e.g. service user, manager of service, specialist</b>
Mike Camponi	Leeds Homes	Homes Business Manager
Gemma Haynes	Leeds Homes	Neighbourhood Services Officer
Jon Place	Accent	Housing Manager
Kathleen Thompson	Accent	Housing Officer

**3. Summary of strategy, policy, service or function that was assessed:**

This report outlines the framework for the Local Lettings Plan which will be applied to the development at Middleton Park Grove, Middleton, Leeds managed by Accent.

The development will consist of 12 properties, which will all be made available for affordable rent. The breakdown is as follows:

3 x 2BH  
9 X 3BH

The objective of the Local Lettings Plan is to assist in creating a better mix of communities, reduce tenancy turnover and associated business costs such as voids and reletting, free up family accommodation in the local area and reduce under occupancy and overcrowding in the area.

**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 checked="" type="checkbox"/>

**Please provide detail:**

The Local Lettings Plan, Appendix 1, for Middleton Park Grove, Middleton, Leeds.

**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"/>
<b>Please provide detail:</b>	

<p><b>5. Fact finding – what do we already know</b></p> <p>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.</p> <p>(priority should be given to equality, diversity, cohesion and integration related information)</p> <ul style="list-style-type: none"> <li>• Monitoring of lettings e.g. profile of members of the Leeds Homes Register by equality groups, lettings outcomes, data on overcrowded households</li> <li>• Allocation of accommodation: guidance for local housing authorities in England, Department for Communities and Local Government, updated 31 December 2013 – this guidance assists local authorities to take advantage of the provisions in the Localism Act 2011 and make use of the existing flexibilities within the allocation legislation.</li> <li>• Demand for Social Housing in Leeds, June 2007, Outside Research and Development, page 168.</li> <li>• Social housing allocation and immigrant communities, Migration, Equalities and Citizenship Team, ippr, Equality and Human Rights Commission, Spring 2009.</li> <li>• National research on satisfaction with lettings undertaken in 2009: Attitudes to housing, Findings from Ipsos MORI Public Affairs Monitor Omnibus Survey (England), Department for Communities and Local Government, July 2009.</li> <li>• Localism Act 2011, investment in community cohesion and delivery of local priorities</li> <li>• Equality Act 2010 and amendment 2012 impact of age restricted lettings policies</li> <li>• Welfare Reform Act 2012, impact of housing benefit entitlement to people under occupying their homes</li> </ul>
<p><b>Are there any gaps in equality and diversity information</b></p> <p><b>Please provide detail:</b></p> <p>Information on equality held on the Leeds Homes Register is not 100% complete, for example, there are around 5% of applications where the ethnicity of the main applicant is not recorded. However, this number has decreased following the introduction of an enhanced application registration system which makes this a mandatory field.</p>
<p><b>Action required:</b></p> <p>Monitor the number of applications registered without equality information, escalate with the registered provider and Leeds Housing Options if required.</p>

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

Yes

No

**Please provide detail:**

This EIA has been reviewed due to the feedback received following an earlier development in Middleton and following feedback of the lettings from local elected members on behalf of customers.

**Action required:**

Further lettings to give greater regard to the needs of disabled customers and those in urgent housing need.

**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 with no local connection to Middleton Park ward
- people without an excellent tenancy record, including vulnerable customers with unmet support needs
- people who are not currently underoccupying or overcrowded in a social rented property, including those with other urgent housing needs.

**Stakeholders**

Services users

Employees

Trade Unions

Partners

Members

Suppliers

Other please specify

**Potential barriers.**

Built environment

Location of premises and services

Information and communication

Customer care

Timing

Stereotypes and assumptions

Cost

Consultation and involvement

specific barriers to the strategy, policy, services or function

**Please specify**

- Demand for social housing outstrips supply. Preference categories favour some customers over others, which may create the perception that the policy is unfair.
- The properties are advertised through the choice based letting system, which may not make sufficient information about preference categories and exceptions readily available to customers, particularly those that have trouble engaging with CBL.
- The number of preference categories may be confusing for customers, particularly those with vulnerabilities.

**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 customers with a local connection. This will benefit people living, working or with family in the area and will contribute towards community cohesion and integration.

The LLP gives preference to underoccupying customers. These are more likely to be older customers. Additionally these customers will be freeing up a family-sized social rented property locally, which could benefit younger households.

The LLP gives preference to overcrowded customers. These customers are more likely to come from BME communities. Additionally these customers will be freeing up a home which may benefit customers who need to downsize due to the effects of welfare reform.

The LLP gives preference to customers with an excellent tenancy record. This will make the development sustainable and contribute towards community cohesion and integration.

The LLP gives preference to customers in employment/training. This will create opportunities for affordable rented homes for customers on low income or studying in the local area, who may not otherwise of been able to afford a property.

**Action required:**

- Accent will be required to monitor lettings made under the LLP by BME group and age, and benchmark with lettings made to comparable Accent properties with no LLP.
- Leeds City Council to monitor lettings to customers in housing need through the nominations agreement.

**8b. Negative impact:**

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 underoccupying and 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.

The LLP gives preference to customers with an excellent 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 or training, which disadvantages customers who can't work due to disability or caring responsibilities.

**Action required:**

In exceptional circumstances, customers with a disability to be exempted from the LLP if appropriate and as agreed by Accent and LCC.

In exceptional circumstances, customers with an urgent housing need to be exempted from the requirement to be overcrowded or underoccupying.

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.

Where support needs are identified through the application process, referrals to support agencies to be made.

In exceptional circumstances, customers with a disability or caring responsibilities who are unable to work to be exempted from the requirement to be working.

Customers with no local connection to the area will be disadvantaged as they are unlikely to be let a property. However, council properties that are released as a result of a let to an underoccupying customer will not require a local connection, where they are advertised through the housing need quota. The local connection definition is wide enough to encompass residence, employment, family and other reasons. To mitigate any adverse equality impacts, the registered provider will have the discretion to waive the local connection requirement in exceptional circumstances where undue hardship would otherwise result.

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

Yes

No

**Please provide detail:**

Under the LLP, 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:**

Accent to make lettings in accordance with the LLP.

**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:**

Accent to make lettings in accordance with the LLP.

**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:**

Demand for social housing outstrips supply. Customers who do not receive preference under the LLP; those without a local connection, those not underoccupying and those without a good tenancy record may perceive the LLP to be unfair.

**Action required:**

Accent and LCC to ensure that appropriate publicity explains the reasoning behind the LLP and that all housing options are explained.



**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)

<b>Action</b>	<b>Timescale</b>	<b>Measure</b>	<b>Lead person</b>

**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

**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](mailto:equalityteam@leeds.gov.uk). For record keeping purposes it will be kept on file (but not published).

**Date impact assessment completed**

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

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