

Equality Impact Assessment (EIA) Tool:

Title of proposal	Affordable Housing at The Leys
Name of division/service	Housing Services
Name of lead officer completing this assessment	Beverly Wagstaffe – Housing Development Officer
Date EIA assessment commenced	31 st October 2024
Date EIA assessment completed (<i>prior to decision being taken as the EIA may still be reviewed following a decision to monitor any changes</i>)	14 th November 2024
Decision maker	City Mayor
Date decision taken	TBC

EIA sign off on completion:	Signature	Date
Lead officer	Beverly Wagstaffe – Housing Development Officer	19 th November 2024
Equalities officer (has been consulted)	Sukhi Biring, Equalities Officer	19 th November 2024
Divisional director	Chris Burgin – Director of Housing	22 nd November 2024

Please ensure the following:

- a) That the document is **understandable to a reader who has not read any other documents** and explains (on its own) how the Public Sector Equality Duty is met. This does not need to be lengthy but must be complete and based in evidence.
- b) That available support information and data is identified and where it can be found. Also be clear about highlighting gaps in existing data or evidence that you hold, and how you have sought to address these knowledge gaps.
- c) That the equality impacts are capable of aggregation with those of other EIAs to identify the cumulative impact of all service changes made by the council on different groups of people.
- d) That the equality impact assessment is started at an early stage in the decision-making process, so that it can be used to inform the consultation, engagement, and the decision. It should not be a tick-box exercise. Equality impact assessment is an iterative process that should be revisited throughout the decision-making process. It can be used to assess several different options.
- e) Decision makers must be aware of their duty to pay 'due regard' to the Public Sector Equality Duty (see below) and 'due regard' must be paid before and at the time a decision is taken. Please see the Brown Principles on the equality intranet pages, for information on how to undertake a lawful decision-making process, from an equalities perspective. Please append the draft EIA and the final EIA to papers for decision makers (including leadership team meetings, lead member briefings, scrutiny meetings and executive meetings) and draw out the key points for their consideration. The Equalities Team provide equalities comments on reports.

1. Setting the context

Describe the proposal, the reasons it is being made, and the intended change or outcome. Will the needs of those who are currently using the service continue to be met?

Having been empty for over 2-years, Leicester City Council acquired The Leys building on Upper Temple Way in 2019 with the aim of refurbishing and bringing back into use to meet a local housing need. The property comprises of 11 single bedroom flats and 22 bedsits (total 33 units) over seven floors, all of which do not comply with current social housing standards. The building has remained empty since acquired and is currently in a state of disrepair.

An Executive Decision is being requested as there is an opportunity to use the adjacent open space as will well acquire land previously occupied by the John Calvert Court and build much needed new affordable housing across all three sites.

The Leys building is currently not in use; hence no existing service users are directly impacted on by this decision. However, the scheme will increase the supply of affordable homes across the city and be available to let to those households on the Council's

housing register who are not able to access market housing and will have a positive impact on improving the landscape in the local area.

2. Equality implications/obligations

Which aims of the Public Sector Equality Duty (PSED) are likely be relevant to the proposal? In this question, consider both the current service and the proposed changes.

a. Eliminate unlawful discrimination, harassment, and victimisation

- How does the proposal/service aim to remove barriers or disproportionate impacts for anyone with a particular protected characteristics compared with someone who does not share the same protected characteristics?
- Is this a relevant consideration? What issues could arise?

Up to 10% of dwellings will be designed to the National Wheelchair Accessible Standard M4(3)(2)(b) with the remainder built to National Accessible and Adaptable Standard M4(2) ([Link](#)) Additionally, all units will be built to Nationally Described Space Standards (NDSS) ([Link](#)) These are a set of streamlined national technical standards that deal with internal space within new dwellings across all tenures, setting out requirements for floor areas at defined levels of occupancy as well as dimensions for key parts of the home. The NDSS and part M standards will help to ensure proposed dwellings will be suitable, both at the first point of occupancy and into the future.

The Council will own and manage the homes, and these will be allocated in the normal way via the existing allocations system, ensuring those in most need are offered accommodation, which takes into account the perspective or existing council tenants housing needs.

b. Advance equality of opportunity between different groups

- Does the proposal/service advance equality of opportunity for people?
- Identify inequalities faced by those with specific protected characteristic(s).
- Is this a relevant consideration? What issues could arise?

The design process aims to ensure equality from the outcomes of the proposed delivery programme and promote equality of opportunity for users. This will be further expanded on during the allocation process, to ensure any support needs and care is addressed at an early stage and allocation is suitably provided.

c. Foster good relations between different groups

- Does the service contribute to good relations or to broader community cohesion objectives?
- How does it achieve this aim?
- Is this a relevant consideration? What issues could arise?

This proposal only delivers new build homes. The design and massing will aim to take into account site capacity and amenity space, along with the impact on existing and neighbouring dwellings. A range of property sizes will be delivered and allocated on a needs basis via the Council's housing allocation policy and process.

3. Who is affected?

Outline who could be affected, and how they could be affected by the proposal/service change. Include people who currently use the service and those who could benefit from, but do not currently access the service. Where possible include data to support this.

Local business and shops – the scheme could have a positive impact as there is potential of having new customers through residents moving into the area.

Households on the housing register in need of affordable housing. As of 1st April 2024, there were 6682 households on the housing register in need of an affordable home which is a 11% increase compared with the previous year. This scheme will have a positive impact providing affordable homes for those households on the housing register providing a range of house types.

Local residents and the surrounding area: The Leys building is currently in disrepair and an eyesore in the area. The open space attracts anti-social behaviours, and the site of the former John Calvert Court is overgrown. This development will not only improve the outlook for the area but will also include provision to enhance the existing open space opposite site.

4. Information used to inform the equality impact assessment

- What **data, research, or trend analysis** have you used?
- Describe how you have got your information and what it tells you

- Are there any gaps or limitations in the information you currently hold, and how you have sought to address this? E.g. proxy data, national trends, equality monitoring etc.

Leicester City Local Housing Needs Assessment 2022 [Link](#) This assessment concludes 7,069 households at the time of publication were living in unsuitable housing in Leicester and unable to afford their own housing.

Housing Crisis Report 2022 [Link](#) This report highlights the shortage of new social housing as a contributing feature of the housing crisis.

Who Gets Social Housing Report 2023/24 [Link](#) This report provides a snapshot on 1 April 2024. The number of households on the register at that time was 6682 which is a 11% increase compared with the previous year. There is a need for all types of housing and demand outstrips supply.

5. Consultation

Have you undertaken consultation about the proposal with people who use the service or people affected, people who may potentially use the service and other stakeholders? What did they say about:

- What is important to them regarding the current service?
- How does (or could) the service meet their needs? How will they be affected by the proposal? What potential impacts did they identify because of their protected characteristic(s)?
- Did they identify any potential barriers they may face in accessing services/other opportunities that meet their needs?

Lead Member for Housing and Ward Members consulted including site visit on 14th May 2024. The Leys building is currently not in use, hence existing service users of this building are not impacted on by this decision. The housing needs and requirements of Leicester City housing applicants are reviewed on a regular basis via reports and evidence as referred to above. There will be further consultation through the planning determination process which will include public consultation, as well as the opportunity for pre-planning consultation with interested parties as the new build housing design evolves.

6. Potential Equality Impact

Based on your understanding of the service area, any specific evidence you may have on people who use the service and those who could potentially use the service and the findings of any consultation you have undertaken, use the table below to explain which individuals or community groups are likely to be affected by the proposal because of their protected characteristic(s). Describe what the impact is likely to be, how significant that impact is for individual or group well-being, and what mitigating actions can be taken to reduce or remove negative impacts. This could include indirect impacts, as well as direct impacts.

Looking at potential impacts from a different perspective, this section also asks you to consider whether any other particular groups, especially vulnerable groups, are likely to be affected by the proposal. List the relevant groups that may be affected, along with the likely impact, potential risks and mitigating actions that would reduce or remove any negative impacts. These groups do not have to be defined by their protected characteristic(s).

Protected characteristics

Impact of proposal:

Describe the likely impact of the proposal on people because of their protected characteristic and how they may be affected. Why is this protected characteristic relevant to the proposal? How does the protected characteristic determine/shape the potential impact of the proposal? This may also include **positive impacts** which support the aims of the Public Sector Equality Duty to advance equality of opportunity and foster good relations.

Risk of disproportionate negative impact:

How likely is it that people with this protected characteristic will be disproportionately negatively affected? How great will that impact be on their well-being? What will determine who will be negatively affected?

Mitigating actions:

For disproportionate negative impacts on protected characteristic/s, what mitigating actions can be taken to reduce or remove the impact? You may also wish to include actions which support the positive aims of the Public Sector Equality Duty to advance equality of opportunity and to foster good relations. All actions identified here should also be included in the action plan at the end of this EIA.

a) Age

Indicate which age group/s is/ are most affected, either specify general age group (children, young people, working aged people or older people) or specific age bands.

What is the impact of the proposal on age?

New build properties will not be age restricted and will be allocated in accordance with the Housing Allocation Policy.

What is the risk of disproportionate negative impact on age?

None

What are the mitigating actions?

None

b) Disability

A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. If specific impairments are affected by the proposal, specify which these are. Our standard categories are on our equality monitoring form – physical impairment, sensory impairment, mental health condition, learning disability, long standing illness, or health condition.

What is the impact of the proposal on disability?

This new build scheme will look to provide up to 10% of the units as wheelchair accessible.

What is the risk of disproportionate negative impact on disability?

None as properties will be allocated in accordance with the Housing Allocation Policy.

What are the mitigating actions?

None

c) Gender reassignment

Indicate whether the proposal has potential impact on trans men or trans women, and if so, which group is affected. a trans person is someone who proposes to, starts, or has completed a process to change his or her gender. A person does not need to be under medical supervision to be protected.

What is the impact of the proposal on gender reassignment?

Not relevant

What is the risk of disproportionate negative impact on gender reassignment?

Not relevant

What are the mitigating actions?

Not relevant

d) Marriage and civil partnership

Please note that the under the Public Sector Equality Duty this protected characteristic applies to the first general duty of the Act, eliminating unlawful discrimination, only. The focus within this is eliminating discrimination against people that are married or in a civil partnership with regard specifically to employment.

What is the impact of the proposal on marriage and civil partnership?

Not relevant

What is the risk of disproportionate negative impact on marriage and civil partnership?

Not relevant

What are the mitigating actions?

Not relevant

e) Pregnancy and maternity

Does the proposal treat someone unfairly because they're pregnant, breastfeeding or because they've recently given birth.

What is the impact of the proposal on pregnancy and maternity?

Not relevant

What is the risk of disproportionate negative impact on pregnancy and maternity?

Not relevant

What are the mitigating actions?

Not relevant

f) Race

Race refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. A racial group can be made up of two or more distinct racial groups, for example Black Britons, British Asians, British Sikhs, British Jews, Romany Gypsies, and Irish Travellers.

What is the impact of the proposal on race?

Not relevant

What is the risk of disproportionate negative impact on race?

Not relevant

What are the mitigating actions?

Not relevant

g) Religion or belief

Religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief. Generally, a belief should affect your life choices or the way you live for it to be included in the definition. This must be a belief and not just an opinion or viewpoint based on the present state of information available and;

- be about a weighty and substantial aspect of human life and behaviour
- attain a certain level of cogency, seriousness, cohesion, and importance, and
- be worthy of respect in a democratic society, not incompatible with human dignity and not in conflict with fundamental rights of others. For example, Holocaust denial, or the belief in racial superiority are not protected.

Are your services sensitive to different religious requirements e.g., times a customer may want to access a service, religious days and festivals and dietary requirements

What is the impact of the proposal on religion or belief?

Not relevant

What is the risk of disproportionate negative impact on religion or belief?

Not relevant

What are the mitigating actions?

Not relevant

h) Sex

Indicate whether this has potential impact on either males or females.

What is the impact of the proposal on sex?

Not relevant

What is the risk of disproportionate negative impact on sex?

Not relevant

What are the mitigating actions?

Not relevant

i) Sexual orientation

Indicate if there is a potential impact on people based on their sexual orientation. The Act protects heterosexual, gay, lesbian, or bisexual people.

What is the impact of the proposal on sexual orientation?

Not relevant

What is the risk of disproportionate negative impact on sexual orientation?

Not relevant

What are the mitigating actions?

Not relevant

7. Summary of protected characteristics

a. Summarise why the protected characteristics you have commented on, are relevant to the proposal?

The building of new affordable housing on these sites will increase the supply and options for those households on the Council's housing register not able to access market housing. The new housing will be general-purpose and not for a specific group or age. A proportion of the units will be wheelchair accessible which will provide an increase supply and options for this group.

b. Summarise why the protected characteristics you have not commented on, are not relevant to the proposal?

This decision relates to a new build scheme with properties being let in accordance with the Council's Allocation Policy. The letting of these properties and who may benefit from them is outside the scope of this project and hence the characteristics referred to as "Not Relevant" are considered irrelevant.

8. Armed Forces Covenant Duty

The Covenant Duty is a legal obligation on certain public bodies to 'have due regard' to the principles of the Covenant and requires decisions about the development and delivery of certain services to be made with conscious consideration of the needs of the Armed Forces community.

When Leicester City Council exercises a relevant function, within the fields of healthcare, education, and housing services it must have due regard to the aims set out below:

a. The unique obligations of, and sacrifices made by, the Armed Forces

These include danger; geographical mobility; separation; Service law and rights; unfamiliarity with civilian life; hours of work; and stress.

b. The principle that it is desirable to remove disadvantages arising for Service people from membership, or former membership, of the Armed Forces

A disadvantage is when the level of access a member of the Armed Forces Community has to goods and services, or the support they receive, is comparatively lower than that of someone in a similar position who is not a member of the Armed Forces Community, and this difference arises from one (or more) of the unique obligations and sacrifices of Service life.

c. The principle that special provision for Service people may be justified by the effects on such people of membership, or former membership, of the Armed Forces

Special provision is the taking of actions that go beyond the support provided to reduce or remove disadvantage. Special provision may be justified by the effects of the unique obligations and sacrifices of Service life, especially for those that have sacrificed the most, such as the bereaved and the injured (whether that injury is physical or mental).

Does the service/issue under consideration fall within the scope of a function covered by the Duty (healthcare, education, housing)? Which aims of the Duty are likely be relevant to the proposal? In this question, consider both the current service and the proposed changes. Are members of the Armed Forces specifically disadvantaged or further disadvantaged by the proposal/service? Identify any mitigations including where appropriate possible special provision.

There should be no disproportionate negative impact on Armed Forces as a result of the demolition of The Leys and the new build scheme as the allocations policy is central in allocating the properties to applicants on a needs basis, the allocations policy includes Armed Forces as a priority group. [Welcome to the Leicester City Council Housing Allocations Policy Manual](#)

9. Other groups

Other groups

Impact of proposal:

Describe the likely impact of the proposal on children in poverty or any other people who we may consider to be vulnerable, for example people who misuse substances, care leavers, people living in poverty, care experienced young people, carers, those who are digitally excluded. List any vulnerable groups likely to be affected. Will their needs continue to be met? What issues will affect their take up of services/other opportunities that meet their needs/address inequalities they face?

Risk of disproportionate negative impact:

How likely is it that this group of people will be negatively affected? How great will that impact be on their well-being? What will determine who will be negatively affected?

Mitigating actions:

For negative impacts, what mitigating actions can be taken to reduce or remove this impact for this vulnerable group of people? These should be included in the action plan at the end of this EIA. You may also wish to use this section to identify opportunities for positive impacts.

a. Care Experienced People

This is someone who was looked after by children's services for a period of 13 weeks after the age of 14', but without any limit on age, recognising older people may still be impacted from care experience into later life.

What is the impact of the proposal on Care Experienced People?

This decision relates to a new build scheme with properties being let in accordance with the Council's Allocation Policy. The letting of these properties and who may benefit from them is outside the scope of this project.

What is the risk of negative impact on Care Experienced People?

Not relevant

What are the mitigating actions?

Not relevant

b. Children in poverty

What is the impact of the proposal on children in poverty?

Providing new affordable homes will have a positive impact for children living in households on the housing register as the increase supply of council homes available will increase the housing options for this group.

What is the risk of negative impact on children in poverty?

Not relevant

What are the mitigating actions?

Not relevant

c. Other (describe)

What is the impact of the proposal on any other groups?

None

What is the risk of negative impact on any other groups?

None

What are the mitigating actions?

None

10. Other sources of potential negative impacts

Are there any other potential negative impacts external to the service that could further disadvantage service users over the next three years that should be considered? For example, these could include:

- other proposed changes to council services that would affect the same group of service users;
- Government policies or proposed changes to current provision by public agencies (such as new benefit arrangements) that would negatively affect residents;
- external economic impacts such as an economic downturn.

None known

11. Human rights implications

Are there any human rights implications which need to be considered and addressed (please see the list at the end of the template), if so, please outline the implications and how they will be addressed below:

None known

12. Monitoring impact

You will need to ensure that monitoring systems are established to check for impact on the protected characteristics and human rights after the decision has been implemented. Describe the systems which are set up to:

- monitor impact (positive and negative, intended, and unintended) for different groups
- monitor barriers for different groups
- enable open feedback and suggestions from different communities
- ensure that the EIA action plan (below) is delivered.

If you want to undertake equality monitoring, please refer to our [equality monitoring guidance and templates](#).

Once built properties are allocated in accordance with the Council's Housing Allocation Policy and process. Lettings are monitored through the Housing Options and the Property Letting team with an annual report to Housing Scrutiny "Who Gets Social Housing."

13. EIA action plan

Please list all the equality objectives, actions and targets that result from this assessment (continue on separate sheets as necessary). These now need to be included in the relevant service plan for mainstreaming and performance management purposes.

Equality Outcome	Action	Officer Responsible	Completion date
Properties are appropriately allocated to those households in needs including those with wheelchair needs.	Properties are let in accordance with the Housing Allocation Policy and monitored through the "Who Gets Social Housing" report.	Housing Options and Property Letting Team	On-going

Human rights articles:

Part 1: The convention rights and freedoms

Article 2: Right to Life

Article 3: Right not to be tortured or treated in an inhuman or degrading way

Article 4: Right not to be subjected to slavery/forced labour

Article 5: Right to liberty and security

Article 6: Right to a fair trial

Article 7: No punishment without law

Article 8: Right to respect for private and family life

Article 9: Right to freedom of thought, conscience, and religion

Article 10: Right to freedom of expression

Article 11: Right to freedom of assembly and association

Article 12: Right to marry

Article 14: Right not to be discriminated against

Part 2: First protocol

Article 1: Protection of property/peaceful enjoyment

Article 2: Right to education

Article 3: Right to free elections