

Pro-forma Equality Impact Assessments

This is a new and important process that will require different perspectives to be considered and, in some (hopefully a very few) cases, difficult decisions may need to be made about policy and service delivery.

Whilst it is necessary to identify a lead officer, it is advised that they do not undertake the impact assessment on their own, but set up a group comprising a diverse range of staff responsible for delivering the service.

Policy/procedure:	Leicestershire Choice Based Lettings scheme		
Name of Lead Officer:	Simon Folwell		
Job Title:	Head of Housing Services		
Service area:	Housing	Directorate:	Community Services
Date:	August 2010		
List others involved in the assessment:	Ian Jones, Housing Strategy Manager, Blaby District Council Vijay Jethwa, Private Sector Housing Team, Blaby District Council		

1	<p>What are the aims/objectives of the policy/procedure and the intended outcomes?</p> <ul style="list-style-type: none"> • To meet the Government's requirements for operating choice based lettings • For the seven district councils to work in partnership to deliver the scheme • To provide fairness and transparency in the allocation of properties • To work in line with the Government's code of guidance for the allocation of properties • To have the new system operational by December 2010 • To provide homeseekers with greater choice and chance of mobility around the County
2	<p>Are there any associated services, policies or procedures? No</p> <p>If 'Yes' please list below</p>
3	<p>Are any other organisations involved in the delivery of the service?</p> <p>The 7 districts of Leicestershire, i.e: Blaby DC, Charnwood BC, Harborough DC, Hinckley and Bosworth BC, Melton BC, North West Leicestershire DC, Oadby and Wigston BC. All register social housing providers with stock holding within Leicestershire</p>
4	<p>How and where will information about the service, policy or procedure be publicised? Is this information available in other languages and formats if requested?</p> <p>Part of the implementation of the new system includes a Communications Plan, which specifically deals with the issue of making service users aware of the new system and how it operates. The new scheme will also include facilities to provide different languages and formats, in order to ensure maximum access.</p>
5	<p>List the main people, or groups of people, that this policy or procedure was designed to reach or benefit, and any other stakeholders.</p> <p>Residents of each of the districts within Leicestershire who are seeking affordable housing. People living outside the County who are looking for affordable housing within Leicestershire. Registered social landlords are key stakeholders, in the their supply of housing will form an integral part of the scheme</p>

Although this form is set out under the broad equality strands consider any impacts/barriers that might cross over between different groups e.g. race/gender, disability/gender, etc. Use the boxes on the next few pages to indicate where the policy could have a positive or a negative impact for different groups with your reasons. You will need to transfer this information to the action plan later.

Key questions to consider are:

- Is there equal access to services for all groups?
- Is there equal quality of service or employment experience for all groups?
- Are there any significant differences in outcomes between groups?
- Is there over- or under-representation of some groups for certain services or in facing enforcement?

You should bear in mind the following when completing this form.

Race: When looking at race consider different ethnic groups within the five broad census headings, and groups not listed as separate census categories, for example Middle Eastern, North African, European, Gypsies and Travellers, Asylum Seekers and Refugees.

Gender: Remember that women and men may have different priorities in relation to what services they want and different needs for how these are provided. Men-only or women-only delivery for some services could be an option.

Disability: All service providers have a duty to make reasonable adjustments for disabled people, including physical features of premises, so it is advisable to anticipate any adjustments that may be required. Consider the barriers faced by different groups of disabled people as listed below. Note also that changes to legislation mean that conditions such as MS, HIV and cancer are now covered from the time of diagnosis.

- Physical impairment -such as people who have difficulty in using their arms or who have mobility issues which mean using a wheelchair or crutches
- Sensory impairment - such as being blind / having a serious visual impairment or being deaf / having a serious hearing impairment
- Mental health condition - such as depression or schizophrenia
- Learning disability/difficulty - such as Down's syndrome or dyslexia or a cognitive impairment such as autistic spectrum disorder
- Long-standing illness or health condition such as cancer, HIV, diabetes, chronic heart disease, or epilepsy

Lesbian / Gay Transgender: Key areas of concern include 'hate crime' and a lack of social facilities. Remember that this type of information is very personal and although people may be willing to declare their sexual orientation on surveys to aid improvement of services they may prefer it to not otherwise be known.

Religion/ Belief: Also includes people who do not follow and religion or have any particular belief system. Because 'hate crime' is a concern for many people from different faith communities this may be a factor in low responses to surveys, so imaginative ways of gathering this information could be considered and good practice established to highlight the benefits of accurate data.

Older people: Older people have different needs so we need to ensure the views of older people are heard and increased participation is encouraged. Communication, mobility and transport are areas we need to consider to aid this involvement, also access to learning opportunities to develop skills.

Young people: Younger people have different needs and we need to ensure their views are heard and increased participation is encouraged along with opportunities to help develop services. Consider using technology, youth services, or School councils to encourage involvement should be considered.

Carer's: A carer is someone who looks after a partner, relative or friend who has a disability, is an older person, or has a long term condition. Carer's are not paid, can often be isolated and are of every age group and ethnic origin. We may therefore need to use more diverse approaches to delivering services and ways to consult with this group; consider using radio, internet, library services or other imaginative ways of consultation. Carers (Equal Opportunities) Act 2004

Other Groups: It is good practice to consider the profile of all our communities e.g. Lone parents, people on low incomes, homeless people, EU Migrant Workers, and to note anything of which you are already aware or that results from your research.

Group	Actual or potential negative impact, unmet needs or barriers	Actual or potential positive impact or ways in which the policy promotes equality	Actual or potential impact of the policy on community cohesion and community relations
Women or men		<p>Greater chances for mobility, which may be of help who those who need to move away from their present location. Scope to be more easily able to access accommodation in other districts. This may mean that some people get re-housed or find alternative accommodation more quickly</p> <p>Offers greater opportunities for support workers to assist clients</p> <p>The need for parents (usually men) with access to children following separation to have a spare room is recognised.</p>	-
People from different ethnic groups	<p>Potential difficulties due to language barriers, in terms of understanding literature, communicating either face to face/over the phone or using the website</p>	<p>Greater number of access channels for the system, including the internet.</p> <p>Better information provided on the website about local facilities, which will help homeseekers make a more informed decision about the area in which they are looking to live.</p> <p>Main community languages have been incorporated as an option for homeseekers to use when making contact by phone and when using the internet</p> <p>Monitoring information is collected on ethnic origins to ensure fair and equal treatment.</p>	<p>Greater transparency of the system, will allow local people to see which groups of people are being successful in applying for properties, which cannot be done at the moment</p> <p>No restrictions on areas where applicants can bid and assistance to move across local authority boundaries.</p>
Disabled People	<p>Potential issues regarding the accessibility of the application form and the system for people with learning disabilities and mental health difficulties.</p>	<p>Phone bidding and IT access to the system will be of benefit to housebound people and those with limited mobility, as well as widening access to the service generally.</p>	

	<p>Potential difficulties for people with learning disabilities to be able to key in their registration number etc. using the phone service.</p> <p>May reveal a greater demand for adaptation or adapted properties, as those properties that become vacant are no longer 'ring fenced' to local applicants.</p>	<p>Browsealoud facility is being incorporated within the website.</p> <p>Forms and leaflets offer large type and Braille alternatives.</p> <p>On-line application process available</p> <p>Use of easy to understand symbols in adverts; use of 'key' symbols for adapted properties, which simplifies understanding whether the property is suitable. This in turn will help improve access to bidding for adapted properties. Key levels A and B will be reserved for disabled home seekers.</p> <p>'Easy read' form will make it easier to apply to be registered as a home seeker.</p> <p>There will be help in each district for home seekers in completing application forms.</p> <p>'Auto bidding' will help to ensure those home seekers who may not be in a position to regularly bid do not miss out. Also of assistance to those who, as a result of mental ill-health or a learning disability may not be able to engage directly with the system for choosing properties.</p> <p>Extra briefing to be provided for learning disability workers about the scheme.</p> <p>Support workers will be able to access the scheme on the clients behalf and support them in making choices.</p> <p>All adapted properties are to be 'pooled' across districts. This will give physically</p>	
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		<p>disabled homeseekers far greater opportunities, by being able to access properties in other districts.</p> <p>Screening of applications will identify those who vulnerable or less able to engage with the service. Tailored support will be provided in the form of direct mailing, telephone support and autobidding.</p> <p>Monitoring information is collected on disability to ensure fair and equal treatment.</p>	
Lesbian, gay or bisexual people	<p>Potential for prejudice by neighbours or staff in organisations?</p>	<p>Reduces scope for bias and prejudice, as it will be the home seeker, not the officer, making the choice about whether the property is suitable.</p> <p>The systems will treat same sex couples in the same way as opposite sex couples in terms of eligibility etc.</p> <p>Monitoring information is collected on sexual orientation to ensure fair and equal treatment.</p>	<p>The underlying transparency in the system (in that it is homeseekers who are selecting which properties they want to bid for) will help to demonstrate who properties are, and are not being allocated to.</p>
Older people	<p>Will all older people have sufficient access to the internet, to be able to access the service?</p> <p>Perception that some older people will prefer to have a paper format, rather than an IT based approach</p> <p>Need to ensure agencies such as Age UK and Care & Repair are fully aware of the system. Need to link with First Contact scheme for the County</p>	<p>Use of symbols and icons in the newsletter and on the web site is good, as it aids understanding.</p> <p>Experience of existing schemes elsewhere is that access through the internet is relatively high. Good range of local community, support and advice groups and bodies within each district, to assist older people with the scheme. Free internet access at local libraries.</p> <p>Scope for auto bidding, to ensure that specific homeseekers do not miss out. Easier for support workers to find out information and assist in applying.</p>	-

		<p>Scope for home visits by each district, for those that cannot travel or are housebound. Screening of applications will identify those who are vulnerable or less able to engage with the service. Tailored support will be provided in the form of direct mailing, telephone support and autobidding.</p> <p>Policy gives priority to moves needed to support elderly relatives.</p> <p>Sheltered housing will be advertised sub-regionally to give more choice of locations.</p>	
Young People	<p>Potential issues for people trying to access the system, who are currently in hostels and temporary accommodation</p> <p>May falsely raise expectations of some 16 to 18 year olds, in that whilst the new CBL scheme allows them to apply, the supply and availability of properties remains the same.</p>	<p>Standardises access to social housing across districts for 16 to 18 year olds.</p> <p>Access channels of mobile phone and internet will be more appealing to younger people – maximising use of IT and introduces ways of applying that have not existed before. Facility to text bids is part of the scheme. 24/7 service via the internet.</p>	<p>With an increased range of access channels, and far greater use of it than in the past, younger people will benefit generally by being able to find out information about housing options more easily and in ways that suit them better.</p>
People from different faith groups	<p>No issues identified</p>	<p>Gives people more choice about where they live – as it will be down to homeseekers to assess whether a location is suitable, appropriate or appealing. The scheme shows no bias, by offering the homeseeker a free and open choice.</p> <p>Monitoring information is collected on faith groups to ensure fair and equal treatment.</p>	-
Transgender people	<p>Potential for prejudice to be displayed against this group by neighbours or staff in organisations</p>	<p>Reduces scope for bias and prejudice, as it will be the homeseeker, not the officer, making the choice about whether the property is suitable.</p>	<p>- The underlying transparency in the system (in that it is homeseekers who are selecting which properties they want to bid for) will help to demonstrate who properties are, and</p>

		Monitoring information is collected on transgender status to ensure fair and equal treatment.	are not being allocated to.
Any other group (e.g. carers, rural communities, socially excluded)	<p>Rural communities – issues of potential limited internet and office access (see next column for measures in place to address this point).</p> <p>Street homeless – issues of the difficulties for this client group being able to access the system.</p>	<p>Potentially greater choice for people who are homeless, because they will have access to other properties across the sub region (this is not the situation at present).</p> <p>Rural communities have scope for greater access through use of newsletters, texting, autobidding etc. Also, they will be actively involved in bidding, whereas at present, they have to wait and see if anything is offered to them).</p> <p>Offenders – those looking for accommodation on release can access the system beforehand discharge, which gives the person (and their advisors/ support workers) greater opportunity to bid for appropriate properties.</p> <p>Home seekers needing a live-in carer will have the need for an extra room recognised in their eligibility criteria.</p> <p>The need for parents with access to children following separation to have a spare room is recognised.</p>	Greater transparency of the system, will allow local people to see which groups of people are being successful in applying for properties, which cannot be done at the moment

Consultation

For this step it is important to refer to any consultation exercises which have been undertaken and/or any complaints received.

7A	<p>What have service users/non-users or other stakeholders (including employees) already told you about the policy and any negative impacts? Who has been consulted and what methods were used?</p> <p>As part of developing the new scheme, an extensive series of consultation events have been carried out. These have included service users, representative agencies and support organisations. Some of these events have been held at a County level, whereas others have been at an individual district level. These events have included workshop sessions, where participants have been able to give their views and feedback about the proposed system. This included an event specifically designed to focus on equality and diversity issues arising from the implementation of CBL; the feedback from this event has been used as the basis for this equality impact assessment.</p> <p>Readability testing of the application form with the voluntary sector and user groups.</p>
7B	<p>If you need to carry out further consultation, who will you be consulting with and by what methods?</p> <p>Visiting support agencies and community groups, as part of briefing them about the scheme. This may lead to suggestion for further improvements.</p> <p>Briefings and training sessions for support agencies.</p> <p>On-going consultation/review with partners of the scheme, to identify ways in which the scheme can be further improved and refined.</p> <p>Customer satisfaction surveys via the web site.</p>

Monitoring and Research

For this step it is important to refer to any monitoring information which is already held. As stated in the guidance notes arrangements need to be set up for effective monitoring if this is not already taking place.

8A	How do we know whether our service is accessible to all groups? The consultation referred to in the previous section has helped to identify the potential barriers to the new scheme. These are now being addressed/ dealt with as part of the scheme design. By doing this, we are hopeful that the scheme will be as accessible as possible to all residents, irrespective of their background or personal circumstances. Care has been taken to design a range of access channels that suit different types of home seeker.
8B	If there is a lack of information, what research will be carried out, and for which groups? Not applicable, given the extensive consultation work that has already been undertaken
8C	If this is a new policy, or one that is not currently monitored, what are the arrangements to begin monitoring the actual impacts of the policy? (To go in action plan) Monitoring arrangements will be overseen by the Project Executive, once the scheme goes live. To review this Equality Impact Assessment once the scheme has gone live, to identify any further actions that need to be taken

Equality Action Plan

Using the information already gathered, summarise your findings in the table on the next page in relation to potential or actual impacts for different groups. If you have identified that any group is experiencing, or is likely to experience, a negative impact, particularly if this could be unlawful discrimination or if it is unintentional, then action must be taken to address this.

Remember that any policy which could unlawfully discriminate must be changed, unless it can be objectively justified.

Even if you found negative impacts that would not amount to unlawful discrimination, you still need to identify ways to remove or reduce these. For example:

- change the policy or procedure
- change how the policy or procedure is put into practice
- find alternative ways of achieving the aims of the policy
- introduce additional measures

If no actions are taken to change the policy or procedure when adverse impacts for some groups have been identified, or where an adverse impact for some groups is unavoidable, you should double check that this could be justified legally. Major changes would need a report to your Directorate highlighting the findings of the equality impact assessment and setting out recommendations such as actions to change the policy, or whether or not to adopt a proposed or revised policy in the light of the findings.

Even if you found no evidence of potential negative impacts, you should consider how to improve any positive impacts or how your policy could be adapted to promote equality and/or good community relations and community cohesion. This should also form part of the action plan.

If you lack sufficient information to answer all the questions at this point, or are unaware what the impact is/will be, further research, monitoring data and/or consultation will be needed and objectives to obtain this information should be included in your action plan.

You should also set out the arrangements for monitoring the impact of the policy in your action plan.

Problem/barriers identified	Actions to achieve aim/objective	Resources required	Target date
Access to the internet	Promote service through the libraries (including mobile services), which do have community internet access points. Also, scope for internet access in reception areas at Council and housing association offices.		
Support agencies being made aware on the new system (including hostels, supported housing providers and those supporting victims of domestic violence/refuges)	Continue with further promotion of the scheme and briefing/training for partner agencies, where appropriate.		
Need to link with First Contact scheme	Specific question to be added into the first contact form		
Accessibility of the application form and the system for people with learning disabilities.	Produce Easy Read form and Easy Read (simple) guide to the system. To ensure that registration numbers are very visible on all standardised documentation.		
Potential difficulties for people with learning disabilities to be able to key in their registration number using the phone service	Link with Leicestershire Care online, as through this service there is scope to provide laptops for vulnerable individuals to use. Briefings to support workers Telephone support for vulnerable applicants and availability of auto-bidding.		
Difficulties due to language barriers	Include options for different languages on phone system. Gujarati version added when it was discovered this was not part of the standard language set. Ensure translation facility (e.g. Google) is available on the CBL website. Interpreter services also available.		
Ensuring that community groups, representatives and leaders are aware of the new system, so that they can help others within the Community	Newsletters and other briefing information widely circulated to community groups – to promote the new scheme and ensure it is understood. To specifically include those groups working with young and old people, as well as carers. To incorporate this as part of the Communications Plan.		
Ensuring that street homeless can access the system	Need to contact/brief relevant agencies and bodies, so that they can help on an individual's behalf. To include local street groups / churches that provide an outreach service,		

	Salvation Army, churches and Shelter Options to bid by phone and text.		
Ensuring the scheme is reliable in the long term	Project executive to monitor implementation and effectiveness of the scheme. Equality Impact Assessment to be reviewed after scheme commences.		

Ways to promote equality or good community relations identified	Aim/objective	Actions to achieve aim/objective	Resources required	Target date
Highlight that CBL offers greater fairness and transparency that existing approaches – and as such is fairer to all	General information about the scheme, and the greater transparency that it offers.	To include specific promotion activities as part of Communications Plan To produce an 'Easy Read' Scheme guide		

Set out your arrangements below for monitoring the policy
Performance information will be reported to the Project Executive, which will take into account not only the efficiency of the scheme, but also the groups who are accessing the system and taking up properties, in comparison with the profile for the County's overall population. It has yet to be decided whether this will be done at a County or district level. .

Set out your arrangements below for reporting back on actions
Progress on the actions above will be reported back to the Project Executive.