

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: Resources and Housing | Service area: Lettings and Tenancy Management |
| Lead person: Kathryn Bramall | Contact number: |
| Date of the equality, diversity, cohesion and integration impact assessment: | |

| |
|--|
| 1. Title: Lettings Policy Review 2017 |
| 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 |
|-----------------|---------------------|--|
| Kathryn Bramall | Leeds City Council | Housing Manager |
| Catriona Purdy | Leeds City Council | Housing Manager |
| | | |

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|---|
| 3. Summary of strategy, policy, service or function that was assessed: |
| All housing authorities must publish an allocations policy in accordance with the Housing Act 1996, as amended. |
| The lettings policy sets out how offers of council accommodation are made, how the housing register is operated and which groups of customers are given preference for lettings of accommodation. It applies to the letting of all Leeds City Council properties. |
| The lettings policy is being reviewed to develop the concept of a new social contract with |

tenants to promote successful and sustainable communities, provide a framework for the review of local lettings policies across the city. It also proposes changes required to support the implementation of a new ICT system for housing applications and property allocations.

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)

- Equality monitoring information and profiling data of customers on the Leeds Homes Register

- Equality monitoring information of customers who have been rehoused by Leeds City Council
- Data on tenants likely to be affected by welfare reform
- Customer consultation undertaken on the proposed changes, including the equality profile of the respondents
- Consultation on the proposed changes with other stakeholders
- Leeds City Council Executive Board report on effective housing management and the lettings framework, February 2016
- Leeds City Council's Tenancy Strategy and Policy
- Ward profiling information
- Department of Communities and Local Government's Code of Guidance - Allocation of accommodation: Guidance for local housing authorities in England. This statutory guidance on social housing allocations for local authorities in England aims to assist them to take advantage of the provisions in the Localism Act 2011. It also encourages authorities to make use of the existing flexibilities within the allocation legislation to ensure that social homes go to people who need and deserve them the most, such as hard working families and members of the Armed Forces.

Are there any gaps in equality and diversity information

Please provide detail:

Some equality information on the Leeds Homes register is incomplete. This is more common in earlier applications. This has been addressed by the introduction of an enhanced application registration system in which equality information is mandatory.

Action required:

Ensure equality information is mandatory on the new housing ICT solution.
Equality information to be collected at the point of lettings for applications without this.

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

Yes

No

Please provide detail:

In February 2016, the council's Executive Board authorised the Lettings and Tenancy Management Team to consult on the proposed changes to the lettings policy.

The council wanted to obtain feedback from members of the public, particularly those seeking social housing in Leeds. This was done through an online survey which was advertised on the council's Leeds Homes website, paper copies of the survey available in the Leeds Homes Flyer, One Stop Centres and sheltered schemes. Customers could respond to the survey online, by post or email.

This was followed by further consultation with Community Committees, local tenant and resident groups, statutory and voluntary sector partners and individual tenants and residents.

Key stakeholders such as RSLs and support providers were invited to give their views through the online survey.

The consultation asked for feedback on the following proposals:

- Introduction of a tenant transfer policy to give greater preference to and reward existing council tenants who have successfully held a tenancy as part of our commitment to the social contract and enabling the council to make better use of its housing stock.
- Use of local connection preference in outer lying areas of the city with low turnover of council stock, high demand and affordability issues
- Conducting home visits to prospective applicants prior to making an offer
- New approach to community lettings policies to replace local lettings policies, with improved links to wider tenancy management issues, including pre-tenancy training.

Other changes that were not part of the consultation are:

- Policy on children at height – this was covered in a separate report to Executive Board in October 2016
- Changes relating to the new Leeds Homes website and ICT systems

Action required:

The results of the consultation to be taken into account in making recommendations to the council's Executive Board, and a summary of the response to be included in Appendix 1 of the report.

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

(**Other** can include – marriage and civil partnership, pregnancy and maternity, and those areas that impact on or relate to equality: tackling poverty and improving health and well-being)

Please specify:

Low income households, vulnerable customers

Stakeholders

Services users

Employees

Trade Unions

Partners

Members

Suppliers

Other please specify: Current council tenants and customers on the Leeds Homes Register

Potential barriers.

Built environment

Location of premises and services

Information and communication

Customer care

Timing

Stereotypes and assumptions

Cost

Consultation and involvement

Financial exclusion

Employment and training

specific barriers to the strategy, policy, services or function

Please specify

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:

Tenant transfer policy

- This will have a positive impact on current tenants who have a good tenancy record, including those who have been registered for a move for a long time and those in housing need
- It will encourage good behaviour which may increase income and reduce anti-social behaviour contributing to sustainable communities.
- Residents in areas where there are council tenancies may benefit from a reduction in anti-social behaviour and sustainable communities.
- This will advantage council tenants with a local connection to the area in which they want to live.

Home visits

- This may advantage older tenants who are more likely to be able to demonstrate a history of sustaining successful tenancies.
- This will advantage applicants who have a good tenancy record and have maintained their property to a good standard.

- This will encourage applicants to maintain their property to a good standard which may improve neighbourhoods and contribute to sustainable communities.
- This will mean tenants and applicants who haven't kept to their tenancy agreement may not be able to move to another council tenancy until they address the issue
- Home visits may help tenants who have unidentified support needs, as officers can make a referral for support.

Pre tenancy training

- Older tenants may perceive that they are advantaged by this policy as they will not normally have to undergo additional training to be eligible for the offer of a home.
- Prospective tenants and applicants age 16 and 17 years who complete the training will have more knowledge about how to manage a tenancy, which may result in sustainable tenancies with lower arrears and less intervention needed from Housing Leeds.
- This may have a positive effect on sustainable neighbourhoods if the pre tenancy training equips prospective tenants to manage their tenancies well and in a way that does not have a negative effect on their neighbours.
- This may also have a positive effect on other tenants and residents and improve confidence in the lettings process. If housing officers have to devote less time to enforcement action, this will free up time to improve the service to other tenants.
- This may help tenants who have unidentified support needs, as officers can make a referral for ongoing support.

Local connection for high demand family houses

- This will advantage tenants and applicants who currently live, work, have immediate family or have children who go to school in the area in which they wish to be rehoused.
- This is likely to advantage White British applicants over other ethnicities, as applicants from other ethnicities are less likely to live, and therefore have a local connection, to outer areas where there is very low turnover of stock and a high demand for family homes.
- This will advantage households with dependent children over other applicants, as this will apply to larger family homes and the lettings policy gives preference to households with dependent children for these property types, including where children attend local schools.
- This will advantage disabled applicants who have a housing recommendation for a house

Age restrictions

- The proposal to develop new lettings policies for blocks designated as retirement living will advantage older applicants over the age of 55 years.
- The harmonisation of age related local lettings policies to 3 bands will advantage applicants who meet the specified ages where overall the age preferences in operation reduce
- The development of alternative local lettings policies to replace existing age preferences will advantage younger people who will not be restricted on the basis of age. There will be knock on benefits for some areas, as large numbers of young people who maybe inexperienced in managing their own tenancy will not be as concentrated in one area, and issues associated with this such as noise nuisance may be reduced.
- The proposal to develop new lettings policies which use the tenancy record of an

applicant (including home visits) to replace an age related local lettings policy will advantage tenants who have paid their rent and not committed anti-social behaviour. This will also advantage other tenants, as the neighbourhoods may be more sustainable with less ASB and the housing officers may have resourced freed up to improve the service to other tenants.

- The proposal to develop new lettings policies which offer preference to tenants under occupying in their current home will benefit tenants in larger properties who have spare bedrooms. It will also benefit low income households who are subject to a reduction in their benefit due to having a spare bedroom. Additionally, lettings to under occupiers will release a larger home which will benefit other applicants who may be over crowded or in another type of housing need.

Children at height

- Family friendly blocks will advantage families with dependent children (including pregnancy/maternity) who are waiting to be rehoused in a house or choose to live in a high rise block, as the block will be 'family friendly'. Checks will be carried out on other prospective tenants to ensure that they have not committed some types of crimes, flats will be suitable in terms of dangers to children such as open balconies and there will be links to Children's Services to make sure support is in place where needed.
- Some minority ethnic groups may be advantaged, as there are some groups who are more likely to be satisfied with high rise living with dependent children. In these cases, their home environment will be safer and more suitable for family living as a result of the investment in the block.
- Blocks where dependent children are not allowed will advantage households who need an extra bedroom for part time access to a child and households without dependent children who need more than one bedroom, who will be rehoused ahead of households with dependent children.
- Blocks where dependent children and part time access cases are not allowed will advantage households without dependent children who need more than one bedroom, who will be rehoused ahead of households with dependent children or part time access.

Qualification criteria decision

- Positive impact of lowering QC threshold will be to pick up on applicants with lower rent arrears to enable us to arrange interventions and support such as a repayment agreement while the debt is more manageable, and in all cases Housing Leeds will consider the applicant's individual circumstances at the time the arrears accrued or when the unacceptable behaviour took place and at the time the housing application is made.

Creating a new Band D

- Positive impact of creating a new Band D for customers without a local connection, who are not eligible for council housing and for homeowners with no assessed housing need will be to increase the chances of rehousing for other customer groups, based on their connection and contribution to the city of Leeds and financial resources available to them. Where a home owner is in housing need their needs will be assessed under the lettings policy for a priority award. It will help keep the housing register manageable and prioritise applications from these groups.

Fast track properties

- Fast track properties will be advertised for a shorter time with the aim of re-letting

them within a day as soon as a suitable bidder has been identified. The justification is to ensure they are allocated as soon as possible to reduce void times. They will have been through one advertising cycle prior to being advertised as a fast track property.

Bidding through Leeds Homes

- The new system will have an option for automated bids to be placed on matching suitable properties, ie in the area and the size / type of property the customer is assessed as needing. This will help applicants who are unable to access the internet easily or who otherwise are unable to place bids

Action required:

Develop clear criteria and procedures on the lettings policy proposals, including guidance to staff on how to ensure any potential negative impacts can be mitigated, by taking a case by case approach where undue hardship would result from a lettings decision.

When developing or reviewing local lettings policies, ensure decisions are evidence based and carry out further consultation with local tenants, residents and members before changes are introduced in individual blocks and areas.

Pick up equality issues in development and implementation of ICT system

8b. Negative impact:

Tenant transfer policy

- This will disadvantage applicants who aren't council tenants, as council tenants will be given preference for council homes in this quota. However, this will be mitigated as there will be a council home release by every letting under this quota.
- This policy will disadvantage certain groups who do not match the current LCC tenant profile. An analysis of which customer groups would be likely to benefit found that female tenants, White British tenants, tenants age 55+, tenants in housing need benefited and tenants who had been waiting for rehousing for less than a year would be advantaged over other groups, however, this was based on rerunning a series of property shortlists and conducting a desktop assessment to identify the customer who is likely to have topped the shortlist.
- This will disadvantage tenants with rent arrears or a history of anti-social behaviour. This will be mitigated as, although they will be subject to the normal tenancy checks, the enhanced checks will not apply to homes advertised in other quotas (with the exemption of some homes with a behaviour related local lettings policy). Any issues will also be picked up at an early stage and can be addressed eg through support referrals or arranging a repayment plan
- This will disadvantage tenants who do not have a local connection to the area they want to live in, such as those estranged from their family. However, the local connection criteria will be wide and exceptional cases can be considered under 'other special reason' where undue hardship would otherwise arise.
- This may disadvantage applicants in a high priority, as a proportion of the lets will go to tenants based on waiting time on the housing register. However, the council will reduce the number of properties let under the date of registration quota, and the overall number of homes let based on the waiting time of the applicant will be reduced from 25% to 15%

Home visits

- This policy will be neutral in terms of carers, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion/belief, sex and sexual orientation.
- Young people may be disadvantaged under this policy as they are less likely to be able to demonstrate a history of maintaining a tenancy successfully and therefore likely to be seen as a higher risk and more likely to receive a home visit. However, cases can be considered on an individual basis and support needs can be addressed if appropriate. It will also help pick up on issues at an early stage. Additionally, pre tenancy training may be available to assist the young person in qualifying for an offer of a new home.
- This will disadvantage applicants who have been unable to maintain their property, which may be due to disability or circumstances outside their control, for example the responsibility of the landlord. However, exceptional circumstances will be considered on a case by case basis.
- Applicants in high housing need may wait for longer to be rehoused if they haven't maintained their existing property. However, for applicants in Band A or B, the officer can decide on an appropriate course of action
- Vulnerable applicants who do not have support in place may be disadvantaged if this is the reason that they have failed the tenancy checks.

Pre tenancy training

- This policy is neutral in terms of gender reassignment, marriage/civil partnership, race, religion/belief, sex, sexual orientation.
- Young people under the age of 18 may perceive that they are disadvantaged by this policy, as they will have to undergo an additional process in order to qualify for an offer of a new home. However, this can be justified as a necessary prerequisite to maintaining a successful tenancy, and exceptional circumstances can be considered on a case by case basis.
- Equally, prospective tenants who do not have access to pre-tenancy training, and those aged 18 years and over may perceive themselves to be at a disadvantage as they will not be able to access the benefits of having the training. However, there are resource implications associated with this and the council is targeting its resources at the highest risk areas, for example, applicants in other age groups who have a failed tenancy record. Attending tenancy training will offer these customer groups a positive way back into housing instead of being found non-qualifying or having reduced preference applied to their application.
- Applicants who are carers will be disadvantaged if they are unable to attend the training due to caring commitments. However, exceptional circumstances can be considered on a case by case basis and other means of offering support may be available.
- Applicants who are unable to attend the training due to pregnancy/maternity will be disadvantaged. However, exceptional circumstances can be considered on a case by case basis, and other means of offering support may be available.
- Prospective tenants of blocks who do not complete their tenancy training will be at a disadvantage, as they may have to wait longer for rehousing. However, exceptional circumstances will be considered on a case by case basis.
- Young people aged under 18 will be disadvantaged as they will not be able to access high rise accommodation, and may wait longer to be rehoused. However, there are other low rise homes in the city that are more suitable for younger tenants, and this can be justified as a proportionate means of achieving the legitimate aim of younger tenants having successful and sustainable tenancies, and assisting tenancy management in high rise blocks.

Local connection for high demand family houses

- This policy will be neutral in terms of age, carers, gender reassignment, marriage/civil partnership, pregnancy/maternity, religion/belief, sex, sexual orientation.
- Applicants with a disability may be disadvantaged if they do not have a local connection as they may wait longer for a suitable property
- Applicants from minority ethnic communities may be disadvantaged, as established communities in areas where the local connection is needed are more likely to consist of White British residents, who would be more likely to be able to establish a local connection under the lettings policy. However, only 50% of family homes would be included in this criteria for new local lettings policies, which would mean that all applicants would be considered based on their housing need for half of all family homes let and, as such, this can be justified as a proportionate means of achieving the legitimate aim of assisting people living locally to stay in the same area as the family grows.
- Applicants who do not have a local connection to the area in which they want to live would be disadvantaged. However, the local connection criteria is wide enough to consider applicants on the basis of their residence, work, immediate family connections, children at school and other special reasons. Additionally, lettings teams will have the discretion to waive the local connection criteria in exceptional circumstances, for example, where an applicant is fleeing violence and cannot be rehoused in the area in which they have a local connection.

Age restrictions

- This policy is neutral in terms of gender reassignment, race, religion and belief, sex and sexual orientation.
- This policy may disadvantage carers who do not meet the age of the local lettings policy in the block in which the person to be cared for is living. However, we will normally allocate an extra bedroom for an overnight carer, and the age of the carer will not prevent a letting being made under the local lettings policy.
- The blocks designated as retirement blocks will disadvantage younger applicants under the age of 55 years. However, this can be justified as a proportionate means of achieving a legitimate aim of providing retirement accommodation for older people and blocks will be selected as retirement homes in part based on the age profile of current tenants. There will be benefits for younger people in the other proposals for local lettings policies, and where age restrictions apply, there will be alternative available accommodation in the area.
- The harmonisation of age related local lettings policies to 3 bands will disadvantage applicants who are not old enough to meet the specified ages. However, this can be justified as a proportionate means of achieving the legitimate aim of ensuring sustainable tenancies in high rise blocks and limiting lifestyle clashes. Additionally, the process of harmonisation is likely to have some immediate advantage for younger applicants, as it is likely to result in a net reduction or lowering of age related local lettings policies and where age restrictions apply, there will be alternative accommodation available in the area.
- Disabled applicants who are not old enough to qualify for the local lettings policy will be disadvantaged, however, lettings to disabled customers who are younger than the age criteria can be considered where the property meets the assessed needs of the applicant.
- Older applicants will be disadvantaged, as there is likely to be a net reduction in the number of properties with a local lettings policy or a reduction in age of some policies. However, where we are unable to justify an age LLP, the council is at a risk of challenge under the Equality Act and we will be unable to justify an unlawful policy on

this basis.

- This may disadvantage pregnant applicants and those with maternity responsibilities as they will be bypassed in favour of applicants over the age of 55 without dependent children. However, there will be the choice of family friendly blocks
- There is a risk that lowering or removing age LLPs will increase anti social behaviour and nuisance, disadvantaging other tenants in the area. However, removal or lowering of age LLPs will be accompanied by more intensive management of the blocks or local lettings policies that address the behaviour of applicants, rather than making assumptions about age. This will ensure that any anti social behaviour is addressed at the point of lettings, or proactively managed where it occurs after a letting.
- The proposal to use the tenancy record of an applicant (including home visits) to replace an age related local lettings policy will disadvantage tenants who are unable to meet the criteria (please see above).
- The proposal to offer preference to tenants under occupying in their current home will disadvantage applicants who are overcrowded or suitably housed in terms of the number of bedrooms. However, a letting under this LLP will release a larger property which may benefit an overcrowded applicant.

Children at height family friendly blocks

- This policy is neutral in terms of age, carers, gender reassignment, marriage/civil partnership, race, religion/belief, sexual orientation.
- This may disadvantage disabled applicants, who may wait longer for a suitable property, however, blocks will be designated family friendly based in part on the household type of current tenants. Disabled applicants who top a shortlist for an adapted property in a family friendly block will be considered, with a household with dependent children normally being considered ahead of another disabled applicant without dependent children.
- Family friendly blocks will disadvantage all adult households requiring more than one bedroom, as they will be bypassed in favour of households with dependent children. However, the majority of high rise accommodation in the city will not give preference in this way.
- Blocks where no dependent children or no children are allowed (eg under part time access arrangements) will disadvantage households who need an extra bedroom for a dependent child. However, this can be justified as the accommodation will generally be unsuitable for dependent children due to issues such as open balconies and other more suitable homes, such as 2+ bed houses and family friendly blocks give preference to households with dependent children.
- Blocks where no children are allowed will disadvantage households with part time access to dependent children, as they will be bypassed in favour of all adult households. However, this can be justified as the accommodation will generally be unsuitable for children due to issues such as open balconies and there is other suitable accommodation available in the city, either in high or low rise flats where the lettings policy permits an extra bedroom.

ICT changes:

Qualification criteria decision

- Negative impact of lowering QC threshold will be to assess more applicants eg who owe lower levels of rent arrears and potentially remove them from the housing register. However, where an applicant triggers the QC assessment their application will be placed in a 'pending assessment' category and will not be activated until the assessment has been completed.

Creating a new Band D

- Negative impact will be on these groups, but in mitigation they will still be on the housing register and able to bid, and may be offered certain lower demand properties. Homeless applicants without a local connection will still be afforded a degree of priority, as required under the Housing Act 1996. Housing Leeds is unable by law to rehouse ineligible applicants, who will continue to be considered by housing associations.

Fast track properties

- This will mean applicants will need to check the website on a daily basis. Some applicants may struggle to do this, for example, if they do not have access to the internet. However, in mitigation these properties will only be advertised as fast track when they haven't been let on the first advertising cycle, and vulnerable applicants will be offered support through automated assisted bidding.

Bidding

- Some applicants may prefer other methods such as advocates placing bids on their behalf.

Action required:

- Monitor the homes released as a result of the tenant transfer policy to ensure that a range of property types and areas are represented.
- Reduce the number of properties let through the date of registration quota to 15% through the lettings policy review.
- Ensure that a consistent policy is followed for rent arrears, ASB, property damage and local connection. Consider exceptional circumstances on a case by case basis where undue hardship would otherwise arise.
- Home visit procedures to state that exceptional circumstances to be considered on a case by case basis and guidance given on this.
- If an applicant in Band A or Band B fails a tenancy check, the officer will consider the individual issues and decide an appropriate course of action which may include referring for support or advising on a course of action to remedy the issue eg. clearing a messy garden.
- Lettings procedures to state that where a prospective tenant has not completed pre tenancy training, and this is a pre-requisite for the letting, that individual circumstances are to be considered on a case by case basis.
- Ensure lettings procedures are clear regarding the criteria for applying and waiving local connection where a decision not to accept local connection would cause hardship to the individual. This will be subject to approval by a senior officer to ensure consistency
- Monitor the equality outcomes of lettings of family homes in high demand areas where a local connection criteria applies for houses.
- Ensure the needs of disabled applicants are considered under all local lettings policies by including provision to consider exemptions for disabled applicants where the property would otherwise meet their requirements
- Area housing management officers to be briefed on changes to lettings policy and community lettings policies so they are aware of equality impacts and exemptions
- Guidance to staff / training on Qualification criteria decisions
- Guidance to staff / training and communication with groups affected by creation of new

Band D

- Guidance and communications for staff and applicants on how Fast Track system works
- Guidance and communications for staff and applicants on how Leeds Homes bidding and automated bidding work

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

Yes

No

Please provide detail:

The tenant transfer policy will support sustainable communities by rewarding tenants who have kept to their tenancy agreement, looked after their property and paid their rent.

Pre tenancy training and home visits will give more opportunities to ensure tenants are prepared for the rights and obligations of their tenancy, and that support needs can be identified at an early stage.

Local connection in high demand areas will allow families to remain close to schools, doctors and support networks.

Retirement blocks will promote good relationships between older applicants, while families will benefit from family friendly blocks. The review of age local lettings policies will put more emphasis on the behaviour of prospective tenants, to promote good relationships between different generations of tenants.

Action required:

Develop a communication plan to inform customers and stakeholders of revised policy, monitor lettings outcomes and share high level data with customers.

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

Yes

No

Please provide detail:

Pre tenancy training will bring prospective tenants together to learn about the rights and responsibilities of having a tenancy

Action required:

Evaluate pilot scheme and amend in light of feedback received.

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; the lettings policy outlines which customer groups are given preference for lettings of council properties, and for particular types of property to achieve best use of stock. This may result in public perception that the policy is unfair and that offers of accommodation are made to particular groups of customers.

Action required:

Develop a communication plan to inform customers and stakeholders of revised policy, monitor lettings outcomes and share high level data with customers.

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 |
|---|---|---|--------------------------------------|
| Ensure equality information is mandatory on the new housing ICT solution. Equality information to be collected at the point of lettings for applications without this. | From February 2018 | New ICT system implemented with equality info mandatory | ICT Project Team |
| The results of the consultation to be taken into account in making recommendations to the council's Executive Board, and a summary of the response to be included in Appendix 1 of the report. | October 2017 to be implemented from February 2018 | New lettings policy approved by Exec Board | Lettings and Tenancy Management Team |
| Develop clear criteria and procedures on the lettings policy proposals, including guidance to staff on how to ensure any potential negative impacts can be mitigated, by taking a case by case approach where undue hardship would result from a lettings decision. | From February 2018 | Guidance issued to staff / training | Lettings and Tenancy Management Team |
| When developing or reviewing | From February 2018 | Community Lettings Policy | Lettings and Tenancy |

| Action | Timescale | Measure | Lead person |
|---|---|--|--------------------------------------|
| local lettings policies, ensure decisions are evidence based and carry out further consultation with local tenants and residents. | | review | Management Team / Housing Management |
| Pick up equality issues in development and implementation of ICT system | Ongoing to Feb 2018 | Implementation of new ICT system | Housing Management / ICT |
| Monitor the homes released as a result of the tenant transfer policy to ensure that a range of property types and areas are represented. | From February 2018 | Analysis of homes released/ tenants who have transferred under the quota | Lettings and Tenancy Management Team |
| Reduce the number of properties let through the date of registration quota to 15% through the lettings policy review. | October 2017 to be implemented from February 2018 | New lettings policy approved by Exec Board | Lettings and Tenancy Management Team |
| Ensure that a consistent policy is followed for rent arrears, ASB, property damage and local connection. Consider exceptional circumstances on a case by case basis where undue hardship would otherwise arise. | From February 2018 | Guidance issued to staff Monitoring of lettings | Lettings and Tenancy Management Team |

| Action | Timescale | Measure | Lead person |
|--|--------------------|---|--------------------------------------|
| Home visit procedures to state that exceptional circumstances to be considered on a case by case basis and guidance given on this. | From February 2018 | Guidance issued to staff / staff training | Lettings and Tenancy Management Team |
| If an applicant in Band A or Band B fails a tenancy check, the officer will consider the individual issues and decide an appropriate course of action which may include referring for support or advising on a course of action to remedy the issue eg. clearing a messy garden. | From February 2018 | Guidance issued to staff / staff training | Lettings and Tenancy Management Team |
| Lettings procedures to state that where a prospective tenant has not completed pre tenancy training, and this is a pre-requisite for the letting, that individual circumstances are to be considered on a case by case basis. | From February 2018 | Guidance issued to staff / staff training | Lettings and Tenancy Management Team |
| Ensure lettings procedures are clear regarding the criteria for applying and waiving local connection. | From February 2018 | Guidance issued to staff / staff training | Lettings and Tenancy Management Team |
| Monitor the equality outcomes | From February 2018 | Monitoring of lettings | Lettings and Tenancy |

| Action | Timescale | Measure | Lead person |
|---|--------------------|---|--------------------------------------|
| of lettings of family homes in high demand areas where a local connection criteria applies for houses. | | | Management Team |
| Ensure the needs of disabled applicants are considered under all local lettings policies by including provision to consider exemptions for disabled applicants where the property would otherwise meet their requirements | From February 2018 | Guidance issued to staff / staff training | Lettings and Tenancy Management Team |
| Area housing management officers to be briefed on changes to lettings policy and community lettings policies so they are aware of equality impacts and exemptions | From February 2018 | Guidance issued to staff / staff training | Lettings and Tenancy Management Team |
| Guidance to staff / training on Qualification criteria decisions | From February 2018 | Guidance issued to staff / staff training | Lettings and Tenancy Management Team |
| Guidance to staff / training and communication with groups affected by creation of new Band D | From February 2018 | Guidance issued to staff / staff training | Lettings and Tenancy Management Team |
| Guidance and communications for staff and applicants on how | From February 2018 | Guidance issued to staff / staff training | Lettings and Tenancy Management Team |

| Action | Timescale | Measure | Lead person |
|--|--------------------|---|--------------------------------------|
| Fast Track system works | | | |
| Guidance and communications for staff and applicants on how Leeds Homes bidding and automated bidding work | From February 2018 | Guidance issued to staff / staff training | Lettings and Tenancy Management Team |
| Develop a communication plan to inform customers and stakeholders of revised policy, monitor lettings outcomes and share high level data with customers. | From February 2018 | Guidance issued to staff / staff training | Lettings and Tenancy Management 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 |
|---|-----------|------|
| | | |
| Date impact assessment completed | | |

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

Though **all** key decisions are required to give due regard to equality the council **only** publishes those related to **Executive Board, Full Council, Key Delegated Decisions** or a **Significant Operational Decision**.

A copy of this equality impact assessment should be attached as an appendix to the decision making report:

- Governance Services will publish those relating to Executive Board and Full Council.
- The appropriate directorate will publish those relating to Delegated Decisions and Significant Operational Decisions.
- A copy of all other equality impact assessments that are not to be published should be sent to equalityteam@leeds.gov.uk for record.

Complete the appropriate section below with the date the report and attached assessment was sent:

| | |
|--|------------|
| For Executive Board or Full Council – sent to Governance Services | Date sent: |
| For Delegated Decisions or Significant Operational Decisions – sent to appropriate Directorate | Date sent: |
| All other decisions – sent to equalityteam@leeds.gov.uk | Date sent: |