

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 Housing</b>	<b>Service area: Housing Management</b>
<b>Lead person:</b> Kath Bramall	<b>Contact number:</b> 07712 216961
<b>Date of the equality, diversity, cohesion and integration impact assessment:</b> 26/6/17	

**1. Title:** Broadleas Letting Policy, Bramley

Is this a:

**Strategy /Policy**
                         
  **Service / Function**
                         
  **Other**

**If other, please specify**

**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>
Kath Bramall	Leeds City Council	Housing Manager

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

This report outlines the framework for the Local Lettings Policy developed for the new 2 bed houses in the Broadleas Street development in Bramley, LS13.

The properties will be available to rent from Autumn/winter 2017.

The Local Lettings Policy has been developed in line with the council's framework for letting new build homes which aim to create mixed communities, reward good behaviour and waiting time and meet housing need in the local area.

This approach is supported by the Localism Act 2011 and the Code of Guidance on Allocations, 2012 which states the policy objectives behind the changes in the Act included making *'it easier for existing social tenants to move by removing the constraints of Part 6 from those social tenants who apply to the housing authority for a transfer, unless they have reasonable preference. Housing authorities will be able to strike a balance between*

*meeting the needs of existing tenants and new applicants for social housing, while making best use of their stock' (paragraph 2.1).*

**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 checked="" 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"/>
<b>Please provide detail:</b> The Local Lettings Policy for 24 properties on Broadlea Street, Bramley	

**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>	

**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 Bramley
- consultation responses by equality groups

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

**Action required:**  
Some equality information is missing from the Orchard Housing system, mainly on older applications registered before we introduced questions on equality issues.

**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 sent to local residents and customers on the waiting list, survey questionnaire being handed over at the local housing office. People who responded to the consultation were asked to provide information about their background.

**Action required:**  
A summary of the consultation responses is included as an Appendix to the delegated decision to approve the local lettings policy.

**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 checked="" 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:**  
People who are unable to meet the criteria for all the preference categories:

- people with no local connection to the Bramley and Stanningley Ward area or to the LS13 post code
- 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 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 checked="" type="checkbox"/> Consultation and involvement |
| <input checked="" 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 new build properties are likely to be perceived as more desirable than existing council stock in the area, and applicants who are not offered a new home may be dissatisfied with the local lettings policy, although the number of new build homes is small compared to the overall number of council homes we normally let in the area. In addition the new build homes will be let at a higher rent than other council houses in the area.
- 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 customers with a local connection to the Bramley and Stanningley ward or the LS13 post code. This will benefit people living or working in the area, or with close family living in the area or who can establish a connection with the area in another way, and will contribute towards community cohesion and integration.

The LLP gives preference to tenants and residents with 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. This will create additional voids by freeing up other council homes when existing tenants transfer. By including the good tenancy record which takes account of the condition of the property the council aims to keep void costs and void times to a minimum, meaning the homes that are freed up will be reallocated to other applicants on the housing register as quickly as possible, including other households in housing need.

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 register.

The LLP gives preference to households with dependent children who live in flats. This will help increase tenant satisfaction with their accommodation and environment and provide the opportunity for households with children to move to a house with its own garden. The LLP may assist households on the housing register have an urgent need to move because of a child being in need where they meet the conditions of the LLP, including have a good tenancy record.

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 who can have difficulty in establishing a local connection due to their service.

The houses will be allocated in accordance with the council's main lettings policy, namely to applicants on the housing register who have primary care of dependent children, or with an assessed medical need for a house as opposed to any other property type. The council will aim to let the houses at full occupation based on the bedroom standard set out in the main lettings policy. Prior to any offer being made the council will undertake affordability checks to ensure prospective tenants are able to afford the rent to avoid and issues arising at a later stage.

**Action required:**

- Leeds City Council to monitor lettings outcomes
- Properties to be advertised with details of the Affordable Rent and applicants to be advised if they are not able to afford the rent following affordability checks

**8b. Negative impact:**

The LLP gives preference to customers with a local connection which disadvantages customers with and urgent housing need who have 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 overcrowded customers and under occupying tenants, 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 households with dependent children who live in flats, which will disadvantage customers with an urgent housing need who don't have dependent children or those who are currently living in a house or who can't meet the LLP criteria in full, for example, due to a tenancy breach.

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

Giving preference to households with primary care of dependent children may disadvantage other household groups, including all-adult households.

**Action required:**

The local connection definition is wide enough to encompass residence, employment, family and other reasons. The definition of residence includes previous periods of residence within the last 5 years, so someone who had to move away from the area recently for example due to being threatened with violence would still be able to establish a connection provided they had lived in the ward or postcode area for 3 of the last 5 years or 6 of the last 12 months. 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.

The council will normally look at tenancy record over the last 5 years. 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 or if there are any other exceptional circumstances that may justify overlooking a tenancy breach.

If a household is in housing need due to having a child in need, and they are not able to meet the strict criteria of the LLP (for example, in terms of tenancy record), the council will consider their application on a case by case basis when working through the shortlist.

In exceptional circumstances, customers who top the shortlist who are in urgent housing need for reasons other than those listed in the local lettings policy may be considered on a case by case basis.

Advertise the houses as being for households with primary care of dependent children. Households made up of all-adults should be advised to apply for other property types such as flats.

**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:**

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:** Post handover Housing Leeds will contact the new tenants and residents to promote the local tenant and residents group.

**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 and the new build homes are likely to be perceived as being more desirable than the council's existing stock, 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 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.

In exceptional circumstances, customers in urgent housing need for a reason other than being overcrowded 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 January 2018	Project Team to review outcome of first lettings	Lettings and Tenancy Management Team
To mitigate any adverse equality impacts, the council has the discretion to waive the <b>local connection requirement</b> to the ward or postcode area in exceptional circumstances where undue hardship would otherwise result.	At shortlisting stage	LCC to consider whether exemptions apply to customers in the order they appear on the shortlist	Inner West Lettings Team
In exceptional circumstances, customers with minor tenancy breaches who have demonstrated a change in behaviour to be exempted from the <b>requirement for an excellent tenancy record</b> . In addition, the council will also consider whether the breach has arisen because the customer required a support package or if there are any other exceptional circumstances that may justify overlooking a tenancy breach.	At shortlisting stage	LCC to consider whether exemptions apply to customers in the order they appear on the shortlist	Inner West Lettings Team
If a household is in housing need due to having a <b>child in need</b> , and they are not able to meet the strict criteria of the LLP (for example, in terms of tenancy record), the council will consider their application on a case by case basis when working through the shortlist.	At shortlisting stage	LCC to consider whether exemptions apply to customers in the order they appear on the shortlist	Inner West Lettings Team
In exceptional circumstances, customers who top the shortlist who are in <b>urgent</b>	At shortlisting stage	LCC to consider whether exemptions apply to customers in the order they	LCC Comms Team, Inner West Lettings Team and Leeds



<p><b>housing need for reasons other than those listed in the local lettings policy</b> will be considered on a case by case basis when working through the shortlist.</p>		appear on the shortlist	Homes Team
<p>Properties to be advertised with details of the Affordable Rent and applicants to be advised if they are not able to afford the rent following <b>affordability checks</b>.</p>	At shortlisting stage	Information included in property adverts and affordability checks completed with prospective tenants prior to offer	Leeds Homes Team / Inner West Lettings Team
<p>Advertise the houses as being for <b>households with primary care of dependent children</b>. Households made up of all-adults should be advised to apply for other property types such as flats.</p>	At advertising stage	Information included in property adverts	Leeds Homes Team
<p>Post-handover Housing Leeds will contact the new tenants and residents to promote the local tenant and residents group.</p>	At viewing / sign up once properties allocated to new tenants	Engagement with new tenants	Tenant and Community Involvement Team / Bramley Housing Office
<p>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</p>	At advertising stage	Information included in property adverts	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 Manager	26/6/2017

**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).

<b>Date impact assessment completed</b>	26/6/2017
If relates to a Key Decision – <b>date sent to Corporate Governance</b>	
Any other decision – <b>date sent to Equality Team (equalityteam@leeds.gov.uk)</b>	