

# **Equality impact assessment form**

**Directorate- Communities and Place**

**Service area – Strategic Housing**

**Name of policy, strategy, review or function being  
assessed- Older Persons Housing Strategy**

**Date of assessment- 29<sup>th</sup> April 2019**

**Name of Head of Service signing it off- Ian Fullagar**

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

**Date published on website**

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Derby City Council



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

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

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

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

Having 'due regard' means:

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

The protected characteristics are:

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

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

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

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

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

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

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

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

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

## **Equality groups and protected characteristics**

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

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

## **Contact for help**

Ann Webster – Lead on Equality and Diversity

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

Tel 01332 643722 Minicom 01332 640666 Mobile 07812301144

## The form

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

Policies will usually fall into three main categories...

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

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

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

### Older Persons Housing Strategy 2019-2029

#### The assessment team

Team leader's name and job title – Jeremy Mason, Principal Housing Strategy Officer

Other team members

<b>Name</b>	<b>Job title</b>	<b>Organisation</b>	<b>Area of expertise</b>
Angelina Novakovic	Housing Strategy Development Officer	DCC	Strategic Housing
Judi Bateman	Volunteer	Disability Hub	Disability
Moira Findlay	Volunteer	Disability Hub	Disability
Andy Findlay	Volunteer	60+ Forum	Disability
Chris Fields	Member/volunteer	60+ Forum	General/OP

## Step 1 – setting the scene

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

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

This Older Persons Housing Strategy 2019-2029, is a revision of the previous strategy and was written to update the previous strategy following a comprehensive review of all the data relating to older people in Derby and their housing needs.

The Strategy aims to provide a wide range of good quality, suitable and affordable accommodation for our older citizens, along with appropriate information and advice, to better enable them to make informed and appropriate housing choices.

The Strategy has been developed to help maximise the provision of suitable housing, despite the pressures from increasing population sizes, and in doing so reflects government policy and local priorities. It covers all older people and those approaching older age who live in Derby or who want to move into the area.

The Strategy builds upon the previous strategy and what initiatives have been successful and effective in the past. Its priorities for the next period 2019-2029 are:

- Improving the range and accessibility of information, advice and support services
- Expanding the availability of good quality housing, both for rent and purchase, enabling older people to live in suitable housing of their choice
- Implementing measures to help people stay independent in their own homes for longer
- Helping people to move to more appropriate housing when their current housing becomes unsuitable or manageable.

The Older Persons Housing Strategy links into the Council's main Housing Strategy, which is the councils over arching strategy for housing and housing led services throughout the city.

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

The Older Persons' Housing Strategy will be a corporately adopted strategy. It contains a number of cross-cutting objectives which will be delivered by a range of services within the council, primarily within Strategic Housing, Adult Social Services and Commissioning, and supported by the actions of external partner agencies. These include registered social housing providers, private developers, the NHS and third sector organisations such as charities and voluntary organisations. Consultation, oversight, monitoring, and responsibility for any future revisions of the strategy will be lead by Strategic Housing.

The Strategic Housing division will deliver the strategy in partnership with a wide range of partner organisations, including statutory bodies, registered social housing providers, developers, NHS and other local authority departments (including Adults social services and Commissioning) and third sector organisations such as charities and voluntary organisations. We will work together to deliver actions against the strategic aims and objectives.

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

The main customers of this strategy will be all older people, irrespective of tenure and income, and including disabled older people, who are resident in Derby or who want to move to Derby. Also affected will be service providers for older people, and organisations/ groups, including developers and registered social landlords who have an interest in developing accommodation for older people and/or services to support them.

The Strategy defines older people as typically anybody aged 55 and over. But in some cases, information we rely on that is provided by government and other agencies might use other age ranges, such as over 60 or over 65.

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

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

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

A survey has taken place with all older people made available on the Council's website, In Touch, Your City Your Say and at the over 60's Forum (formerly over 50s). The survey sought the views on parts of the strategy from older people and their carers and all relevant organisations and services.

The draft Strategy was also promoted at the Strategic Liaison Group to other registered providers of housing and other local service providers

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

Other people/organisations consulted include:

- Elected members
- Scrutiny board
- Housing associations
- All members of the over 60's Forum (previously over 50's Forum), including Age UK
- Disability Hub
- LGBT groups and households
- Local Community Groups representing diversity in the City
- Health and Social Care providers
- Council departments including Adult Social Care and Commissioning
- Members of the public

**5 Using the skills and knowledge in your assessment team, and from any consultation you have done, what do you already know about the**

equality impact of the policy on particular groups? Also, use any other information you know about such as any customer feedback, surveys, national research or data. Indicate by a tick for each protected characteristic group whether this is a negative or a positive impact. If it's negative, fill in the mitigation section as well to explain how you are going to lessen the impact.

### Age

What do you already know?	Positive impact	Negative impact	Mitigation
The changing demographic profile for older people means that there is continuing shortages of appropriate housing for older people, across all tenures. There is an increasing need to increase the provision of housing with care to support older people to remain in their own homes for longer.	X		

### Disability

What do you already know?	Positive impact	Negative impact	Mitigation
Disabled older people find it more difficult to access appropriate and affordable housing, as there is a lack of attractive and suitable options for their needs. There is a shortage of suitable, appropriate and attractive housing for disabled households.	X		

## Gender identity- trans

What do you already know?	Positive impact	Negative impact	Mitigation
People may experience victimisation or ASB if living in areas where there is discrimination. People in social housing may have more limited housing options due to their reliance on social housing.	X		

## Race

What do you already know?	Positive impact	Negative impact	Mitigation
There may be hidden discrimination in particular sectors such as private housing. Some people may find language barriers in terms of accessing tenancies and understanding terms and conditions of tenancies. Some people may experience discrimination in certain parts of the city or feel socially isolated.	X		

## Religion or belief or none

What do you already	Positive	Negative	Mitigation
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<b>know?</b>	<b>impact</b>	<b>impact</b>	
Some people may need to live nearer places of worship and its likely that there is limited social housing available in certain areas. There may be a need for some sensitive allocations.	<b>X</b>		

### **Sex**

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
There are higher levels of women living for longer than men, although some will have increasing health and mobility issues. There is therefore a higher demand for appropriate housing with care for older women.	<b>X</b>		

### **Sexual orientation**

<b>What do you already know?</b>	<b>Positive impact</b>	<b>Negative impact</b>	<b>Mitigation</b>
People may experience victimisation or ASB if living in areas where there is discrimination. Sensitive allocations are required for social housing.	<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 lessen any negative impact on any of the equality groups? How are you going to fill any gaps in information you have discovered?**

Firstly, the EIA conducted considered and examined any negative impacts or potential negative impacts. Those identified will be subject to further enquiries, consultation and liaison to mitigate those impacts.

The potential impact that has been identified for older people themselves (the particular group being defined as age), is the potential for older people not being able to complete the necessary online forms associated with either acquiring a property (social housing) or for applying for the relevant benefits. This group has discussed this issue and has agreed that the housing strategy team will liaise with appropriate reception teams and benefits service to explore alternative services and options; what is being provided and what potentially could be provided will be reported back to the assessment group.

**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> </ul>

		<ul style="list-style-type: none"> <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)

Our Assessment Team has agreed this as being Outcome Number 1.

Why did you come to this decision?

Overall, the Group agreed that the EIA has not identified any known areas of discrimination or negative impact.

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

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

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

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

#### **Equality Action Plan –setting targets and monitoring**

## Age

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
We will liaise with key departments at the Council House over support services to help access and completing forms as an alternative to online services.	This will make a difference for people who either don't have access to a computer or who are unable to access online services for other reasons.	Strategic Housing will explore the position with the relevant services and feedback to the Assessment Team.	To be undertaken by Strategic Housing.

## Disability

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
We will continue to make appropriate and suitable allocations and promote an increase in suitable new housing.	This will ensure disabled households are able to live in their home without any adverse impact.	Derby Homes	Derby Homes

## Gender identity - trans

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
We will continue to make	This will allow people to live peacefully in	Derby Homes	Derby Homes

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

## **Race**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Ensure that sensitive allocations continue to be made	This will allow people to live peacefully in their homes and neighbourhoods.	Derby Homes	Derby Homes

## **Religion or belief or none**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
Ensure that sensitive allocations continue to be made	This will allow people to live peacefully in their homes and neighbourhoods	Derby Homes	Derby Homes

## **Sex**

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

### **Sexual orientation**

<b>What are we going to do to advance equality</b>	<b>What difference will it make</b>	<b>When will we do it and who will lead</b>	<b>Monitoring arrangements</b>
We will ensure that sensitive allocations continue to be made.	This will hopefully enable tenant to live peacefully.	Derby Homes.	Derby Homes

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

### Polish

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

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

### Punjabi

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

### Slovakian

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

### Urdu

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



Derby City Council