

# **Equality impact assessment form**

**Directorate- Communities and Place**

**Service area – Strategic Housing**

**Name of policy, strategy, review or function being  
assessed – Housing Strategy 2020-2029**

**Date of assessment – 6<sup>th</sup> February 2020**

**Name of Director/Head of Service signing it off  
Ian Fullagar**

**Decision of Cabinet, Personnel Committee or Chief  
Officer Group**

January 2019



Derby City Council



## **Equality impact assessment – please read this section first before you do the assessment**

This is our equality impact assessment form to help you equality check what you are doing when you are about to produce a new policy, review an older one, write a strategy or plan or review your services and functions. In fact you need to do an equality impact assessment whenever a decision is needed that affects people and **before** that decision is made.

So why do we need to do equality impact assessments? Although the law does not require us to do them now, the courts still place significant weight on the existence of some form of documentary evidence of compliance with the **Public Sector Equality Duty** when determining judicial review cases. This method helps us to make our decisions fairly, taking into account any equality implications, so yes we still need to do them.

The Public Sector Equality Duty is part of the Equality Act 2010 and this Duty requires us as a public body to have '**due regard**' to eliminating discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act. It requires us to advance equality of opportunity and foster good relations between people who share a '**relevant protected characteristic**' and people who don't.

Having 'due regard' means:

- removing or minimising disadvantages suffered by people due to their protected characteristics
- taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people
- encouraging people with certain protected characteristics to participate in public life or in other activities where the participation is disproportionately low.

The protected characteristics are:

- age
- disability
- gender identity
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

This completed form should be attached to any Chief Officer Group, Cabinet or Personnel Committee report to help elected members make their decisions by taking the equality implications into account. Equality impact assessments **must be done before** decisions are made. Include the Cabinet or Personnel Committee's decision on the front sheet when you know it.

You'll find that doing these assessments will help you to:

- understand your customers' and communities needs
- develop service improvements
- improve service satisfaction
- demonstrate that you have been fair and open and considered equality when working on re-structuring
- make sure you pay due regard to the requirements of the Public Sector Equality Duty.

Don't do the form by yourself, get a small team together and make sure you include key people in the team such as representatives from our Diversity Forums and employee networks and you could invite trade union representatives too – the more knowledge around the table the better. You also need to decide how and who you will consult with to help inform the equality impact assessment. Our Lead on Equality and Diversity can help with useful contacts – we have a team of people who are used to doing these assessments and can help with information on barriers facing particular groups and remedies to overcome these barriers.

You'll need to pull together all the information you can about how what you are assessing affects different groups of people and then examine this information to check whether some people will be negatively or positively affected. Then you'll need to look at ways of lessening any negative effects or making the service more accessible – this is where your assessment team is very useful and you can also use the wider community. Against every negative impact you will need to complete the mitigation section to explain how you will lessen the impact.

Agree an equality action plan with your assessment team, setting targets for dealing with any negative effects or gaps in information you may have found. Set up a way of monitoring these actions to make sure they are done and include them in your service business plans.

When you have completed the assessment, get it signed by your Head of Service or Service Director and **send it to our Lead on Equality and Diversity for checking and to publish on our website**. It is a public document so must not contain any jargon and be easy to understand.

Remember, we need to do these assessments as part of our everyday business, so we get our equality responsibilities right and stay within the law – Equality Act 2010.

## **Equality groups and protected characteristics**

These are the equality groups of people we need to think about when we are doing equality impact assessments and these people can be our customers or our employees and job applicants...

- Age equality – the effects on younger and older people
- Disability equality – the effects on the whole range of disabled people, including Deaf people, hearing impaired people, visually impaired people, people with mental health issues, people with learning difficulties, people living with autism and people with physical impairments
- Gender identity – the effects on trans people
- Marriage and civil partnership equality
- Pregnancy and maternity equality - women who are pregnant or who have recently had a baby, including breast feeding mothers
- Race equality – the effects on minority ethnic communities, including newer communities, Gypsies and Travellers and the Roma community
- Religion and belief or non-belief equality – the effects on religious and cultural communities, customers and employees
- Sex equality – the effects on both men and women and boys and girls
- Sexual Orientation equality – the effects on lesbians, gay men and bisexual people

## **Contact for help**

Ann Webster – Lead on Equality and Diversity

[ann.webster@derby.gov.uk](mailto:ann.webster@derby.gov.uk)

Tel 01332 643722 Minicom 01332 640666 Mobile 07812301144

## The form

We use the term ‘policy’ as shorthand on this form for the full range of policies, practices, plans, reviews, activities and procedures.

Policies will usually fall into three main categories...

- Organisational policies and functions, such as recruitment, complaints procedures, re-structures
- Key decisions such as allocating funding to voluntary organisations, budget setting
- Policies that set criteria or guidelines for others to use, such as criteria about school admissions, procurement methods, disabled facilities grants, on street parking bays

If in doubt – it’s better and safer to do an Equality Impact Assessment than not to bother! You never know when we may get a legal challenge and someone applies for Judicial Review.

### What’s the name of the policy you are assessing?

**Housing Strategy 2020 -29**

### The assessment team

Team leader’s name and job title – Angelina Novakovic, Housing Strategy Development Officer

Other team members

<b>Name</b>	<b>Job title</b>	<b>Organisation</b>	<b>Area of expertise</b>
Jeremy Mason	Principal Housing Strategy Officer	Strategic Housing	housing
Judi Bateman	Member	Disability Hub	Disability
Moira Findlay	Member	Disability Hub	Disability
Andy Findlay	Member	Disability Hub	Disability

Name	Job title	Organisation	Area of expertise

**Step 1 – setting the scene**

Make sure you have clear aims and objectives on what you are impact assessing – this way you keep to the purpose of the assessment and are less likely to get side tracked.

- 1 What are the main aims, objectives and purpose of the policy? How does it fit in with the wider aims of the Council and wider Derby Plan? Include here any links to the Council Plan, Derby Plan or your Directorate Service Plan.**

This draft Housing Strategy is a refresh of the current strategy which is shortly due for renewal. There are a number of key changes since the last Strategy prompting a more relevant strategy to be developed, mostly national changes such as changes to welfare reform and local Government funding. The new strategy also takes into account new demographic data and changes to the local housing market.

Our priorities for housing in Derby are captured by our vision: to ensure all Derby's residents have access to good quality homes and housing services which support communities and improve quality of life.

In order to deliver this vision, four key priorities have been identified:

- Priority 1 – Best use of Housing Stock: getting the most out of the homes that already exist. This is an important priority which considers how to make the most of our allocations to affordable housing and will include a review of both the Allocations Policy and the Tenancy Strategy in 2020/21. It also includes private sector work through our Empty Homes Strategy which will also be updated in 2021
- Priority 2 – Housing Quality and Standards: well designed, well managed decent homes. Ensuring housing is of suitable quality and properly managed is a key priority in Derby, as we have a higher than average older housing stock.
- Priority 3 – Vulnerable People: providing suitable accommodation for vulnerable groups, linked where necessary to specialist support. This priority is about supporting people to stay in their own homes: we will try to enable people to stay in their own homes by commissioning services and accommodation that enables residents to remain supported in mainstream accommodation wherever possible.
- Priority 4 – Housing Development and Regeneration: supplying a range of new housing that meets need and contributes to urban renewal. This priority ensures that we focus on delivering new build housing both in the city and also in neighbouring districts, in order to alleviate homelessness, and overcrowding.

The delivery of these priorities is set out in the Housing Strategy Action Plan. The assessment of the equalities impact will largely focus on these actions and consider them in turn and overall in terms of how successful they will be in delivering these priorities.

The context for this housing strategy is that it is part of the Council's Plan, which sets out the City's over-arching goals. The Housing Strategy will directly support the vision and themes of the Council Plan and seeks to contribute to the goal of making Derby a happy and healthy city.

**2 Who delivers/will deliver the policy, including any consultation on it and any outside organisations who deliver under procurement arrangements?**

The Housing Strategy will be a corporately adopted strategy, which will be delivered by a range of partners and organisations, including Housing Strategy, Adult Social Care, Housing Development, Housing Regeneration, Derby Homes, as well as a number of other internal departments and external organisations. It contains a number of objectives and aims which are specific to a range of 'stand alone' strategies, including the Homelessness and Rough Sleeping Strategy 2020-2025, the Empty Homes Strategy, the Disabled Adults Accommodation Strategy and Older Persons Housing Strategy.

The new draft strategy is currently out for consultation with residents and organisations in the City via a survey on Your City Your Say, as well as other none online methods. The consultation is open for three months and will conclude on 2nd March 2020.

**3 Who are the main customers, users, partners, employees or groups affected by this proposal?**

The main customers of this strategy will be all people who are living and/ or working in Derby, including single people, older people and families. For people who are either physically or mentally disabled or elderly, this may also include their carers.

**Step 2 – collecting information and assessing impact**



**4 Who have you consulted and engaged with so far about this policy, and what did they tell you? Who else do you plan to consult with? – tell us here how you did this consultation and how you made it accessible for the equality groups, such as accessible locations, interpreters and translations, accessible documents.**

A consultation plan has been developed with Consultation Officers in the Communications Team. Widespread promotion has taken place via a press release, e-media such as the council's website (Your City Your Say), In Touch, Twitter and iDerby – this is to ensure that as large a group of people as possible know that the consultation is taking place.

A survey is currently taking place with all residents and organisations in the City, which has been made available on the council's website, Intouch, Your City Your Say and at the library and other locations like housing offices.

The draft strategy has also been promoted throughout the council to all relevant departments and to other housing providers.

The Council's standard alternative language translation box was put onto the questionnaires circulated and on the website.

Other people and organisations consulted include:

- Elected members
- Public Health
- Housing associations and charitable organisations
- Disability Hub
- Over 60's Forum members (including Age UK)
- Health and Social Care Providers
- Adult Social Care and Commissioning
- Members of the Public
- Derby Homes

**5 Using the skills and knowledge in your assessment team, and from any consultation you have done, what do you already know about the equality impact of the policy on particular groups? Also, use any other information you know about such as any customer feedback, surveys, national research or data. Indicate by a tick for each protected characteristic group**

whether this is a negative or a positive impact. If it's negative, fill in the mitigation section as well to explain how you are going to lessen the impact.

### Age

What do you already know?	Positive impact	Negative impact	Mitigation
Older people need more housing and better choices	X	x	There is an acknowledgment by group members that Extra Care alone is not sufficient to meet need. There is some need that is halfway between very low support needs and higher levels of support and care. This type of need could potentially be met through the provision of floating support or full time on site support if it is within sheltered housing schemes. It was felt by the group that it should be explored whether this type of provision of floating support could be reintroduced to some schemes.
Younger people find accessing suitable housing difficult due to the lack of supply.	X	X	Despite the strategy acknowledging the need for more accommodation for younger people, there needs to be better transition for younger disabled people from a young age (suggested 14yrs) and that this should be looked at several years in advance of younger people needing their own accommodation. Action agreed to explore the need to be more involved with the transition process.

### Disability

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
Disabled people find it more difficult to access appropriate and affordable housing	x	X	There are a number of families with hidden disabilities and there needs to be more bungalows and family sized accommodation to meet needs. Action agreed to emphasise this within the strategy.

### **Gender identity- trans**

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
Trans people may experience discrimination or ASB. More people are having to rent a home in the private rented sector including the young and older people. Issues they face are likely to be compounded for trans people. Research suggests that LGBT people experience higher levels of homelessness than non-LGBT. DCC and Derby Homes have clear and comprehensive equality and diversity policies and procedures and training for staff to ensure services are non-discriminatory. Derby Homes' ASB policies and procedures include dealing with hate crimes such as transphobic	x		.

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
incidents. Housing Options staff are trained to offer appropriate advice and assistance to trans people seeking housing or who are homeless or potentially homeless			

### **Marriage and Civil Partnership**

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
No Negative impact known	x		

### **Pregnancy and maternity**

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
No negative impact known	x		

### **Race**

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
People may experience discrimination or ASB because of their race. DCC and Derby Homes have clear and comprehensive equality	x		

and diversity policies and procedures and training for staff to ensure services are non-discriminatory. Derby Homes' ASB policies and procedures include dealing with hate crimes including those that relate to race.			

### Religion or belief or none

What do you already know?	Positive impact	Negative impact	Mitigation
Some families with particular beliefs may need to live nearer to places of worship; there are high levels of BME communities living in Normanton/Arboretum	X	X	Some households may need to have accommodation which is designed to be 'culturally sensitive' (eg prayer rooms etc). this could be explored with the Development team.

### Sex

What do you already know?	Positive impact	Negative impact	Mitigation
	X		

### Sexual orientation

What do you already know?	Positive impact	Negative impact	Mitigation
	X		

**Important** - For any of the equality groups you don't have any information about, then make it an equality action at the end of this assessment to find out. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. You can get lots of information on reports done from organisations' websites such as the Equality and Human Rights Commission, Stonewall, Press for Change, Joseph Rowntree Trust and so on. Please don't put down that the impact affects 'everyone the same' – it never does!

**6 From the information you have collected, how are you going to lessen any negative impact on any of the equality groups? How are you going to fill any gaps in information you have discovered?**

For each of the mitigating factors for the respective protective groups, we will revisit the housing strategy and strengthen /amend some of the areas for action (as suggested) and also explore the potential of proposed actions.

**Step 3 – deciding on the outcome**

**7 What outcome does this assessment suggest you take? – You might find more than one applies. Please also tell us why you have come to this decision?**

<b>Outcome 1</b>	<b>No major change needed</b> – the EIA hasn't identified any potential for discrimination or negative impact and all opportunities to advance equality have been taken
<b>Outcome 2</b>	<b>Adjust the policy</b> to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified?

<b>Outcome 3</b>		<p><b>Continue the policy</b> despite potential for negative impact or missed opportunities to advance equality identified. You will need to make sure the EIA clearly sets out the justifications for continuing with it. You need to consider whether there are:</p> <ul style="list-style-type: none"> <li>• sufficient plans to stop or minimise the negative impact</li> <li>• mitigating actions for any remaining negative impacts</li> <li>• plans to monitor the actual impact.</li> </ul>
<b>Outcome 4</b>		<p><b>Stop and rethink</b> the policy when the EIA shows actual or potential unlawful discrimination</p>

Our Assessment team has agreed Outcome number(s)

Outcome 1 – No major change needed

Why did you come to this decision?

It was felt by the group that overall, there was very little negative impact on individual protected groups and that where these were identified, these could be appropriately mitigated.

If you have decided on **Outcome 3**, then please tell us here the justification for continuing with the policy. You also need to make sure that there are actions in the Equality Action Plan to lessen the effect of the negative impact. This is really important and may face a legal challenge in the future.

If you have decided on **Outcome 4** then if the proposal continues, without any mitigating actions, it may be likely that we will face a legal challenge and possibly a Judicial Review on the process - it is really important that the equality impact assessment is done thoroughly, as this is what the Judge will consider.

## Step 4 – equality action plan – setting targets and monitoring

- 8 Fill in this table with the equality actions you have come up with during the assessment. Indicate how you plan to monitor the equality impact of the proposals, once they have been implemented.

### Equality Action Plan –setting targets and monitoring

#### Age

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
We will explore whether floating support could be re introduced to some housing schemes	This will enable some people stay at home for longer	Strategy team will liaise with Commissioning team	Review within the first year of the strategy
There needs to be a better focus on the transition arrangements for younger disabled people at an earlier age	Better transition for younger people	Strategy team to liaise with CYP	Review within the first year of the strategy

#### Disability

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Re – emphasise the need for more bungalows and larger family housing	Meet the need of disabled families	Strategy team to liaise with development team	Review within the first year of the strategy



### Gender identity - trans

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>

### Marriage and Civil Partnership

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>

### Pregnancy and maternity

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>

### Race

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>

### **Religion or belief or none**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Need to explore whether there could be more housing provision nearer places of worship and design of properties to be culturally sensitive	Meet religious needs	Strategy team to liaise with development team	Review within the first year of the strategy

### **Sex**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>

**Sexual orientation**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>

We can give you this information in any other way, style or language that will help you access it. Please contact us on: 01332 643722  
Minicom: 01332 640666

### Polish

Aby ułatwić Państwu dostęp do tych informacji, możemy je Państwu przekazać w innym formacie, stylu lub języku.

Prosimy o kontakt: **01332 643722** Tel. tekstowy: 01332 640666

### Punjabi

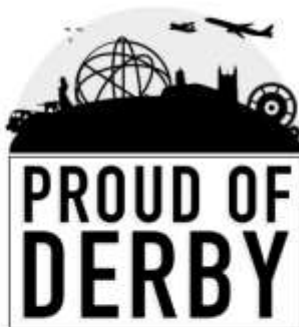
ਇਹ ਜਾਣਕਾਰੀ ਅਸੀਂ ਤੁਹਾਨੂੰ ਕਿਸੇ ਵੀ ਹੋਰ ਤਰੀਕੇ ਨਾਲ, ਕਿਸੇ ਵੀ ਹੋਰ ਰੂਪ ਜਾਂ ਬੋਲੀ ਵਿੱਚ ਦੇ ਸਕਦੇ ਹਾਂ, ਜਿਹੜੀ ਇਸ ਤੱਕ ਪਹੁੰਚ ਕਰਨ ਵਿੱਚ ਤੁਹਾਡੀ ਸਹਾਇਤਾ ਕਰ ਸਕਦੀ ਹੋਵੇ। ਕਿਰਪਾ ਕਰਕੇ ਸਾਡੇ ਨਾਲ ਟੈਲੀਫੋਨ **01332 643722** ਮਿਨੀਕਮ 01332 640666 ਤੇ ਸੰਪਰਕ ਕਰੋ।

### Slovakian

Túto informáciu vám môžeme poskytnúť iným spôsobom, štýlom alebo v inom jazyku, ktorý vám pomôže k jej sprístupneniu. Skontaktujte nás prosím na tel.č: 01332 643722 Minicom 01332 640666

### Urdu

یہ معلومات ہم آپ کو کسی دیگر ایسے طریقے، انداز اور زبان میں مہیا کر سکتے ہیں جو اس تک رسائی میں آپ کی مدد کرے۔ براہ کرم **01332 643722** منی کام 01332 640666 پر ہم سے رابطہ کریں۔



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