



Derby City Council

# **Equality impact assessment form**

**Directorate – Communities and Place**

**Service area - Strategic Housing**

**Name of policy, strategy, review or function  
being assessed – Private Housing Renewal  
Policy 2020-2030**

**Date of assessment – November 2020  
Signed off by –Ian Fullagar**

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

**Derby... Achieving**

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 reassignment
- 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.

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 and people with physical impairments
- Gender reassignment – 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

In addition, we have decided to look at the effects on families and people on low incomes too as we feel this is very important.

## **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 07812 300079

## 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 - do one! 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?

Private Housing Renewal Policy 2020-2030

### The assessment team

Team leader's name and job title – Angelina Novakovic Housing Strategy

Development Officer

Other team members invited through all Diversity Forums.

Those attending:

<b>Name</b>	<b>Job title</b>	<b>Organisation</b>	<b>Area of expertise</b>
Angelina Novakovic	Housing Strategy Development Officer	DCC	Housing Strategy
Stuart Smith	Housing Strategy Development Officer	DCC	Housing Strategy
Dale Durrant	Member of DCC Disability Hub	DCC Disability Hub	Disability

Rachel Rule	Works at Parent Carer Together	Parent Carer Together	Families with children with educational needs/disabilities
Richard Parfett	Volunteer	Disabled Workers Network	Disability

## 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.

Derby recently completed a stock condition survey in 2019, the outcome of which helped to inform a new Private Housing Renewal Policy for 2021-2030, which sets out the initiatives, assistance, loans, grants and works that the Council will undertake to promote improvements to the quality and choice of housing within the private sector.

As part of this EIA exercise, we have drafted a table of information, which summarises the key aims of the new Policy (by comparison with the current one), which has been shared with EIA members.

The new Policy aims to continue the work that was delivered under the previous Policy which expires at the end of this year. It supports the following commitments and is aligned with the Council Plan 2019-2023 and the Housing Strategy 2020-2029:

- More private sector dwellings brought back into use or demolished.
- Continue to protect residents by tackling statutory nuisance and environmental crime.
- Continued delivery of the Healthy Housing Hub.
- Reduction in the number of older and disabled people having to move to residential and nursing home.
- Provide good-quality housing across the city
- Increase the housing supply
- Improve the health and wellbeing of tenants in the private rented sector by improving housing standards and, in particular, by tackling rogue landlords.

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

The Policy is owned by the Head of Strategic Housing Services and delivered by the Strategic Housing Division via:

Healthy Housing Hub (HHH) including Handy Person Service Disabled Facilities Grants Service (DFG)  
Empty Homes Service\*  
Compulsory Purchase and Enforcement Programme DASH Services - Decent and Safe Homes Project City Energy Saving Programme (CESP)

In partnership with several other council departments including Council Tax, Electoral Roll, Climate Change Team, Social Services, Housing Standards Team and external organisations, including Derby Homes.

Works to homes of vulnerable and/or disabled people are carried out by private contractors who submit competitive quotes for works funded or part funded through financial assistance e.g. Disabled Facilities Grants.

Handy Person works to homes of vulnerable people are carried out by direct employees of DCC's Handy Person Service.

DASH Services contracts training and accreditation services as necessary in its delivery of subscription services for member local authorities.

The Strategic Housing Division is delivering the consultation on the Policy, with support from Consultation Officers and Engagement Officers within the Strategic Services .

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

### **Healthy Housing Hub (HHH)**

Vulnerable customer:

- who has a medical condition or other vulnerability that may be affected by their housing conditions; or
- whose housing conditions are such that they may be detrimental to their health and well-being.

### **Healthy Housing Assistance**

A vulnerable customer on low income, who is in receipt of an income related or disability related benefit and includes:-

- People living with a chronic or severe health difficulty/illness/frailty or disability – (evidence may be sought)
- Older people or pre-school children – defined as those over 60 and under 5 years of age

### **Handy Person Service –**

Over 60 years of age and in receipt of a means tested benefit or low income as determined by a 'test of resources' or must be over 75 years of age.

**Disabled Facilities Grants (DFG) –**

Disabled residents requiring adaptations costing more than £1,000. Eligibility statutorily prescribed.

**Empty Homes Service**

Assistance and encouragement for all owners or potential owners of empty private sector property across the city. Service promoted widely, but all owners of empty residential property proactively identified and contacted. Tackling the waste of empty homes benefits neighbours and neighbourhoods affected by empty homes and helps address housing need in the city.

**Compulsory Purchase and Enforcement Programme**

Enforcement programme relating to owners of empty private sector property across the city, where owners have failed to co-operate with the Empty Homes Service and return their long term empty properties to occupation. Tackling the waste of empty homes benefits neighbours and neighbourhoods affected by empty homes and helps address housing need in the city.

**DASH Services**

Landlords, tenants and local authorities regionally. Local Authority members subscribe to DASH and pay for services, including training and landlord accreditation. Subscribing members dictate service provision.

**Home Energy programme**

Advice and support for all Derby residents.

Assistance available in accord with Government initiatives and associated criteria; generally for those in fuel poverty and/or hard to treat homes.

**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.**

Consultation plan developed with Consultation Officers within Housing Strategy and Consultation Team

Wide spread of dissemination in the form of information about the consultation and links to the documents on Your City, Your Say – with links to response questionnaires.

Appearing on DCC website.

Coverage in In-touch to reach all DCC employees and Members.

Diversity forums.

Requested DCC Twitter and Facebook coverage.

Consultation response questionnaire available for on-line completion or hardcopy submission. Access to translation and interpretation services is available; and these are used as required. Information, communications, etc. can be made available in other languages, formats or hard-copy on request. For example, our Policy states:

We can give you this information in any other way, style or language that will help you access it. Please contact us on 01332 640319 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 .. 640319 . Tel. tekstowy: 01332 .. 640666

Punjabi

ਇਹ ਜਾਣਕਾਰੀ ਅਸੀਂ ਤੁਹਾਨੂੰ ਕਿਸੇ ਵੀ ਹੋਰ ਢੰਗ ਵਿੱਚ ਦੇ ਸਕਦੇ ਹਾਂ, ਜਿਸਦੀ ਸਹੂਲਤ ਹੋਵੇਗੀ ਜਿਸਦੀ ਜ਼ਰੂਰਤ ਹੋਵੇਗੀ। ਕਿਰਪਾ ਕਰਕੇ ਸਾਨੂੰ ਆਪਣੇ ਸੰਪਰਕ ਨੰਬਰਾਂ 'ਤੇ ਸੰਪਰਕ ਕਰੋ।  
01332 640319 ਫਿਲਿਪ 01332 640666 ਤੇ ਸੰਪਰਕ ਕਰੋ।

Urdu

01332 640319 ہمیں یہ معلومات کسی بھی اور انداز میں دے سکتے ہیں جو آپ کے لیے سہولت دے گا۔ براہ کرم ہمیں اپنے رابطہ نمبروں پر رابطہ کریں۔  
01332 640666 ہم سے رابطہ کریں۔

**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 equality group whether this is a negative impact, a positive one or if you are not sure**

Equality groups	What do you already know?	No impact	Positive impact	Negative impact	Not sure
Age	Extensive data held in HHH Evaluation Report and draft		X		
	<p>Older Person's Accommodation Strategy, for example. Older age being a growing proportion of the population.</p> <p>HHH targeted at preschool and 60+ with strong feedback.</p> <p>Handyperson targeted at 60+ with strong feedback.</p> <p>Continuation of these two programmes in particular focuses positive impacts on the pre-school and 60+ age groups.</p> <p>Other programmes apply across all ages.</p>				

<p><b>Disability</b></p>	<p><b>HHH and Handy Person Service – strong feedback.</b></p> <p><b>DFG Service – being a statutory service, impacts directly on people with disability.</b></p> <p><b>Continuation of these three programmes in particular focuses positive impacts on people with disability.</b></p> <p><b>Other programmes apply generally, whether living with disability or not.</b></p> <p><b>It is noted that there is a possibility that disabled people are disproportionately affected by poor housing, due to higher numbers living in more deprived areas.</b></p>		<p><b>X</b></p>		
<p><b>Gender reassignment - trans</b></p>	<p><b>No specific impacts, and able to benefit where fit criteria for programmes offered.</b></p>	<p><b>x</b></p>	<p><b>x</b></p>		
<p><b>Marriage and civil partnership</b></p>	<p><b>No specific impacts, and able to benefit where fit criteria for programmes offered.</b></p>	<p><b>x</b></p>	<p><b>x</b></p>		
<p><b>Pregnancy and maternity</b></p>	<p><b>Links and data through Child and Family Poverty Commission, Priority Families team and Public Health Division.</b></p> <p><b>HHH – strong feedback.</b></p> <p><b>No specific impacts, and able to benefit where fit criteria for programmes offered. However, pre-school children are a specific target group on the HHH</b></p>	<p><b>x</b></p>	<p><b>x</b></p>		
<p><b>Race</b></p>	<p><b>No specific impacts, and able to benefit where fit criteria for programmes offered. Though in general, the worst housing tends to be in areas with higher BME population, level of deprivation and relatively greater level of need – so programmes that improve housing condition do tend to have a higher focus on these areas.</b></p>	<p><b>x</b></p>	<p><b>x</b></p>		

<b>Religion or belief or none</b>	<b>No specific impacts, and able to benefit where fit criteria for programmes offered.</b>	<b>x</b>	<b>x</b>		
<b>Sex</b>	<b>No specific impacts, and able to benefit where fit criteria for programmes offered.</b>	<b>x</b>	<b>x</b>		
<b>Sexual Orientation</b>	<b>No specific impacts, and able to benefit where fit criteria for programmes offered.</b>	<b>x</b>	<b>x</b>		
<b>Families and people on low income</b>	<b>Links with Child and Family Poverty Commission, Priority Families team and Housing Standards Team.</b>  <b>HHH, Handy Person and Home Energy Programme tend to focus on low income, vulnerable and those in fuel poverty. Strong feedback.</b>  <b>Housing Standards Team focus on the improvement of poorer quality private rented housing in the city. Statutory enforcement activity.</b>		<b>x</b>		

**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 lesson any negative impact on any of the equality groups? How are you going to fill any gaps in information you have discovered?**

**Our day-to-day experience shows that, for all groups, but particularly older people, the general national shift of information and services to digital on-line can exclude from service take-up. Our services will, within the capacity of resource availability, ensure that hard-copy and other options remain available, that we work with health, community and other partners for direct referral, and that we continue to offer home visit services.**

**Age, pregnancy and families/people on low income – working closely with CCG, Public Health in development of Healthy Housing Vulnerability Index to further improve pro-active targeting.**

**Working with Age UK, with the Child and Family Poverty Commission, Priority Families team, GPs, community groups, CAD, media and many others to raise profile, expand partnerships and encourage direct referral of individuals from target groups...**

**Work with Child and Family Poverty Commission is in early days and HHH budgets are small – but these links should be further strengthened.**

**Disability – statutory scheme with criteria dictated by Govt.**

**Gender, marriage, sex, sexuality, religion – all programmes are gender, marriage, sex, sexuality neutral.**

**Race – in general, the worst housing tends to be in areas with higher BME population, level of deprivation and relatively greater level of need.**

**We work with community groups such as:**

Indian Centre

West Indian Dementia Session

Village Learning Centre

Health Promotion Meetings

West Indian Heart Health Event

Roma Cancer Workshop

African Cancer Workshops

Pakistan Centre Cancer Workshop

HMRC Work & Health Event at Agard Street

Fifty Plus Event

Live-Well Event, Council House, Derby

Royal Derby Heart Event

Time To Change Event

Ramp Up Red Event

Sikh Cancer Event

Hindu Women's Cancer Event

Sinfin Health Centre Cancer Event

All Derby City libraries.

St Edmunds Church, Allestree

Royal Derby Hospital, Foyer

United Reform Church Alvaston

Sahara Project

**And others to raise awareness of service availability.**

**Regularly review intervention mapping and equalities data collected to maintain understanding and awareness of service take-up, to enable any adjustments necessary to be identified at an early stage.**

**Inform Derby Direct with its role within Social Care and the 'Talking Point' programme run by Adult Social Care in Derby, of support available through the strategy for vulnerable people living in accommodation that is detrimental to their wellbeing and health.**

## **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>	<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: <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>	<b>Stop and rethink</b> the policy when the EIA shows actual or potential unlawful discrimination

Our Assessment team has agreed Outcome number(s)

**Outcome 1.**

Why did you come to this decision?

**No major barriers were identified by the assessment team, just some minor improvements as detailed in Table 8.**

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 the table (on the next page) 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

<b>What are we going to do to advance equality?</b>	<b>How are we going to do it?</b>	<b>When will we do it?</b>	<b>What difference will this make?</b>	<b>Lead officer</b>	<b>Monitoring arrangements</b>
Strengthen links with Child and Family Poverty Commission	Very recent presentation to commission – and housing promotional detail circulated to commission members	ongoing	Increase awareness of services of target group and those working with target group	Ian Fullagar	
Work to ensure that, for all groups, but particularly older people, the general national shift of information and services to digital on-line does not exclude from our service take-up.	Ensure that hard-copy and other options remain available, that we work with health, community and other partners for direct referral, and that we continue to offer home visit services.	ongoing	Increase awareness of services and take-up of services by those members of the target group which do not have access to or cannot readily make use of digital on-line services.	Ian Fullagar	
Review and strengthen our promotion of services offered to raise awareness still further.	Utilise the full range of council media opportunities and close working with communities. And ensure images used reflect diversity of target groups.	ongoing	Increase awareness of services of target group and those working with target group	Ian Fullagar	
Regularly review intervention mapping and equalities data collected to maintain an understanding and awareness of service take-up.	Six monthly review by Housing Renewal Review Group	ongoing	Will maintain an understanding and awareness of service take-up, and enable any adjustments necessary to be identified at an early stage.	Ian Fullagar	

**Make sure you include these actions in your Directorate service business plans.**