

## Equality, Diversity, Cohesion and Integration (EDCI) impact assessment

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

<b>Directorate: Communities, Housing &amp; Environment</b>	<b>Service area: Housing Leeds</b>
<b>Lead person: K Bramall</b>	<b>Contact number: 378 1110</b>
<b>Date of the equality, diversity, cohesion and integration impact assessment:</b>	

<b>1. Title: Local Lettings Plan for new build properties at the Sugar Hill site in Oulton</b>
Is this a:
<input checked="" type="checkbox"/> <b>Strategy / Policy</b> <input type="checkbox"/> <b>Service / Function</b> <input type="checkbox"/> <b>Other</b>
<b>If other, please specify</b>

### 2. Members of the assessment team:

<b>Name</b>	<b>Organisation</b>	<b>Role on assessment team For example, service user, manager of service, specialist</b>
Kath Bramall	LCC	Housing Manager
Zuzka Downing	Leeds Federated Housing Association	Area Manager
Rebecca Janes	Leeds Federated Housing Association	Neighbourhood Officer
Daniel Massey	Leeds Federated Housing Association	Development Project Manager

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

LCC and Leeds Federated Housing Association have agreed a local lettings plan (LLP) for the first lets of new properties at the Sugar Hill development in Oulton. The LLP gives some former tenants the opportunity to move back to the estate by giving preference for lettings in the following order:

First tier (direct offers to be made):

- Former Sugar Hill tenants whose properties were demolished, where the tenancy commenced before 28/11/17 and
- Local connection to the Leeds City Council area, based on residence, family associations or employment
- Applicants will be shortlisted based on the date of their tenancy commencement

Second tier (properties to be advertised through Leeds Homes):

- Other customers on the housing register with a local connection to the Rothwell Ward area using the same definition
- Applicants will be shortlisted in order of priority award

All applicants will need to meet the requirements of Leeds Federated Housing Association's Lettings Policy.

The LLP will allow under occupation by 1 bedroom under the first tier subject to affordability. Overcrowding will not be permitted.

The LLP also provides for 10 Protected tenants to move to new build homes on protected tenancies.

**4. Scope of the equality, diversity, cohesion and integration impact assessment**  
(complete - 4a. if you are assessing a strategy, policy or plan and 4b. if you are assessing a service, function or event)

**4a. Strategy, policy or plan**  
(please tick the appropriate box below)

The vision and themes, objectives or outcomes	<input type="checkbox"/>
The vision and themes, objectives or outcomes and the supporting guidance	<input type="checkbox"/>
A specific section within the strategy, policy or plan	<input checked="" type="checkbox"/>

**Please provide detail:**

The LLP sets out how the criteria that will be used to allocate the properties.

<b>4b. Service, function, event</b> 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"/>
<b>Please provide detail:</b>	

<p><b>5. Fact finding – what do we already know</b></p> <p>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.</p> <p>(priority should be given to equality, diversity, cohesion and integration related information)</p> <p>Census data for the local area: <a href="#">Leeds Observatory – Welcome to the Leeds Observatory – Census 2021</a></p> <p>Equality information on displaced tenants – we hold information on the tenants who have been in contact with the service, but not all have active housing applications, which means we do not hold full equality data.</p> <p>We do hold more robust data on the applicants who have selected Rothwell / Oulton / Woodlesford as their first choice area.</p> <p>In summary: There are 103 applicants for Rothwell, Oulton or Woodlesford in Band A and B who need a 2 or 3 bedroom home. The breakdown of equality data for the main applicant is shown below:</p> <table border="1"> <thead> <tr> <th>Sex</th> <th>Number</th> <th>Percent</th> </tr> </thead> <tbody> <tr> <td>Female</td> <td>83</td> <td>81</td> </tr> <tr> <td>Male</td> <td>20</td> <td>19</td> </tr> <tr> <td><b>Grand Total</b></td> <td><b>103</b></td> <td><b>100</b></td> </tr> </tbody> </table> <p>This compares to 57% of the total register who are female</p> <table border="1"> <thead> <tr> <th>Ethnic origin</th> <th>Number</th> <th>Percent</th> </tr> </thead> <tbody> <tr> <td>White - British</td> <td>15</td> <td>15</td> </tr> <tr> <td>White - English</td> <td>71</td> <td>69</td> </tr> </tbody> </table>	Sex	Number	Percent	Female	83	81	Male	20	19	<b>Grand Total</b>	<b>103</b>	<b>100</b>	Ethnic origin	Number	Percent	White - British	15	15	White - English	71	69
Sex	Number	Percent																			
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Ethnic origin	Number	Percent																			
White - British	15	15																			
White - English	71	69																			

White - Welsh	1	0
Any other White background	4	4
Black or Black British - African	3	3
Mixed/multiple ethnic group - White and Asian	1	0
Mixed/multiple ethnic group - White and Black African	1	0
Mixed/multiple ethnic group - White and Black Caribbean	3	3
Any other mixed/multiple ethnic group	1	0
Prefer not to say	3	3
<b>Grand Total</b>	<b>103</b>	<b>100</b>

This compares to 60% of the whole register who are White British / or English

Sexual orientation	Number	Percent
Bisexual	3	3
Gay Man	1	0
Heterosexual / Straight	95	92
Prefer not to say	4	4
<b>Grand Total</b>	<b>103</b>	<b>100</b>

This compares to 86% total register who identify as heterosexual

Disability	Number	Percent
Yes	20	20
No	80	78
Prefer not to say	3	3
<b>Grand Total</b>	<b>103</b>	<b>100</b>

This compares to 21% total register who have a disability

Applicant or partner in paid work	Number	Percent
Up to £15,000	22	21
£15,000 - £24,999	15	15
£25,000 - £34,999	9	9
£35,000 - £59,999	2	2
I/we are not in paid work	55	53
<b>Grand Total</b>	<b>103</b>	<b>100</b>

This compares to 45% total register who are not in paid work

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

Neither the council or LFHA manage properties in the immediate area of the development, so we do not hold equality data on local tenants

**Action required:**

Monitor outcomes of lettings by equality characteristics

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

Yes       No

**Please provide detail:**

Meetings with Save our Homes group of residents and former residents of Sugar Hill.  
Consultation on LLP hosted on LFHA website  
Consultation with elected members

**Action required:** Analysis of consultation survey

**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 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:**

**Stakeholders**

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

## Potential barriers

- |                                     |  |                                     |                                     |
|-------------------------------------|--|-------------------------------------|-------------------------------------|
| <input type="checkbox"/>            | <b>Built environment services</b>                                      | <input type="checkbox"/>            | <b>Location of premises and</b>     |
| <input checked="" type="checkbox"/> | <b>Information and communication</b>                                   | <input checked="" type="checkbox"/> | <b>Customer care</b>                |
| <input type="checkbox"/>            | <b>Timing</b>  | <input type="checkbox"/>            | <b>Stereotypes and assumptions</b>  |
| <input type="checkbox"/>            | <b>Cost</b>  | <input type="checkbox"/>            | <b>Consultation and involvement</b> |
| <input type="checkbox"/>            | <b>Financial exclusion</b>   | <input type="checkbox"/>            | <b>Employment and training</b>      |
| <input type="checkbox"/>            | <b>specific barriers to the strategy, policy, services or function</b> |                                     |                                     |

### Please specify

Where properties are advertised through Leeds Homes the details of the LLP criteria will be set out in the advert.

## 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 will give former tenants who took up a tenancy at Sugar Hill prior to the announcement that the properties would be redeveloped the opportunity to return to the new build estate.

Due to the cut off date of tenancy start dates of November 2017 a maximum of 17 households would benefit under tier 1 preference. Some former tenants have moved into social housing, and if they move to the new development their properties will be freed up to relet to other customers. The cut off date recognises the needs of the longer standing tenants who took up a tenancy prior to the planning application being made, including some who would have been Coal Board tenants.

It is unlikely all 17 who are potentially eligible will take up the offer, as many have settled in other areas, no longer have a housing application registered or need a larger property than the new build scheme can offer.

This means it is likely more properties will be available for other customers on the housing register, provided they meet the tier 2 criteria. Under tier 2 applications will be

shortlisted in order of priority, meaning offers will be made to customers in the highest housing need. This will help groups including homeless customers, people living in poor housing conditions, with medical needs or who have a need to move on welfare or hardship grounds. Potentially this may help customers move out of, or prevent them having to move into, temporary accommodation. Rothwell is an area of high demand and LCC and LFHA hold very little stock in the Oulton area.

The local connection criteria means customers will be able to remain or move back to an area they have a connection with, including their employment or close family.

**Action required:**

Where possible contact will be made with the eligible former tenants to inform them of the LLP and establish if they are interested in applying for one of the new homes.

Former tenants will need an active housing application and must meet the standard eligibility and qualification rules to join the Leeds Homes Register.

There are no 1 bedroom properties at the new development, so any former tenants needing a 1 bedroom property will need to decide if they wish to consider accepting the offer of a larger home (subject to affordability checks).

Due to the nature of the scheme, the fact that former tenants have been rehoused elsewhere, and that the homes will come online between February 2025 and January 2026, these properties will be let by making direct offers to former tenants rather than advertising through Leeds Homes. If the properties are advertised it would rely on the former tenants placing bids within the 7 days of the advert, and the phasing / property size means that some tenants could not expect to be successful until the final phase of the development is delivered.

Where properties are advertised in Leeds Homes, they will only be available to bid on for 1 week.

The scheme is likely to be very popular and receive 100s of bids, but other customers would be unlikely to be made an offer which could raise expectations unfairly.

Making direct offers would mean former tenants and other customers were aware of when they are likely to be made an offer and they would not need to place bids.

**8b. Negative impact:**

The LLP prioritises former tenants ahead of other applicants. The first preference tier will be the former tenants pre-November 2017 who can establish a current connection to Leeds.

This disadvantages those tenants who have moved out of area and who will not be able to establish a local connection by the time properties are handed over. Some former tenants may not have an application registered and the council may not have current contact details for them.

It also disadvantages other tenants who moved to Sugar Hill after November 2017 when the planning application was made however this group would have held Assured Shorthold tenancies that offered limited security.

The first preference criteria disadvantages applicant who were not former tenants and who may be in higher housing need than the former tenants.

The second preference is to applicants with a connection to the Rothwell ward area in order of housing priority.

This disadvantages customers who cannot establish a connection who may be in higher housing need or be in under-represented equality groups.

**Action required:**

The first preference criteria only apply to the initial allocation of the properties.

Under tier 2 applications will be shortlisted in order of priority. The top ranked customer with a local connection to Rothwell will be considered for offers ahead of other customers without a connection.

Due to demand it is likely that customers in Band A with a local connection will be successful.

Some customer groups will be disadvantaged by the local connection criteria, for example;

- customers who do not meet the local connection criteria but are unable to live safely in an area they do have a connection with due to domestic abuse
- customers who do not meet the statutory definition based on length of residence in the ward or not having or being estranged from close family

LFHA will consider cases where a customer cannot establish a connection on a case by case basis, and if extreme hardship would result may make an offer.

LCC operate a local connection LLP on 50% family sized homes (2+ bedrooms) in Rothwell, so there are alternative options for other applicants on the housing register in the ward area who do not meet the LLP criteria.

LFHA have limited housing stock in this area and advertise available homes on Leeds Homes website.

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

Yes

No

**Please provide detail:**



The LLP gives former tenants the opportunity to return to the estate where they meet the criteria, and the protected tenants can be made an offer of a new protected tenancy.

**Action required:**

Inform former tenants of the LLP and timescales for the new homes being available and support them make housing applications.

**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:**

n/a

**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:**

The policy gives preference to former tenants ahead of other applicants on the housing register under the first tier, and to a wider group with a local connection to Rothwell under the second tier. The LLP may release some social housing for relet under the main lettings policy.

**Action required:**

The number of former tenants qualifying under Tier 1 has been limited to those with the longest connection to the area. Other applicants who are not former tenants will be able to bid on properties under the Tier 2 criteria if they have a local connection to the Rothwell area.

Applicants who are unable to establish a local connection with the Rothwell area will have the opportunity to bid on other properties advertised through Leeds Homes or be signposted to information / advice on rehousing.

**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)

<b>Action</b>	<b>Timescale</b>	<b>Measure</b>	<b>Lead person</b>
Monitor outcomes of lettings by equality characteristics	After properties let		Leeds Federated / LCC
Analysis of consultation responses	September 2024		LCC
Inform former tenants of the LLP and timescales for the new homes being available and support them make housing applications, make offers through direct lets.	Sept / Oct 2024		LCC / LFHA
For customers who do not meet the LLP - sign post to alternative options / advice	Ongoing		LCC / LFHA

**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
<b>Date impact assessment completed</b>		

**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](mailto: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 <b>Governance Services</b>	Date sent:
For Delegated Decisions or Significant Operational Decisions – sent to appropriate <b>Directorate</b>	Date sent:
All other decisions – sent to <a href="mailto:equalityteam@leeds.gov.uk">equalityteam@leeds.gov.uk</a>	Date sent: