

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: Communities, Housing and Environment	Service area: Housing
Lead person: Helen Gibson	Contact number: 0113 378 5825
Date of the equality, diversity, cohesion and integration impact assessment:	

1. Title: Future of six high rise and resident rehousing – Bailey and Brooklands Towers, Ramshead Heights, Leafield Towers, Raynville Court and Grange.

Is this a:

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

If other, please specify

2. Members of the assessment team:

Name	Organisation	Role on assessment team For example, service user, manager of service, specialist
Helen Gibson	Leeds City Council	Project Manager (Programme Lead)
Helen Jackson	Leeds City Council	Head of Business Development & Housing Projects
Maddie Edwards	Leeds City Council	Head of Housing Management
Mandy Sawyer	Leeds City Council	Head of Housing and Homelessness
Tom O'Connell	Leeds City Council	Area Manager
Vicki Hooper	Leeds City Council	Service Manager
Ian Montgomery	Leeds City Council	Service Manager
Roisin Donnelly	Leeds City Council	Housing Manager
Kathryn Bramall	Leeds City Council	Housing Manager
Jamie Sampler	Leeds City Council	Project Officer

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

This assessment considers six of the high-rise blocks owned and managed by the council, three in Seacroft, one in Moortown and two in Armley. These blocks are of a

Large Panel System (LPS) construction, each 10 storeys high with 60 flats - 30 one bedroom and 30 two bedroom – 360 homes in total.

Block	Ward
Bailey Towers	Killingbeck & Seacroft
Brooklands Towers	
Ramshead Heights	
Leafield Towers	Moortown
Raynville Court	Armley
Raynville Grange	

As significant investment work is needed to bring the blocks up to an appropriate standard, including intrusive and costly strengthening works, an options appraisal was undertaken. The recommended approach is for all residents to be rehoused, with appropriate support for those who need it, and for subsequent demolition to clear the sites. This would enable the development of new modern housing in the future on the sites whether by the council or other parties.

This supports our aim for all our residents to live in good quality, healthy and affordable homes and for them to be safe and feel safe, and to deliver an approach that provides best value.

The aim is to start rehousing residents from November 2023, as well as suspending new lettings, removing voids from housing stock, the award of 'band A' housing priority and direct let status to tenants and the negotiation with leaseholders to repurchase any leasehold flats. Qualifying residents will be paid a home loss and / or disturbance payment.

Future resulting decision(s) will include the procurement and undertaking of demolition activity for the sites, and any required decisions relating to the acquisition of leasehold properties; including compulsory purchase if voluntary buy-back sales are not able to be successfully negotiated.


Any decision(s) relating to future redevelopment or sale of the land would be separate decisions for housing and subject to separate reports.

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	
<p>Please provide detail:</p> <p>This supports the aspirations set out in the Best Council Plan, in particular the objectives of:</p> <ul style="list-style-type: none"> • Everyone living in good quality, affordable homes, and; • for everyone to be safe and feel safe. <p>Working to empty and then demolish these blocks will enable us to remove unsustainable and lower quality homes from the council housing stock, moving residents to accommodation of better quality that they can stay in for the longer term. It will also support compliance with the new regulatory requirements for residential high-rise buildings under the Building Safety Act.</p> <p>The scope of this assessment covers the full programme of rehousing activities required to relocate residents and leaseholders from the above 6 blocks, as well as the decision to demolish and clear the sites.</p> <p>This includes:</p> <ul style="list-style-type: none"> • <u>Suspension of new lettings</u>: the suspension of lettings (to the flats and the nearby garages) with any void properties taken out of charge. • <u>Award of priority bidding statuses</u>: award of 'band A' housing priority and direct let status to tenants of the blocks to facilitate bidding through Leeds Homes. • <u>Demolition of garage sites</u>: demolition of garage site(s) in advance of the main demolition if required (this would be undertaken through Leeds Building Services). • <u>Rehousing and support for moving</u>: We are committed to supporting residents through the rehousing process and to successfully move to new homes that suit them longer-term, whilst working to manage the impact of this on the Leeds Homes Register. We will engage and work with all residents to identify their rehousing needs and support them to seek alternative housing. • <u>Buy back of leasehold properties</u>: including obtaining a survey to agree a suitable property value through to the negotiation of voluntary buy-back, and if unsuccessful; the compulsory purchase process. • <u>Site security</u>: As flats become vacant, they will be secured. In addition, we will also consider and work to manage any community safety needs as blocks become emptier e.g. for additional security from CCTV surveillance, mobile patrols or additional regular inspections. • <u>Site access</u>: this will be maintained to contactors, subject matter experts, staff members, ward members or any other ad-hoc visitors as required, along with maintaining/ providing relevant CX alerts to these visitors. <p>In relation to rehousing support internal service providers will be used where possible. Civic Enterprise Leeds, through Leeds Building Services, already provides the voids and repairs service for the blocks in Seacroft and Moortown. Mears provide the voids and repairs service for the Raynville blocks. Civic Enterprise Leeds will provide the move support for all residents across the city.</p>	

Following rehousing completion, demolition is expected to be undertaken. The procurement decisions for all sites will be subject to a separate decision(s).

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)

Demographic information on the residents within the 6 blocks has been initially collected via Civica (CX) Housing ICT system in May 2023 of Main and Joint tenants (not household members). This includes information on the volume of residents and leaseholders, community language details and the volume of known disabilities or any mental health conditions, see table 1 (below).

Table 1: Residents Profile (May 2023)

Age:	Range 18 - 88 with 17% of residents aged <30, 38% of residents aged >55
Gender:	59% Male, 40% Female, 1% Unknown
Language Preference:	English 58%, Polish 1% Other <1%, Unknown 40%
Medical Indicators:	Total Registered Disabilities 59, Mental Health Impairment 18, Physical Impairment 2, Other 43
Religion:	Not Applicable
Sexual Orientation:	Not Applicable

The average age across the 6 blocks is 49. With 140 residents aged >55 and seven of those residents aged >80. There are six tenancy holders aged <19 who are not classed as vulnerable. Out of all the blocks, Leafield Towers has the highest percentage of residents that are over 55 (62%).

40% of residents across the 6 blocks have an unknown language preference, this places a requirement on the rehousing project team to be aware and supportive of any cultural, language or literacy implications.

The primary language is English representing 218 residents. With 1% of residents declaring a non-English language (Polish) and <0.3% listed as other language need. 149

residents had no recorded/ unknown language. This represents 40% of the residents across the 6 blocks.

Rehousing will be in line with the council's lettings policy. Equality issues are taken into account, including by residents being able to express their preference on the areas they wish to be rehoused in. Individual needs (e.g. disability) are also considered in the offer of suitable accommodation.

Direct engagement with residents / leaseholders

In July 2023, the residents (tenants and leaseholders) were engaged on the known plans for the six high-rise blocks and to gather EDCI support data to address identified data gaps. The following activities were completed as part of this programme:

- Initial letters drop; a letter to the residents explaining the full remit of known plans to suspend lettings, rehouse residents / leaseholders and conduct an options appraisal to determine a refurb or demolition of the blocks. This letter included anticipated FAQs (Frequently Asked Questions).
- Initial letters drop (email); an electronic version of the initial letter drop (detailed above)
- Poster: a poster outlining engagement opportunities to residents situated in the noticeboard on site for each block.
- Mobile office / on site drop-in; three sessions held per Cluster (1 daytime session, one evening session and a weekend session) to allow maximum engagement with residents and provide the opportunity for open Q&A.
- Bookable appointment sessions (in-person); a total of 36 appointment slots per block (30 min slots per session across two dates) which allowed residents / leaseholders to ask questions, raise concerns and obtain information, advice and guidance in a private setting.
- Bookable appointment sessions (telephone); a total of 36 appointment slots per block (30 min slots per session across two dates) which allowed residents / leaseholders to ask questions, raise concerns and obtain information, advice and guidance over the telephone.
- Finalisation letters drop; a final message of thanks to the residents / leaseholders, reminding them of contact details for any follow-up queries and updated FAQs based on some of the questions residents asked us.

It should be noted that:

- bookable appointments helped maximise engagement with residents who may otherwise have found it difficult to attend a drop-in session or public event.
- colleagues are aware of the translation services available if required, to help ensure engagement with non-English language residents and;
- services available to have any material issued in large print and braille.
- during the advertised engagement activity, staff door knocked and met a number of residents which also helped identify any vulnerabilities or support needs.

Following the advertised engagement sessions, we have reviewed those who we have yet to speak to, about the future of the blocks and sought individual contact based on any known information - such as via an interpreter, or through an advocate (further details below).

Data collected from the consultation and engagement outreach sessions (detailed above) has been analysed and thematised, points arising in relation to equality characteristics requirements have been fully considered, with 210 properties successfully engaged, resulting in data being collected on declarations of 13 caring responsibilities, 26 physical disabilities and 13 mental health impairments.

It should be noted that the overall resident response to engagement has been positive. Whilst some residents have expressed sadness of having to move, most residents understand the requirement to invest in the blocks to provide better quality homes. Two thirds of residents that stated an area of choice preference across the engagement sessions, wished to remain in the local area. One in five residents are currently actively seeking rehousing with a housing application already in place. The engagement has also helped identify those who may need additional help and support with registering their housing applications and move support.

All additional EDCI declarations will be included on the rehousing project's tracker to ensure that identified needs are continually met throughout the rehousing project. All communications have been drafted/ logged and will continue to be reviewed and updated, to support planning, monitoring and delivering communications and engagement activity throughout the rehousing project's delivery.

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

Data collected in May on these high-rise blocks presents a population of circa 373 main and joint tenancy holders.

The main area of data gaps relates to disabilities. In 84% of records, we have no information. In addition, in 40% of records on language preference are recorded as 'not known'. These areas were identified to explore in our engagement activity so that we can provide these residents with appropriate support, and we are updating information on our systems accordingly. We also do not hold any nationality data set.

Medical Indicators: Total Registered Disabilities 59, Mental Health Impairment 18, Physical Impairment 2 and Other 43.

A programme of direct engagement with residents and leaseholders was delivered in July 2023 and throughout August 2023 to collect any additional data. Across the 6 blocks we have spoken with 60% of households. To engage with the remaining resident a program of engagement has started again by local teams which commenced in August 2023. This will ensure residents are aware of the plans for the blocks and help identify any further support needs.

Details of the second programme of engagement is outlined below (which is ongoing):

- Data gathering- we have reviewed who we have not spoken to about the future of the blocks and sought individual contact. This was based on any known information such as via an interpreter, or through an advocate (further details below).
- Interpreter supported appointments; where an identified language preference was noted, a telephone or face-to-face appointments with the support of an interpreter will be arranged.

- Text message series: a short message is proposed to encourage those households who we have not spoken to about the future of the blocks, contact their local housing office for further information.
- Home visits: for some residents it was noted that a home visit would be more beneficial to confirm they are aware of the plans and to gather any data on EDCI requirements.

This programme will continue through September and into October. At the beginning of September, across the 6 blocks, we have spoken with 78% of households. It may not be possible to achieve 100% confirmation of engagement with all residents prior to rehousing. However, we will continue working to make sure that all residents have been engaged with and are aware of the support available.

Action required:

The following actions are required to address identified data gaps and to utilise known EDCI data to enhance the rehousing project's delivery:

- Deliver continuous rehousing outreach activity; to seek confirmation of known plans and EDCI considerations of the remaining 105 households identified as a data gap, through local Housing Office and rehousing project team rehousing engagement.
- Transpose identified EDCI and non-EDCI considerations; onto the rehousing project tracking document so that all considerations can be monitored and identified support provided throughout the rehousing project's delivery.
- Utilise support referral processes; to address any remaining data gaps following the second outreach activity which seeks to provide adequate information, advice and support to residents declaring EDCI considerations throughout the project's delivery. For example, an Adaptations referral.
- Establish EDCI rehousing project controls; established through adding an entry to the rehousing project's Risk Register. This will ensure consideration and support levels are reviewed and confirmed as adequate throughout the rehousing project's risk assessment practices.

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

Yes

No

Please provide detail:

Activity for resident engagement has been covered in earlier sections of this assessment.

An internal Board is providing leadership and oversight of this activity, with a membership consisting of senior managers across Housing as well as in City Development and Finance, led by the Chief Officer for Housing. This Board will retain overarching responsibility for ensuring appropriate and timely engagement with designated stakeholder groups.

Cross-council and elected member engagement has taken place to gather insight, perspective, feedback on the proposed approach and to prepare for enacting the decision. Information on this is provided in the decision report.

Action required:

The following actions are required to maintain fair, cohesive and inclusive communications throughout the project's delivery:

- Regularly review and update the approach to communication; key communications will be noted, relevant audiences and planned delivery dates identified.
- Communications-inclusive delivery team; including representation from Housing's Communications team which will support communication outputs, as well as inputting communication-related subject matter expertise throughout delivery.

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 | | |

(**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:

Data collected in July 2023 identified common questions/ themes of residents across the 6 blocks. It identified that some residents were concerned about the financial impact of moving will have and/or requested support with rehousing. This was either applying for rehousing due to difficulties using the online application form or physically moving.

Support will be in place to help residents claim the home loss/disturbance payments which will support residents' concerns about the financial impact. Local Housing teams will also support residents with any benefit claims and housing application enquiries.

Within the FAQs issued to tenants, a section is also included about financial abuse and its forms. Should any resident have any concerns about keeping themselves or their money

safe or are approached by someone they do not know asking about money. We have encouraged them to approach their local housing office.

Stakeholders

- | | | |
|--|---|---------------------------------------|
| <input checked="" type="checkbox"/> Services users | <input checked="" type="checkbox"/> Employees | <input type="checkbox"/> Trade Unions |
| <input checked="" type="checkbox"/> Partners | <input checked="" type="checkbox"/> Members | <input type="checkbox"/> Suppliers |
| <input type="checkbox"/> Other please specify | | |

Potential barriers

- | | |
|--|--|
| <input type="checkbox"/> Built environment | <input type="checkbox"/> Location of premises and services |
| <input type="checkbox"/> Information and communication | <input type="checkbox"/> Customer care |
| <input type="checkbox"/> Timing | <input type="checkbox"/> Stereotypes and assumptions |
| <input type="checkbox"/> Cost | <input checked="" type="checkbox"/> Consultation and involvement |
| <input type="checkbox"/> Financial exclusion | <input type="checkbox"/> Employment and training |
| <input type="checkbox"/> 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:

The following positive factors have been considered during this assessment:

- Residents will be able to move to homes that suit them in the longer term, that are of better quality, for example, tenants with medical issues will be assessed for more appropriate type of housing, and overcrowded households will be offered larger accommodation.

- Residents that had already wanted to move will be able to do so more easily and quickly.
- Financial compensation will be provided to qualifying residents for home loss and/or disturbance.

Action required:

Not applicable

8b. Negative impact:

The following negative factors have been considered in this assessment:

- Residents will all need to move. Rehousing can be disruptive and unsettling for those affected and could result in social and /or family support networks being weakened.
- Rehousing these residents, and the temporary loss of stock, will have negative implications for other people waiting for council homes in Leeds.
- Some tenants at the blocks are vulnerable and have additional support needs and will need support throughout the rehousing process.
- Any tenants with a Right to Buy application, will not be able to progress this.
- Trespassers may be attracted to the sites as the blocks become emptier and then unoccupied
- Residents living nearby may be negatively impacted when occupancy levels drop significantly.

Action required:

The following actions are required to balance the negative factors being assessed in this report:

- Award of priority and direct letting statuses to tenants; to remove any blocking factors which may delay or impede rehousing progress / efficiencies.
- Right-to-buy protection; to ensure that current discounts are protected and progress to the residents' new tenancies, in line with LCC policies and eligibility criteria.
- Site security provision(s); to minimise anti-social behaviour within the blocks and dwellings, reviewed frequently as site occupancy decreases.
- Local resident communication(s); agreement of key messages and communication mechanism(s) to outreach to residents with the locale.
- Additional support for vulnerable residents; ensuring that staffing resources are available to support residents to make a housing application and progress the rehousing process.

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

Yes

No

Please provide detail:

Action required:

Not applicable

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

Yes

No

Please provide detail:

Action required:

Not applicable

11. Could this activity be perceived as benefiting one group at the expense of another? (for example where your activity or decision is aimed at adults could it have an impact on children and young people)

Yes

No

Please provide detail:

Action required:

Not applicable

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
<u>Deliver ongoing rehousing outreach activity</u> ; to seek confirmation of any rehousing and support needs. To also gather EDCI considerations of the remaining tenancy holders identified as a data gap, through local Housing Office(s) rehousing engagement.	September 2023 to rehousing conclusion	Housing Officers assigned to support rehousing project rehousing activities are making a record of unrecorded EDCI considerations and escalating to the rehousing project team, as required.	Mandy Sawyer / Tom O'Connell / Pamela Parker / Elizabeth Goor/ Maddie Edwards
<u>Utilise support referral processes</u> ; between the local Housing Office(s) & other services to provide support to residents as identified.	From early November 2023	Process agreed with all services as needed to support the rehousing project, whereby rehousing assessments completed with appropriate recommendations made on housing and support needs.	Local Housing Office(s)
<u>Ensure data relating to EDCI considerations is available</u> ; to those involved in rehousing support, via safe and secure rehousing tracking documents.	Ongoing	Up to date records will be kept and monitored through a Rehousing Tracker and this information will be used for future engagement.	Helen Gibson / Madeline Edwards

Action	Timescale	Measure	Lead person
<u>Establish EDCI rehousing project controls</u> ; use Program Risk Register to ensure consideration and support levels are reviewed and confirmed as adequate throughout delivery.	Early-November 2023 and ongoing	Entry added to the Risk Register. EDCI considerations are periodically monitored and continuously reviewed alongside standard risk assessment activities with issues being monitored, tracked and reported upon until resolution.	Helen Gibson / Jamie Sampler
<u>Regularly review and update the approach to communication</u> ; which will detail key milestones, identified content and relevant audiences alongside planned delivery dates.	ongoing	Communications requirements are monitored through specialist representation within the rehousing project team, with communication continually refined to meet internal and external customer needs.	Ian Montgomery / Helen Gibson
<u>Agreement of a rehousing lettings process</u> ; which defines support mechanisms, allowances and reasonable considerations to minimise the disruption of family networks, social loss and meeting agreed resident's rehousing preferences where possible.	Sept/October	Lettings support agreed for the rehousing commencement with consideration given to minimising social loss, and supportive methods to meet the lettings preferences of residents / leaseholders wherever possible	Vicki Hooper / Kath Bramall
<u>Right-to-buy protection as appropriate</u> ; to ensure that	End-September / ongoing	Full assessment completed of allowances to ensure that	Home Ownership Team

Action	Timescale	Measure	Lead person
current discounts are protected and progress to the residents' new tenancies, in line with LCC policies and eligibility criteria.		residents allowances are unaffected and progress to their new tenancies correctly.	
<u>Establishment of direct lettings statuses and 'band A' housing priority on residents housing applications</u> ; to remove any blocking factors which may delay or impede rehousing progress / efficiencies.	From 1 November 2023	Direct let statuses and 'band A' are in place.	Local Housing Office / Voids Team
<u>Site security provision(s)</u> ; to minimise anti-social behaviour within the blocks and dwellings as site occupancy decreases.	Ongoing	Local safety is kept under review, and consideration of static or mobile security presence as needed, to minimise anti-social behaviour.	Strategy & Investment and Housing Management working with Leeds Watch/ CEL
<u>Nearby residents and stakeholders communication(s)</u> ; agreement of key messages and communication mechanism(s) to share with residents within the locale.	Mid-November	Residents and stakeholders are engaged on known plans, and future planned milestones.	Ian Montgomery / Roisin Donnelly
<u>Provide additional support for vulnerable residents</u> ; ensuring that staffing resources are available to support residents	Ongoing	Appropriate representation occurs at regular rehousing project meetings to ensure	Mandy Sawyer / Madeline Edwards / Helen Gibson

Action	Timescale	Measure	Lead person
to make a housing application and progress the rehousing process.		<p>support requirements are met rapidly.</p> <p>Vulnerable residents are enabled and supported throughout the rehousing application and moving process.</p>	

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
Helen Jackson	Head of Business Development & Housing Projects	20/09/2023
Date impact assessment completed		August-September 2023

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: 20 Sept 2023
For Delegated Decisions or Significant Operational Decisions – sent to appropriate Directorate	Date sent:
All other decisions – sent to equalityteam@leeds.gov.uk	Date sent: