

# Equality impact assessments – for services, policies and projects

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## Why undertake an equality impact assessment?

An equality impact assessment is an important part of our commitment to delivering better services for our communities. The form will help us find out what impact or consequences our functions, policies, procedures and projects have on our communities, as well as employees and potential employees.

By undertaking an impact assessment, we are able to:

1. Take into account the needs, experiences and circumstances of those groups of people who use (or don't / can't use) our services.
2. Identify any inequalities people may experience.
3. Think about the other ways in which we can deliver our services which will not lead to inequalities.
4. Develop better policy-making, procedures and services.

## Background

<b>Name of service / policy / project and date</b>	<b>Reintegration of housing services back to Cheltenham Borough Council (CBC)</b>
<b>Lead officer</b>	<b>Martin Stacy, Housing Strategy &amp; Partnerships Manager</b>
<b>Other people involved in completing this form</b>	<b>Claire Hughes, Corporate Director and Monitoring Officer</b>

## Step 1: About the service, policy or project

<b>What is the aim of the service / policy / project and what outcomes is it contributing to</b>	<p>The council aims to reintegrate its housing services back within CBC.</p> <p>The external operating environment has become increasingly challenging in recent years. Last year alone, the long term impact of high inflation and a capped rent has meant that, over 30 years, the capacity within the Housing Revenue Account (HRA) has been reduced by approximately £79m.</p> <p>Reintegrating housing services back within CBC will provide opportunities to create efficiency savings, which in turn will help CBC to focus even more on maximising our opportunities to deliver on the priorities as set out in our ambitious Corporate Plan 2023-2027. This includes increasing the supply of affordable housing and working towards Cheltenham being carbon net zero by 2030.</p> <p>In addition, the new Social Housing (Regulation) Act 2023, now gives the Regulator of Social Housing more powers and opportunities for the scrutiny of our housing services. Crucially, it is CBC as the local housing authority, rather than CBH as our housing management organisation, that is accountable in the event that we fall short of the Regulator of Social Housing's Consumer Standards. By bringing housing services back in-house, we will be ensuring that CBC is best placed to understand any potential issues that might arise during the delivery of our housing services, which in turn will enable us to respond to them accordingly.</p>
<b>Who are the primary customers of the service / policy / project and how do they / will they benefit</b>	<p>CBC tenants, leaseholders and the community at large will benefit from these changes.</p> <p>As we move through and beyond the transitional phase of winding-up CBH, we anticipate the following benefits to emerge:</p> <ul style="list-style-type: none"><li>- A streamlined customer journey through one organisation rather than two for all CBC services – housing, Council Tax, waste &amp; recycling, benefits etc. This will further build on the successful co-location of housing options in the council offices.</li><li>- A strengthened framework for tenants and leaseholders to influence and be involved in shaping housing delivery, as well as developing more robust opportunities for tenant and leaseholder scrutiny of housing services.</li><li>- The potential combination of CBC's capital project team and CBH's development team could create a team of greater capability and capacity to take forward the £180million housing investment plan, which will ensure greater pace of delivery of new affordable homes.</li><li>- The operating efficiencies will ensure better value for money for tenants' rents and leaseholders' service charges, through reducing duplication of effort and integration of services. Moreover, an integrated housing service within a Cheltenham-wide model can be the catalyst to creating a tenure-neutral approach to service delivery, with single access points and seamless customer journeys, and with a</li></ul>

	<p>person-centred approach focused on supporting those most in need through early intervention and prevention.</p> <p>This integrated approach to service delivery will help ensure that CBC can fully harness our skills and capacity, create a step-change in social value and maximise our ability to deliver for all our residents, businesses and customers.</p>
<b>How and where is the service / policy / project implemented</b>	<p>The housing services will be brought back in-house, following the winding-up of CBH. Once this decision is taken, a transition plan and timeline for implementation will be developed. The report to Cabinet includes the following recommendations that will help provide a framework for implementation:</p> <ul style="list-style-type: none"> <li>- CBC's Chief Executive, in consultation with the Leader and the Cabinet Member for Housing, will develop an integration action plan.</li> <li>- We will commission a consultation framework to develop our Tenant Offer, which will provide tenants and leaseholders with the opportunity to help shape our future housing services.</li> <li>- This consultation framework and the recommended Tenant Offer will be subject to review by CBC's Overview and Scrutiny Committee, upon their request.</li> </ul>
<b>What potential barriers might already exist to achieving these outcomes</b>	<p>The proposal to bring the housing services back to CBC will have the effect of helping overcome some of the barriers and challenges that CBC is exposed to as a result of the external operating environment (i.e. financial and regulatory, as set out above). For this project to be a success CBC will focus on placing tenants and leaseholders at the heart of the future shaping of our housing services. The project to bringing the service back in-house will be carefully managed, taking account of the risks, as identified in the report to Cabinet.</p>

## Step 2: What do you already know about your existing and potential customers?

<b>What existing information and data do you have about your existing / potential customers e.g. Statistics, customer feedback, performance information</b>	<p>CBH regularly collects tenant insight data on CBC's behalf, measuring satisfaction levels across a range of services, such as repairs, value for money, etc. This data is used to inform activity on an ongoing basis and also provides insight to inform opportunities for future improvement, in combination with data and learning arising from complaints and other customer feedback.</p>
<b>What does it tell you about who uses your service / policy and those that don't?</b>	<p>As set out above, we will commission a consultation framework to help inform the future Tenant Offer.</p>
<b>What have you learnt about real barriers to your service from any</b>	<p>N/A</p>

<b>consultation with customers and any stakeholder groups?</b>	
<b>If not, who do you have plans to consult with about the service / policy / project?</b>	Yes, as above.

### **Step 3: Assessing community impact**

How does your service, policy or project impact on different groups in the community? Please outline what you are already doing to benefit this group, what you are doing that might disadvantage this group, what you could do differently to benefit the group.

**People from black and minority ethnic groups**

**People who are male or female**

**People who are transitioning from one gender to another**

**Older people / children and young people**

**People with disabilities and mental health challenges**

**People who have a particular religion or belief**

**People who are attracted to their own sex, the opposite sex or to both sexes.**

**People who are married or in a Civil Partnership**

**People who are pregnant or who are on maternity leave**

**Other groups or communities**

The development of a consultation framework to help inform a future Tenant Offer will help ensure that our approach to delivering housing services takes into account any potential impact on the different groups in our communities. As part of CBH's Single Equality Scheme, we know that of our tenants:

- 24% are over the age of 65, and 3% of our tenants are under the age of 24;
- 61% are female, 38% are male and 1% transgender;
- 34% have a disability;
- 68% consider themselves to be heterosexual, 0.5% gay, 0.5% bisexual, and 31% prefer not to say;
- 47% have no religious beliefs, 40% are Christian, 3% are Muslim, 6% prefer not to say, with the remaining 4% having 'other' beliefs;
- 94% are White, 2% Asian, 2% Mixed race, 1% Black, 1% Chinese.

#### Step 4: What are the differences?

<b>Are any groups affected in different ways to others as a result of the service / policy / project?</b>	No, our aim is to deliver positive benefit for all.
<b>Does your service / policy / project either directly or indirectly discriminate?</b>	There is no discrimination arising either directly or indirectly as a result of CBC's proposal to wind-up CBH.
<b>If yes, what can be done to improve this?</b>	N/A
<b>Are there any other ways in which the service / project can help support priority communities in Cheltenham?</b>	Our aim will be to bring a wide range of benefits to tenants, leaseholders and communities at large as a result of bringing our housing services back in-house.

#### Step 5: Taking things forward

<b>What are the key actions to be carried out and how will they be resourced and monitored?</b>	As set out above under in step 1 – project implementation.
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<b>Who will play a role in the decision-making process?</b>	The Leader of the Council and CBC's Chief Executive, in consultation with the Cabinet Member for Housing.
<b>What are your / the project's learning and development needs?</b>	These will be identified once the project has been set up to bring the service in-house
<b>How will you capture these actions in your service / project planning?</b>	To be confirmed once the project is set up.