

## **Equality Analysis Equality Impact Assessment (EIA) Form ‘Knowing your customers needs’**

### **Background**

An Equality Analysis is a way of making sure that equality considerations are embedded into our decision-making processes and that equality is considered when we are developing key policy & services etc.

One tool to help you do this is an Equality Impact Assessment or EIA. It will assist you in ensuring that “due regard” has been given to identify any potential or actual impact (Positive or Negative) that our policies/services/functions\*etc., have on differing groups of people.

EIAs also provide a systematic approach to identifying and recording gaps and actions in relation to ensuring equal access when providing functions.

### **The purpose of the Equality Analysis is to:**

- make us focus on the needs, experiences and circumstances of everyone who will be affected by the decisions the Council makes
- direct us to seek alternative ways of achieving our aims and avoiding inequality
- enhance our creditability with our service users to have greater confidence in our performance
- improve our policy making procedures and services

\* Note: For simplicity we have sometimes referred to the following (listed below) as ‘Functions’. This includes: Services, Employment Practices, Projects, Strategy, Processes, Systems, Practices, Procedures, Protocols and Guidelines

## Legislation - Equality duty

As a local authority that provides services to the public, Melton has a legal responsibility to ensure that we can demonstrate having paid due regard to the need to:

- Eliminate discrimination, harassment and victimisation
- Advance Equality of Opportunity
- Foster good relations

For the following protected characteristics:

1. Age
2. Disability
3. Gender reassignment
4. Marriage and civil partnership
5. Pregnancy and maternity
6. Race
7. Religion and belief
8. Sex
9. Sexual orientation

When completing the Equality Impact Assessment you are encouraged to consider other disadvantaged or socially excluded communities or groups e.g. carers, the homeless, rural communities, priority neighbourhoods, ex-forces personnel etc., who are likely to be affected by the proposal. The evidence also needs recording to demonstrate that consideration has been given.

**Please complete sections 1 to 8.**

### 1. Overview of policy/function being assessed

<b>Title of the policy</b>	Draft Housing Allocations Policy
<b>Is it new or existing?</b>	New
<b>Date</b>	10.02.2022
<b>Officer undertaking EIA</b>	Alison Bennett
<b>Who else is involved in undertaking this assessment?</b>	<a href="mailto:checkandchallenge@melton.gov.uk">checkandchallenge@melton.gov.uk</a> Councillor Freer

**A. Outline: What is the purpose of this policy? (Specify the aims and objectives.) Please also state why the policy has been introduced or changed.**

- 1.1 Local housing authorities are required to have a mechanism to assess housing need, advertise available social housing and allocate properties to households in need. This is known as the Housing Allocation Scheme. The Housing Allocation Scheme determines who can join the housing register for social housing and the level of priority that will be awarded based on an applicant's circumstances. It provides a framework to determine eligibility and prioritisation of applications for social housing properties via the Housing Register (Choice Based Letting Scheme).
- 1.2 A revised housing allocations scheme for Melton Borough Council has been drafted, and is currently out for consultation to seek feedback from stakeholders, residents and current housing waiting list applicants on the proposed new policy. A further report detailing the outcome of the consultation, equalities impact assessment, final policy and timeline for implementation would be considered by Cabinet in March 2022.

**B. Who are the people/groups affected and what is the intended change or outcome for them?**

Current and future housing register applicants will be affected, but consultation will be undertaken with both current waiting list applicants, but also local government, statutory and voluntary organisations, registered providers and local estate agents.

**C. Equality implications/obligations.**

**Will this proposal/policy/service etc., meet the Equality Act requirement to have 'due regard' to the need to meet any of the following duties?**

**(In this question, consider both the new/current service and the proposed changes).**

Equality Duty.	Is the equality duty listed in the left hand column relevant to your policy/service etc?		Comments on how it meets the duty or why is not relevant
	Yes	No	
<p><b>(1) Eliminate unlawful discrimination, harassment and victimisation – please complete section 4 of the template.</b></p>	Yes		<p>The draft policy prioritises those applicants who are fleeing harassment or discrimination, acknowledges the Rehabilitation of Offenders Act and is fully compliant with both the Housing Acts and the Homelessness Reduction Act 2017</p>
<p><b>(2) Advance equality of opportunity between different groups</b>  How does the proposal/policy/service etc ensure that the intended outcomes promote equality of opportunity for users who have protected characteristics?</p> <p>This includes:</p> <ul style="list-style-type: none"> <li>• Removing or minimising disadvantages for protected groups of people</li> <li>• Taking steps to meet the needs of people from protected groups where these are different from the needs of other people</li> <li>• Encouraging people from protected groups to participate in public life or in other activities where there participation is disproportionately low e.g. are stakeholders engaged in the process and are there any barriers?</li> </ul>			<p>The policy includes a clear statement to adhere to the Equality Act 2010. The policy is more focussed on those individuals who have protected characteristics.</p> <p>The draft policy also looks to remove those applicants without an evidenced housing need from the register, freeing up officers time to provide a more bespoke and focussed service for those applicants who have protected characteristics.</p>

Equality Duty.	Is the equality duty listed in the left hand column relevant to your policy/service etc?		Comments on how it meets the duty or why is not relevant
	Yes	No	
<p><b>(3) Foster good relations between different groups (tackling prejudice and promoting understanding).</b> Does the service contribute to good relations or to broader community cohesion objectives? How does it achieve this aim?</p> <p>This could include: <i>(The following are examples and so you do not need to answer all the bullet points below.)</i></p> <ul style="list-style-type: none"> <li>• Building services around people and communities and involving them</li> <li>• Considering if there are strong and positive relationships between groups/communities affected by this policy. Does the policy/service bring together groups of people not used to interacting with each other? If so will it raise any issues that need to be addressed?</li> <li>• Tackling myths and misinformation. If the service is seen as unfair by certain groups, how do you tackle the myths and communicate this?</li> </ul>	X	X	<p>The policy is designed to govern the allocation of social housing, targeted at those in the greatest need.</p> <p>The draft policy has been written to manage applicants expectations, and ensure that the revised housing register will only include those applicants who have a realistic prospect of being offered social housing, and therefore does not unrealistically raise applicants expectations, where there is no prospect of the applicant being offered a social tenancy.</p> <p>Whilst the Choice Based lettings system is web based, should any one need assistance with either the completion of their application or is digitally excluded, advice and assistance will be available to assist with their application and any enquiries. This will ensure that they are able to fully access the system and be kept updated on their application.</p> <p>The draft policy includes the Armed Forces Covenant which assists with the reintegration of former and current armed forces personnel into society and assists them in their search for housing.</p>

## **D. Which groups have been consulted as part of the creation or review of the policy? Did they identify any barriers?**

The consultation is currently live, running from the 13.01.2022 until the 25.02.2022. The consultation is web based where respondents can either access and comment on the full draft allocations policy, or respond to a number of key questions which relate to the main changes proposed in the draft allocations policy.

To further promote the consultation exercise the following actions have been undertaken

Three briefing sessions for Councillors and Parish Clerks

Correspondence to all current housing register applicants

Correspondence to all neighbouring local authorities, registered providers, social and voluntary organisations, our MP, local estate agents and advice centres

Foot notes on the bottom of all emails sent from the housing team encouraging people to respond

Discussion at officer groups

Promoted on the councils website

Promoted through officer working groups, such as the Health & Well being forum.

We are assisting those individuals who are digitally excluded, by both sending out paper copies and progressing any comments they may wish to make on the policy.

## **2. What we already know and where there are gaps**

### **A. What existing information/data do you have/monitor about different diverse groups in relation to this policy?**

**This could consist of previous EIA's, reports, consultation, surveys, demographic profiles etc.**

We do not currently hold this type of information, but along side the housing allocation policy we are implementing a new IT based system which will capture this information in the future.

There is an issue that as the new policy increases the local connection criteria this criteria could discriminate against non UK residents, for example, if someone had moved here from another country they would not be eligible under that criteria for 2 years, but it is there to better balance the number of eligible applicants with the annual number of properties which become available to let and it in no way targets any specific group or characteristic.

## **B. What does this information/data tell you about diverse groups?**

**If you do not hold or have access to any data/information on certain/all diverse groups, what do you need to begin collating/monitoring? (please list)**

We do not currently hold this type of information, but along side the housing allocation policy we are implementing a new IT based system which will capture this information in the future

## **3. Do we need to seek the views of others and if so, who?**

**A. In light of the answers you have given in question 1D & 2 do you need to consult with specific groups? If not please explain why.**

The comprehensive consultation has been undertaken in such a way as to encourage as many people as possible to comment on the policy via a variety of mediums such as email, correspondence and briefing sessions.

## **4. Assessing the impacts**

In light of any data/consultation/information and your own knowledge and awareness, please identify whether the policy has an actual or potential positive or negative impact on the groups specified and whether there is evidence of discrimination. Please read the guidance that accompanies this template.

If you have identified actual or potential negative impact or discrimination that is illegal, you are required to take action to remedy this immediately.

If you have identified negative impact or discrimination that is justifiable or legitimate please give your reasons. You will need to consider what can be done to mitigate its effect on those groups of people.

Provide an explanation for your decisions.

<b>Diversity Groups</b>	<b>Positive impacts</b>  (Actual or Potential)	<b>Negative impacts</b> (Including any barriers)  (Actual or Potential)	<b>Is there evidence of direct/indirect discrimination?</b> (Is it illegal or legitimate/justifiable?)	<b>Mitigation</b>  Where there are potential barriers, negative impacts identified and/or the barriers or impacts are unknown, please outline how you propose to minimise or remove all negative impact or discrimination.
<b>Age</b>	We have a high number of properties which are suitable for older people, and the draft policy ensures that those applicants are retained on the register			
<b>Disability</b>  - Physical - Visual - Hearing - learning disabilities - mental health	The draft policy prioritises those applicants with disabilities in acknowledgement of their need for social housing and adapted properties	As the system is web based, consideration needs to be given to ensure that people can either apply by other options		via a paper copy which officers will input, or by officers working directly with the applicant to input their application



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<b>Gender / Sex</b>	The draft policy prioritises those applicant who are fleeing domestic violence			
<b>Religious Belief</b>	When suitability of accommodation is being considered, the applicant ability to access specific religious facilities is considered as part of this assessment process			
<b>Racial Group</b>				
<b>Sexual Orientation</b>	No impacts on this specific group			

<b>Diversity Groups</b>	<b>Positive impacts</b>  (Actual or Potential)	<b>Negative impacts</b> (Including any barriers)  (Actual or Potential)	<b>Is there evidence of direct/indirect discrimination?</b> (Is it illegal or legitimate/justifiable?)	<b>Mitigation</b> Where there are potential barriers, negative impacts identified and/or the barriers or impacts are unknown, please outline how you propose to minimise or remove all negative impact or discrimination.
<b>Gender reassignment/ Transgender</b>	The draft allocation policy acknowledges and provides for the allocation of a separate bedroom for any household member who is undergoing gender re-assignment			
<b>Other protected groups</b> - Pregnancy & maternity - Marriage & civil partnership	Prioritises those applicants who are fleeing domestic violence			
<b>Other socially excluded groups</b> - Carers - Low literacy - Priority neighbourhoods - Health inequalities - Rural isolation - Asylum seeker and refugee communities - Current and ex-armed HM forces personnel (Veterans)	The draft allocations policy contains specific clauses designed to assist and acknowledge the needs of the following groups Care leavers Ex offenders Asylum seekers Current and ex HM armed forces personnel			

## 5. Action Plan

Please include any identified concerns/actions/issues in this action plan:

The issues identified should inform your 'One Council Delivery Plan' and, if appropriate, your Consultation Plan.

Action Number	Action	Responsible Officer	Target Date
1	In consultation at the present time, and some respondents have raised issues seeking support and advise which are being progressed.	Alison Bennett	25.02.2022
2	The new IT system will capture ethnicity and diversity monitoring data	Alison Bennett	Spring 2022
3	For those applicants who are no longer eligible to remain on the register specific support and advice will be provided on an individual basis	Alison Bennett	Spring 2022
4			
5			
6			
7			
8			
9			

## 6. Who needs to know about the outcomes of this assessment and how they will they be informed

	Who needs to know? (Please tick)	How they will be informed? (We have a legal duty to publish EIA's)
<b>Internally (employees &amp; Check &amp; Challenge group)</b>	EIA will be circulated to the group	EIA will be published

	<b>Who needs to know?</b> (Please tick)	<b>How they will be informed?</b> (We have a legal duty to publish EIA's)
<b>Externally (service users, stakeholders, private sector householders, landlords etc)</b>		EIA will be published
<b>Others</b>		EIA will be published
<b>To ensure ease of access, what other communication needs/concerns are there?</b>		

## 7. Internal Scrutiny

To be completed and signed by a **member of the check and challenge group**.

**Please delete as appropriate.**

I agree with this assessment/action plan

**If disagree**, state action/s required

**Signed (Check and challenge):** Carolyn Appleby

**Date:** 23.02.22

## 8. Conclusion

To be completed and signed by the **Head of Service**.

**Please delete as appropriate.**

I agree with this assessment/action plan

**If disagree**, state action/s required, reasons and details of who is to carry them out with timescales:

**Signed (Head of Service):** Aysha Rahman

**Date:** 23.02.22