Equality Impact & Needs Assessment (INA) Form.

Name of the policy, function or project: Leicestershire Choice Based Lettings - Statement of Shared Policy

Service: Housing, Community Services

Complete this form for any existing/proposed policy/function/project regardless of whether it is aimed at external customers or internal staff. Please also be aware that equality policy applies to staffing/human resources issues as much as to external service delivery issues. Please note that existing policies/functions will be assessed as per an agreed annual programme. However if you are reviewing or devising a policy etc that is not currently in the 3 year plan it still needs an INA

Answer every question – even if it is negative.

If you conclude that there is a negative impact you will need to review the policy/function/project to improve the equalities performance and minimise or remove the impact. This should be done using the 'Improvement Actions Planned' table. Where appropriate such actions should be included in your Service Plan for the following year.

If the Corporate Equalities & Access Group (CEAG) feels this impact assessment needs further consideration, **you will be asked to review your conclusions.**

As a result of this exercise, you will have checked that your policy/function/project does not have negative/adverse impacts in terms of Gender, Gender re-assignment/ transgender, Ethnicity/Race, Disability, Age, Sexual Orientation, Religion or Belief, Marriage/Civil Partnerships, Pregnancy/Maternity (equality target groups).If it does you will have identified relevant actions needed to minimise or remove such impact and their likely resource implications.

This is not simply a paper exercise – it is designed to make sure that your policy/function/project and service (development) is delivered fairly and effectively to all sections of our local community, and our employees!

Please note that the Council is required to publish the results of these assessments, and update; therefore **your completed form may be a public document.**

Once completed and/or when your corresponding report is submitted to Management Board –Cabinet, please pass this form, together with documentation describing both the policy/function/project it concerns and any evidence relating to assessed impacts, to Alison Moran, Performance Manager. *If this is a new policy/service/procedure/function/project this form will also need to be attached to your draft report for approval by your Director prior to its first submission to Management Board. Reports cannot be considered by Management Board unless both they & this INA have had prior approval by the relevant Director.*

For further details please see separate Guidance Note on process for completion of INA's

To complete the form using 'check marks' in the boxes, position the cursor over the box you require, left double click, then select 'checked' in the 'check box form field options' box that appears on screen.

a.	Preparation

The work on this section should be done in advance and be used as part of your INA. Please attach examples of available evidence, including monitoring information, research and consultation reports.

1a. Do you have relevant data available on the number of people within the scope of your policy/function/project? E.g. whole population of the district/ward or employee data.
In relation to:

	Yes	No
• Women and men	☒	☐
• Gender reassignment	☐	☒
• Black and minority ethnic communities	☒	☐
• People with disabilities	☒	☐
• Age groups	☒	☐
• Sexual orientation	☐	☒
• Religion or belief	☐	☒
• Marital status/civil partnership	☐	☒
• Pregnancy/Maternity	☐	☒

1b. Do you have relevant data available on the number of people subject to or impacted by your policy/function/project? E.g. numbers of disabled people using the service.
In relation to:

	Yes	No
• Women and men	☒	☐

- Black and minority ethnic communities ☒ ☐
- Gender reassignment ☒ ☐
- People with disabilities ☒ ☐
- Age groups ☒ ☐
- Sexual orientation ☒ ☐
- Religion or belief ☒ ☐
- Marital status/civil partnership ☐ ☒
- Pregnancy/Maternity ☒ ☐

2. If you have answered 'yes' to the above questions your monitoring data should be compared to the current available census data to see whether a proportionate number of people are taking up your service. Please make any comments regarding service take up if relevant:

Not applicable

If you have answered 'no' please explain reasons for lack of relevant data:

Not applicable

3. Are you aware of any relevant equality or diversity related consultation, research, or good practice guidance in relation to this area? If so then please list and attach here: Yes   No
☒ ☐

Social Housing Allocation and Immigrant Communities 2009
Commission of Racial Equality Code of Practice in Social Rented Housing
Code of Guidance for Racial Equality in Housing
Allocation of Accommodation: Guidance for Local Housing Authorities in England

4. Do you need to carry out further research/ consultation to identify impacts, needs etc? Please specify what and who with?

Yes ☐ No ☒

| |
| |

b.   Your policy, service, function or project

1. What is the title and main aim or purpose of the policy/function/service/project?

Leicestershire Choice Based Lettings – Statement of Shared Policy
The 7 District Local Authorities (excluding Leicester City) operate a partnership which offers Choice Based Lettings across all of their Districts. The policy contains those elements of the housing allocations policy and associated procedures that the partner councils intend to operate in common.

2. List the areas of activity of the policy/function/project, e.g. the recruitment strategy might have advertising, interviewing, short listing etc. as activity areas.

Application assessment and verification
Medical Assessment (if required)
Financial Assessment (if required)

3. Who are the main intended beneficiaries of the policy/function/service/project?

Residents of each of the Districts within Leicestershire who are seeking affordable housing
Registered social landlords are key stakeholders, in that their supply of housing will form an integral of the scheme

4.Which people / groups may be affected by the policy/function/project – whole population or particular groups?

> Whole population excepting those who are subject to immigration restrictions, those that do not have a local connection to any of the 7 Districts within the Leicestershire homes scheme and those with the financial means to meet their own housing needs.

5. Are you expecting to make any changes during the next year?

- Policy   Yes ☐   No ☒
- Function   Yes ☐   No ☒
- Project   Yes ☐   No ☒
- Procedure   Yes ☐   No ☒

6. Who else will be involved in undertaking the INA (names and roles)?

> Ann Ball, Housing Services Manager, Harborough District Council
> Rebecca Holcroft, Housing Options Manager, Blaby District Council

c. Impact Assessment

1. Complete the following tables for each equality target group, by inserting a check mark or tick in one of the 3 options columns - Positive impact, Negative impact, Neutral.
   - ★ Consider the information gathered in Section (a) of this form, compare monitoring information with census data, and considering any other evidence, research or consultations, identify any instances where you believe people in different equality groups could be impacted differentially.
   - ★ This is particularly important where you think that the policy/function/project could have a **negative impact** on any of the equality target groups, i.e. it could disadvantage them, but also
   - Where you think that the policy/function/project could have a **positive impact** on any of the equality target groups or contribute to promoting equality, equal opportunities or improving relations within equality target groups
   - Otherwise, if you think that neither negative nor positive apply, then choose **neutral impact**
   - Note that only **one** type of impact can be applicable for any particular equality group category e.g. male or female.
   - **In all cases, please state briefly the reason/rationale for your assessment.**

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a) How will the policy/function/project/procedure impact on men, women and those who are transgendered or have gone through gender re-assignment? e.g. flexible working arrangements might have a positive impact on women with caring responsibilities

Gender	Positive impact	Negative impact	Neutral	Reason/Rationale for Assessment
Male	☐	☐	☒	The policy offers greater choice, more mobility options across Leicestershire and offers greater opportunities for support for Male, Female and Transgender/GR homeseekers.
Female	☐	☐	☒	As above
Transgender/GR	☐	☐	☒	As above

b) How will the policy/function/project/procedure impact on people from different or minority ethnic communities? This may involve using Council services differently, e.g. will Muslim women use the Council's swimming pool more often if separate sex swimming arrangements are in place?

Ethnicity	Positive impact	Negative impact	Neutral	Reason/Rationale for Assessment
White British	☐	☐	☒	
White European	☐	☐	☒	
Mixed Ethnicity	☐	☐	☒	
Asian	☐	☐	☒	
African or Caribbean	☐	☐	☒	
Gypsy/Roma	☐	☐	☒	
Other ethnic group	☐	☐	☒	

c) How will the policy/function/project/procedure impact on people with disabilities, e.g. if information about Council Tax benefits are not made available in large print or alternative formats, access to such benefits might be denied to people with a visual impairment or learning disability.

Disability/Health	Positive impact	Negative impact	Neutral	Reason/Rationale for Assessment
Visually impaired	☐	☐	☒	
Hearing impairment	☐	☐	☒	
Physically disabled	☒	☐	☐	People with physical disabilities have access to housing which meets their specific needs over and above other households.
Learning difficulty	☐	☒	☐	Potential issues relating to suitability for a tenancy.
Mental health problem	☐	☒	☐	Potential issues relating to suitability for a tenancy.
Other longstanding health problem which	☐	☒	☐	Concerns relating to people in residential care

				needing to move into more appropriate accommodation.
limits day to day activities				

d) Does the policy/function/project/procedure impact on people differently based on their age, e.g. a job advertisement that requires at least ten years post qualification experience would clearly prevent people in their twenties from applying

Age Group	Positive impact	Negative impact	Neutral	Reason/Rationale for Assessment
Children (under 16)	☐	☐	☒	Scheme applies to applicants over 16 only.
(16 to 29)	☐	☒	☐	Not all Social Housing Providers accept under 18's as tenants and rules can be complex and differ from area to area. Registered Providers that accept 16 & 17 year olds provide tenancies that are subject to locally agreed protocols determining the type of property they will be considered for. Concerns also raised over young people receiving appropriate support to place bids & receive advice tailored to need.
(30 – 44)	☐	☐	☒	
(45 – 59)	☐	☐	☒	
(60 – 74)	☒	☐	☐	Transfer homeseekers currently under occupying will now be placed in a higher need band
Older (over 75)	☒	☐	☐	As above

e) Does the policy/function/project/procedure impact on people differently based on their sexual orientation, e.g. if housing policy is only to offer temporary accommodation to couples of different sex a gay or lesbian couple would be unable to be housed

Sexual Orientation	Positive impact	Negative impact	Neutral	Reason/Rationale for Assessment
Heterosexual	☐	☐	☒	No impact identified
Gay or Lesbian	☐	☐	☒	No impact identified
Bisexual	☐	☐	☒	No impact identified

f) Does the policy/function/project/procedure impact on people differently based on their religion or belief e.g. would a person of the Hindu religion be able to give a binding affirmation if a procedure requires the swearing of an oath on the Bible?

Religion or Belief	Positive impact	Negative impact	Neutral	Reason/Rationale for Assessment
Christian	☐	☐	☒	No impact identified. The CBL scheme does give people more choice about where they wish to live, it will be up to the homeseeker to identify whether a location is suitable, appropriate or appealing.
Hindu	☐	☐	☒	As above
Muslim	☐	☐	☒	As above
Sikh	☐	☐	☒	As above
Jewish	☐	☐	☒	As above
Other	☐	☐	☒	As above
Non believer	☐	☐	☒	As above

g) Does the policy/function/project/procedure impact on people differently based on any of the other protected characteristics where these are affected by aspects of the Equality Act (e.g. marital status and civil partnership; pregnancy or maternity)

The policy changes the time at which an unborn child counts for housing purposes as a child from within six months of expected date of delivery to within three months.

If you conclude that there is a **negative impact** in one or more of the target groups you will need to **amend the policy/function/project and/or take further action, to minimise or remove the impact** This should be done using the 'Improvement Actions Plan' table overleaf.   If you think that other actions could be taken **to increase any positive impacts**, please include these too. Where appropriate, such actions should be included in your current/proposed Service Plan.

Impact & Needs Assessment: Improvement Actions Plan

Please list below any recommendations for action to improve the equalities performance of the policy/function/project that you plan to take as a result of this impact assessment. This could be to change the policy itself or involve other initiatives. Where appropriate, these actions should also be included in your current/proposed Service Plan.

Issue/Link to INA question number	Action Required	Lead Officer	Time-scale	Resource implications	Comments
Question C – Mental Health Problems	A robust method of assessing people with mental capacity issues and/or learning difficulties needs to be in place in order to determine if an applicant has the mental capacity to sustain a tenancy.				This needs to include appropriate agencies (support / care / health organisations) in order to assess a homeseekers mental capacity. The inclusion of this exclusion was questioned during the consultation event.
Question C – Other longstanding health issues	Need to ensure that people currently residing in residential care receive appropriate support in finding suitable accommodation which meets their needs.				Are people supported well enough to ensure that they are able to react to adverts for appropriate accommodation. Concerns raised about the impact on support services and their capacity. Continue with programme of training for partner agencies.
Question D – 16 – 29 year olds	Locally agreed protocols and adequate support arrangements need to be in place for 16 and 17 year olds.				Concerns were also raised over the level of support in place for 16 & 17 year olds to assist them in maintaining a tenancy and adjusting to independent living. Suggestion of making support a condition of their tenancy agreement. It has been agreed that the homeless delivery group will include developing a "pathway to housing" for 16/17 year olds which includes local and countywide work

					with LAs and other relevant agencies and the work being carried out on the 16/17 year old protocol. Continue with programme of training for partner agencies.
Question G – Pregnant Women	Accessible information is required to ensure that pregnant women are aware of at what stage an unborn child is considered for housing purposes				Are undertaking further consultation on this to see if we do adopt this change. RPs have raised concerns about changing this and would prefer to keep it as currently is.

Please ensure that the section below is completed and signed by one or both   NAMED officers as applicable:

NAME:_____(Please print name)

Signed:_____
(Corporate/Group/Service Manager)

Date:_____

NAME:_____(Please print name)

Signed:_____
(Completing Officer)

Date:_____

Please keep a copy on record to which the public could have full access. Also send or e-mail a copy of this completed form along with documentation describing the policy/function/project it concerns to:

Alison Moran, Performance & Systems Manager