

Equality, Diversity, Cohesion and Integration 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

Directorate: Environment and Neighbourhoods	Service area: Housing Support
Lead person: Kathryn Bramall	Contact number: 22 43296
Date of the equality, diversity, cohesion and integration impact assessment:	

1. Title: Lettings Policy Review 2013
Is this a:
<input checked="" type="checkbox"/> Strategy /Policy <input type="checkbox"/> Service / Function <input type="checkbox"/> Other
If other, please specify

2. Members of the assessment team:

Name	Organisation	Role on assessment team e.g. service user, manager of service, specialist
Kathryn Bramall	Leeds City Council	Housing Support, Leeds Homes Policy Manager
Catriona Purdy	Leeds City Council	Housing Support, Development Officer

3. Summary of strategy, policy, service or function that was assessed:
All housing authorities must publish an allocations policy in accordance with the Housing Act 1996, as amended.
The lettings policy sets out how offers of council accommodation are made, how the housing register is operated and which groups of customers are given preference for lettings of accommodation. It applies to the letting of all Leeds City Council properties.
The lettings policy is being reviewed in response to the legislative changes in the Localism Act 2011 and the subsequent Code of Guidance issued in June 2012, the regulations on the Armed Forces issued in July and November 2012 and the housing benefit changes to be introduced in April 2013.

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)
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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:	

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 see equality assurance in procurement)	
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)

- Equality monitoring information and profiling data of customers on the Leeds Homes Register
- Equality monitoring information of customers who have been rehoused by Leeds City Council
- Data on overcrowded households
- Data on under occupying tenants who will be affected by the housing benefit changes
- Customer consultation undertaken on the proposed changes, including the equality profile of the respondents
- Consultation on the proposed changes with other stakeholders
- Leeds City Council Executive Board report on the lettings policy, December 2012
- Leeds City Council’s Tenancy Strategy and 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.

Are there any gaps in equality and diversity information
Please provide detail:
 Some equality information on the Leeds Homes Register is incomplete. This is more common in earlier applications. This has been addressed by the introduction of an enhanced application registration system in which equality information is mandatory.

Action required:
 Ongoing reminders to officers of the importance of accurately recording equality information for new applications and of collecting information which is missing on older applications.

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

<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
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Please provide detail:

In December 2012, the council's Executive Board authorised Housing Policy to begin consultation on the proposed changes to the lettings policy. The consultation ran from 19 December 2012 to 22 February 2013.

Housing Policy wanted to obtain feedback from members of the public, particularly those seeking social housing in Leeds. This was done through placing a survey on the council's online 'Talking Point' consultation portal, including a copy of the survey in the Leeds Homes paper flyer and undertaking face to face surveys with customers in One Stop Centres and housing offices throughout the city. Customers were signposted from the Leeds Homes Flyer and website (where vacant council, RSL and private rented properties are advertised), by a press release and from the 'carousel' feature on the Leeds City Council website. Customers could respond to the survey through the post or by email.

Key stakeholders such as RSLs and support providers were invited to give their views, either via the online survey or with separate written responses.

The main proposals consulted on were:

1. The 'Qualification Criteria' – which groups can apply to the Leeds Homes Register
2. Reviewing the proportion of properties let under the Date of Registration Quota
3. Changing the local connection area from housing office to Ward area for properties advertised through the Date of Registration Quota
4. Removing sheltered properties and bungalows from the Date of Registration Quota
5. Capping the effective date of registration for owner occupiers with no housing need
6. Ring fencing a proportion of properties for under occupying tenants affected by housing benefit changes
7. Increasing the priority for overcrowded social housing tenants to free up smaller properties
8. Introducing pre-transfer checks for council tenants in Band C
9. Increasing the time a priority is awarded to 180 days
10. Resetting the date of application for customers in Band C who refuse a reasonable offer of accommodation.

Other changes which were not part of the consultation were;

- British Armed Forces – new statutory regulations for Armed Forces personnel in urgent housing need
- People assessed as lacking capacity – procedures to be updated in conjunction with Leeds Social Care
- 16 and 17 year olds to be assessed by Children's Services prior to being rehoused.
- New direct let category for customers requiring adapted properties in preparation for Accessible Housing Register
- Remove direct let category – NASS and supporting people direct lets
- Centralising housing needs assessments to the council, and implementing a revised training programme for lettings staff

Action required:

The results of the consultation to be taken into account in making recommendations to the council's Executive Board, and a summary of the response to be included as an appendix to the lettings policy report

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

Age

Carers

Disability

Gender reassignment

Race

Religion or Belief

Sex (male or female)

Sexual orientation

Other

(for example – marriage and civil partnership, pregnancy and maternity, social class, income, unemployment, residential location or family background, education or skills level)

Please specify: Low income households, vulnerable customers

Stakeholders

Services users

Employees

Trade Unions

Partners

Members

Suppliers

Other please specify: Current council tenants and customers on the Leeds Homes Register

Potential barriers.

Built environment

Location of premises and services

Information and communication

Customer care

Timing

Stereotypes and assumptions

Cost

Consultation and involvement

specific barriers to the strategy, policy, services or function

Please specify: Demand for social housing outstrips supply; the lettings policy outlines which customer groups are given preference for lettings of council properties and for particular property types to achieve best use of stock. Scarcity of social housing (and of particular types and sizes) can lead to a public perception that the lettings policy is unfair and that preference is given to particular customer groups.

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:

1. Qualification criteria

- The council will consider all cases individually before making a decision that the customer is non-qualifying to join the housing waiting list.
- The 'qualification criteria' will not be applied to people with rent arrears who are fleeing domestic violence or hate crime. This will benefit vulnerable customers who need to move due to violence.
- Applying the 'qualification criteria' to customers who have been guilty of anti social behaviour (ASB) may protect vulnerable customers who at risk of suffering from anti-social behaviour.
- The 'qualification criteria' on people living outside the UK will not be applied to British Armed Forces (BAF) personnel or people who are temporarily abroad. This will benefit BAF customers stationed abroad and customers who have to leave the country temporarily, for example to care for a relative.
- The 'qualification criteria' on local connection will not be applied which will benefit vulnerable customers at risk of homelessness, and BAF customers stationed outside of Leeds, people who do not qualify under work, residence or family (for example people with non-typical family relationships, or people who have been in foster care), vulnerable customers, for example those that have been in care, people fleeing violence who cannot be rehoused in the area that they have a local connection to.
- The 'qualification criteria' on people who have caused damaged to their home may benefit vulnerable customers who are at risk of suffering from anti-social behaviour.

2. Changing the local connection area from housing office to Ward area for DOR properties

- This will be easier to communicate to customers so all equality groups will benefit, particularly vulnerable customers

3. Removing sheltered properties and bungalows from the date of registration quota

- This will mean that all properties will be let on the basis of housing need, regardless of how long the customer has been waiting. This will benefit older and disabled customers with an assessed need for sheltered housing or bungalows

4. Capping the effective date of registration for owner occupiers with no housing need

- This may mean that other customers will have a greater chance of being rehoused. This may benefit customers in housing need and customers who are on low incomes and unable to buy their own home, and would be a more

proportionate measure than removing owner occupiers in Band C from the waiting list altogether.

5. Increasing the priority for overcrowded social housing tenants to free up smaller properties
 - This will give greater preference for lettings to overcrowded households and will have a positive impact on overcrowded households, particularly BME customers who are more likely to be living in overcrowded conditions
6. Increasing the time a priority is awarded to 180 days
 - This will mean a customer will have an extra two months in priority before having to request a priority extension. This means that vulnerable customers who may have difficulty in requesting priority extensions are more likely to be rehoused before expiry of priority. This may also free up staff resources to assist vulnerable customers
9. 16 and 17 year olds to be assessed by Children's Services prior to being rehoused
 - This will benefit young vulnerable customers as it will mean they will receive appropriate support and housing and means the council fulfils its legal duties
10. New direct let categories – adaptations
 - This will mean that disabled people can 'match' an appropriate property for their needs more easily through the development of an Accessible Housing Register. It also means that disabled people who have difficulty in using CBL can be made a direct offer of a property. This will benefit disabled people.
11. Centralising housing needs assessments to the council, and implementing a revised training programme for lettings staff will benefit all groups of customers by ensuring consistent and fair implementation of the lettings policy

Action required:

- Lettings to be monitored under the DOR and housing needs quota
- Revised training programme to be implemented for lettings officers
- Centralisation of housing need assessments to be implemented

8b. Negative impact:

1. Qualification criteria
 - The 'qualification criteria' on rent arrears will mean that vulnerable customers and those on low incomes are more likely to be disadvantaged. This may also apply to under occupying tenants affected by the housing benefit changes
 - Applying the 'qualification criteria' to customers who have been guilty of anti social behaviour (ASB) may disadvantage vulnerable customers or those with mental health problems who may be more likely to exhibit this kind of behaviour
 - The 'qualification criteria' on people who have caused damage to their home may disadvantage vulnerable customers who may be more likely to exhibit this type of behaviour.
2. Changing the local connection area from housing office to Ward area for DOR properties

- This may disadvantage vulnerable customers who have grown accustomed to the existing system
3. Capping the effective date of registration for owner occupiers with no housing need
 - This may have a negative impact on older customers who are more likely to be owner occupiers
 4. Introducing pre-transfer checks for tenants in Band C
 - This may disadvantage vulnerable customers who may have more difficulty keeping to the terms of the tenancy agreement
 5. Increasing the length of time a priority is awarded for to 180 days
 - This may disadvantage vulnerable customers who are bidding inappropriately or have an issue with their housing application as this may not be highlighted until the priority is extended
 6. Resetting the date of application for customers in Band C who refuse a reasonable offer of accommodation
 - This may disadvantage older people, who have early registration as they may lose more 'waiting time' if they refuse a reasonable offer of accommodation

Action required:

- Procedures to be written with clear guidance on factors to be taken into account when applying the qualification criteria, including circumstances in which local connection can be waived
- The housing computer system workflow to be amended to reflect the qualification criteria, to ensure consistency in applying the criteria
- ALMO/BITMO support teams to be briefed to ensure customers have access to support
- Equality monitoring to be completed on customers that do not meet the qualification criteria
- Implementation training for frontline staff so that changes are communicated to customers effectively. Frontline staff to be reminded to check applications for appropriate bidding, bed requirements, bypass reasons etc on customer contact to ensure customers are not disadvantaged by the extra 2 months in priority
- Information about changed published in the flyer and on the Leeds Homes website
- A revised customer information leaflet and summary of the new lettings policy to be produced

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

Yes

No

Please provide detail:

Retaining the date of registration quota, which seeks to balance the needs of customers in reasonable preference with the aspirations of customers who wish to be rehoused in an

area they have a local connection to, assists in creating mixed and sustainable communities and also assists younger people to need to remain in or move to an area, for example grown up children who wish to live close to family support.

Action required:

Communicate changes to customers through the flyer and Leeds Homes website. Share lettings results with customers.

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

Yes

No

Please provide detail:

See point 9.

Action required:

See point 9.

11. Could this activity be perceived as benefiting one group at the expense of another?

Yes

No

Please provide detail:

Demand for social housing outstrips supply; the lettings policy outlines which customer groups are given preference for lettings of council properties and for particular property types in order to achieve best use of stock. This may result in public perception that the policy is unfair and that offers of accommodation are made to particular groups of customers.

Action required:

See point 9

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
ALMO officers to collect missing equality monitoring data on LHR	Ongoing	% of applications with complete information	Kath Bramall
Revised training programme to be implemented for lettings officers Centralisation of housing need assessments to be implemented	From May 2013	Improved consistency of application of policy, reduced complaints and audit result	Kath Bramall
The results of the consultation to be taken into account in making recommendations to the council's Executive Board, and a summary of the response to be included as an appendix to the lettings policy report	Executive Board report – April 2013	Executive Board report	Kath Bramall
Lettings to be monitored under the DOR and housing needs quota	To be monitored on a quarterly basis	Quarterly monitoring reports published on the intranet	Mike Camponi
Procedures to be written with clear guidance on factors to be taken into account when applying the qualification criteria, including circumstances in which local connection can be waived. Also guidance on advice given to non-qualifying customers about housing options	To be completed prior to implementation and updated on a monthly basis	Procedures published on intranet	Kath Bramall
ALMO/BITMO support teams to be briefed to ensure customers have access to support	To be completed prior to implementation	Minutes of meetings	Kath Bramall

Action	Timescale	Measure	Lead person
Equality monitoring to be completed on customers that do not meet the qualification criteria	Ongoing	Annual monitoring report	Mike Camponi
Implementation training for frontline staff so that changed can be communicated to customers effectively. Frontline staff to be reminded to check applications for appropriate bidding, bed requirements, bypass reasons etc on customer contact to ensure customers are not disadvantaged by the extra two months priority period	To be completed prior to implementation	Staff receive briefings / training on new policy, attendance records	Kath Bramall
Information about changes published in the flyer and on the Leeds Homes website	To be completed prior to implementation	Copies of flyer	Kath Bramall
Share lettings results with customers on the Leeds Homes website.	Ongoing		Mike Camponi
Develop a revised customer information leaflet and summary of new lettings policy	May / June 2013	Leaflet produced	Kath Bramall

13. Governance, ownership and approval

State here who has approved the actions and outcomes from the equality, diversity, cohesion and integration impact assessment

Name	Job Title	Date
Kath Bramall	Leeds Homes Policy Manager	18 March 2013

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

Date copy sent to Equality Team

Date published