

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: Housing Leeds
Lead person: Gurmeet Virdi	Contact number:

Date of the equality, diversity, cohesion and integration impact assessment:

1. Title: Implementation of the	he new CBL IT system	
Is this a:		
Strategy /Policy	x Service / Function	Other
If other, please specify		

2. Members of the assessment team:

eam ager of service,
ness Change

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

The council is implementing a new CBL IT system, which will include an online housing application and a lettings portal. Applicants will be able to complete and update their application, search for homes, place bids and receive messages online.

The current method of application, which is a paper form, will have limited availability, and the majority of applicants will be expected to apply online. Most applicants will be expected to search for homes on the website, the flyer will not exist in the same format and will have limited availability.

Most communications with applicants will be by through the online messaging facility, and notifications of messages via email.

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	
The vision and themes, objectives or outcomes and the supporting guidance	
A specific section within the strategy, policy or plan	
Please provide detail:	

4b. Service, function, event please tick the appropriate box below	
The whole service (including service provision and employment)	
A specific part of the service (including service provision or employment or a specific section of the service)	x
Procuring of a service (by contract or grant)	

Please p	provide	detail:
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The provision of an online housing application an lettings portal through a new IT system

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
- Data on applicants indicating that they need support with their application
- Data on Leeds residents in terms of internet access
- Customer consultation undertaken on the proposed changes
- Consultation on the proposed changes with other stakeholders
- Leeds City Council's lettings policy
- 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.
- Office for National Statistics: Internet Users in the UK (2017)

We currently register around 12,000 new applications a year and there are around 24,000 live housing applications on the housing register.

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

Number of applicants without internet access Number of applicants unable to compete an online application form

Action required:

Consultation with support workers

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

EDCI impact assessment

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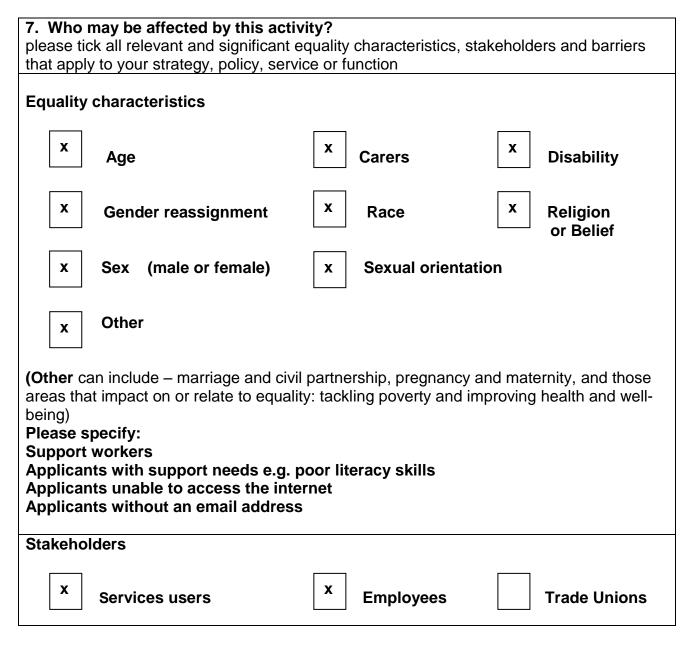
No

Please provide detail:

Tenant groups have been involved in the website design options. Staff have been involved in the configuration

Action required:

Continue to involve staff in cofig Tenants to be involved in testing – checking wording of questions etc



X Partners	X Members Suppliers
Other please specify	
Potential barriers.	
Built environment	X Location of premises and services
X Information and communication	Customer care
Timing	Stereotypes and assumptions
Cost	Consultation and involvement
Financial exclusion	x Employment and training
specific barriers to the stra	ategy, 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:

Age: According to the Office of National Statistics report 'Internet users in the UK' (2017), almost all adults under 55 years of age have recently used the internet, including 99% of under 35s. Regular internet users may find it more convenient to complete an application online, rather than completing a written form.

Applicants below the lowest age that can be considered on an age local lettings policy will be unable to place a bid. This will ensure that their bids will not be wasted, and can be used to bid on appropriate properties.

Younger applicants who are ineligible for sheltered properties as they do not have a sheltered recommendation will be unable to place a bid for sheltered properties. This will ensure that their bids are not wasted and can be used to bid on appropriate properties.

Applicants under 18 years of age will be unable to bid on high rise flats. This will ensure

that their bids are not wasted and can be used to bid on appropriate properties.

Carers: Carers with internet access may find it more convenient to complete an online form, particularly if their caring responsibilities make it difficult for them to leave them home. Generally they will still have to provide proofs in person, although it will be possible to upload these directly in the future. Carers helping to complete a form for someone with mobility problems may also find the internet more convenient. Proofs can be submitted by post.

There is a question on the form – 'Do you need an extra bedroom for a carer who stays overnight but does not live with you?' If the applicant answers 'yes' they will receive further information at the end of the form about what proofs to provide. This should mean that customers have the right information to provide the correct proofs and are more likely to get the correct bedroom entitlement and priority assessment.

Disability: Applicants with mobility problems or those that use assistive software may find an online application more convenient to complete, where they are able to access the internet.

There will be more information available about a property and the local area on the CBL website which will assist customers who find it difficult to view properties, and the local area before placing a bid.

There is an 'auto bidding' function, which will automatically place bids in the correct areas of choice for bidders who may be unable to bid, for example, those with a learning disability who find it difficult to navigate the system.

Applicants who require internal or external wheelchair access or easy/level access will not be able to bid on properties where this is impossible to achieve through adaptations. This will mean that bids are not wasted on inappropriate properties. It will also save Occupational Therapists time in assessing properties, which may mean that assessments are completed in a shorter period of time.

It will be possible to direct match applicants to adapted properties on the new system, which will mean that customers needing an adapted property may receive a direct offer of a home, rather than having to bid and wait for the property to be assessed/adaptations fitted etc. This will also help to ensure that we make best use of stock and current adaptations.

Gender reassignment: No impact

Race: Applicants who are unable to read English may be able to use an online translation tool to complete the application form.

Religion and belief: Improved information about local areas including maps may make it easier to see if properties are suitable in terms of proximity to places of worship.

Sex: According to the Office for National Statistics men are slightly more likely to be recent internet users than women. However, the difference is more marked in older age groups. Recent internet use by men aged 65 to 74 years was 79% and by men aged 75 years and over was 47%. This compares with recent internet use by women in these age groups at

76% and 35% respectively. Men may therefore be more likely to benefit from the online housing application form and lettings portal than women.

Sexual orientation: No impact

Support workers: Support workers will be able to complete the application form on line with their clients in their homes, where they have mobile internet access. The will also have more information easily available to assist in rehousing such as bidding position and bypass reason.

Vulnerable customers: See attached table

Action required:

• Communications with support agencies and people / groups likely to be affected about the changes and information on how the new system will work

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8b. Negative impact:

Age – According to the Office of National Statistics report 'Internet users in the UK' (2017), recent internet use is lower for older age groups. Older age groups may have more difficulty completing an online application form.

Care leavers may not be able to register an online application if they have not received their National Insurance Number. Customers without a National Insurance Number will have to attend Leeds Housing Options to register a housing application.

Carers – Carers who do not have internet access or IT skills may experience difficulty in registering an online housing application.

Disability - According to the Office of National Statistics, disabled people are less likely to be recent internet users. This may be due to lack of internet access or IT skills. Disabled people may therefore face more disadvantage in accessing the online housing application and using the online lettings portal. They may also face further disadvantage in attending a One Stop Centre / Community Hub / Leeds Housing Options for assistance.

Gender reassignment: Applicants can currently only choose male or female as options for gender. Female applicants will be asked if they are pregnant. This may affect applicants who do not identify as male or female, but will have no other option, and those that do not identify as female and are pregnant.

Race – Refugees who have not yet received a National Insurance Number will be unable to register an application online. They will have to attend Leeds Housing Options to register an application.

Applicants who are unable to read English may have trouble navigating the system. To mitigate this, assistance will be available through

Sex – According to the Office for National Statistics, women are slightly less likely to be recent internet users than men. The proportion of men who had recently used the internet was 90% in 2017 compared with women at 88%. This difference is larger in older age groups. Recent internet use by men aged 65 to 74 years was 79% and by men aged 75 years and over was 47%. This compares with recent internet use by women in these age groups at 76% and 35% respectively.

Sexual orientation: The system does not recognise same sex relationships where these are not the main or joint in terms of bedroom requirements

Vulnerable applicants:

Please see attached table

Action required:

- Implement changes when the Equality Team have finished reviewing the corporate guidance around gender equality groups.
- Implement advice from the Equality Team around pregnancy questions.
- Work with Customer Services and Libraries to ensure that assistance can be given to customers
- Publicise the telephone number
- Train staff on bedroom req may be inaccuracies
- Comms plan
 - Identify current points of entry for applicants
 - How will it be different
 - Who do we need to inform?
- Check which support agencies do not have mobile access, and consider best solution.
- See other actions in table below

EIA issues for vulnerable customers

Change	Possible negative effect on vulnerable customers	Mitigation	Possible positive effect on vulnerable customers	Actions needed
Registering a housing		1	L	1
Paper form will not be available. Applicants will need to register their application form online. National Insurance number (NINO), email address and postcode (or use XY1 1XY) will be mandatory on the online application form.	Some applicants will not have a device to access the internet or internet access at home.	Applicants who have an email address and are able to input an online application can use public access PCs at 19 One Stop Centres, 6 Community Hubs 32 libraries and Wortley housing office. See attached appendix. App available for smart phones and free wifi available [check where]??	May highlight vulnerable customers with unmet support needs who can be referred for support May encourage customers who don't currently access the internet to start using it May help customers learn new IT skills	Comms to staff working in OSC, libraries, CH and housing Comms to support workers Publicity to applicants Add info about free wifi to website
IT skills needed	Some applicants will not be familiar with online forms and will need assistance to set up an email address or complete the form	Assistance is available at OSCs, CHs, libraries and Wortley Housing office. Training courses, including setting up a free internet address available at libraries. Form can be saved incomplete and the customers can return to it later	The online form will only take customers through the questions applicable to them, so will be easier to complete than the paper form for some people	Comms to staff working in OSCs, libraries, CHs and housing Request adding inputting/maintaining a housing application/bidding be added to the Council Services Online course
IT skills needed	Some applicants will have higher support needs that cannot be met by Customer Services staff	Support workers will be able to assist service users to submit an application. In exceptional circumstances, applicants can submit a back office	May highlight vulnerable customers with unmet support needs who can be referred for support	Develop criteria for applicants eligible for assistance with back office application, and those eligible for a home visit. Investigate having

Change	Possible negative effect on vulnerable customers	Mitigation	Possible positive effect on vulnerable customers	Actions needed
Registering a housing	application	•	•	
		application by approaching Leeds Housing Options, or can be visited at home by the Outreach Team to submit their application.		customer access PCs in LHO Comms with support workers
Internet access needed to submit application	Support workers may not have mobile internet access to support service users to input applications	Early comms to support agencies, so that they have time to consider other ways to support service users, such as drop ins or meeting in a library. In exceptional circumstances it may be possible to produce a simplified paper form that support workers can complete with the service user and input on their behalf later in the office	Faster registration of housing applications.	Identify support workers in Leeds without mobile internet access Comms to support workers – attend providers' forum t brief managers. More detailed guidance to support workers to be provided closer to go live (after xmas?)
Internet access needed to submit application	Some applicants will have mobility issues that mean they are unable to leave their homes, and will not be able to attend OSCs etc for assistance	In exceptional circumstance LHO can complete applications with customers in their homes	Some applicants with mobility issues and internet access may prefer to complete an online application or by phone?	Procedures for registering back office applications Check with LHO – possibility of telephone registrations?
National insurance number mandatory for online applications	Some applicants such as refugees and care leavers may not have a NINO	Applicants without a NINO can approach LHO, where an application can be registered in the back office There is some help text to assist customers who cannot remember their NINO	May highlight vulnerable customers who need additional support	Help text on application form Procedures for registering back office applications at LHO Comms to support workers

Change	Possible negative effect on vulnerable customers	Mitigation	Possible positive effect on vulnerable customers	Actions needed
Registering a housing	application			
Email address mandatory for new online applications	Some vulnerable applicants, such as those leading chaotic lives or elderly isolated customers may not have an email address.	Training available in libraries to set up and use a free email address Support workers can assist with setting up an email address for current applicants in advance of the changes. In exceptional circumstances LHO can register an application in the back office without an email address	Opportunity to learn new skills and use internet	Comms to support workers Procedures to reflect this Research – is there a guide to obtaining a free email address?
Postcodes required for current housing and housing history	Vulnerable applicants may have difficulty remembering their postcode for their current address and housing history. They will be unable to progress without this. Homeless people may not have a postcode	Some advice will be given on the website about how to find a postcode using a postcode checker. Generic postcode can be used – this will be displayed on the website help text. Support workers can assist with housing history, and in some cases can contact benefits for a list of previous address claims on behalf of the applicant. LHO can refer people to benefits for address history In exceptional circumstances, applications can be registered in the back office without full housing history. A care of address can be	May highlight vulnerable customers who need additional support	Add help text to form with generic postcode and assistance to find postcodes. Check if registration team can check postcodes at point of verification where the generic postcode has been used. (Process mapping) Comms to support workers Comms to OSC etc staff LHO to continue to assist customers with address history Procedures for registering back office applications at LHO

Change	Possible negative effect on vulnerable customers	Mitigation	Possible positive effect on vulnerable customers	Actions needed
Registering a housing	application		-	
		used for homeless applicants		
Online housing application Some fields will be mandatory – applicant will be unable to progress without completing some fields. 5 year housing history mandatory	Some vulnerable applicants may have more difficulty inputting an online application	Assistance is available in OSCs Support workers to be aware so that they can assist In exceptional circumstances, applications can be registered in the back office without a 5 year housing history	May highlight vulnerable customers who need additional support	Comms to OSC etc staff Comms to support workers Procedures for registering back office applications at LHO
Qualification criteria – if an applicant meets the trigger, the application will be suspended until a decision is reached by the housing office	Vulnerable applicants with a chaotic housing history may be more likely to trigger due to rent arrears or ASB.	QC/RP procedures take into account housing need, vulnerability and changes of behaviour of applicant	Applicants identified as non qualifying at the point of application will know this at a much earlier stage, and will have the opportunity to demonstrate a change in their behaviour. This is an improvement on the current process where applicants often find out that they are non qualifying at the point of offer	Comms to OSC etc and housing staff Comms to support workers

Change	Possible negative effect on vulnerable customers	Mitigation	Possible positive effect on vulnerable customers	Actions needed
Maintaining an online	housing application			
Log in process more complicated than current system. Password and memorable date needed that can be reset by email	Vulnerable applicants may find it more difficult to remember their log in details, or to reset their log in details using their email address	Support will be available for lost passwords	For current applicants, first log in is with current log in details. Log in will be more secure to prevent unauthorised access from other people	Complete and plan for collection email addresses Plan in place for customers who do not have an email address prior to go live Consider a simplified password
Email default method of communication	Vulnerable applicants may not have regular email access, or may not check their email or messages on their online application. Offers and requests for information could be missed.	In exceptional circumstances, the default method of communication can be overridden in the back office and changed to letter Messages available when applicant logs in Current procedures in place to contact advocate	Vulnerable applicants often change address frequently, and letters are sent to the wrong address. Email may be a better solution for them	Comms to OSC etc and housing staff Libraries training Review advocate procedures Procedures for back office override Consider procedures on 3 month rule for existing applicants who don't bid
Eligibility to bid for properties and shortlisting position determined by details on application. May particularly affect customers with medical needs	Vulnerable applicants may have more difficulty in keeping their application up to date Eligible properties may be inappropriate Auto bids may be placed on ineligible properties May appear in wrong place on shortlist.	Home page on application displays current details Annual review to remind customers to update their details Staff trained, and aware of need to refer for medical assessments Support workers informed of changes Lettings teams can identify changes needed when a customer is contacted Will be able to see status when log in and update application	Customers can see current details on online application (improvement from current system) Inability to bid on correct property may highlight change needed (improvement from current system)	Comms to staff Comms to support agencies Wording of review letter

Change	Possible negative effect on vulnerable customers	Mitigation	Possible positive effect on vulnerable customers	Actions needed
Bidding				•
Flyer will not be available in the same format. More basic flyer to be produced, but available in exceptional circumstances only. Customers who approach OSCs will be directed to self serve on public access PCs.	Applicants without internet access may be unable to see properties to bid on by phone	Flyer can be sent to customers who do not have internet access and have mobility problems Flyer can be made available to support agencies Assistance available at OSCs etc on public access PCs	May assist some customers to learn new IT skills and access the internet Can offer autobidding as alternative	Flyer to be available on the Gateway system Check if there are other support providers in Leeds who could receive this by email Leeds Homes to maintain list of vulnerable customers meeting the criteria for receiving the list by post.
Applicants without email addresses may be unable to bid on the new CBL website (decision needed)	Vulnerable applicants unable to log in or place bids on new CBL website	Bidding by telephone and text still available Auto bid available for vulnerable applicants More basic version of the flyer may be sent to support agencies More basic version of the flyer may be available in OSCs etc (decisions needed) In exceptional circumstances, flyer can be sent by post	More tailored support to vulnerable customers	Auto bid procedures Decision needed re: applicants without email addresses Decision on reallocation of resources to support vulnerable customers
Auto bidding – customers can choose to have auto bidding, where bids are automatically placed in area of choice for eligible properties. Placed one day before	Customer does not have the same choice in bids – matching criteria and area of choice only	Will be removed at customer request?? Bids can be removed	Customer does not need to bid, remember their log in details or check property adverts May speed up rehousing Will save support worker time, where they place	Auto bid procedures Procedures for priority removal – consider taking into account if bid is an auto bid

Change	Possible negative effect on vulnerable customers	Mitigation	Possible positive effect on vulnerable customers	Actions needed
close of lettings cycle.			bids	
Administrative bidding – similar to auto bidding but cannot be removed by applicant	These are placed by a member of staff and cannot be removed by the customer	Only to be used in exceptional circumstances, where a customer ????	May speed up rehousing for customers who do not bid	Administrative bid procedures
Bidding position given but doesn't always reflect correct position due to range of factors – local connection / LLPs etc	Some vulnerable customers may have difficulty understanding the system	More information available to assist rehousing. More transparent system	Customers can use the information to bid more strategically and speed up rehousing Reduces contact time for	Clear messages on the website and at point of bidding Staff training
LLPS etc			customers and support workers – this information is regularly requested	Support worker comms
More contact by email, e.g to chase up proofs of local connection.	Vulnerable customers may be less likely to check email	Lettings team will still attempt a phone call Advocated will be contacted	May be better than writing a letter for customers that move frequently	Staff training Scripts for customer services staff Help menu on site
Can see bypass reasons	Some vulnerable customers may have difficulty understanding the	More information available to assist rehousing. More transparent system	Customers can use the information to identify inappropriate bidding	Procedures, particularly where bypass is due to 3 rd party information
	system Risk if show all bypass reasons eg where experiencing violence		Reduces contact time for customers and support workers – this information is regularly requested	
Fast track properties – those not let first time. May require daily checking of website	Customers who do not log on every day may miss these properties	Property will have already been through one full lettings cycle Bulk emails may be used to advise potential applicants that property will be available	Quicker way to access rehousing for customers in urgent housing need	Fast track procedures

Change	Possible negative effect on vulnerable customers	Mitigation	Possible positive effect on vulnerable customers	Actions needed
Application reviews				
Application will be cancelled 3 months after review date if no response. After this time a new online application must be completed. Date of registration will be reset	Vulnerable customers who do not regularly check their emails may miss the review	Back office applications can be reactivated in exceptional circumstances Customers can retain their date of registration outside of 3 months in exceptional circumstances	Review ensures that applications are up to date	Procedures for back office applications

9. Will this activity promote strong and positive relationships between the groups/communities identified?
X Yes No
Please provide detail:
More transparency may lead to an increase in the perception that they system of allocating housing is fair.
Action required:
10 Deep this activity bring groups/communities into increased contact with each
10. Does this activity bring groups/communities into increased contact with each other? (e.g. in schools, neighbourhood, workplace)
Yes X No
Please provide detail:
Action required:
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)
x Yes No
Please provide detail:

Housing supply is limited with more people bidding for properties than we have stock available. There is a risk that vulnerable customers will be deterred from applying for council and housing association homes if they find it difficult to access the internet or lack IT skills.

Action required:

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
Comms, guidance and training to staff	By go live – Feb 18	Staff trained and aware of impact of system on vulnerable applicants. Staff able to refer applicants for training or extra support Scrips/FAQ for CS staff	Catriona Purdy
Comms to support agencies – raise awareness at Providers Forum and more detailed guidance after Christmas	Providers Forum – autumn 2017 Detailed guidance – Jan 2018	Support staff aware of new website in advance and how vulnerable customers may be affected	Catriona Purdy
FAQs and help for applicants available on the website Help text available on online application form	By go live – Feb 18	Tenants have checked FAQs through service improvement groups Available on website	Catriona Purdy
Comms to customers Include decisions on who we write to – ineligible customers, those that don't provide an email address	Comms plan completed – September 2017 Comms delivered by go live Feb 2018	Applicants have been advised of new website in advance through means outlined in comms plan	Catriona Purdy

Action	Timescale	Measure	Lead person
Contact libraries to request inputting/maintaining an application added to customer training	August 2017	Libraries are aware of incoming website and customer training needs	Catriona Purdy
Develop/review procedures: Auto bidding Administrative bids Back office inputting Qualification criteria Advocate consent Bypass Priority removal procedures Mailing list	To discuss with lead	Procedures in place, guidance for staff available, staff trained	Kath Bramall Charli Fudge
Investigate telephone registrations and public access PCs in LHO	To discuss with lead	Depends on outcome of investigation	Charli Fudge
Decision needed on applicants without an email address	Oct 2017	Consultation completed with support agencies, sufficient mitigation in place	Catriona Purdy
Plan for collecting email addresses completed and actioned	Go live Feb 2018	Majority of email address collected before go live	Catriona Purdy
Decision needed on reallocation of resources to vulnerable customers	Go live Feb 2018	Resources allocated to provide more assistance to vulnerable customers	Gurmeet Virdi
Comms from website – review letter etc to ensure applications	Go live Feb 2018	Letters completed – Service improvement volunteers?	Catriona Purdy

Action	Timescale	Measure	Lead person
are up to date			

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

toring progress for equality, diversity, cohesion and integration 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 <u>equalityteam@leeds.gov.uk</u> for record.

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

Date sent:
Date sent:
Date sent: