

Equality, Diversity, Cohesion and Integration (EDCI) screening



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.

A **screening** process can help judge relevance and provides a record of both the **process** and **decision**. Screening should be a short, sharp exercise that determines relevance for all new and revised strategies, policies, services and functions.

Completed at the earliest opportunity it will help to determine:

- the relevance of proposals and decisions to equality, diversity, cohesion and integration.
- whether or not equality, diversity, cohesion and integration is being or has already been considered, and
- whether or not it is necessary to carry out an impact assessment.

Directorate: Communities, Housing & Environment	Service area: Housing Leeds
Lead person: Kath Bramall	Contact number: 37 81110

1. Title: Lettings Policy review 2023-24

Is this a:

Strategy / Policy

 Service / Function

 Other

If other, please specify

2. Please provide a brief description of what you are screening

Executive Board are asked to approve consultation on proposed changes to the council's lettings policy. A full EDCI Assessment will be completed when final proposals are drawn up for approval. Executive Board are also asked to approve an extension to the suspension of the Date of Registration and Tenant Transfer quotas until the new lettings policy is approved.

Date of Registration and Tenant Transfer Quotas

Under the lettings policy section 6.2.9 the council may suspend the quotas in the event of an emergency arising. The Date of Registration and Tenant Transfer Quotas have been suspended since April 2021.

The table below shows the percentage of all applicants rehoused by **priority band**, from

2020 to Quarter 2, 2023/24:

Date	Band A+	Band A	Band B	Band C	Band D
2020-21	5	68	10	16	0
2021-22	4	64	10	22	0
2022-23	4	69	10	17	0
Q1	3	78	8	11	0
Q2	2	77	10	11	0
Difference	-3	+9	0	-5	0

This shows a general increase over time in allocations made to customers in a Band A priority since the suspension of the quotas. The Band C applicants rehoused during 23/24 are in the main allocations made via the DOR element of the new build lettings policy and to retirement life homes.

The table below shows the percentage of applicants rehoused by **ethnicity**, from 2020 to Quarter 2, 2023/24:

Date	White British	Asian/ Asian British	Black/ Black British	Mixed Race	Other	Not Known
2020-21	68	6	14	4	2	6
2021-22	70	7	13	4	2	1
2022-23	69	8	13	5	2	3
Q1	71	6	13	4	2	3
Q2	68	7	13	6	2	4
Difference	0	+1	-1	2	0	-2

The table below shows the percentage of applicants rehoused by **disability**, from 2020 to Quarter 2, 2023/24:

Date	Yes	No	Prefer Not to Say	Not Known
2020-21	31	66	3	0
2021-22	29	68	3	0
2022-23	28	69	3	0
Q1	30	67	3	0
Q2	28	69	2	0
Difference	-3	3	-1	0

The table below shows the percentage of applicants rehoused by **age band**, from 2020 to Quarter 2, 2023/24:

Date	16-29	30-39	40-49	50-59	60-69	70-79	80-89	90+
2020-21	30	23	16	12	11	5	3	0
2021-22	26	24	16	15	12	4	2	1
2022-23	27	27	16	13	11	5	1	0
Q1	24	24	19	14	13	4	2	0

Q2	25	25	18	16	11	4	1	0
Difference	-5	+2	+2	+4	0	-1	-2	0

The table below shows the percentage of applicants rehoused by **sexuality**, from 2020 to Quarter 2, 2023/24:

Date	Heterosexual / Straight	Gay Man	Lesbian/Gay Woman	Bisexual	Prefer not to say
2020-21	88	1	1	1	9
2021-22	88	1	1	2	8
2022-23	88	1	1	2	8
Q1	87	1	1	2	9
Q2	88	1	1	3	7
Difference	0	0	0	+2	-2

The table below shows the percentage of applicants rehoused with a **carer**, from 2020 to Quarter 2, 2023/24:

Date	Yes	No	Prefer Not to Say	Not Known
20-21	12	75	11	2
2021-22	12	78	9	1
2022-23	13	81	6	0
Q1	13	80	7	0
Q2	14	80	6	0
Difference	+2	+5	-5	-2

Housing Leeds is asking Executive Board to extend the suspension until the final version of the Lettings Policy is approved. In the meantime, we will be consulting on a proposal to remove the DOR and TT quotas permanently to assist more customers in high housing need.

It is anticipated that this change will benefit those households with an assessed housing need the most. The council has a duty to give these customers reasonable preference in allocating council homes. A more detailed piece of work will be undertaken as part of the lettings policy review to consider the equality characteristics of customers on the register and potential impact on lettings outcomes for different equality groups with mitigations considered when required.

Other proposals for consultation

The remaining changes are being proposed in response to increased demand on council lettings and are very different to our current policy, meaning a number of groups are likely to be affected by the proposals, if approved.

The changes proposed are:

1. Allocating the majority of properties to applicants in housing need on a permanent basis
2. Reviewing the criteria for joining the housing register and removing the following groups:
 - applicants who are not in housing need
 - applicants with sufficient financial resources to meet their own needs (a household income of over £60k pa), or owning assets such as a residential property or other property that could be sold
 - applicants who have not lived in Leeds for a minimum of 2 years
 - applicants with no local connection to Leeds (based on residence, close family associations or employment)
 - existing social housing tenants who are not in housing need
3. Restricting the adult household members who can be included on an application as a household member to be rehoused
4. Increasing the age where a household member qualifies for their own bedroom from 16 to 18 years old
5. Increasing the length of time priority is awarded from 180 to 365 days
6. Creating a new Direct Let category for roofless customers to allow direct offers to be made outside of the normal date order
7. Making offers of high rise accommodation to households with dependent children and no longer awarding priority to move out of high rise unless there are extenuating circumstances to support a move, or if there is a local lettings policy on blocks restricting lettings to households with children.

A summary of the potential impacts of these proposals is outlined below:

Housing register qualification criteria

Local authorities have the power to set their own qualification criteria, provided it does not disqualify certain groups (travellers, members of the armed forces, people fleeing domestic abuse, witness protection cases, social housing tenants moving for work and people likely to be in housing need) or on equality grounds. Leeds care leavers placed out of area would be considered to have a local connection.

The council has legal duties to ensure secure accommodation is available for certain homeless customers and to give 'reasonable preference' for offers to certain groups under its lettings policy. There is no duty to rehouse customers who are not in assessed housing need, although 11% of lets in Quarter 2, 2023-24 were made to Band C customers. This was mainly in Retirement Life accommodation for over 60s.

The table below shows the number of applicants likely to be affected by the proposals:

Applicants who are in no assessed housing need	18,519 applicants are in Band C or Band D This includes applicants who have previously been awarded a priority that has expired and not been extended 64% of applications in no housing need are White / White British, the second highest group is Black / Black British 25% state they have a medical condition or disability impacting on their daily lives 26% are under 30 years old, 28% between 30 and 39, 18%
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	<p>between 40 and 49, 13% are between and 59 and 15% are 60 years old or over 2% describe their sexual orientation as bisexual, 1% are gay men and 1% are lesbians/gay women 11% consider themselves to be carers. Safeguards would be needed to ensure applicants who may have a housing need are assessed correctly and supported with bidding and the priority extension process.</p>
Financial resources Home owners	<p>50 applicants have declared an annual income of over £60K 9 are in Band A or B 29 are White British 9 under 30, 16 are 30 – 39, 11 are 40 – 49, 7 are 50 – 59 and 6 are over 60 8 have indicated they have a medical condition or a disability 19 have dependents under 19 in the household 2 describe their sexual orientation as gay men 4 consider themselves to be carers</p> <p>Any restrictions on joining the register based on a household's financial resources would need to consider the size of the household, whether the household is in receipt of benefits, including disability benefits, whether there are specific requirements for medical needs and what housing costs they can reasonably afford</p>
Leeds residence – minimum of 2 years	<p>91% of applications are registered from an address with a Leeds postcode, and 2400 applications are from outside Leeds. These applicants may not all have lived in Leeds for 2 years, and some may be able to establish a local connection with Leeds through close family or employment. If this proposal were introduced there would be exemptions for certain groups including travellers, customers experiencing domestic abuse, members of the Armed Forces, tenants moving to take up work and Leeds care leavers placed out of area</p>
No local connection to Leeds	<p>The number of people in this group isn't known because the information isn't mandatory when an application is made but is likely to be less than the 2400 who don't have a Leeds address. If this proposal were introduced there would be consideration for people who are unable to establish a connection as defined by the Housing Act where there were exceptional circumstances, for example, witness protection referrals</p>
Tenants not in housing need	<p>5373 social housing tenants (LCC, other local authority tenants and housing association tenants) are in Band C or D of the housing register.</p>

	<p>3500 (65%) are White British 1820 (33%) have indicated they have a disability 1296 (24%) are over 60 years old Safeguards would need to be strengthened to ensure applicants who may have a housing need are assessed correctly and supported with bidding and the priority extension process where appropriate. Consideration needs to be given to the impact excluding this group would have on demand for Retirement Life properties suited to over 60s, as well as under-occupation moves that would free up a larger council or housing association home for other customers.</p>
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Restricting adult household members

There are several situations where an applicant may want to add adult household members (who are not their spouse, civil partner or partner) to their housing application. This includes extended family members, carers, or non-related adults. The council doesn't have enough properties to meet demand in general, but has a very low supply of 4+ bedroom properties.

Where an adult is added to an application they normally qualify for a bedroom in their own right, whereas if the allocation was made to a household with dependent children the room could be occupied by up to 2 children. In some cases, there is no evidence of any relationship between the parties, and there is concern that applications can be made to obtain an additional bedroom and larger property fraudulently, which may result in under occupation where that person fails to take up occupation and deprives another household on the housing register from being rehoused to that sized property.

There are 930 applications where there are 3 or more people in the household, with no dependents under 19 years old.

There would need to be consideration of the impact on extended families where different generations having been living as a household group for some time, rather than applications where a non-related adult living at a different address is added to the application. Further analysis is required to understand whether this change could impact on different equality groups, particularly customers from ethnically diverse backgrounds, and any mitigations that are required to ensure these customers are not adversely impacted.

1197 applicants need a 4+ bedroom property, 500 of these are in a priority band.

Age to qualify for a separate bedroom

Under the current calculation, a person will qualify for their own bedroom at 16 years old. The proposal to increase this to 18 will mean a 17-year-old would be expected to share with another child aged 0-17 of the same gender. A household of 2 adults in a relationship who have 2 female children aged 1 and 17 would be expected to live in a 2-bedroom property. The household would not be assessed as overcrowded and would not qualify for a priority award in a 2 bedroom property. In a 1 bed home they would be awarded Band B.

There is the potential that more 16 and 17-year-olds would apply for a 1-bedroom property in their own right which could increase demand for 1 bedroom properties and the number of approaches to Leeds Housing Options.

The proposal could potentially incentivise moves to the private sector, where LHA would be calculated based on 16-year-old threshold, albeit under the LHA shared room rate.

Further analysis is needed to determine the number of people this would potentially impact on the register, and the likely impact on demand for 1-bedroom properties and 2+ family sized houses.

Increasing the length of time priority is awarded from 180 to 365 days

This proposal would increase the number of people on the housing register in a priority band, as a number of applicants don't request an extension. Further analysis is needed on this group of customers.

If the length of the priority award was increased further work would be needed to identify and support customers in a priority band who have not placed bids to ensure they are actively looking for rehousing and are being realistic in terms of their areas.

Direct lets for roofless customers

This would apply to customers the council has accepted a full homelessness duty towards who are living in temporary accommodation or Bed and Breakfast.

The direct let could incentivise a move into temporary accommodation instead of customers maintaining their own arrangements such as staying temporarily with friends or family, and could potentially remove some choice of rehousing, as the offer would be made of an available suitable property that may not be in their preferred area of choice.

Further analysis is needed on the equality characteristics of this group. The creation of a new Direct Let category would allow direct offers to be made outside of the normal date order and ahead of other customers in housing need. The aim would be to free up temporary accommodation, ensure customers are offered secure long-term accommodation and reduce financial pressures on the council.

Rehousing children in high rise

The proposal is to make offers of high rise accommodation to households with dependent children and no longer award priority to move out of high rise unless there are extenuating circumstances, or if there was a local lettings policy on blocks deemed unsuitable for children to live.

716 LCC tenants living in high rise are on the housing register (this includes a number of tenants from the 'Reema' blocks affected by the regeneration programme). 322 require a 2+ bedroom property, of which 262 have a dependent under the age of 19 years old in the household. 155 of these have a priority Band A or B to move.

Further analysis is needed on the groups likely to be impacted by this change.

3. Relevance to equality, diversity, cohesion and integration

All the council's strategies and policies, service and functions affect service users, employees or the wider community – city wide or more local. These will also have a greater or lesser relevance to equality, diversity, cohesion and integration.

The following questions will help you to identify how relevant your proposals are.

When considering these questions think about age, carers, disability, gender reassignment, race, religion or belief, sex, sexual orientation. Also those areas that impact on or relate to equality: tackling poverty and improving health and well-being.

Questions	Yes	No
Is there an existing or likely differential impact for the different equality characteristics?	X	
Have there been or likely to be any public concerns about the policy or proposal?	X	
Could the proposal affect how our services, commissioning or procurement activities are organised, provided, located and by whom?		X
Could the proposal affect our workforce or employment practices?		X
Does the proposal involve or will it have an impact on <ul style="list-style-type: none"> • Eliminating unlawful discrimination, victimisation and harassment • Advancing equality of opportunity • Fostering good relations 	X	

If you have answered **no** to the questions above please complete **sections 6 and 7**

If you have answered **yes** to any of the above and;

- Believe you have already considered the impact on equality, diversity, cohesion and integration within your proposal please go to **section 4**.
- Are not already considering the impact on equality, diversity, cohesion and integration within your proposal please go to **section 5**.

4. Considering the impact on equality, diversity, cohesion and integration

If you can demonstrate you have considered how your proposals impact on equality, diversity, cohesion and integration you have carried out an impact assessment.

Please provide specific details for all three areas below (use the prompts for guidance).

- **How have you considered equality, diversity, cohesion and integration?** (think about the scope of the proposal, who is likely to be affected, equality related information, gaps in information and plans to address, consultation and engagement activities (taken place or planned) with those likely to be affected)

The EDCI screening has considered the make up of the housing register and lettings

outcomes, and the equality groups likely to be affected.

- **Key findings**

(think about any potential positive and negative impact on different equality characteristics, potential to promote strong and positive relationships between groups, potential to bring groups/communities into increased contact with each other, perception that the proposal could benefit one group at the expense of another)

The proposals are aimed at helping more people in housing need to obtain council housing, and will be accompanied by a communications campaign to highlight the pressures on council housing. Where proposals have been put forward, the aim is to support other households in urgent need.

- **Actions**

(think about how you will promote positive impact and remove/ reduce negative impact)

To complete a full EDCI with final proposals and to include equality considerations in the consultation.

5. If you are *not* already considering the impact on equality, diversity, cohesion and integration you *will need to carry out an impact assessment*.

Date to scope and plan your impact assessment:

December 2023

Date to complete your impact assessment

August 2024

Lead person for your impact assessment (Include name and job title)	Kath Bramall, Housing Manager
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6. Governance, ownership and approval		
Please state here who has approved the actions and outcomes of the screening		
Name	Job title	Date
Date screening completed		

7. Publishing	
<p>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.</p> <p>A copy of this equality screening should be attached as an appendix to the decision making report:</p> <ul style="list-style-type: none"> • 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 screenings that are not to be published should be sent to equalityteam@leeds.gov.uk for record. <p>Complete the appropriate section below with the date the report and attached screening was sent:</p>	
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: