

EQUALITY, DIVERSITY AND INCLUSION

CITY OF DONCASTER COUNCIL

Due Regard Statement Template

How to show due regard to the equality duty in how we develop our work and in our decision-making.

Due Regard Statement

A **Due Regard Statement** (DRS) is the tool for capturing the evidence to demonstrate that due regard has been shown when the council plans and delivers its functions. A Due Regard Statement must be completed for all programmes, projects and changes to service delivery.

- A DRS should be initiated at the beginning of the programme, project or change to inform project planning
- The DRS runs adjacent to the programme, project or change and is reviewed and completed at the relevant points
- Any reports produced needs to reference “Due Regard” in the main body of the report and the DRS should be attached as an appendix
- The DRS cannot be fully completed until the programme, project or change is delivered.

<p>1 Name of the 'policy' and briefly describe the activity being considered including aims and expected outcomes. This will help to determine how relevant the 'policy' is to equality.</p>	<p>Local Lettings Policies support housing management and strategic objectives by restricting or prioritising allocations for a certain area or scheme by excluding certain groups of people who have an active housing application. These additional criteria are outside of the Housing Allocations Policy. Following this review the policies being proposed for retention are listed below.</p> <ol style="list-style-type: none">1. The Crescent Dunscroft - 53 houses2. Coniston Road Mexborough - 22 flats3. Auckland Road Mexborough - 23 flats and 1 house4. The Oval Conisbrough - 83 flats and 22 bungalows5. Silverwood House Town Centre - 128 flats6. Jubilee Court Wheatley - 42 flats7. Park View Adwick le Street - 48 flats8. New build Council Homes (listed in section 5) <p>The first 7 schemes listed have Local Lettings Policies to mitigate and reduce potential ASB (Anti-Social Behaviour) on allocation of relets. This is to support housing management interventions and vulnerable residents within the schemes and surrounding areas. The 7 schemes represent 422 units of accommodation from a total stock of c. 20,000 units of accommodation.</p> <p>The 8th scheme applies to New Build Council Homes on the initial let and following 12 months, after which they will be let in accordance with the rules set out in the City of Doncaster Council's Housing Allocations Policy. The Local Lettings Policy gives additional priority to applicants with an enhanced local connection to designated areas of each new build scheme. Local connection criteria includes residence, employment or direct family members living in the designated areas for 3 years or more. Following the review, it is proposed that additional priority will also be given to council tenants under occupying houses wishing to downsize to an age-designated bungalow or flat who have the enhanced local connection. This excludes adapted accommodation, which is let through</p>
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		<p>nomination from the City of Doncaster Council's Housing Register to ensure best use of this limited stock and is to incentivise the release of council houses to relet. The policies have been in place since 2013/14 as confirmed in Appendix A and have been reviewed in 2022/23 with members, Strategic Housing, SLHD and locality meetings including partners with an overview of the schemes and wider area. This followed the review of the City of Doncaster Council's Housing Allocations Policy where there is provision in the policy for Local Lettings Policies.</p> <p>The aim and expected outcomes of the policies are:</p> <ul style="list-style-type: none"> • To support sustainable communities • To support housing management through reduction/mitigation of ASB • To enable local people to access quality affordable housing • To increase the number of council houses released to relet to those most in need through the prioritisation of older people under occupying a council house for new build bungalow or flat • Support tenancy sustainability and the wellbeing and independence of older tenants of council houses by giving them priority to access a new build bungalow or flat
2	Service area responsible for completing this statement.	<p>St Leger Homes of Doncaster Housing Services Access to Homes</p> <p>St Leger Homes of Doncaster Equality & Diversity Manager</p>
3	Summary of the information considered across the protected groups. Service users/residents	<p>Age 46.2% of customers are aged 55 and over. Age restrictions are applied by property type for older person's accommodation. None of the LLP properties with a minimum age restriction were previously general needs accommodation and the minimum required age has been reduced potentially increasing access to younger people dependent on demand. However, it is important to note that underage applicants with an assessed medical need are eligible to be considered and are included in the City of Doncaster Council's Accessible Housing Register and are eligible to bid on certain properties to meet their medical rehousing needs. These policies</p>

Doncaster Workforce	<p>consistently apply the same eligibility rules to property type and size as the overarching Housing Allocations Policy. There are both negative and positive impacts according to access to accommodation based on these criteria, but the negative impacts are mitigated by the fact that underage applicants with assessed medical needs remain eligible.</p> <p>Disability 21.2% of customers have a disability. The Local Lettings Policies do not apply to new build adapted units where disabled applicants on the City of Doncaster Council's Accessible Housing Register and those assessed as needing an adapted property through the medical assessment process are prioritised for these units based on need. This is to ensure best use of stock and enables properties to be planned for specific households where there is a lack of existing stock available. The additional schemes listed do not have any purpose built or extensively adapted properties. The impact on disabled applicants is positive.</p> <p>Race 3.98% of customers are from ethnic minority backgrounds. There are no criteria in this policy that have regard to race. Although recently settled applicants may not meet the local lettings criteria of 3 years for new build homes. This also applies to Homeless families with a local connection of less than 3 years and other groups within the local connection exemptions. The impact is mitigated due to the low number of new builds in comparison to other relets available. Therefore, the impact is neutral.</p> <p>Sex 37.9% told us they were male. 61.9% female, and 0.2% other. There are no criteria in this policy that have regard to sex. Therefore, the impact is neutral.</p>
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	<p>Sexual Orientation 66% of customers are heterosexual, 0.85% are LGBTQ+ and the remainder have not answered. There are no criteria in this policy that have regard to sexual orientation. Therefore, the impact is neutral.</p> <p>Religion and Belief 15,003 customers told us they follow a religion or belief. There are no criteria in this policy that have regard to religion or belief. Therefore, the impact is neutral.</p> <p>Maternity and Pregnancy We do not collect this data. There are no criteria in this policy that have regard to maternity or pregnancy. The property eligibility rules mirror that of the City of Doncaster Council's Housing Allocations Policy. Therefore, the impact is neutral.</p> <p>Gender Reassignment 0.01% of customers told us they were transgender. There are no criteria in this policy that have regard to gender reassignment. Therefore, the impact is neutral.</p> <p>Marriage and Civil Partnership We do not collect this data. There are no criteria in this policy that have regard to marriage and civil partnership. Therefore, the impact is neutral.</p>
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Additional criteria outside of the protected characteristics:

Socio-Economic Status

There are no criteria in this policy related to income. The new build policy includes place of employment within the enhanced local connection to support people in accessing their place of work. Therefore, the impact is **positive**.

Armed Forces Veterans

There are no criteria in this policy related to veterans. Applicants are bypassed if they do not meet the additional criteria of each policy. Where a new build enhanced local connection criteria applies, we are flexible and will consider where someone has grown up in the area as well as family/residence and employment.

Therefore, the impact is only **negative** for those not meeting the criteria although this is mitigated by the extremely low numbers of properties subject to Local Lettings Policies in comparison to other relets reduces the impact to this group.

Homelessness and Rough Sleepers

Applicants are bypassed if they do not meet the additional criteria of each policy.

Therefore, the impact of the Local Lettings Policies is dependent on the applicant's circumstances. Should they not meet the criteria they have the right to request and submit any further information to be considered. The impact is **negative** although this is mitigated by the extremely low numbers of properties subject to Local Lettings Policies in comparison to other relets reduces the impact on this group. 2% of properties are subject to the ASB Local Lettings Policies and New Build Homes are 1 : 25.24 relets. It is important to note that these properties are not supported housing which for some would be more appropriate accommodation where additional support is required before moving into independent living.

Care Leavers

Applicants are bypassed if they do not meet the additional criteria of each policy.

Therefore, the impact of the Local Lettings Policies is dependent on the applicant's circumstances. We have an additional direct match scheme for care leavers of up to 20

		<p>units a year as well as a shared accommodation model. After reviewing the applicants on Direct Match and from experience of allocating to this group there is no demand from this group for the schemes covered by Local Lettings Policies, due to the ASB issues. Where a new build enhanced local connection criteria applies, we are flexible and will consider a connection as being a foster placement as well as family/residence and employment. We do also consider people who grew up in the area who may not have an existing connection, as long as we can establish this through Revenue records that we have access to. Therefore, the impact is only negative for those not meeting the criteria although this is mitigated by the extremely low numbers of properties subject to Local Lettings Policies in comparison to other relets reduces the impact to this group and by the additional schemes we in place to facilitate access to housing.</p>
<p>4</p>	<p>Summary of the consultation/engagement activities</p>	<p>Consultation has been with the following groups:</p> <ul style="list-style-type: none"> • SLHD Housing Management • Doncaster Council Strategic Housing /Local Investment Planning • SLHD Executive Management Team • Elected members from cross area wards including those who have new build schemes currently being delivered
<p>5</p>	<p>Real Consideration:</p> <p>Summary of what the evidence shows and how has it been used</p>	<p>SLHD produce a yearly Equality, Diversity and Inclusion (EDI) report, which includes a profile of the Housing Register and Housing Allocations relating to Equality and Diversity. Some data from that report on the Waiting List of prospective customers includes:</p> <ul style="list-style-type: none"> • 1,433 applications from ethnic minorities • 2,814 applicants told us they have a disability • 224 applicants told us that they were LGBTQ+, while 7,217 said they were heterosexual • 5,577 applicants are female, 3,329 are male and 11 are transgender <p>This policy has been in place since the Council New Build Programme began in 2013/14.</p>

Since then, 480 New Build units have been delivered up to and including 2021/22. From 2015/16 to 2021/22, when we have comparable data, we have relet 9,845 properties and had 390 New Build Council Homes. Therefore, over the period the ratio of relets to new builds in 25.24 : 1.

Delivery	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	Total
Council New Build Start on Site	33	57	104	129	124	0	0	0	33	480 Ex 13/14 and 14/15 390
Number of Voids Relet	N/A	N/A	1673	1483	1505	1447	1386	1217	1134	9845

In Phase 2 of the 2020-2025 programme there are 123 units across 7 sites, 25 of which have recently secured planning permission (15th November 2022) and 4 secured planning permission on 7th March 2023, with 1 remaining site left to secure Planning Permission in the future. All start on site dates will be after April 2023. The 7 sites are within the North, Central South and West areas of the Borough so are not concentrated in one area.

Phase 3 of the 2020-2025 programme is subject to confirmation that sites are suitable and all of the sites and the number of units per site, so at present we cannot provide exact details. With an expectation to submit planning applications for Phase 3 sites during 2023

		<p>with start on site in 2024. The current indicative total is around 750 units, but this will change following site appraisal. Again, potential sites are spread across the Borough.</p> <p>Therefore, given the ratio of relet to new build is 25.24 : 1 as such, the majority of allocations are not subject to this policy and applicants are able to be considered for other vacancies within each area.</p>
6	Decision Making	<p>The decision-making report includes a section on the due regard statement and the legal obligations we are under in having regard to the content of this statement as part of the decision-making process.</p>
7	Monitoring and Review	<p>As part of the review there is a planned review matrix, where outcomes and relevance will be reviewed to ensure that ongoing policies are legally compliant and fit for purpose.</p>
8	Sign off and approval for publication	<ul style="list-style-type: none"> • <i>By signing this statement off as complete you are confirming that 'you' have examined sufficient information across all the protected groups and used that information to show due regard to the three aims of the general duty. This has informed the development of the activity.</i> • <i>If this statement accompanies cabinet paper it will be published as part of, the cabinet report publication process. Statements accompanying cabinet reports are also published on our website. If this statement is not to be submitted with a cabinet paper, please maintain a copy for your own records that can be retrieved for internal review and in case of future challenge.</i>