

## Charnwood Borough council

### Equality impact assessment 'Knowing the needs of your customers and employees'

#### Background

An equality impact assessment is an improvement tool. It will assist you in ensuring that you have thought about the needs and impacts of your service/policy/function in relation to the protected characteristics. It enables a systematic approach to identifying and recording gaps and actions.

#### Legislation- equality duty

As a local authority that provides services to the public Charnwood Borough council has a legal responsibility to ensure that we can demonstrate having paid due regard to the need to:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity
- Foster good relations

For the following protected characteristics:

1. Age
2. Disability
3. Gender reassignment
4. Marriage and civil partnership
5. Pregnancy and maternity
6. Race
7. Religion and belief
8. Sex
9. Sexual orientation

What is prohibited?

1. Direct discrimination
2. Indirect discrimination
3. Harassment
4. Victimisation
5. Discrimination by association
6. Discrimination by perception
7. Pregnancy and maternity discrimination
8. Discrimination arising from disability
9. Failing to make reasonable adjustments

**Note: Complete the action plan as you go through the questions**

#### Step 1 – Introductory information

<b>Title of the policy</b>	Tenancy Support Policy
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<b>Name of lead officer and others undertaking this assessment</b>	Claire Westrup and Gill Taylor
<b>Date EIA started</b>	2 <sup>nd</sup> January 2019
<b>Date EIA completed</b>	8 <sup>th</sup> October 2019

### Step 2 – Overview of policy/function being assessed:

Outline: What is the purpose of this policy? (Specify aims and objectives)
<p>The objectives of the Tenancy Support Policy are to:</p> <ul style="list-style-type: none"> <li>▪ support and empower tenants to sustain tenancies;</li> <li>▪ help tenants deal with any problems or issues that arise during their tenancy such as rent arrears or problems with welfare benefits;</li> <li>▪ provide direct support through Tenancy Support Officers and Financial Inclusion Officers;</li> <li>▪ refer tenants to partner agencies for more specialist or long-term advice and support when needed;</li> <li>▪ liaise with other statutory agencies, and make representations on tenants' behalf;</li> <li>▪ create safer and more stable communities;</li> <li>▪ reduce the economic and social effect of failed tenancies;</li> <li>▪ reduce rent arrears, and the associated costs of legal action;</li> <li>▪ maximise tenants' incomes;</li> <li>▪ help tenants to maintain their independence;</li> <li>▪ prevent and reduce homelessness and the associated costs.</li> </ul>
What specific group/s is the policy designed to affect and what is the intended change or outcome for them?
All current tenants of council-owned dwellings and any potential tenants to help them manage and sustain their tenancy
Which groups have been consulted as part of the creation or review of the policy?
Housing Management Advisory Board, Charnwood Housing Residents' Forum, Policy Scrutiny Group

### Step 3 – What we already know and where there are gaps

List any existing information/data do you have/monitor about different diverse groups in relation to this policy? Such as in relation to age, disability, gender reassignment, marriage and civil partnership, pregnancy & maternity, race, religion or belief, sex, sexual orientation etc.

Data/information such as:

- Consultation
- Previous equality impact assessments
- Demographic information
- Anecdotal and other evidence

A range of diversity information is available from our records and held in QL (our housing management system) for all those customers receiving housing management services. This includes information on age, gender, ethnicity, sexual orientation, race, religion and disability of tenants who receive help from the Tenancy Support Team.

What does this information / data tell you about diverse group? If you do not hold or have access to any data/information on diverse groups, what do you need to begin collating / monitoring? (Please list)

This information enables support to be directed to the most vulnerable tenants. The information allows us to identify which groups of tenants most need help and support to maintain their tenancies and to direct resources accordingly. We can also use the information to ensure that support is delivered fairly and that no group is being overlooked or disadvantaged.

#### Step 4 – Do we need to seek the views of others? If so, who?

In light of the answers you have given in step 2, do you need to consult specific groups to identify needs / issues? If not please explain why.

Staff in the Tenancy Support Team, Financial Inclusion Team, Children, Families and Partnerships Manager at Charnwood Borough Council, Principal Officer – Customer Engagement & Older Person’s Services, Housing Income Team Leader and Head of Landlord Services have all been consulted.

#### Step 5 – Assessing the impact

In light of any data/consultation/information and your own knowledge and awareness, please identify whether the policy has a positive or negative impact on the individuals or community groups (including what barriers these individuals or groups may face) who identify with any ‘protected characteristics’ and provide an explanation for your decision (please refer to the general duties on the front page).

	Comments
<b>Age</b>	Support will be offered to tenants of all ages where deemed appropriate and beneficial to the tenant.

	<p>Older people may be less able to identify and access benefits to which they may be entitled. This increases their vulnerability and may lead to deterioration in their health and wellbeing. Support will address this by providing financial inclusion and welfare benefits advice.</p> <p>Older people can begin to struggle to live independently due to dementia or physical frailty. Tenancy Support Officers will, where required, offer older tenants help to access appropriate health and social care services to support them to continue to live in their own homes or to access more supported accommodation.</p>
<p><b>Disability (Physical, visual, hearing, learning disabilities, mental health)</b></p>	<p>Not all tenants with disabilities will need help to live independently or maintain a tenancy. However support is offered to those where it is identified they may need it.</p> <p>Many of our tenants have mobility, mental health and other disability needs.</p> <p>Health problems, including mental health problems and learning difficulties (which may also include problems with reading and writing) might, affect how a person can manage their tenancy. For example tenants in these groups may have difficulty in managing their benefits and in budgeting and therefore in paying their rent. They may need additional support in understanding what is acceptable behaviour, in keeping themselves safe and in maintaining clean and tidy homes and gardens.</p> <p>Tenancy Support Officers will offer specialist advice and support where that is deemed to be appropriate and beneficial. We will, if necessary refer the tenant to an external tenancy support agency that might be able to offer longer term more structured or specialist support or to another service such as Social Care or Health.</p>
<p><b>Gender reassignment (Transgender)</b></p>	<p>Support will be offered to all tenants regardless of their gender identity.</p> <p>Tenancy Support Officers will offer specialist advice and support where that is deemed to be appropriate and beneficial. We will, if necessary refer the tenant to an external tenancy support agency that might be able to offer longer term more structured or specialist support or to another service such as Social Care or Health.</p>
<p><b>Race</b></p>	<p>Support is available to all tenants regardless of their race where deemed appropriate and beneficial to the tenant.</p>

	<p>People from abroad or who do not have English as a first language may be susceptible to tenancy failure. Tenants who have been former asylum seekers may have mental health difficulties that make living independently more of a struggle.</p> <p>Tenancy Support officers will offer specialist advice and support where that is deemed to be appropriate and beneficial. We will, if necessary refer the tenant to an external tenancy support agency that might be able to offer longer term more structured or specialist support or to another service such as Social Care or Health or to another service that supports people from other countries offering language and cultural support. Gaining access to external support may also include paying for interpreting services such as Language Line.</p>
<p><b>Religion or belief (Includes no belief)</b></p>	<p>Support is available to all tenants regardless of their religion or belief.</p> <p>Tenancy Support officers will offer specialist advice and support where that is deemed to be appropriate and beneficial. We will, if necessary refer the tenant to an external tenancy support agency that might be able to offer longer term more structured or specialist support or to another service such as Social Care or Health or to another service that supports people of other religions or beliefs. We will make reasonable adjustments in the nature of support offered according to someone's religious or cultural needs.</p>
<p><b>Sex</b></p>	<p>Support is available to all tenants regardless of their sex.</p> <p>Tenancy Support Officers will offer specialist advice and support where that is deemed to be appropriate and beneficial. We will, if necessary refer the tenant to an external tenancy support agency that might be able to offer longer term more structured or specialist support or to another service such as Social Care or Health. We will make reasonable adjustments in the nature of support offered according to someone's sex.</p>
<p><b>Sexual orientation</b></p>	<p>Support is available to all tenants regardless of their sexual orientation.</p> <p>Tenancy Support Officers will offer specialist advice and support where that is deemed to be appropriate and beneficial. We will, if necessary refer the tenant to an external tenancy support agency that might be able to offer longer term more structured or specialist support or</p>

	to another service such as Social Care or Health. If necessary we will make reasonable adjustments in the nature of support offered according to someone's sexual orientation. We will, if necessary try to refer the tenant to an external support agency that might be able to offer longer term more structured or specialist support or to another service that supports LGB tenants.
<b>Other protected groups (pregnancy &amp; maternity, marriage &amp; civil partnership)</b>	<p>Support is available to all tenants, including these protected groups. Pregnant tenants and / or those on maternity are more likely to be vulnerable and in need of support.</p> <p>Tenancy Support Officers will offer specialist advice and support where that is deemed to be appropriate and beneficial. We will, if necessary refer the tenant to an external tenancy support agency that might be able to offer longer term more structured or specialist support or to another service such as Social Care or Health. We will make reasonable adjustments in the nature of support offered according to someone's pregnancy &amp; maternity, marriage &amp; civil partnership status. We will, if necessary try to refer the tenant to an external tenancy support agency that might be able to offer longer term more structured or specialist support or to another service such as Social Care or Health.</p>
<b>Other socially excluded groups (Carers, low literacy, priority neighbourhoods, health inequalities, rural isolation, asylum seeker and refugee communities etc.)</b>	<p>These groups are more likely to be vulnerable and in need of tenancy support.</p> <p>Tenancy Support Officers will offer specialist advice and support where that is deemed to be appropriate and beneficial. We will, if necessary refer the tenant to an external tenancy support agency that might be able to offer longer term more structured or specialist support or to another service such as Social Care or Health.</p>

Where there are potential barriers, negative impacts identified and/ or barriers or impacts are unknown, please outline how you propose to minimise all negative impact or discrimination.

Please note:

- a) If you have identified adverse impact or discrimination that is illegal, you are required to take action to remedy this immediately.
- b) Additionally, if you have identified adverse impact that is justifiable or legitimate, you will need to consider what actions can be taken to mitigate its effect on those groups of people.

There is no adverse impact or discrimination identified in this assessment.

Tenancy support will benefit vulnerable tenants by providing help and support when needed to sustain their tenancies.

Summarise your findings and give an overview as to whether the policy will meet Charnwood Borough council's responsibilities in relation to equality and diversity (please refer to the general duties on the front page).

Delivery of the council's general equalities duties is supported by the provision of general professional advice and assistance from the Tenancy Support team.

### Step 6- Monitoring, evaluation and review

Are there processes in place to review the findings of this assessment and make appropriate changes? In particular, how will you monitor potential barriers and any positive/ negative impact?

The needs of tenants are assessed and monitored at every contact with the Tenancy Support Team.

How will the recommendations of this assessment be built into wider planning and review processes?  
e.g. policy reviews, annual plans and use of performance management systems.

No recommendations have been identified in this assessment.

### Step 7- Action plan

**Please include any identified concerns/actions/problems in this action plan:**  
The problems etc. identified should inform your service plan and, if appropriate, your consultation plan


Reference number	Action	Responsible officer	Target date
	No actions have been identified in this assessment		

### Step 8- Who needs to know about the outcomes of this assessment and how will they be informed?

	Who needs to know (Please tick)	How they will be informed (we have a legal duty to publish EIA's)
Employees	✓	Team meetings
Tenants	✓	Publication on the council's website

<b>Partners and stakeholders</b>	✓	Publication on the council's website
<b>Others</b>	✓	Future and potential tenants through publication on the council's website.
<b>To ensure ease of access, what other communication needs/concerns are there?</b>		None identified.

**Step 9- Conclusion (to be completed and signed by the service head)**

<b>Please delete as appropriate</b>	
<b>I agree with this assessment.</b>	
<b>Signed (service head):</b>	
<b>Date: 08/10/2019</b>	<b>Peter Oliver - Head of Landlord Services</b>

**Please send completed & signed assessment to Suzanne Kinder for publishing.**



**CHARNWOOD BOROUGH COUNCIL**

**EQUALITY IMPACT ASSESSMENT**

**'KNOWING THE NEEDS OF YOUR CUSTOMERS AND EMPLOYEES'**

**Step 1      Introductory information**

<b>Title of the service</b>	Communal cleaning contract
<b>Name of lead officer and others undertaking this assessment</b>	Andrew Staton - Landlord Services Manager
<b>Date EIA started</b>	8 May 2019
<b>Date EIA completed</b>	20 August 2019

**Step 2      Overview of service/function being assessed:**

Outline: What is the purpose of this service? (Specify aims and objectives)
The proposal is to introduce a cleaning service for tenants and leaseholders living in the council's accommodation served by communal entrances, internal halls, stairways and landings. The service will be introduced following unacceptable STAR survey dissatisfaction levels (2016 and 2018) over the cleanliness of these areas. The service, when introduced, will be paid for by levying a service charge on affected residents, calculated on the total contract price but according to the frequency of cleaning (fortnightly or monthly), established through consulting residents over their preferred frequency.
What specific group/s is the service designed to affect and what is the intended change or outcome for them?
All current and future tenants of council-owned dwellings serviced by internal communal entrances, stairways and landings
Which groups have been consulted as part of the creation or review of the service?
All affected tenants and leaseholders

**Step 3      What we already know and where there are gaps**

List any existing information/data do you have/monitor about different diverse groups in relation to this service? Such as in relation to age, disability, gender reassignment, marriage and civil partnership, pregnancy & maternity, race, religion or belief, sex, sexual orientation etc.

Data/information such as:

<ul style="list-style-type: none"> <li>▪ Consultation</li> <li>▪ Previous equality impact assessments</li> <li>▪ Demographic information</li> <li>▪ Anecdotal and other evidence</li> </ul>
<p>A range of diversity information is available from our records and held in QL (our housing management system) for all those customers receiving or potentially receiving [applicants] housing management services. This includes information on age, gender, ethnicity, sexual orientation, and disability. The range of information is limited in relation to certain characteristics (e.g. sexual orientation).</p>
<p>What does this information / data tell you about diverse group? If you do not hold or have access to any data/information on diverse groups, what do you need to begin collating / monitoring? (Please list)</p>
<p>This information enables support to be directed to the most vulnerable tenants, and also shape our services to meet the needs of vulnerable people across a range of diverse groups.</p>

**Step 4 Do we need to seek the views of others? If so, who?**

<p>In light of the answers you have given in step 2, do you need to consult specific groups to identify needs / issues? If not please explain why.</p>
<p>Staff in landlord services teams have been consulted as well as affected tenants and leaseholders.</p> <p>The proposal has been endorsed in principle by Charnwood Housing Residents' Forum and the Housing Management Advisory Board.</p>

**Step 5 Assessing the impact**

<p>In light of any data/consultation/information and your own knowledge and awareness, please identify whether the service has a positive or negative impact on the individuals or community groups (including what barriers these individuals or groups may face) who identify with any 'protected characteristics' and provide an explanation for your decision (please refer to the general duties on the front page).</p>	
	<b>Comments</b>
<b>Age</b>	There will be no adverse effect from this service on this protected group
<b>Disability (Physical, visual, hearing, learning disabilities, mental health)</b>	Disabled people could be affected adversely by this service if appropriate health and safety procedures (e.g. signage) were not practised by the contractor.
<b>Gender reassignment (transgender)</b>	There will be no adverse effect from this service on this protected group
<b>Race</b>	There will be no adverse effect from this service on this

	protected group
<b>Religion or belief (Includes no belief)</b>	There will be no adverse effect from this service on this protected group
<b>Sex</b>	There will be no adverse effect from this service on this protected group
<b>Sexual orientation</b>	There will be no adverse effect from this service on this protected group
<b>Other protected groups (pregnancy &amp; maternity, marriage &amp; civil partnership)</b>	There will be no adverse effect from this service on this protected group
<b>Other socially excluded groups (carers, low literacy, priority neighbourhoods, health inequalities, rural isolation, asylum seeker and refugee communities etc.)</b>	There will be no adverse effect from this service on this protected group

Where there are potential barriers, negative impacts identified and/ or barriers or impacts are unknown, please outline how you propose to minimise all negative impact or discrimination.

Please note:

- a) If you have identified adverse impact or discrimination that is illegal, you are required to take action to remedy this immediately.
- b) Additionally, if you have identified adverse impact that is justifiable or legitimate, you will need to consider what actions can be taken to mitigate its effect on those groups of people.

Any potential adverse impact on disabled people will be mitigated by the insistence on rigorous and legally-compliant safety measures and procedures being practised by the contractor when cleaning the blocks. As part of the contract implementation process, full risk assessments and method statements will be required and compliance against these will form part of the contract monitoring quality control process.

Other than above, there is no anticipated adverse impact from this new service other than a financial one that will affect every resident. The service charge will be eligible for housing benefit and universal credit in full.

Summarise your findings and give an overview as to whether the service will meet Charnwood Borough council's responsibilities in relation to equality and diversity (please refer to the general duties on the front page).

The service will meet the Council's responsibilities in relation to quality and diversity. There is no adverse impact on protected groups that is not sufficiently mitigated against.

**Step 6 Monitoring, evaluation and review**

Are there processes in place to review the findings of this assessment and make appropriate changes? In particular, how will you monitor potential barriers and any positive/ negative impact?
After twelve months' service duration we will assess the impact that the additional charge has had on arrears [to see if they increased arrears] indicate any bias towards those not able to claim benefits.
How will the recommendations of this assessment be built into wider planning and review processes? e.g. service reviews, annual plans and use of performance management systems.
No recommendations have been identified in this assessment.

**Step 7 Action plan**

Please include any identified concerns/actions/problems in this action plan:			
Reference number	Action	Responsible officer	Target date
1.	Review impact of introduction of cleaning scheme to identify any adverse impact on protected groups.	Andrew Staton – Landlord Services Manager	March 2021

**Step 8 Who needs to know about the outcomes of this assessment and how will they be informed?**

	Who needs to know (Please tick)	How they will be informed (we have a legal duty to publish EIA's)
Employees	✓	Team meetings
Tenants and leaseholders	✓	Publication on the council's website
To ensure ease of access, what other communication needs/concerns are there?		None identified.

**Please delete as appropriate**

**I agree with this assessment / action plan**

**If *disagree*, state action/s required, reasons and details of who is to carry them out with timescales:**

**Signed (service head):**

A handwritten signature in black ink, appearing to be 'S. Kinder', is written in the signature box.

**Date: 20/08/2019**

**Please send completed & signed assessment to Suzanne Kinder for publishing.**

