# **APPENDIX F**

# **Equality Impact Assessment**

Housing Revenue Account 2009/10

Service Improvement Pro-forma and Guidance

**Leicester City Council** 

EIA area: Housing Revenue Account - Budget 2009/10
Lead Officer: Dave Pate

# **Equality Impact Assessments (EIA)**

## Why do an EIA?

Local government as a service provider and as an employer must meet its statutory equality responsibilities, which cover all of the equality strands, these being age, disability, gender, race, religion/belief and sexual orientation. We must promote equality of opportunity among the diverse range of Leicester residents and service users, as well as proactively tackle discrimination that negatively impacts on the lives of people within the city.

If service providers do not take account of people's various 'equalities' needs, as listed below, the way they provide information and services to people could work against the people they aim to serve. The impact on the service will be low user take up and low levels of customer satisfaction.

The purpose of the equality impact assessment is to assess whether there are any barriers in place that prevent people using a service or benefiting from a policy. The assessment helps you identify positive and negative impacts affecting service users based on the equality strands below. It also helps you identify any organisational barriers unintentionally affecting users and enable you to identify action that needs to be taken to address adverse issues. The Equality Standard for Local Government enables us to track how well we are doing in demonstrating that the Council embodies good equalities practice and performance.

The equality impact assessment is also an opportunity for you to think about the role you and your service play in promoting equality and delivering equality outcomes, also include equality outcomes that are already in place for your service. An equality impact assessment is based on **evidence and not assumptions**.

## **Equality 'strands'**

- Gender (access to services, work life balance, needs of carers)
- Race (BME issues, language needs and cultural/social traditions)
- Age (the needs of young and old people compared to the rest of the population)
- Disability (individual needs across a variety of disabilities and wider issues within society)
- Religion or belief (influence on access to services and workforce issues)
- Sexual orientation (discrimination faced by lesbian, gay and bisexual people).

## How often do you carry out an EIA on your service/policy?

All department management teams have set out a schedule of EIAs for their services and key policies.

An EIA is NOT a one-off activity. The population of Leicester is constantly changing and many of our services change regularly to keep up with changing service demands: generated by population changes or legal changes by the Government affecting provision.

When you are preparing for any changes to your service, you should undertake an EIA with that change in mind.

When you are proposing a new policy, you should undertake an EIA testing your assumptions about the new policy. Once the policy is being implemented, carry out another EIA to see if there are any unforeseen equalities impacts.

Every year as you prepare your service plan, you should review the past year's user take up against the equality strands, to determine whether you are managing to meet this diversity of need. You should assess how well you are doing in meeting your equality outcomes. Any required changes should be picked up in your service plan. The service plan will be the main document against which the Council will assess how well we are doing in providing equality outcomes for the people of Leicester.

## What is an EIA?

An equality impact assessment enables you to identify whether your service or policy discriminates against any individuals or groups categorised by the six equality streams. The assessment framework helps you identify positive and negative impacts that your service or policy may have on its intended users. It also helps you identify any organisational barriers unintentionally limiting access to users and enables you to identify action that needs to be taken to address adverse issues.

Our legal statutory requirements are as follows: Race Relations Act 1976, Amendment Act 2000 Disability Discrimination Acts 1995 and 2005 Equal Pay Act 1970 Sex Discrimination Act 1975, Amendment 2005 Equality Act 2006, which introduces Gender Duty Gender Recognition Act 2004

## **Legal Requirements:**

Employment Equality Religion & Belief and Sexual Orientation Regulations 2003

Equality Act Religion & Belief and Sexual Orientation Regulations 2007 Employment Equality Age Regulations 2006 Civil Partnership Act 2005

## Assess the relevance

The starting point for an Equality Impact Assessment is to assess the equality impact on your particular service, function or policy and ensure that this is proportionate to the relevance of equality for your EIA area.

**Proportionality:** the weight given to equality strands should be proportionate to its relevance to a particular function. This may mean giving greater consideration and resources to functions/policies that have most effect on the public or employees of the council.

**Relevance:** Certain equality strands will be more relevant to some functions than others.

When thinking of the above look at those functions/services/policies, which have an impact on the delivery of front line services or actual front line services themselves, as well as those, which form the core business for departments and divisions.

Also are there any functions/services/policies, where service problems have been identified around equalities, areas of public concern around how our services are provided and low take up.

Also planned service changes, such as new policy development, review of existing policies and reorganisation of service(s).

Your EIA outcomes need to be fed into your service plan, and updated on an annual basis.

In order for an Equality Impact Assessment to be carried out effectively, an assessment team of between 4-6 people needs to be set up, with members having relevant knowledge/experience of the particular area or those who can contribute effectively.

Assessment team members can consist of front line staff, managers, service users, contractors/partners, etc.

Equality Impact Assessment				
Name of service, function or policy	Housing Revenue Account Budget 2009/10			
Date of assessment	January 08			
Lead officer & contact details	Dave Pate Service Director, Housing Improvement and Repairs - 29 6801			
List others involved in the assessment	Gurjit Minhas – Strategy and Performance Officer (Equalities Lead) Graham Troup – Principal Accountant Jackie Gale – Account/Administration Manager Helen McGarry –Service Improvement Manager			

# **Stage 1: Scope the Terms of Reference**

The first stage of beginning the EIA is to reflect on the current service/function or policy and its impact on the six equality strands. It will be helpful to have an initial 'mind mapping' session with review team colleagues to establish the full extent of equality and diversity issues that will help in informing the terms of reference for the actual EIA.

## **Equality and diversity issues**

What are the equality and diversity issues in relation to the service, function or policy?

**Age**: Some older people on pensions will be on lower incomes than the average household, so that increase in rent and in some cases service charges may cause financial problems. The service needs to ensure that people are able to access money/debt advice where necessary. For most people the increase in rent and service charges is covered by housing benefit and therefore the increase will have no impact on them. Tenants need to be referred to support agencies where appropriate, to enable them to maintain their tenancies and standards of health and well-being.

**Disability**: Some disabled people may be on low incomes therefore an increase in rent and in some cases service charges may cause financial problems. Information on the increase in rent and service charges needs to be made accessible for disabled people. The service needs to ensure that people are able to access money/debt advice where people need it. For most people the increase in rent and service charges will be covered by housing benefit and therefore the increase will have no impact on them. Tenants need to be referred to support agencies, where appropriate to enable them to maintain their tenancies and standards of health and well-being.

**Gender**: The profile of tenant's will need to be identified in respect to gender as many families with children are on low incomes. For most people the increase in rent and service charges is covered by housing benefit therefore the increase will have no impact on them. The service needs to ensure that people are able to access money/debt advice where it is required. Tenants need to be referred

to support agencies where appropriate, to enable them to maintain their tenancies and standards of health and well-being.

**Race**: Some BME households are on low incomes, and an increase in rent and service charges may cause financial difficulties. Information on the increase needs to be accessible and communicated to people in community languages as appropriate. The service needs to ensure that people are able to access money/ debt advice where it is required. For most people the increase in rent and service charges is covered by housing benefit and therefore the increase will have no impact on them. Tenants need to be referred to support agencies where appropriate to enable them to maintain their tenancies and standards of health and well-being. The ethnic composition of tenants will need to be identified.

**Religion/Belief**: The service could contact local places of worship to provide information about the increase and information about who to contact for financial advice and assistance. For most people the increase in rent and service charges is covered by housing benefit and therefore the increase will have no impact on them. Services need to be culturally appropriate and sensitive to religious requirements.

**Sexual Orientation**: Ensure information is available at the Lesbian Gay Bisexual and Transgender (LGBT) Centre about the increase and where to get money/ debt advice. Some LGBT households may be on low incomes. The service needs to ensure that people are able to access money/ debt advice where people need it. For most people the increase in rent and service charges is covered by housing benefit and therefore the increase will have no impact on them. Tenants need to be referred to support agencies where appropriate to enable them to maintain their tenancies and standards of health and well-being.

For the majority of people on housing benefits the increase in rent and service charges will have no impact as it will be covered by the benefit. Households that will be affected detrimentally are those that are working and are on low incomes and who do not qualify for benefits.

It is on the proposals outlined in the Housing Revenue Account – Budget 2009/10 essment is on the proposals to increase the rents on council properties by an
essment is on the proposals to increase the rents on council properties by an
and to increase the service charges, where applicable, by 5.5%.
et using a prescribed government formula, which the council has no discretion or be service charges are determined by the Council and there is discretion in this area wernment does suggest that the increase be 0.5% above the inflation rate as a Retail Price Index. Leicester City Council has followed the government formula in coming up with the proposed increase in rent and service charges.
It will cover all six equality strands and identify how people will be affected by the sed.
ement will be involved in this EIA and made aware of any recommendations is assessment.
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# **Stage 2: Preliminary Assessment**

## Part 1:

In order to complete the table below, it may be useful to carry out a quick audit of current data or information, for instance from:

- Value for Money.
- Inspections.
- Demographic data, census information.
- Equality profile of clients: information on which groups use/receive service and which don't but may wish to do so, etc.
- Consultation information, complaints, feedback, and research: what do different groups thinks of the service.
- Views of front line staff, stakeholders and key partners.

Information on the service/function or policy			
What are the aims/objectives /purpose of the service or policy?	Rental income and income from service charges finances the Housing Revenue Account (HRA). The HRA aims to deliver high quality services to meet the needs and aspirations of Council tenants, many of whom are elderly and or come from disadvantaged groups		
What are the key performance targets/ indicators for the service or policy? i.e. including value for money indicators.	% of tenants satisfied with the overall service provided.		
Who are the key stakeholders, partners, groups for your service or policy?	Tenants Residents Leaseholders Tenants/ Residents Associations Members Housing Improvement and Repairs Service Strategy, Commissioning, Performance and Business Support Housing Management		

Energy Management Income Maximisation Team Housing support providers Other support providers who help with income management

# Part 2:

Initial equality considerations	
What are the equality aims/ objectives for the service or policy?	The equality aims of the Housing Revenue Account link into the departmental equality aims, which are to ensure we comply with the requirements of the Equality Standard. Various service areas have also outlined their commitment to meet the Diversity Key Lines of Enquiry, which have been produced by the Audit Commission. These are:
	<ul> <li>Ensuring service user profile is monitored by equality strands.</li> <li>Analysing monitoring information and using it to shape more appropriate services.</li> <li>Ensuring information is available in a range of languages and formats as required.</li> <li>Working towards a representative workforce and service take up.</li> <li>Service adheres to departmental and corporate equality policies.</li> <li>Ensure service complies with the Commission for Racial Equality Code of Practice in Rented Housing.</li> </ul>
What are the current equality targets/indicators for the service or policy?	As above

What equality outcome for your service or policy are you working towards?	To ensure that the decision to increase rent and service charges does not discriminate against any particular groups of service users.
Are there any equality barriers for your service or policy?	Some of the potential barriers as a result of increasing rent and service charges may relate to:

Stage 3: Monitoring

Collection of monitoring da	ata (for both s	ervice	users an	d internal	users	of service	s)	Evidence Please list type and location
What service user/staff feedback information do		Race	Gender	Disability	Age	Sexual Orientation	Religion	Satisfaction Forms
you collect and how often?	Satisfaction	~	~	~	<b>~</b>			
jed comoci and now often.	Complaints							
	Workforce							
What information on user take up do you collect?		Race	Gender	Disability	Age	Sexual Orientation	Religion	IBS System Tenants sign up forms
	Service use	~	~	<b>✓</b>	~			i onanto digit ap formo
	Workforce							
What other monitoring								Excel Data
information do you collect on service users/staff?							on on service ch fit is monitored.	arges

	There are 25638 Council tenants, with an equality profile as follows:	
	<ul> <li>32% are over 60years old</li> <li>60% are female.</li> <li>28% of tenants whose ethnicity is known are from BME backgrounds.</li> </ul>	
	Approximately 80% of tenants receive housing benefit which covers the rent. All service charges subject to the increase proposed in the HRA report are covered by housing benefit too if the tenant is eligible for benefit.	
	The analysis of HRA service charges show that:	
	<ul> <li>6814 properties are subject to a service charge for television services</li> <li>482 properties are subject to a service charge for concierge services</li> <li>2801 properties are subject to a service charge for door entry systems</li> <li>4917 properties are subject to a service charge for communal cleaning</li> <li>7609 properties are subject to a service charge for way lighting</li> <li>2943 properties have miscellaneous service charges</li> </ul>	
	Many properties have more that one service charge. 46% of the service charges are for properties in the centre area and this is where there is a larger concentration of tenants from BME backgrounds.	
How do you track changes in user needs?	Public Meetings are held with tenants and regular forums take place. The service analyses satisfaction forms.	
Thinking about the six	Age – Date of birth of tenants is collected and recorded	
equality strands, and the	Disability – No accurate information on disability.	
monitoring information you	Gender – Information is collected and recorded.	
have, are there any gaps for particular equality	Race – Not all tenants disclose their ethnicity, however the ethnicity of the majority of tenants affected by the proposed changes has been collected and	
group?	recorded.	
	Religion/Belief – Information is not collected, the department is waiting for a	

corporate standard to be adopted. Sexual Orientation - Information is not collected, the department is waiting for a corporate standard to be adopted.	ı
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# **Stage 4: Consultation**

Consultation will be an ongoing process throughout an EIA and will involve your colleagues from the outset. In developing your views on the service, function or policy you should also involve a number of stakeholders (both internal and external) including people who might appropriate challenge the views you have developed.

It is a legal requirement that consultation takes place with appropriate stakeholders as part of the EIA process, to gain their perspectives on the work that this being undertaken and the services delivered. To meet the race and gender duties, it is necessary to consult with interest groups. A requirement of the disability duty is that disabled people are directly engaged in the EIA process.

Internal consultation		Evidence Please list type and location
Have you involved staff groups, other members of staff, and other council departments in your assessment? Please list those you have involved, as well as dates, etc.	Staff from a number of divisions from the Adults and Housing Department have been involved in this assessment.	December 08
Have you involved your Departmental Equality Officer and/or Departmental Equality Group/Forum?	The Departmental Equality officer has been involved in this Equality Impact Assessment and advice has been sought from the Corporate Head of Equalities.	

External consultation		Evidence Please list type and location
What consultation have you carried out with service users/stakeholders/partners to inform this EIA? What problems did users/ stakeholders/partners raise that need to be addressed to improve your service/policy?	Housing Management has now set up strategic meetings with tenants on a quarterly basis called Performance Panel Meetings. Area offices hold quarterly tenant and leaseholder forum meetings. These are used to pick up local issues on estates and identify where initiatives need to be financed. All estates have regular inspections. All offices have one – off consultation exercises to find out the needs of tenants.  The recommendations included in the report were discussed and agreed with tenant's representatives at the Housing Performance Panel.	Minutes from Performance Panel Meetings. Notes from area offices meetings with tenants. Reports from estate inspections.
How does the service impact on your users/stakeholders/ partners?	The decision to increase rent and service charges will not impact on most council tenants who are on Housing Benefit. Households where tenants are working and receiving a low wage will be impacted by the increase and for some it may cause financial difficulties. However they may, as a result of the change in their circumstances now qualify for Housing and/or other benefits.	
What positive impacts have been identified?	The Housing Revenue Account will continue to finance the delivery of high quality services to Council tenants.	
What negative impacts have been identified?	The negative impact is that households on low wages who do not qualify for Housing Benefit may face problems in paying the increase in rent and service charges. This is irrespective of which equality groups they belong to.	

Organisational Barriers		
Are there any potential organisational barriers in place that could adversely affect any of your users? If yes, what are they?	Some of the potential barriers as a result of the proposed charges may relate to: <ul> <li>Customer access to information about the changes</li> <li>How information is communicated to users</li> <li>The ease of use of information provided</li> <li>Availability in different language formats</li> <li>Information provided on rights and /entitlements</li> <li>Information on which agencies can help with money/ debt advice (Promotion of this to tenants)</li> <li>Physical access to services</li> <li>Monitoring of potential adverse impact on particular groups</li> </ul>	
Are there organisational barriers that only affect certain user groups?	Age - Information provided on rights and /entitlements Disability – Availability of information in different formats, physical access to services.  Gender - Information provided on rights and /entitlements Race – Availability of information in different languages Religion/belief - How and where information is communicated to users Sexual orientation – How and where information is communicated to users	

# **Stage 5: Analysis and Recommendations**

## **Assessment findings and impact**

Summarise the main equalities issues that you have identified, from the monitoring data and consultation you have carried out.

**Age**: 32% of tenants are over 60years old and may be living on pensions. The decision to increase rent and service charges will cause financial problems for some older people if they do not receive Housing Benefit. The service needs to ensure that people are able to access money/ debt advice where necessary. Tenants need to be referred to support agencies where appropriate, to enable them to maintain their tenancies and standards of health and well-being.

**Disability**: 0.5% of tenants consider themselves to be disabled. This is probably an under representation of people with disabilities. Some disabled people may be on low incomes therefore an increase in rent and service charges will cause financial difficulties if they do not receive Housing Benefit. Information on the increase in rent and service charges needs to be made accessible for disabled people in easy read and other formats. Housing offices and venues used for consultation events need to be physically accessible. The service needs to ensure that people are able to access money/ debt advice where people need it. Tenants need to be referred to support agencies, where appropriate to enable them to maintain their tenancies and standards of health and well being.

**Gender**: 60% of tenants are women, some of which will be single parent families will be on low incomes. The decision to increase rent and service charges will cause financial problems for some people if they do not receive Housing Benefit The service needs to ensure that people are able to access money/ debt advice where it is required. Tenants need to be referred to support agencies where appropriate, to enable them to maintain their tenancies and standards of health and well being.

Race: 28% of tenants whose ethnicity is known are from Black and Minority Ethnic (BME)

backgrounds. Some BME households are on low incomes, so that an increase in rent and service charges may cause financial difficulties, particularly if they are not on Housing Benefit. Information on the increase in charges needs to accessible and communicated to people in community languages as appropriate. The service needs to ensure that people are able to access money/ debt advice where it is required. Tenants need to be referred to support agencies where appropriate to enable them to maintain their tenancies and standards of health and well being. Religion/Belief: The service needs to contact local places of worship and provide information about the increase and information about who to contact for financial advice and assistance. The decision to increase rent and service charges will cause financial problems for some people if they do not receive Housing Benefit. Services need to be culturally appropriate and sensitive to religious requirements. Surgeries and advice sessions for tenants need to be held on days and times that do not conflict with times for prayer. **Sexual Orientation**: Ensure information is available at the Lesbian Gay Bisexual and Transgender (LGBT) Centre about the increase and where to get money/ debt advice. Some LGBT households may be on low incomes. The decision to increase rent and service charges will cause financial problems for some people if they do not receive Housing Benefit. The service needs to ensure that people are able to access money/ debt advice when and where people need it. Tenants need to be referred to support agencies where appropriate to enable them to maintain their tenancies and standards of health and well being. Services need to be LGBT friendly and staff need to have had awareness training. People need to feel they are in a safe environment if they approach the service for assistance. What are the main problems/ Age – Affordability is a problem for some households. People need to be aware of their rights and barriers/issues that need to be entitlements addressed for specific equality Disability - Affordability is a problem for some households. Information about the increase and the assistance available needs to be accessible and in plain English.

Gender - Affordability is a problem for some households. People need to be aware of their rights and

Race - Affordability is a problem for some households. Communication of information about the

groups?

entitlements

	increase and assistance available needs to be in community languages. Religion/belief - Affordability is a problem for some households. Ensure information about the increase and assistance available is communicated appropriately. Sexual orientation - Affordability is a problem for some households. Ensure information about the increase and assistance available is communicated appropriately.		
Recommendations			
What are your proposed recommendations for the equality strands?  What are your proposed recommendations for other areas?	The service needs to ensure that information about the increase in rent and service charges and the advice and assistance that is available is accessible to all the tenants.  Housing Management to monitor arrears, non-payment and affordability issues with tenants and intervene where necessary to provide assistance.		

# Stage 6: Action Plan

All boxes must be completed, and relevant actions included for your service, i.e. where no further action is required against a strand please state this.

Equality Strand/ Activity	Action Reqaired	Outcome for Service	Measures required	Lead Officer (Service Manager)	Timescale
	The service needs to ensure	More tenants of all ages being	% of people paying rent and	David	Ongoing
Age	that the provision of	able to pay the district heating	service charges.	Taylor	

	information about the increase and advice and assistance is available to tenants. So that tenants are able to access benefits and entitlements.	charges.	% increase in people using the services provided by the Income Management Team		
Disability	The service needs to ensure that accessible information about the increase and advice and assistance is available, to help people maximise their income.	More disabled tenants being able to access advice and assistance to enable them to pay their rent and service charges.	% of people paying rent and service charges. % increase in disabled people using the services provided by the Income Management Team.	David Taylor	Ongoing
Gender	The service needs to ensure that the provision of information about the increase and advice and assistance is available to tenants. So that tenants are able to access benefits and entitlements.	More tenants being able to pay their rent and service charges.	% of people paying their rent and service charges.  % increase in people using the services provided by the Income Management Team.	David Taylor	Ongoing
Race	Communication of the increase and advice and assistance is in appropriate community languages, to help people maximise their income.	More tenants being able to pay their rent and service charges.	% of people paying their rent and service charges.  % increase in people using the services provided by the Income Management Team	David Taylor	Ongoing
Religion/ Belief	Information about the increase and advice and assistance is	More tenants being able to pay their rent and service charges.	% of people paying their rent and service charges.	David Taylor	2009

	available in local places of worship.				
	Surgeries and advices sessions to be held on days and times that do not conflict with prayer times		% increase of people using the services provided by the Income Management Team		
Sexual Orientation	Information about the increase and advice and assistance is available at the LGBT Centre.	More tenants being able to pay their rent and service charges.	% of people paying their rent and service charges.	David Taylor	2009
	Services need to be LGBT friendly; staff need to have had awareness training.	More people feeling they are in a safe environment when they approach the service for assistance	% increase in people using the services provided by the Income Management Team		
Other associated issues (if appropriate)	Housing Management to monitor arrears, non-payment and affordability issues with tenants and intervene where necessary to provide assistance.	The service would be able to identify and intervene when people need assistance.	Reducing arrears cases and any formal action against tenants.	David Taylor	Ongoing
					2009

# **Next Steps:**

Once an EIA has been completed, this is the start of an ongoing process and the following actions need to be taken:

#### **EIA Outcomes:**

The EIA should clearly state what the equality outcomes will be for the service/function or policy, and how these will be achieved, and success measured.

### **Completed EIAs:**

- The lead officer should agree the completed EIA with the review team.
- The lead officer needs to contact the Departmental Equality Officer for feedback, and the necessary amendments made.
- The final completed EIA to be tabled at DMT/SMT and to be agreed.
- The final EIA also needs to be shared with relevant partners/stakeholders/service users, especially those involved in the EIA consultation.
- The EIA actions need to be included in the relevant service plan(s) and be part of the service planning process.

### **Report summary:**

• The lead officer needs to complete the report summary and forward this to the Departmental Equality Officer and this will then be published via the internet and insite, in order to meet out statutory obligations.

#### Evaluation/feedback form:

■ This form needs to be completed by the review team and lead officer and gives those involved in the EIA process an opportunity to provide their feedback/views, etc, on the whole process.

## Monitoring/Review/Evaluation of EIA

The EIA will be monitored and updated via the action plan on an annual basis. The EIA lead officer will be responsible for providing the relevant information and this needs to be concise and detailed. Reports will be produced for Directorate/DMT/SMT and Departmental Equality Groups/Forums, detailing progress to date and any barriers/issues being identified.