

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

This form:

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

Directorate: Environment and Housing	Service area: Housing Management
Lead person: Kath Bramall	Contact number: 07712 216961
Date of the equality, diversity, cohesion and integration impact assessment: 08/11/2017	

1. Title: Garnets – Local Lettings Policy

Is this a:

Strategy /Policy

 Service / Function

 Other

If other, please specify

2. Members of the assessment team:

Name	Organisation	Role on assessment team e.g. service user, manager of service, specialist
Kath Bramall	Leeds City Council	Housing 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 and 3 bed houses in the Garnet Terrace and Garnet Place development in LS11.

The properties will be available to rent from early 2018.

The Local Lettings Policy has been developed in line with the council’s framework for letting new build homes which aims to create mixed communities, reward good behaviour, give consideration to waiting times 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"/>
Please provide detail: The Local Lettings Policy for 25 properties on Garnet Terrace and Garnet Place, LS11	

4b. Service, function, event

please tick the appropriate box below

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

5. Fact finding – what do we already know

Make a note here of all information you will be using to carry out this assessment. This could include: previous consultation, involvement, research, results from perception surveys, equality monitoring and customer/ staff feedback.

(priority should be given to equality, diversity, cohesion and integration related information)

- information held on the Leeds Homes Register on demand for housing in the City and Hunslet ward and local area
- 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 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 housing register, a survey questionnaire and a drop in consultation 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 connection to the City & Hunslet ward area
- 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

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

- 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 faced barriers accessing information about the properties.
- The location of the properties fall within the City & Hunslet Ward therefore we have removed the local connection through employment from the Local Lettings Policy and replaced it with a connection to the City & Hunslet ward area by means of either residing in or having family associations in the ward. If we incorporated employment in the local connection criteria applicants from across the city would be able to be rehoused here which would challenge the purpose of building these properties to rehouse local people and freeing up council homes to relet in the local area.

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 connection to the City & Hunslet ward area. This will benefit people living in or having 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 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 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 connection to the area which disadvantages customers with and urgent housing need who have no connection to the area.

The LLP gives preference to customers with a connection to the area by way of residing in the ward or having close family associations in the ward which will disadvantage customers working in the ward 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.

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

Action required:

The connection to the City & Hunslet ward area is wide enough to encompass residence, 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 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 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.

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 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 connection definition is wide enough to encompass residence, family and other reasons. To mitigate any adverse equality impacts, the council has the discretion to waive the 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 may 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 may be considered.

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

12. Equality, diversity, cohesion and integration action plan

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

Action	Timescale	Measure	Lead person
Leeds City Council to monitor lettings outcomes	By March 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 connection requirement 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 South Lettings Team
In exceptional circumstances, customers with minor tenancy breaches who have demonstrated a change in behaviour to be exempted from the requirement for an excellent tenancy record . In addition, the council will also consider whether the breach has arisen because the customer required a support package 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 South Lettings Team
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.	At shortlisting stage	LCC to consider whether exemptions apply to customers in the order they appear on the shortlist	Inner South Lettings Team
In exceptional circumstances, customers who top the shortlist who are in urgent housing need for reasons other than	At shortlisting stage	LCC to consider whether exemptions apply to customers in the order they appear on the shortlist	LCC Comms Team, Inner South Lettings Team and Leeds Homes Team

those listed in the local lettings policy will be considered on a case by case basis when working through the shortlist.			
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 .	At shortlisting stage	Information included in property adverts and affordability checks completed with prospective tenants prior to offer	Leeds Homes Team / Inner South Lettings Team
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.	At advertising stage	Information included in property adverts	Leeds Homes Team
Post-handover Housing Leeds will contact the new tenants and residents to promote the local tenant and residents group.	At viewing / sign up once properties allocated to new tenants	Engagement with new tenants	Tenant and Community Involvement Team / Inner South Housing Office
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	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	31/10/2017

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. For record keeping purposes it will be kept on file (but not published).

Date impact assessment completed	08.11.2017
If relates to a Key Decision – date sent to Corporate Governance	
Any other decision – date sent to Equality Team (equalityteam@leeds.gov.uk)	