

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

Directorate: Environments & Housing	Service area: Lettings & Tenancy Mgmt
Lead person: Gemma Haynes	Contact number: 07712 216964
Date of the equality, diversity, cohesion and integration impact assessment: April – June 2016	

1. Title:
Is this a:
<input checked="" 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
Gemma Haynes	Leeds City Council	Housing Policy Manager
Tommy Nolan	Salvation Army HA	Housing Services Manager
Sebastian Draper	Salvation Army HA	Housing Officer
Jenny Coop	Leeds City Council	Neighbourhood Services Officer – Equality & Diversity

3. Summary of strategy, policy, service or function that was assessed:
New Local Lettings Plan (LLP) for the development at Copper Beech Avenue, Bramley managed by Salvation Army HA.

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:	

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)

- Monitoring of lettings e.g. profile of members of the Leeds Homes Register by equality groups, lettings outcomes, data on overcrowded households
- 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.
- Demand for Social Housing in Leeds, June 2007, Outside Research and Development, page 168.
- Social housing allocation and immigrant communities, Migration, Equalities and Citizenship Team, ippr, Equality and Human Rights Commission, Spring 2009.
- 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.
- Localism Act 2011, investment in community cohesion and delivery of local priorities
- Equality Act 2010 and amendment 2012 impact of age restricted lettings policies Welfare Reform Act 2012, impact

Are there any gaps in equality and diversity information

Please provide detail:

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.

Action required:

Monitor the number of applications registered without equality information, escalate with the registered provider and Leeds Housing Options if required.

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

Yes

No

Please provide detail:

Salvation Army HA held an open day in March 2016 attended by local residents and Ward Members to get ideas on the types of criterion to use in the Local Lettings Plan along with ideas for future community activities and events.

Action required:

None.

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

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> Age | <input checked="" type="checkbox"/> Carers | <input checked="" type="checkbox"/> Disability |
| <input checked="" type="checkbox"/> Gender reassignment | <input checked="" type="checkbox"/> Race | <input checked="" type="checkbox"/> Religion or Belief |
| <input checked="" type="checkbox"/> Sex (male or female) | <input checked="" type="checkbox"/> Sexual orientation | |
| <input type="checkbox"/> 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:

Stakeholders

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Services users | <input type="checkbox"/> Employees | <input type="checkbox"/> Trade Unions |
| <input checked="" type="checkbox"/> Partners | <input checked="" 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 checked="" 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 |



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:

Anyone can bid for properties which will be advertised through Choice Based Lettings and therefore any of the characteristics listed may be affected by success or failure of being allocated a property.

Age - 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 with dependant children.

Disability– In circumstances where a property has been identified as being suitable for a customer with disabilities the criteria of the LLP can be waived so as not to pose a barrier.

Carers – In circumstances where a customer is a Carer and therefore unable to work, this element of the LLP can be waived.

Gender reassignment– The LLP will be applied in the same way for customers with gender reassignment and we do not consider there to be any direct implications.

Race - The LLP will be applied in the same way for customers of all races and we do not consider there to be any direct implications. The LLP gives preference to overcrowded customers. Evidence would suggest that 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.

Religion or belief - The LLP will be applied in the same way for customers of all religions and beliefs and we do not consider there to be any direct implications.

Sex (male or female) - The LLP will be applied in the same way for customers both male and female we do not consider there to be any direct implications.

Sexual orientation The LLP will be applied in the same way for customers of all sexual orientation's and we do not consider there to be any direct implications

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 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. This will create opportunities for affordable rented homes for customers on low income in the local area, who may not otherwise of been able to afford a property. The definition of employment means current **employment** or confirmed offer of employment. The employment can be part-time but not casual. Self-employment and people on zero hours contracts also counts.

The LLP gives preference to members or former members of the HM armed forces in return for the important contribution they make to our Country.

Action required:

Salvation Army HA will be required to monitor lettings made under the LLP by BME group and age, and benchmark with lettings made to comparable Salvation Army HA properties with no LLP.

Leeds City Council to monitor lettings to customers in housing need through the nominations agreement.

8b. Negative impact:

Age - The LLP gives preference to underoccupying customers. These are more likely to be older customers however this negative impact is balanced as preference is also given to overcrowded customers which are more likely to be younger households with dependent children.

Gender reassignment – The LLP will be applied in the same way for customers with gender reassignment we do not consider there to be any direct implications.

Race - The LLP will be applied in the same way for customers of all races and we do not consider there to be any direct implications.

Religion or belief - The LLP will be applied in the same way for customers of all religions and beliefs we do not consider there to be any direct implications.

Sex (male or female) - The LLP will be applied in the same way for customers both male and female and we do not consider there to be any direct implications. However we will look specifically at the needs of single parents and economic groups and specifically the impact on female parent applicants who are unable to meet the criteria.

Sexual orientation The LLP will be applied in the same way for customers of all sexual orientation's and will we do not consider there to be any direct implications.

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, 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 Salvation Army HA 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. Single parents who have caring responsibilities to dependant children who are not able to work may also be exempted. The definition of employment would be current employment or confirmed offer of employment. The employment can be part-time but not casual. Self-employment and people on zero hours contracts also counts.

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:

Salvation Army HA 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:

Salvation Army 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 under occupying or overcrowded, those who are not members or former members of the armed forces, those not in employment and those without a good tenancy record may perceive the LLP to be unfair. However, in exceptional circumstances customers with a disability, an urgent housing need, with caring responsibilities, unable to work or other special circumstances may be exempted from the requirements of the LLP where this may be seen to cause discrimination. This would be in agreement with LCC and Salvation Army HA.

Action required:

Salvation Army HA 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)

Action	Timescale	Measure	Lead person
Monitor the number of applications registered without equality information, escalate with the registered provider and Leeds Housing Options if required.	Ongoing	Increase in number of applicants with equality information recorded.	Mike Camponi
Salvation Army HA will be required to monitor lettings made under the LLP by BME group and age, and benchmark with lettings made to comparable Salvation Army HA properties with no LLP.	Ongoing	Benchmark Copper Beech Avenue development allocations with other comparable Salvation Army HA properties.	Tommy Nolan
Leeds City Council to monitor lettings to customers in housing need through the nominations agreement.	Ongoing	Nominations performance	Beenash Mohay
In exceptional circumstances, customers with a disability to be exempted from the LLP if appropriate and as agreed by Salvation Army HA and LCC.	Ongoing	Shortlist results and property demand.	Tommy Nolan/Beenash Mohay
In exceptional circumstances, customers with an urgent housing need to be exempted from the requirement to be overcrowded or underoccupying.	Ongoing	Shortlist results and property demand.	Tommy Nolan/Beenash Mohay
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.	Ongoing	Shortlist results and property demand.	Tommy Nolan/Beenash Mohay
In exceptional circumstances, customers with a disability or caring responsibilities who are	Ongoing	Shortlist results and property demand.	Tommy Nolan/Beenash Mohay

unable to work to be exempted from the requirement to be working. Single parents who have caring responsibilities to dependant children who are not able to work may also be exempted.			
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.	Ongoing	Shortlist results and property demand.	Tommy Nolan/Beenash Mohay/Local Housing Office
Salvation Army HA to make lettings in accordance with the LLP.	Ongoing	Property advertisement criteria and nominations performance	Beenash Mohay
Salvation Army HA and LCC to ensure that appropriate publicity explains the reasoning behind the LLP and that all housing options are explained.	Ongoing	Clear description in property advertisement	Tommy Nolan/Beenash Mohay

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
Jenny Coop	Neighbourhood Services officer	08/06/2016

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	08/06/2016
If relates to a Key Decision – date sent to Corporate Governance	
Any other decision – date sent to Equality Team (equalityteam@leeds.gov.uk)	