

Equality Analysis Equality Impact Assessment (EIA) Form 'Knowing your customer's 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

Title of the policy	Housing Revenue Account (HRA) Business Plan
Is it new or existing?	New
Date	17.3.22
Officer undertaking EIA	Pam Wharfe
Who else is involved in undertaking this assessment?	

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.

The purpose of the policy is to provide an overall steer to the investment in the council's housing stock and services to council tenants.

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

It affects all council tenants but also to a lesser extent the 29 council leaseholders.

Amongst council tenants it will affect people who have all the protected characteristics.

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	
(1) Eliminate unlawful discrimination, harassment, and victimisation – please complete section 4 of the template.			
<p>(2) Advance equality of opportunity between different groups 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"> • Removing or minimising disadvantages for protected groups of people • Taking steps to meet the needs of people from protected groups where these are different from the needs of other people • 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? 	Yes		<p>For those with physical disabilities it will ensure that their homes are accessible both internally and externally.</p> <p>By ensuring that sufficient resources are available to manage and support tenants in their homes meeting a variety of challenges sometimes because of their protected characteristics the Plan is critical to meeting the Council’s equality duties.</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>(3) Foster good relations between different groups (tackling prejudice and promoting understanding). 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"> • Building services around people and communities and involving them • 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? • Tackling myths and misinformation. If the service is seen as unfair by certain groups, how do you tackle the myths and communicate this? 		No	<p>While this is very relevant for the housing service it has a more tenuous link to the physical investment in the housing stock.</p> <p>It is, however, important that there is funding for tenant engagement and for the work of housing officers which contribute to community cohesion (neighbourhood disputes, anti-social behaviour). The latter is included in the overall funding for housing described within the 30-year picture in the executive summary of the Business Plan.</p>

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

The formation of the Plan has been built on consultation with tenants via 3 different methods

- 1) All tenants via the Residents' Satisfaction Survey (the survey achieved a 26.8% response)
- 2) A focus group of tenants (4 tenants attended but identified issues in a more detailed way)
- 3) A survey of tenants on the priorities for investment

- 1) **The Residents' Satisfaction Survey** tested answers for age and gender and found that the age group over 60 were more satisfied than other age groups with the housing service. The age group 35 – 59 was slightly less satisfied. They did not find any significant barriers for this group. They found a slight difference on gender with male respondents being more satisfied than female respondents.

- 2) **The focus group** identified lighting issues in the winter as a concern for residents which is more likely to be of concern to female tenants and older tenants and might restrict their movements in the winter months.

3) **The survey on investment priorities**

- The survey asked, “Do you consider yourself to have a health problem or a disability which has lasted or is expected to last at least 12 months?” of those answering this question 70% said yes. The survey therefore picked up barriers from disabled respondents.

“I have asked several people about putting a handrail down our path as its very dangerous when slippy and its sloped 4 disabled people have to use it.”

and issues with disabled parking. One respondent commented

“Wish I could see a housing officer to discuss disability issues.”

It also picked up the needs of younger people and children. The following were picked up as missed priorities

“Where possible play areas should be provided and properly maintained.”

And

“Melton are a good council and the town is a lovely place to raise a family there just needs to be more for the youth I'm nearly 44 now but back growing up in Melton there's was numerous places for kid now there's nothing just a thought”

- The survey was answered by more people in the older age group. The Council's system identifies 36% of tenants being in the age group 65-85 whereas of the respondents to the investment survey 65% were in this age group.
- The survey was answered in almost the same proportions in terms of gender as the Council's database (survey 58% female 42% male and database 59% female and 41% male) so the responses are likely to have matched the view by gender of tenants.

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.

The Business Plan compares the information on the age of council tenants with the demography of Melton as a whole and concludes that there is a higher number of council tenants in the 65 to 85 age group than for Melton as a whole. It is more likely that council tenants will need more supported housing options than the general populace. This needs to be considered in the supported housing review that is underway.

In terms of ethnicity the Business Plan identifies that 82% of tenants on the council's database do not have an ethnicity recorded and suggests a way forward.

The investment survey asked for details on ethnicity and of those who responded 96% identified themselves as being "White British" the others being "Any other white background" and "Polish".

The information held on the Council's database about tenants' disabilities is limited and needs to be updated. For the investment survey 62% of those who responded to the questionnaire, identified that they had a disability.

The information on religious belief from the investment survey showed that 75% of those who responded identified as Christian, 18% as no religion and 6% as other.

The information on sexuality from the investment survey showed that 97% of those who responded identified as heterosexual, with just over 1% identifying as gay and bisexual.

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)

The various methods of consultation have given good information in terms of older tenants and those with disabilities. The ethnicity profile of the investment survey is similar to that of the borough of Melton.

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 investment survey has picked up views from people with disabilities and the older age groups. There is a need to ensure that the council's investment priorities meet the needs of younger age groups. This will need to be picked up via future work on tenant engagement.

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 act 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.

Diversity Groups	Positive impacts (Actual or Potential)	Negative impacts (Including any barriers) (Actual or Potential)	Is there evidence of direct/indirect discrimination? (Is it illegal or legitimate/justifiable?)	Mitigation 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.
Age	The high involvement of older tenants in the investment survey suggests that their concerns will be addressed by the HRA Business Plan.	The low involvement in the investment survey of younger tenants is a concern.	There is no evidence of discrimination.	Younger tenants need to be a focus of the council's future work on tenant engagement.
Disability <ul style="list-style-type: none"> • Physical • Visual • Hearing • learning disabilities • mental health 	The response from people with a wide range of disabilities to the investment survey suggests that their views have been captured and therefore the priorities identified likely to be aligned with theirs.			

Diversity Groups	Positive impacts (Actual or Potential)	Negative impacts (Including any barriers) (Actual or Potential)	Is there evidence of direct/indirect discrimination? (Is it illegal or legitimate/justifiable?)	Mitigation 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.
Gender / Sex	The gender split within the tenant database is reflective of that in the survey so again is likely to be aligned on priorities.			
Religious Belief	The investment survey asked for information on religious belief.			
Racial Group	There is insufficient information on ethnicity held on the council's database for council tenants. However, the ethnicity of those responding to the investment survey is similar to the borough as a whole.		There is no evidence of discrimination	The council should consider how to improve the data it holds on council tenants.
Sexual Orientation	There was a high level of identification with heterosexual (97%) in the survey.			
Gender reassignment/ Transgender			No one self-identified as being in this group in the investment survey	This will be mitigated by updating data held on tenants.
Other protected groups <ul style="list-style-type: none"> • Pregnancy & maternity • Marriage & civil partnership 			No one self-identified as being in these groups in the investment survey	Unless these categories are included in future monitoring forms it will be difficult to see who fits in these protected groups. It needs to be picked up via the council's equalities monitoring forms.

Diversity Groups	Positive impacts (Actual or Potential)	Negative impacts (Including any barriers) (Actual or Potential)	Is there evidence of direct/indirect discrimination? (Is it illegal or legitimate/justifiable?)	Mitigation 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.
Other socially excluded groups <ul style="list-style-type: none"> • Carers • Low literacy • Priority neighbourhoods • Health inequalities • Rural isolation • Asylum seeker and refugee communities • Current and ex-armed HM forces personnel (Veterans) 	Health inequalities has been picked up via those responding who identified a long standing illness and disability information. It is not possible, using the existing equalities information gathering form to address the other categories.		The majority of people in these groups are not identified on the council tenant database nor have they been identified via the investment survey, so it is not possible to assess whether they have been discriminated against.	The housing service needs to evaluate which of these groups are most likely to be impacted by the service and then included in monitoring.

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	There are gaps in the Council's database relating to information about council tenants. Work needs to be done to evaluate how to rectify this.	Lesley Armstrong	30.12.22
2	Younger tenants need to be more effectively engaged in consultation with the Council. This is recognised as a difficult task across the social housing sector.	Lesley Armstrong	30.12.22

Action Number	Action	Responsible Officer	Target Date
3			
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)
Internally (employees & Check & Challenge group)	√	It will be an appendix to the HRA Business Plan
Externally (service users, stakeholders, private sector householders, landlords etc)	√	It will be an appendix to the HRA Business Plan
Others		
To ensure ease of access, what other communication needs/concerns are there?		

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): Signed off by Check and Challenge group

Date: 07.06.22

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: 07.06.22

Once approved by Head of Service please arrange to publish on the Council's website