

Equality Impact Assessment Template – Stage Two

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| <p>What is the decision Executive is being asked to make?</p> <p>Please add a summary of relevant legislation and whether the proposed decision conflicts with any of the Council’s key strategic priorities</p> | <p>To adopt the new Housing Allocations Policy following consultation.</p> <p>An Allocations Policy detailing how the council will allocate social housing in its area is required by part VI of the Housing Act 1996. It must meet the council’s legal requirement to provide a statement of choice and adhere to the “Allocation of Accommodation: Guidance for Local Housing Authorities in England” (CLG, June 2012). Section 166A(13) and 168(3) of the Housing Act requires that changes to a Housing Allocations Policy to be consulted on with all stakeholders</p> <p>The policy must also have regard to the Children’s Act 2004 and the Equalities Act 2010</p> |
| Budget Holder for item being assessed: | Janet Weekes |
| Name of assessor: | Fidelis Ukwenu |
| Name of Service & Directorate | Housing Service, Place |
| Date of assessment: | 19/08/2020 |
| Date Stage 1 EIA completed: | 05/02/2020 |

STEP 1 – Scoping the Equality Impact Assessment

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| 1. What data, research and other evidence or information is available which will be relevant to this Equality Analysis? Please tick all that apply. | | | |
| Service Targets | | Performance Targets | |
| User Satisfaction | | Service Take-up | |
| Workforce Monitoring | | Press Coverage | |
| Complaints & Comments | | Census Data | |
| Information from Trade Union | | Community Intelligence | |
| Previous Equality Impact Analysis | | Staff Survey | |
| Public Consultation | ✓ | Other (please specify) Data from the housing register | ✓ |

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| 2. Please summarise the findings from the available evidence for the areas you have ticked above. |
| The new allocations policy will reduce the number of housing applicants who qualify to join and remain on the council’s common housing register. It is estimated that the number of applicants |

on the housing register will reduce from 3,000 households to 800 households. The changes to the policy including the qualification criteria has the same impact on all groups on the housing register including those with protected characteristics. This is because the changes mainly affect the ability of non-residents of West Berkshire to join the council's housing register with the net effect that social housing in the district is targeted at the most vulnerable residents of the district.

There is a positive impact for households of housing applicants who have a disability in terms of the banding priority awarded under the new policy.

3. If you have identified any gaps in the evidence provided above, please detail what additional research or data is required to fill these gaps? Have you considered commissioning new data or research eg a needs assessment?

If 'No' please proceed to Step 2.

No

STEP 2 – Involvement and Consultation

1. Please outline below how the findings from the evidence summarised above when broken down, will affect people with the 9 protected characteristics. Where no evidence is available to suggest that there will be an impact on any specific group, please insert the following statement '*There is no evidence to indicate that there will be a greater impact on this group than on any other.*'

| Target Groups | Describe the type of evidence used, with a brief summary of the responses gained and links to relevant documents |
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| Age – relates to all ages | There is no evidence to indicate that there will be a greater impact on this group than on any other |
| Disability - applies to a range of people that have a condition (physical or mental) which has a significant and long-term adverse effect on their ability to carry out 'normal' day-to-day activities. This protection also applies to people that have been diagnosed with a progressive illness such as HIV or cancer. | Just under 12% of applicants on the housing register who had a status change in the last financial year identified as having a disability. A third of this (under 4%) number had 15 points or more under the old points based system. Comparatively 17% of applicants reporting no disability had 15 points or more. This meant that applicants who have a disability with a housing need did not rank as high priority based on their housing need for available social tenancies compared to those without a disability. Of the 271 properties let in the last financial year ending March 2020, 80% of the properties were let to applicants with |

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| | <p>15 points or more.</p> <p>Under the new housing allocations policy, applicants who have a housing need with a disability exacerbated by their housing circumstances will be automatically placed in one of the top two bands. This will help us achieve our objective to target WBC's limited social housing at the most vulnerable residents in housing need so this group will not be disadvantaged.</p> |
| <p>Gender reassignment - definition has been expanded to include people who chose to live in the opposite gender to the gender assigned to them at birth by removing the previously legal requirement for them to undergo medical supervision.</p> | <p>There is no evidence to indicate that there will be a greater impact on this group than on any other.</p> |
| <p>Marriage and Civil partnership –.protects employees who are married or in a civil partnership against discrimination. Single people are not protected.</p> | <p>There is no evidence to indicate that there will be a greater impact on this group than on any other.</p> |
| <p>Pregnancy and Maternity - protects against discrimination. With regard to employment, the woman is protected during the period of her pregnancy and any statutory maternity leave to which she is entitled. It is also unlawful to discriminate against women breastfeeding in a public place</p> | <p>There is no evidence to indicate that there will be a greater impact on this group than on any other.</p> |
| <p>Race - includes colour, caste, ethnic / national origin or nationality.</p> | <p>There is no evidence to indicate that there will be a greater impact on this group than on any other.</p> |
| <p>Religion and Belief - covers any religion, religious or non-religious beliefs. Also includes philosophical belief or non-belief. To be protected, a belief must satisfy various criteria, including that it is a weighty and substantial aspect of human life and behaviour.</p> | <p>There is no evidence to indicate that there will be a greater impact on this group than on any other.</p> |
| <p>Sex - applies to male or female.</p> | <p>There is no evidence to indicate that there will be a greater impact on this group than on any other.</p> |
| <p>Sexual Orientation - protects lesbian, gay, bi-sexual and heterosexual people.</p> | <p>There is no evidence to indicate that there will be a greater impact on this group than on any other.</p> |

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| <p>2. Who are the main stakeholders (eg service users, staff etc) and what are their requirements?</p> |
| <p>✓ Those who are currently on the council's common housing register</p> |

- ✓ Residents of West Berkshire who have a housing need or who are interested in obtaining social housing.
- ✓ Registered providers of social housing operating within West Berkshire

3. How will this item affect the stakeholders identified above?

Only those meeting the qualification criteria set out in the new housing allocations policy will be able to join or remain on the common housing register. Consequently about two thirds of the households on the current housing register will no longer qualify to remain on the common housing register.

STEP 3 – Assessing Impact and Strengthening the Policy

What have you assessed the impact as being? If there are potential adverse or differential impact on protected groups, what are the measures you will take to mitigate against such impact. Is there any opportunity to promote equality and good relations?

No adverse impact has been identified to any of the protected groups. A positive impact is anticipated for those with a disability.

STEP 4 – Procurement and Partnerships

Is this item due to be carried out wholly or partly by contractors?

No

If 'yes', will there be any additional requirements placed on the contractor? Have you done any work already to include equality considerations into the contract? You should set out how you will make sure that any partner you work with complies with equality legislation.

STEP 5 – Making a Decision

Summarise your findings and make a clear statement of the recommendation being made as a result of the assessment. This will need to take into account whether the Council will still meet its responsibilities under the Public sector Equality Duty (Section 149 of the Equality Act), which states:-

A public authority must, in the exercise of its functions, have due regard to the need to:-

(i) Eliminate discrimination, harassment, victimisation and any other conduct that is

prohibited by or under this Act;

- (ii) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it, in particular the need to:-**
- (a) Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;**
- (b) Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;**
- (iii) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.**

The decision is for approval as no adverse impacts have been identified against any protected group.

A positive impact has been identified for households with a disability. Following assessment and verification, this group of housing applicants who have a housing need will be placed in either of the two higher bands A (Emergency need to move) or band B (urgent need to move).

STEP 6 – Monitoring, Evaluating and Reviewing

Once the change has taken place, how will you monitor the impact on the 9 protected characteristics?

Management information collected to enable assessment of applications to join the housing register and to inform banding includes equalities data. This will be monitored periodically and an annual review carried out to track any impact on the 9 protected characteristics. Outcomes such as number of properties let and the number of households on the housing register will be monitored.

STEP 7 – Action Plan

| | Actions | Target Date | Responsible Person |
|---------------------------------------|--------------------------|--------------------|---------------------------------|
| Involvement & consultation | Annually – RP Forum | Annual | Strategy and Reviews Manager |
| Data collection | N/A | | |
| Assessing impact | Annual impact assessment | 31/03/2022 | Housing Allocations Team Leader |
| Procurement & partnership | N/A | | |

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| Monitoring, evaluation and reviewing | Audits and quarterly assurance checks | Annual Quarterly | Housing Allocations Team Leader/ Strategy and Reviews Manager |
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STEP 8 – Sign Off

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| The policy, strategy or function has been fully assessed in relation to its potential effects on equality and all relevant concerns have been addressed. | | |
| Contributors to the Assessment | | |
| Name: | Job Title: | Date: |
| Head of Service (sign off) | | |
| Name: Gary Lugg | Job Title: Head of Development and Planning | Date: 18/11/2020 |