

Equality Analysis

What is an Equality Analysis and why do we need to complete one?

It is designed to ensure that an organisation's policies, practices, events, projects, activities and decisions are fair and do not present barriers to protected characteristic groups. This covers both strategic and operational activities.

The EA will help to ensure that:

- we understand the potential effects of the policy or activity by assessing the impacts on different groups.
- any adverse impacts are identified, and actions identified to remove or mitigate them.
- decisions are transparent and based on evidence with clear reasoning.

Please complete the form below followed by the checklist to help you decide whether a full Equality Analysis is required.

Step 1

1. Person responsible for this assessment

Name:	Lynne Horton
Job Title:	OD Manager
Directorate:	Corporate Services
Service / Team:	HR/OD Team
Date of Assessment:	4 November 2022

2. Names of any others involved in carrying out the assessment

Name:	Cheryl Hodkinson	Job Title:	Housing Management Team Leader
Name:	Alison Dalton	Job Title:	BMBC Group Leader Strategic Housing
bm	Rachel Burgon	Job Title:	BMBC Senior Housing Advisor
Name:	Julie Walker	Job Title:	Senior Housing Assessment Officer

3. Description of Strategy, Policy, Service, Project, Activity or Decision

Title:	Lettings Policy
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Is it new? Yes No

Is it a review of existing? Yes No

Aims and Objectives

When completing this section please consider:

What you are doing?

Why you are doing it?

Who will benefit?

<p>Revision of Lettings Policy to ensure:</p> <ul style="list-style-type: none">Balance of supply and demandRehousing of those in most needMake better use of stockQuality advice and supportPositive housing register managementTransparency <p>Those in most housing need should benefit from these changes.</p>

4. Who is affected?

Please give details of which groups or individuals are affected.

For example, tenants, employees, contractors, partner organisations, wider community, others

<p>Housing register applicants, tenants, employees within the service, council, partners, councillors, other registered providers.</p>
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Are there any known inequalities? (Give a brief description)

Some people with various protected characteristics may not be able to access the housing register. There will be more restrictions to access the register to balance supply and demand ensuring those in most housing need have the best opportunity of being rehoused. Whilst this will have a negative impact on some protected characteristic groups, the options of choice in other housing tenures are open to them. Each individual accessing the register will be assessed on their needs therefore reducing any negative impact.

5. Equality Act 2010 Public Sector Equality Duty

- The Equality Act 2010 aims to achieve equal opportunities in the workplace and wider society. It gives protection to people with a protected characteristic. These are:
 - Age,
 - disability,
 - gender'
 - gender reassignment,
 - marriage and civil partnership,
 - pregnancy and maternity,
 - race, colour, ethnic and national origin
 - religion or belief, sex and
 - sexual orientation.
- The public sector equality duty requires all public bodies, including local authorities, to have due regard to the need to:
 - Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act.
 - Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - Foster good relations between people who share a protected characteristic and those who do not.

How is the public sector equality duty met?

Eliminate unlawful discrimination (including harassment, victimisation and other prohibited conduct)

The Lettings Policy aims to operate fairly giving regard to those in most housing need to address supply and demand. It is transparent and enhancements through the interactive tool will mean people can make informed choices regarding their housing options.

Advance equality of opportunity (between people who share a protected characteristic and people who do not share it)

The support on offer to housing applicants and tenants within the community aims to assist people to manage their tenancy and sustain healthy relations within the community. It is important that area profiling data is utilised to manage and maintain community cohesion.

Foster good relations (between people who share a protected characteristic and people who do not share it) Could it have an adverse impact on relations between different diverse groups?

Support is in place to assist individuals and a front line housing management presence exists within communities. It will mean that those in most housing need are being rehoused and enhanced support will be in place to assist those who require it.

Equality Analysis

Checklist

The following questions will help you identify whether a full Equality Analysis is required.

Please answer all the questions with reference to the protected characteristics; age, disability, gender, gender reassignment, marriage and civil marriage / partnership, pregnancy and maternity, race, religion or belief and sexual orientation.

Please Note. For significant policy/procedure/service changes, please go straight to page 6 as a full EA is always required.

Question 1	Yes	No
Are there any groups who may have trouble accessing this service?	x	
Please provide comments:		

Those not on line and those with communication access issues may find the service more difficult. This is addressed through the mediated assisted application and bidding service.

Question 2	Yes	No
Does your information suggest that some groups of people are less satisfied than others?	x	
Please provide comments: Younger people are less satisfied as there is a lower availability of family homes and smaller accommodation with no age restrictions.		
Question 3	Yes	No
Will this service have a significant impact on any of our tenants?		x
Please provide comments: The policy only applies to those tenants wanting to move. The rules are being changed to ensure we allocate homes fairly and to those in most need first. The impact is therefore positive.		
Question 4	Yes	No
Do you have any evidence that discrimination, harassment and/or victimisation could occur as part of this service?		x
Please provide comments:		
Question 5	Yes	No
Do you think the service will enable communication and improve good relations between the organisation and its employees, residents, contractors or anyone else?	x	
Please provide comments: The changes to the policy will increase the number of homes available for needs based lettings.		
Question 6	Yes	No
Does this service need to improve the way in which it is communicated to people who have literacy, numeracy or any other access needs?		x
Please provide comments: We have an assisted application and bidding service for applicants with literacy, numeracy and other access needs.		
Question 7	Yes	No

Does consultation need to be carried out? If the consultation is with customers, contact customerengagement@berneslaihomes.co.uk	X	
Please provide comments: Consultation to be carried out with applicants and BH Tenant Voice Panel (Oct-Dec 2022) Consultation to focus on impact of changes and developing effective communications.		

Please use the table below to assess the priority.

Add up how many questions you answered 'Yes' to and follow the appropriate action.

Priority	Number of questions answered 'Yes'	Action
High	3 or more	A full assessment is required, please continue to 'Step 2 – Full Equality Analysis'
Medium	1 to 2	No further action is required. Please sign the 'Declaration Section at the end of the form
Low	0	No further action is required. Please sign the 'Declaration Section at the end of the form

Step 2 – Full Equality Analysis

The full analysis explores ways to reduce or eliminate barriers and/or negative impacts.

When completing the next section think about whether the strategy, policy, service, project, activity or decision could have a negative, positive or neutral effect of groups or individuals. It's important to make use of in-house and published data, for example reports from Northgate.

Please consider:

What you are doing ?

Why you are doing it?

How you are doing it?

Who can access the service easily and who may not be able to access the service and why?

Protected Characteristics	Negative	Positive	Neutral	Recommendations: Consider any barriers which will have negative impact and/or good practices giving positive impact
<p>Age</p> <p>Consider:</p> <ul style="list-style-type: none"> • The way younger and older people access services may be different • Use of technology • Child care / care of other dependant • Timings / Flexibility, such as work patterns • Transport arrangements • Venue location 			✓	<p>Interactive tool will assist people to make informed choices. People who don't have access to technology will need assistance. We need to ensure staff are able to assist when taking calls on the interactive tool.</p> <p>Tenancy ready – present a range of options to ensure everyone can access the service ie. Online and out of hours. Locations also need to be considered to ensure this is easily accessible.</p> <p>Ensuring communications - consider access and communication needs of individuals.</p> <p>Single people and couple are more likely to be younger. Could this have an impact on the type of accommodation, implications on RTB etc</p> <p>Care leavers – automatically assigned a housing coach</p>

<p>Disability (includes physical, learning, sensory (deaf / blind), mental health)</p> <p>Consider:</p> <ul style="list-style-type: none"> • Communication methods • Accessibility – venue, location, transport • Range of support needed to participate • Hearing loops / interpreters • Disability awareness training for employees 			✓	<p>Support required for people who can't access online or those who require additional support. Ensure transparency around minor and major adaptations. Is there an opportunity through tenancy ready to link in with other service areas eg. support, grant funding, more money in your pocket. There is a positive impact if direct lets can be matched to the stock and specific needs. Early engagement with registered providers delivering small schemes to ensure match with people on the waiting list with specialist needs. We need to be aware of any support requirements before we are considering down banding people. AAG translation need to be briefed at an high level in relation to sensitive conversations. What impact disability income has in relation to the income qualifications?</p>
<p>Race (includes gypsy, travelling, refugee and migrant communities)</p> <p>Consider:</p> <ul style="list-style-type: none"> • The size of the BAME communities that your service / project affect • Language (s) spoken / understood • Culture, such as hygiene, clothing, physical activities, mixed gender activities • What access support can you offer? 				<p>Consider our tenant profile – what does it tell us in relation to areas? Are there any cluster areas? Have we done any consultation with equality groups? What groups should we consult with? Migrant Support Network and Barnsley Together forum. Be aware of community tensions.</p>
<p>Protected Characteristics</p>	<p>Negative</p>	<p>Positive</p>	<p>Neutral</p>	<p>Recommendations: Consider any barriers which will have negative impact and/or good practices giving positive impact</p>

<p>Religion, Faith or Belief</p> <p>Consider:</p> <ul style="list-style-type: none"> • The diversity within the communities that your service / project affect • Prayer times, meal times, food (some religions do not eat meat), cultural habit or belief, religious holidays such as Ramadan • Awareness training for employees 			✓	<p>Greater knowledge and understanding around refugee numbers to be more proactive. This will enable better planning of provision eg. larger accommodation. Knowledge of religious holidays is required so that we know for when we're making offers. When running live sessions, be mindful of times and days to plan for inclusive events or offer choice.</p>
<p>Pregnancy and Maternity</p> <p>Consider:</p> <ul style="list-style-type: none"> • Flexible hours of the service / project • Is there access to private area for breastfeeding mothers? 			✓	<p>MATB1 required currently – is this going to be the same and if not what implications will this have? Income and affordability – any implications?</p>
<p>Gender</p> <p>Consider</p> <ul style="list-style-type: none"> • The impact on men and women • Child care / Care of other dependant • Mixed / single gender groups / activities • Timing of services / Projects 			✓	<p>Dependent or working age children Split households – children 3 or more nights per week – generalised statement that children may be with mum. It can impact either gender</p>
<p>Sexual orientation (includes Lesbian, Gay and Bisexual (LGBTQ+))</p> <p>Consider</p> <ul style="list-style-type: none"> • LGBTQ+ people should feel safe to disclose their sexual orientation without fear of prejudice • Make it clear you recognised civil marriage and partnerships • Awareness training for employees 			✓	<p>Any community tensions in certain areas? Separation issues – children (same as above)</p>
<p>Transgender</p>			✓	<p>Be aware of community tensions</p>

<p>Consider:</p> <ul style="list-style-type: none"> • Trans people should be able to disclose their gender identify without fear of prejudice • Making it clear you have a Transgender policy and process • Awareness training for employees 				Staff sensitivity – ensure transgender policy is complied with.
<p>Marriage and civil marriage / partnership</p> <p>Consider</p> <ul style="list-style-type: none"> • All couples or partners, regardless of gender, should be able to access services 			✓	

Summary of recommendations			
	Actions	Officer	Date
1	Ensure equality monitoring takes place – annual lettings plan. Monitor equality data on exclusions from register – any trends?	Lettings Manager	Annual April 2023 Qtrly trend monitor April 2023
2	Training on the interactive property tool for staff required and ensure staff are able to support applicants	Lettings Manager	Jan 2023
3	Ensure tenancy ready workshops are accessible – present various options.	Assessment Team Leader	May 2023
4	Communication plan required re: consultation and then implementation and long term delivery.	Lettings Policy Project Officer	Jan 2023

5	Consult equality groups, MSN, Barnsley Together re changes.	Lettings Policy Project Officer	Jan 2023 on policy scheme and May – June 2023 on service model
6	Clarity on the definition of minor and major adaptations and ensure clear communication to public.	Lettings Manager	March 2023 (for final policy)
7	Ensure signpost and link to other support services through tenancy ready	Assessment Team Leader	May 2023 develop model for go live
8	Ensure engagement with registered providers delivering small schemes to ensure match with people on the waiting list with specialist needs	Lettings Team Leader	Jan – Mar 2023 – develop revised RSL partnership meetings and pro forma for nominations
9	Ensure we are aware of any support requirements before we are considering down banding people.	Assessment Team leader	May 2023 – establish process
10	AAG translation need to be briefed at an high level in relation to sensitive conversations	Lettings Manager	Jan 2023
11	Consider our tenant profile – what does it tell us in relation to areas? Are there any cluster areas?	Lettings Manager	Link to action 1
12	Greater knowledge and understanding around refugee numbers to be more proactive Knowledge of religious holidays is required so that we know for when we're making offers.	Lettings Manager	Link to action 1
13	When running live sessions, be mindful of times and days to plan for inclusive events or offer choice	Lettings Policy Project Officer	December 22 to Jan 23 (consultation window) Service development (Mar 23 to Aug 23)

Review date for the Policy / Service:	Post public consultation – please advise of an appropriate date
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Declaration

Please tick the appropriate action:

	I can confirm that step 1 of the process has been completed and can conclude that a full Equality Analysis is not required.
✓	I can confirm that a full Equality Analysis has been completed

Signature of person undertaking the assessment:	<i>L. Horton</i>		
Print name:	L Horton	Date:	4/11/22

Please email your completed EA to equalityanalysis@berneslaihomes.co.uk