

Equality impact assessment form

Directorate – Communities and Place

Service area – Strategic Housing

**Name of policy, strategy, review or function being
assessed – Private Sector Empty Homes Strategy 2020-
2025**

Date of assessment –

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

**Decision of Cabinet, Personnel Committee or Chief Officer
Group – Accompanying Report to Cabinet July 2021**

Date published on website - tbc

January 2019



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

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?

Private Sector Empty Homes Strategy 2020-2025

The assessment team

Team leader’s name and job title – Sue Li – Empty Homes, Compulsory Purchase and Enforcement Manager

Other team members

Name	Job title	Organisation	Area of expertise
Pamela Thompson	Engagement Officer	DCC	Community Engagement Diversity
Safia Iqbal	Healthy Housing Manager	DCC	Housing Renewal Frail and vulnerable communities

Name	Job title	Organisation	Area of expertise
Martin Brown	Housing Initiatives Manager	DCC	Housing Renewal Housing and Health Housing Strategy
Ann Webster	Lead on Equalities and Diversity	DCC	Equalities and Diversity
Andy Findlay	Volunteer		Disability/60+ Equality
Moirra Findlay	Volunteer		Disability Equality
Bob Uwusu	Volunteer		Race Equality

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.**

The Private Sector Empty Homes Strategy sets out the processes, initiatives, assistance and enforcement that the Council will undertake to promote the renovation and reoccupation of long term empty private sector properties.

The Strategy supports the following commitments within the Council Plan and Derby Recovery Plan:

- More private sector dwellings brought back into use
- Continue to protect residents by tackling statutory nuisance and environmental crime.
- Provide good-quality housing across the city
- Increase the housing supply
- Increase the supply of affordable housing
- Increase the supply of adapted homes
- Provide accommodation for vulnerable communities
- Reduce homelessness
- Reduce Derby's carbon footprint by increasing thermal efficiency of renovated properties
- Efficient services that are value for money

Combined actions within the Strategy support all three themes of the Council Plan 2019-2023:

- A city with big ambitions
- A city of health and happiness
- A council focused on the things that matter

The Private Sector Empty Homes Strategy sits under the Council's over-arching Housing Strategy 2020-2029 which sets out the local picture regarding housing need and supply and where the most acute shortages are. It also sets out our vision for housing and the key priorities we must deliver on. The Housing Strategy has 4 priorities and the Empty Homes Strategy makes a contribution to each one:

1. **Best Use of Stock: getting the most out of homes that already exist** - the Strategy will return existing vacant homes into use and increase the supply of market and affordable housing.
2. **Housing Quality and Standards: well designed, well managed, decent homes** – dilapidated homes will be renovated and brought up to standard. Homes purchased by the Council will be managed by Derby Homes and thermal efficiency of those properties will be above currently required standards.
3. **Vulnerable People: providing suitable accommodation for vulnerable groups, linked where necessary to specialist support** – suitable empty homes purchased by the council may be adapted for wheelchair access. Working alongside Adult Social Care and registered providers, empty homes may also be sourced for housing initiatives to support vulnerable groups and other groups with specific needs.
4. **Housing Development and Regeneration: supplying a range of new housing that meets need and contributes to urban renewal** – the Strategy supports the renovation and conversion of buildings within the city centre to provide city living accommodation.

Tackling empty properties contributes to the provision of market, affordable and specialist accommodation, the regeneration of the City; whilst reducing crime, ASB and urban blight.

Additionally, the financial benefits, through new Homes Bonus and recovery of debt associated with empty homes, contributes favourably to the council's overall budgetary position.

Empty Homes are mainly identified from the status recorded Council Tax records. Properties are selected for enforcement based upon strategic factors such as property type, time empty, condition and location in order to remove bias. The enforcement policy outlines the steps involve in enforcement to ensure the process does not disadvantage any group of owners when compared to others. The Housing Renewal Review Group oversees empty homes assistance and will be able to monitor any equalities data collected.

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

The Strategy is owned by the Head of Strategic Housing Services and delivered by the Strategic Housing Division via the Empty Homes Service and Compulsory Purchase and Enforcement Programme

In partnership with several other council departments including Council Tax, Electoral Roll, Housing Standards Team and external organisations, including Derby Homes and other local Registered Providers.

The Empty Homes Service links in to the wider Housing Renewal Policy, but has a standalone strategy and EIA

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

Empty Homes Service – the Strategy provides the tools and processes in order to offer advice and assistance to owners or take enforcement action where owners are unwilling or unable to bring empty homes into use.

Internal partners – Council Tax, Electoral Services, Housing Standards, Development, Development Control, Environmental Services, Property Services are engaged in order to verify properties are empty, locate owners, provide support and assistance to owners, acquire properties where owners wish to sell or support enforcement action where necessary.

Derby Homes – the Private Sector Housing Team and homelessness prevention work provides support to owner to let property to households on the housing register and/or at risk from homelessness. Housing Management will manage properties acquired by the Council or empty homes purchased by Derby Homes directly.

Empty Homes Owners – the Strategy details the support available to return empty homes to use or enforcement tools that can be employed where owners are unwell or unable to take action

Derby City Residents – where residents are negatively affected by the problems caused by empty homes, the Strategy details the tools used to address such issues

External Partners – registered housing providers looking for property to return to use as affordable housing or buildings to acquire for specialist accommodation. Agents, landlords and developers helping to ensure empty homes are renovated and let or sold on. The Empty Homes Team will work with community development groups requesting engagement to improve equity and representation across communities in Derby.

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.**

- Consultation plan developed with Consultation Officers within Strategic Housing and Consultation Team;
- Wide spread of dissemination in the form of information about the consultation and links to the documents on Your City, Your Say – with links to response questionnaires;
- Appearing on DCC website;
- Coverage in In-touch to reach all DCC employees and Members;
- Consultation details emailed direct to known contacts at the East Midlands Empty Property Forum
- Requested DCC Twitter and Facebook coverage;
- Consultation response questionnaire available for on-line completion or hardcopy submission;

Access to translation and interpretation services is available; and these are used as required. Information, communications, etc. can be made available in other languages, formats or hard-copy on request

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 programme applies across all age groups but young people may lack access to social housing and unable to afford to buy or rent in the private sector. Increasing supply and property types helps young people access the housing market	X		
Older people may go into care without making adequate provision about the future of their existing homes. The Strategy aims to raise awareness of options which may help pay towards care	X		

What do you already know?	Positive impact	Negative impact	Mitigation
fees. The service can also assist frail and/or elderly people overcome difficulties in selling empty property and help them move forward			

Disability

What do you already know?	Positive impact	Negative impact	Mitigation
There is a shortage of lifetime homes. Where the Council purchases empty homes suitable for adaptation, this option will be considered	X		
Support can be offered to those with a disability or whose health has deteriorated to overcome difficulties in selling empty property in order to move forward	X		

Gender identity- trans

What do you already know?	Positive impact	Negative impact	Mitigation
No specific impacts and gender identity or reassignment will not affect support offered or enforcement programmes but returning empty homes to use offers housing choice to those living or wishing to live in Derby	X		

Marriage and Civil Partnership

What do you already know?	Positive impact	Negative impact	Mitigation
No specific impacts and marital status will not affect support offered or enforcement programmes but returning empty homes to use offers	X		

housing choice to those living or wishing to live in Derby			
Support can be offered to those experiencing marital or partnership breakdown in order to overcome barriers to selling property and moving forward	X		

Pregnancy and maternity

What do you already know?	Positive impact	Negative impact	Mitigation
No specific impacts, being pregnant or with a child(ren) will not affect support offered or enforcement programmes but returning empty homes to use offers housing choice to those living or wishing to live in Derby	X		

Race

What do you already know?	Positive impact	Negative impact	Mitigation
No specific impact, a person's race will not affect support offered or enforcement programmes, however, there are a higher proportion of empty homes in some Wards with a higher BAME population and so empty homes action is often focused in these areas; which can mean that nuisance, deterioration and ASB in and around empty properties can be better addressed and returning empty homes to use provides wider housing choice generally	x		

Religion or belief or none

What do you already know?	Positive impact	Negative impact	Mitigation
No specific impacts, a person's religion or belief, or that they have none, will not affect support offered or enforcement programmes but returning empty homes to use offers housing choice to those living or wishing to live in Derby	X		

Sex

What do you already know?	Positive impact	Negative impact	Mitigation
No specific impacts, a person's sex will not affect support offered or enforcement programmes but returning empty homes to use offers housing choice to those living or wishing to live in Derby	X		

Sexual orientation

What do you already know?	Positive impact	Negative impact	Mitigation
No specific impacts, a person's sexual orientation will not affect support offered or enforcement programmes but returning empty homes to use offers housing choice to those living or wishing to live in Derby	X		

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?

The Empty Homes Service has assisted many different types of people in different situations. These include bereaved relatives with no knowledge of the probate process, owners in care and their families, individuals with mental health issues, individuals with financial issues, individuals with mobility issues and individuals with personal issues that are barriers to accessing services. Each empty homes case is unique and it is our aim to ensure that the service we offer is inclusive to all.

Day-to-day experience shows that, for all groups, but particularly older people or people with mental health issues, the general national shift of information and services to digital on-line can exclude from service take-up. Our services will, within the capacity of resource availability, ensure that hard-copy and other options remain available and the Empty Homes Service is committed to offering site meetings and home visits in order to address exclusion.

In relation to age, disability, gender, marriage, sex, sexuality and religion – programmes are gender, marriage, sex, sexuality and faith neutral.

Race – in general, the worst housing tends to be in areas with higher BME population, level of deprivation and relatively greater level of need. The incentives and initiatives we offer, as well as enforcement interventions are therefore most likely to be targeted in these areas as the number of empty properties is likely to be higher; which can mean that neighbourhood nuisance, deterioration and ASB in and around long term empty homes in those areas can be better addressed; and returning empty homes to use increases housing choice for those living in or wishing to live in those areas and Derby generally.

Public Sector Equality Duty – when compulsory purchasing an empty property the Council must demonstrate it has complied with the PSED when dealing with the empty home owner

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?

Outcome 1	X	No major change needed – the EIA hasn't identified any potential for discrimination or negative impact and all opportunities to advance equality have been taken
Outcome 2		Adjust the policy to remove barriers identified by the EIA or better advance equality. Are you satisfied that the

		proposed adjustments will remove the barriers you identified?
Outcome 3		<p>Continue the policy 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:</p> <ul style="list-style-type: none"> • sufficient plans to stop or minimise the negative impact • mitigating actions for any remaining negative impacts • plans to monitor the actual impact.
Outcome 4		Stop and rethink the policy when the EIA shows actual or potential unlawful discrimination

Our Assessment team has agreed Outcome number(s)

<p>Outcome 1</p>

Why did you come to this decision?

<p>The Strategy aims to deliver a service that is inclusive and provide bespoke support to return empty homes to use</p> <p>The Strategy supports the supply of general needs accommodation, property that is adapted for wheelchair access or the supply of accommodation for specialist needs</p> <p>The Strategy contributes to homelessness prevention</p>
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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

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Help owners provide quality, well-managed accommodation of different types and sizes to increase housing options	Increase access to housing market by young people	Annually Sue Li	From review of empty homes records
Home visits, within Derby City, for frail and elderly	Increase engagement	Ongoing Sue Li	From review of empty homes records

Disability

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Refer suitable properties to Development team for adaption	Increase supply of homes that are wheelchair accessible	Annually Sue Li	From empty homes records
Provide documents in different formats as necessary	Increase inclusion	As requested Sue Li	From empty homes records

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Provide home visits within Derby City	Increase inclusion	As requested	From empty homes records

Gender identity - trans

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Ongoing monitoring of data collected to maintain an understanding and awareness of service impact, usage and need	Provide an inclusive service	Annually Sue Li	Empty Homes Records

Marriage and Civil Partnership

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Ongoing monitoring of data collected to maintain an understanding and awareness of service impact, usage and need	Provide an inclusive service	Annually Sue Li	Empty Homes Records

Pregnancy and maternity

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Ongoing monitoring of data collected to maintain an understanding and awareness of service impact, usage and need	Provide an inclusive service	Annually Sue Li	Empty Homes Records

Race

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Make use of interpretation services if required by service user	Provide an inclusive service	As requested Sue Li	Empty Homes Records
Translation of documents if required by users	Provide an inclusive service	As requested Sue Li	Empty Homes Records

Religion or belief or none

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Ongoing monitoring of data collected to maintain an understanding and awareness of service impact, usage and need	Provide an inclusive service	Annually Sue Li	Empty Homes Records

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements

Sex

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Ongoing monitoring of data collected to maintain an understanding and awareness of service impact, usage and need	Provide an inclusive service	Annually Sue Li	Empty Homes Records

Sexual orientation

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Ongoing monitoring of data collected to maintain an understanding and awareness of service impact, usage and need	Provide an inclusive service	Annually Sue Li	Empty Homes Records

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

Polish

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

Prosimy o kontakt:

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 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: 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 منی کام 01332 640666 پر ہم سے رابطہ کریں۔



Derby City Council