

Stevenage Borough Council

Equality Impact Assessment Toolkit



What is the legal background of equality and diversity?

The Equality Act 2010

Everyone's right to be treated fairly is covered in law by the Equality Act 2010, which came into force in October 2010. The Act protects nine characteristics and they are:

Age Disability Gender reassignment

Marriage or civil partnership Pregnancy and maternity Race

Religion or belief Sex Sexual orientation

When a person feels that they have not been treated fairly because of any of these characteristics it is called unlawful discrimination.

The Public Sector Equality Duty

Section 149 of The Equality Act 2010 is called the Public Sector Equality Duty. Stevenage Borough Council has a statutory obligation to comply with the requirements of the Duty which are to carry out our functions in a way that gives due regard to the need to:

- Remove discrimination, harassment, victimisation and any other conduct that is unlawful under this Act
- **Promote equal opportunities** between people who share a protected characteristic and those who don't
- **Encourage good relations** between people who share a protected characteristic and those who don't.

What is an Equality Impact Assessment (EqIA)?

A process that helps us to evidence and understand the impacts that our decisions might have on different types of people, and improve them where we can. These decisions can relate to existing services, policies and functions, procurement exercises, plans for future changes and new projects.

It is designed to help us think about both positive and negative impacts on people and look at how to avoid disadvantage or further improve our services.

The aim is to make sure that we plan, develop and deliver fair and inclusive services and that we promote equality and positive relationships between the different communities that we serve.

Although the assessment of any socio-economic impact has been removed from the Act, officers at Stevenage are encouraged to use their discretion in assessing impact on people who are less fortunate because of their social and / or economic background.



Why do we do them?

EqlAs have been used at Stevenage for a number of years and are a really useful way of showing how we consider the needs of our diverse communities and staff. And by using them effectively, we'll be able to mitigate any potential legal challenge of discrimination under the Equality Act 2010. EqlAs help us to:

- Consider the differing needs of people in our community and workforce
- Demonstrate to all of our stakeholders that we place great importance on meeting and understanding the needs of different residents and employees
- Ensure that decisions are made in a fair, transparent and accountable way
- Focus our activity on delivering positive outcomes for our communities instead of being process-driven
- Meet our legislative requirements under the Equality Act 2010 and Public Sector Equality Duty.

Who should complete EqIAs?

Anyone who has to develop and deliver policy, strategy, projects, and services, or make decisions that could impact on people. There should be more than one officer involved in developing the EqIA so that a range of views can be considered. For example a:

- Project manager and lead officers involved in the project
- Service manager and staff involved in delivering the service
- Policy / strategy developer and representatives from other SDUs who will be delivering the function.

How do I complete it?

This toolkit should provide you with most of the information you need to get started, including a few pointers to help you to decide which level of EqIA will be most useful. The two options are a Brief EqIA and a Full EqIA.

You'll see as you go through the toolkit that in addition to using your expertise, the decisions and potential impacts identified should be evidenced as far as possible. A great way of evidencing is by way of consulting with people who are likely to be affected by the outcome, and by analysing local data.

You may find that you complete a Brief EqIA and identify a need to further analyse the impact in a Full EqIA. This is a great example of how it can help to inform and guide decision-making, and demonstrates to our customers, staff and stakeholders that we take equality and inclusion seriously.



When should an EqIA be started?

In the early stages of your activity and certainly before any decision is made. It's very unlikely that it will be completed in one go – you'll find it useful to keep coming back to it, updating as new evidence comes to light, or as different viewpoints are taken into account.

It's a good idea to keep copies of previous versions – not just to help you to keep track, but it can also demonstrate where we have changed a decision or planned direction in light of a potential impact on particular groups.

Your EqIA should not be completed at the end of the process as:

- Your decision could cause discrimination, or benefit certain equality groups more than others
- Time and resource could be used inefficiently if the decision has to be reviewed
- You could miss an opportunity to further promote equality and inclusion
- Your decision could fail to meet the council's statutory requirements and create a risk of legal challenge.

What kinds of things should I consider?

When completing an EqIA it's helpful to think about the following:

Negative / Positive / Unequal impact

It's unlikely that a decision will impact on people in light of every characteristic. Where there is no impact or actions identified, feel free to add N/A (not applicable).

Please be aware that where there is a negative impact, you will not necessarily be expected to mitigate this. The aim of the EqIA is to demonstrate that we have given due regard to the potential impact on people and have taken action as far as is practical and reasonable.

- How will different groups of people be affected if the decision is implemented as planned?
- Does the data and evidence collected highlight problems that need to be addressed, such as disadvantage, discrimination and harassment?
- Does the evidence suggest increased or lower than expected (unequal) uptake, access or participation by different groups?
- Are there any rules, requirements or regulations around it that might affect accessibility?
- Is there evidence of better outcomes for different groups?
- Are current measures in place and having a positive impact on particular groups?



Evidence of potential impact

Collect, analyse and record information and data relating to the protected characteristics or any other groups that may be affected. Examples could include:

- Service user data
- Results of consultation, involvement activities or surveys
- Feedback from service users on their outcomes and experiences
- Information about the town, its wards and local communities such as Census data
- Comparisons made with similar policies / services in other departments or authorities
- Recommendations from inspections, audit reports and reviews
- National, regional and local research findings
- Information from partners, trade unions and local groups from the voluntary and community sector.

Opportunities to promote equality and inclusion

- What more can we do to positively impact on these groups?
- Is there an opportunity to improve access and outcomes for different groups?
- How can communications be used more effectively?
- Is there an opportunity to promote positive attitudes and good relations between different groups?

What do we still need to find out?

- What gaps in evidence and information have been found?
- How can these be filled?
- When will this information be captured and reviewed in completing this EqIA?

You should collate and assess all the information you need **before a decision** on your activity is made. If you don't there is an increased risk of exposing the council to legal challenge, if a wrong, inappropriate or ineffective decision is made.

Consultation

As a co-operative council, we aim to involve our staff, communities and stakeholders in decision-making as much as possible. This should always be proportionate to the scale of the decision being made, how many people might be affected or interested and the level of impact it will have.

- How have the views and knowledge of staff who will be delivering the service been considered? Have staff more generally been able to contribute?
- What have your customers fed back?
- Have you consulted the voluntary and community sector in making your decision? How will they be engaged in future?
- Have you drawn on the knowledge of partnering organisations?
- How have other stakeholder been able to contribute and what have they said?



Conclusion and actions

- Have inequalities, inclusions issues or opportunities to further improve equality and inclusion been identified?
- What adjustments have been made to your initial plan as a result of this EqIA?
- If you are continuing as planned or are stopping altogether, what are the reasons?
- What can be done to prevent, minimise or mitigate any negative or unequal impacts identified?
- How can you help people who are vulnerable, stereotyped or marginalised?
- What opportunities are there to remove discrimination and harassment, promote equal opportunities and encourage better relations amongst our communities?
- How could your function be more accessible to people who are underrepresented or don't currently use your service?

Where can I find more information?

Our intranet has lots of useful information, or you can email <u>equalities@stevenage.gov.uk</u> for help and guidance.

We also have a network of Equality Champions across the council – please ask your Head of Service for information on who your representative is.

How do I get started?

By turning over the page!



First things first: does this activity need an EqIA?

Subject of the	Allocation Policy Review	
assessment:		
Please answer Yes or No to the	ne following questions:	
Does it affect staff, service user	s or the wider community?	Yes
Has it been identified as being important to particular groups of people?		
Does it or could it potentially affect different groups of people differently (unequal)?		
Does it relate to an area where there are known inequalities or exclusion issues?		
Will it have an impact on how other organisations operate?		
Is there potential for it to cause public service provider?	controversy or affect the council's reputation as a	Yes

Where a positive impact is likely, will this help to:	Please tick all that apply (✓)
Remove discrimination and harassment?	\checkmark
Promote equal opportunities?	\checkmark
Encourage good relations?	✓

If you ticked or answered Yes to one or more of these questions you should carry out an
EqIA. There are two levels of analysis (Brief and Full) and in deciding which to go for, you
should think about not just the number of people affected but the significance of the effect on
them – both positive and negative.

If you answered No to all of the questions and decide that your activity doesn't need an EqIA you must explain below why it has no relevance to equality and diversity. You should reference the information you used to support your decision and seek approval from your Head of Service or Strategic Director before sending this to equalities@stevenage.gov.uk.



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Full Equality Impact Assessment For a policy, project, service or other decision that is new, changing or under review

What is being assessed? Allocations Policy Re				view	
Lead Assessor	Lori Smith, Housing Supply Manager, Stevenage Borough Council		Assessment team	Tracy Jackson, Operations Manager (Providing Homes), Stevenage Borough Council	
Start date	November 2022 Reviewed September 23	End date	November 2024		Lettings Officer / Allocations Assistant. Carrie Addams – Continuous Improvement Manager
When will the EqIA be reviewed?		November 2	2024		

Who may be affected by it?	People wishing to join the Housing Register People currently on the Housing Register Anyone wanting to access social housing in Stevenage. Our Internal and external partners – particularly those we have nomination rights with
What are the key aims of it?	To assess the current allocations policy and make relevant changes to create realistic expectations surrounding social tenancies, with the aim of making best use of council stock. The new policy aims to apply a priority banding based on need, being open, fair and transparent.

What positive measures are in place (if any) to help fulfil our legislative duties to:



What sources of data / information are you using to inform your assessment?

We have researched other local authorities of similar size to Stevenage and their allocations polices, from this we have been able to identify new ideas from their policies that could replace and improve our current policy. We have also sought the advice of a consultant expert and our shared services legal team.

To help frame the proposed policy, consultation on seven proposals took place for eight weeks beginning in October 2022. Responses were collected online and in person.

To allow for more face to face discussions, a further two weeks of consultation on questions 1, 2 and 3 was carried out in December 2022. Further online responses were also received during this period.

Key groups across the community were consulted including Housing Register applicants from all bands, those not on the register, older people, single people, homeless, minorities and those with disabilities. Key stakeholder organisations were also consulted including Housing Associations, County Council services and mental Health Services. Members of the Community Select Committee representing all elected parties in Stevenage also provided feedback and recommendations in March and September 2023. The Leader of the council and the Deputy Leader of the council – Executive Member for Housing and Housing Development were also consulted.

The response rate was high and the results classed as robust. The population is 89,500 in Stevenage. A 95% confidence value would be achieved from 350-400 responses and 551 responses were received in total giving a margin of error of 4%. By referring to demographic information at https://www.ons.gov.uk/visualisations/censusareachanges/E07000243/ We were able to confirm that the respondents accurately reflected the population of Stevenage and the consultation is statistically relevant.

The consultation responses were used to inform decisions made on the proposed changes to the policy. The proposed changes will be reviewed by the Executive of Stevenage Borough Council on 12 October 2023.



In assessing the potential impact on people, are there any overall comments that you would like to make?

It is important that, as a Local Authority, we monitor and assess the impact this strategy may have on people wishing to join our Housing Register. We need to ensure that there is no indirect, or direct, discrimination, contrary to our public sector equality duty. We are morally and legally accountable for ensuring our homes are let in a way that doesn't put any individuals or marginalised groups at a disadvantage.

Evidence and impact assessment

Explain the potential impact and opportunities it could have for people in terms of the following characteristics, where applicable:

Age										
Positive impact	Yes Negative impact Unequal impact									
Please evidence The new scheme will reference the opportunity to take Independent Living allocations out of the scheme, including Choice Based Lettings, to allow the department to make best use of stock.										
information you used to support this assessment	This type of housing and easier process.	tends to be for older	people and will make	their allocation of new	homes a smoother					
dosessiment	A potential "New Generation Scheme 'otherwise known as a "concealed household scheme' which could positively have advantaged younger people by giving them more chance of being allocated a social home by providing a quota of lettings per year to this group was considered and received a positive response in consultation. However, in the last year only 17 studios and 46 one bedroom properties were let, which indicates that stock levels aren't sufficient to support a new Generation Scheme.									
	Close monitoring of the impact of the policy during the first year of implementation may lead to this proposal being reconsidered as part of the review.									
	Care leavers, usually 18 to 21 years, have been positively impacted by the changes to the policy. Care leavers will be given the opportunity to bid on 1-bedroom properties and also band 1 priority. Currently they are only permitted to bid on studio accommodation. Availability of this type of accommodation is very limited and results in care leavers waiting for extended periods to secure a home. The change will speed up their ability to move on when they are assessed as ready to live independently.									



			"Usive"				
	Please note the current age limit for the scheme is age 16 to join housing register, and have a tenancy at 18 years' old.						
	We have taken these data sources into a	ccount - Herts Insight Diversity P	rofile - Age				
	https://www.reports.esriuk.com/view-repo	rt/638ca3f75a2541799e0683995	79d719e/E07000243				
	2021 Census Profile: https://www.ons.gov.uk/visualisations/censusareachanges/E07000243/ - latest changes in Stevenage.						
What opportunities are there to promote equality and inclusion?	What do you still need to find out? Include in actions (last page) Results of the consultation on the New Generation proposal						

Disability e.g. physical impairment, mental ill health, learning difficulties, long-standing illness								
Positive impact Yes Negative impact Unequal impact								
Please evidence the data and information you used to support this assessment	and adaptations, in a applicants with a hou welfare grounds will I lettings across all bar	way that is fair and traising need in reasonal oe able to join the Hounds and therefore measocial housing in the b	how to award priority to ansparent. A major proble preference groups using Register. The quant properties are let to orough is let to those	oposed change to the including a need to mota system which spread those with low prioring.	policy is that only ove on medical or eads a percentage of ty is being removed.			



			Vusive C				
	We have taken these data sources into account - Herts Insight Diversity Profile - Disability						
	https://www.reports.esriuk.com/view-report/638ca3f75a2541799e068399579d719e/E07000243						
	2021 Census Profile:						
	https://www.reports.esriuk.com/view-report/79b7917a1c72415ea39bca5ed45c6094/E10000015?clear=true						
	https://www.ons.gov.uk/visualisations/censusareachanges/E07000243/ - latest changes in Stevenage.						
What opportunities are there to promote equality and inclusion?	To make the policy clear and transparent, ensuring all disabled customers receive equitable treatment and priority.	What do you still need to find out? Include in actions (last page)	Results of the consultation, particularly around banding for housing need and the number of bands				

Gender reassignment										
Positive impact	Negative impact Unequal impact									
Please evidence the data and information you used to support this assessment	Please evidence the data and information you used to support this No impact in terms of housing registration – not compulsory question for registration We have taken these data sources into account - Herts Insight Diversity Profile - Transgender									
2021 Census Profile:										



What opportunities are there to promote equality and inclusion?	N/A	What do you still need to find out? Include in actions (last page)	N/A

Marriage or civil partnership								
Positive impact		Negative impact Unequal impact						
Please evidence the data and information you used to support this assessment	No impad	et						
What opportunities are there to promote equality and inclusion? N/A What do you still need to find out? Include in actions (last page)								

Pregnancy & maternity						
Positive impact		Negative impact		Unequal impact		
Please evidence the data and information you used to support this assessment	A proposed change to the policy is to offer priority banding to pregnant applicants or those with children who are sharing a home with family or friends and who meet the Allocation Policy eligibility criteria, are owed a homelessness prevention duty that has ended and have been allowed to stay at home for at least					



https://www.reports.esriuk.com/view-report/c0060a87d61a4c0dbea7bfebb6fbf84e/E10000015?clear=true

2021 Census Profile:
 https://www.reports.esriuk.com/view-report/79b7917a1c72415ea39bca5ed45c6094/E10000015?clear=true

https://www.ons.gov.uk/visualisations/censusareachanges/E07000243/ - latest changes in Stevenage.

What opportunities are there to promote equality and inclusion?

N/A

What do you still need to find out? Include in actions (last page)

Race							
Positive impact		Negative impact		Unequal impact			
Please evidence the data and information you used to support this assessment	Race is not a compulsory question for the Housing Register, however, the policy gives Gypsy or Traveller households consideration when applying the residency criteria where the applicant may not fully meet the five years in the last seven rule, if that period has been broken by travelling but the applicant has spent the majority of the time residing in Stevenage. This will ensure that these households are not unfairly disadvantaged by the residency eligibility criteria.						
	We have taken these data sources into account - Herts Insight Diversity Profile - Ethnicity						
	https://www.reports.esriuk.com/view-report/638ca3f75a2541799e068399579d719e/E07000243						
	2021 Census Profile: https://www.reports.esriuk.com/view-						
	-		6094/E10000015?clea	ar=true			



https://www.ons.gov.uk/visualisations/censusareachanges/E07000243/ - latest changes in Stevenage.

By referring to demographic information at https://www.ons.gov.uk/visualisations/censusareachanges/E07000243/ we were able to confirm that the consultation respondents accurately reflected the population of Stevenage and the results are statistically relevant.

What opportunities are there to promote equality and inclusion?

N/A

What do you still need to find out? Include in actions (last page)

Religion or belief							
Positive impact		Negative impact		Unequal impact			
Please evidence the data and information you used to support	No impact – this is not something that we assess or discriminate against in the register application process.						
this assessment	We have taken these data sources into account - Herts Insight Diversity Profile - Religion https://www.reports.esriuk.com/view-report/638ca3f75a2541799e068399579d719e/E07000243						
	2021 Census Profile:						
	https://www.reports.esriuk.com/view-report/79b7917a1c72415ea39bca5ed45c6094/E10000015?clear=true						
	https://www.ons.gov.	uk/visualisations/cens	usareachanges/E0700	00243/ - latest change	es in Stevenage.		



What opportunities are there to promote equality and inclusion?

Possible cultural differences – larger families / more than one family looking to share?

What do you still need to find out? Include in actions (last page)

Results of the consultation, if there is demand/feedback in relation to religion or belief we will review this section.

Sex							
Positive impact		Negative impact Unequal impact					
Please evidence the data and information you used to support this assessment	No impact – this is not something that we assess or discriminate against. We have taken these data sources into account - Herts Insight Diversity Profile - Gender https://www.reports.esriuk.com/view-report/638ca3f75a2541799e068399579d719e/E07000243 2021 Census Profile: https://www.reports.esriuk.com/view-report/79b7917a1c72415ea39bca5ed45c6094/E10000015?clear=true . https://www.ons.gov.uk/visualisations/censusareachanges/E07000243/ - latest changes in Stevenage.						
What opportunities are to promote equality a inclusion?		N/A	What do you still need out? Include in actions page)				



Sexual orientation e.g. straight, lesbian / gay, bisexual							
Positive impact		Negative impact Unequal impact					
Please evidence the data and information you used to support this assessment	We have https://www.2021 Cerhttps://www.report/79	taken thes ww.reports. nsus Profile ww.reports. b7917a1c7	e data sources into acesiuk.com/view-repo	assess or discriminate ecount - Herts Insight rt/638ca3f75a2541799	Diversity P 9e0683995 ar=true	79d719e/E	<u>07000243</u>
What opportunities are there to promote equality and inclusion?		N/A		What do you still nee out? Include in action page)		N/A	

Socio-economic¹

e.g. low income, unemployed, homelessness, caring responsibilities, access to internet, public transport users, social value in procurement

¹Although non-statutory, the council has chosen to implement the Socio-Economic Duty and so decision-makers should use their discretion to consider the impact on people with a socio-economic disadvantage.



	T	1			"Clusive co"	
Positive impact	Yes	Negative impact		Unequal impact		
Please evidence the data and information you used to support this assessment	a former home from those who can afform and assets. This how members were concresources are not a week taken the https://www.hertfor.https://www.ons.go	urrently the Allocations Scheme excludes applicants who have over £16,000 of savings from the sale of former home from joining the Housing Register. Consideration was given to extending this to exclude ose who can afford to find accommodation in the private or owned sector by setting limits on earnings and assets. This however has not been included in the proposed changes to the policy because embers were concerned about the need to continually review current affordable limits and the staffing esources are not available to carry out regular affordability assessments. We have taken these data sources into account -Herts Insight Economy, Work & Education Profile teps://www.hertfordshire.gov.uk/microsites/herts-insight/topics/economy-work-and-education.aspx teps://www.ons.gov.uk/visualisations/censusareachanges/E07000243/ - latest changes in Stevenage. The new proposed policy will award those at socio-economic disadvantage such as those living in vercrowded accommodation and homeless applicants priority banding.				
What opportunities and to promote equality a inclusion?	nd accepted economic have mo successf owing to of applica	posed change is I those at a socio- c disadvantage would re chance of being ul for a social home the reduced number ants competing for properties	What do you still nee out? Include in action page)		of the consultation	

Other						
please feel free to consider the potential impact on people in any other contexts						
Positive impact		Negative impact		Unequal impact		
Please evidence the data and	Any others?					



information you used to support this assessment			
What opportunities are to promote equality are inclusion?		What do you still need to find out? Include in actions (last page)	

What are the findings of any consultation with:

	Triat are the infamige of any concurration with								
Staff?	Staff are included in the consultation	Residents?	Included in the consultation						
Voluntary & community sector?	Included in the consultation	Partners?	Included in the consultation						
Other stakeholders?	Councillors will have an input during the so process	cheme approval							



Overall conclusion & future activity

Explain the overall findings of the assessment and reasons for outcome (please choose one):					
No inequality, inclusion issues or opportunities to further improve have been identified					
Negative / unequal impact, barriers to inclusion or improvement opportunities identified	2a. Adjustments made				
	2b. Continue as planned				
	2c. Stop and remove				

Detail the actions that are needed as a result of this assessment and how they will help to remove discrimination & harassment, promote equal opportunities and / or encourage good relations:							
Action Will this help to remove, promote and / or encourage? Responsible officer Deadline How will this be embedded as business as usual?							
Review the outcomes of the consultation against the factors above	Ensure it has been considered	Carrie Addams	Pre- Executive	It will form part of the final policy			

Approved by Assistant Director / Strategic Director: Rob Gregory Date: 04/04/2023

Updated by Operations Manager - Providing Homes: Tracy Jackson

Date:28/9/23



Please send this EqIA to equalities@stevenage.gov.uk