

# Full Equality Impact Analysis



Title of review	Allocations Policy
Service	Housing Services, Community Services
Date of review	May 2013
Date of next review	July 2014
Lead officer, Job Title and Service	Victoria May, Housing Options Manager
Review team	Claire Grant, Business Services
Scope of the analysis	The Housing Options Service manages the housing register and has a statutory obligation to offer housing advice and options. One of the key areas is homeless intervention and prevention. The current Lettings Policy was adopted in October 2004 following publication of Allocations of Accommodation Code of Guidance. There is a statutory obligation for each local housing authority to publish how they will let their homes. The Allocations Policy should have a life of approximately 3-5 years however this is subject to change should there be any further new government policy or legislation.
Beneficiaries	The Allocations Policy is an important operational document that sets out how we will allocate social homes. Nine key areas have been identified to consult on which are the main changes to the document which will affect households on the housing register and new applicants.
Stakeholders	Stakeholders to the Allocations Policy include: <ul style="list-style-type: none"> <li>- Residents</li> <li>- Council Members</li> <li>- Council Staff</li> <li>- Public Sector Partners (e.g. Police, Kent County Council, Fire &amp; Rescue and NHS)</li> <li>- Housing Associations</li> <li>- Community &amp; Voluntary Organisations</li> <li>- Social tenants</li> </ul>
Relevant data and research	Having reviewed the housing register it is at a record high with nearly 6000 households on the housing register of which over 2600 households are on the register with no re-housing need. There are 501 households on the housing register who live outside of the Thanet district.

	<p>Research and data is still emerging of households effected by bedroom tax and welfare changes and it is essential that the housing register has provision to address this issue to ensure accommodation is affordable.</p>
Access complaints	<p>No specific complaints have been received relating to the Draft Allocations Policy.</p>
Engagement	<p>The Allocations Policy has been developed over a number of months by the Housing Options Manager. The implementation of the Localism Act enabled local authorities to have more power in the way social homes are allocated.</p> <p>It was decided to hold member's workshops to obtain views of how they would like to see the policy shaped and written to ensure that potential powers enabled from the Localism Act were explored and key decision were heard to ensure the policy met the housing need within Thanet. These were held on the 25 September, 26 September and 1 October 2012.</p> <p>In addition the Housing Options Team were consulted on including the key messages from the members workshops and these were held on 16 October and 19 October 2012.</p> <p>On 31 October 2012 East Kent Housing were consulted on to ensure the draft document met their needs.</p> <p>SMT were presented with the Allocations Policy on 20 December 2012 and the key changes were discussed.</p> <p>A public consultation is due to run from Friday 25 January to Friday 1 March 2013 to give members of the public an opportunity to comment on the draft Allocations Policy. The consultation will be available to complete online and hard copy surveys will also be available upon request or to collect from local libraries and council offices. The consultation will be promoted through the local press, on the council's website, by posters in key public places and through social media channels. Key stakeholder and partner organisations will be contacted directly to ensure they have an opportunity to comment and to invite them to promote the consultation through their own communication channels to their customers. A link to the online survey will also be published on the Kent Homechoice website to residents currently bidding for a property.</p>
Results of Engagement	<p>The formal consultation has not yet commenced however the feedback and comments received from all workshops have helped to inform priorities for the Allocations policy and requests were made to have these clearly set out upon consultation. They are as follows:</p> <ul style="list-style-type: none"> <li>- Closed Housing Register</li> <li>- Applicants will be required to meet minimum three years residency criteria to qualify for the housing register.</li> <li>- Exclusion for households who have been guilty of unacceptable behaviour</li> <li>- Additional bedrooms for families with two children of the opposite sex where the eldest is over 10 years old</li> <li>- Additional bedroom requests for carers in line with Housing Benefit guidance</li> <li>- Homeless Households placed into Band C</li> <li>- Armed Forces Personnel prioritised and not effected by other criteria's</li> </ul>

	<p>set out in policy.</p> <ul style="list-style-type: none"> <li>- Tighter guidelines on former and current rent arrears taking into consideration of the changes to welfare reform.</li> <li>- A cap on assets and savings to the value of £16k inc exclusion for households earning a salary in the next tax bracket</li> </ul> <p>A full report will be issued to SMT with the consultation outcome.</p>	
<b>Relevance to the Duty:</b>		
<p>1. <b>Eliminate unlawful discrimination</b> – harassment, victimisation and any other conduct prohibited by the Act;</p> <p>The policy aims to make long term improvements to the way in which social housing is allocated ensuring those most in need are considered and appropriately banded. It also aims to ensure that Thanet District Council makes best use of its housing stock enabling households to fully understand their housing options. The Housing Act outlines ‘Reasonable Preference’ categories that should be prioritised appropriately and this has been addressed within the policy ensuring consistency and fair treatment of this category of households.</p>		
<p>2. <b>Advance equality of opportunity</b> – between people who share a protected characteristic and people who do not share it by;</p> <ul style="list-style-type: none"> <li>• The policy seeks to have a consistent approach to disabled households who require additional rooms for carers to ensure that the criteria is clear and in line with housing benefits which will ensure any accommodation offered is affordable. Section 3.5 clearly states the criteria that applicants will be assessed against.</li> <li>• The policy seeks to prioritise households with medical difficulties appropriately to ensure that they are linked in with the relevant agencies for adequate support. Section 3.3 outlines Kent Agency Assessment which enables statutory agencies to assess health/support need and housing conditions to recommend appropriate level of priority.</li> <li>• The provision for extra care housing is outlined in the policy to enable elderly households who require a supported environment to be considered for re-housing. Section 5.2 outlines that support and care required will be assessed via a dedicated allocations panel.</li> </ul>		
<p>3. <b>Foster good relations</b> – between people who share a protected characteristic and people who do not share it, by; tackling prejudice and promoting understanding between people with a protected characteristic and others.</p> <p>The Allocations Policy contributes to this aim and raises the awareness of protected characteristics by outlining specific groups within the policy and making the verification criteria clear.</p>		
<b>Equality impacts raised or identified:</b>		
<p>The Allocations Policy provides a clear framework for households who wish to apply on the Thanet Housing Register and details how housing will be allocated.</p>		
Protected Characteristic	Commentary	
Age	Impact	The delivery of the Allocations Policy will have a positive impact of all ages ensuring accommodation offered is affordable and

		sustainable
	Mitigation	None needed
Gender	Impact	The delivery of the Allocations Policy will have a positive impact on both men and women
	Mitigation	None needed
Race	Impact	The Allocations policy aims to have a positive impact for all people regardless of their race. All EEA National households will be re-assessed at time of re-application to ensure they are eligible for housing.
	Mitigation	All EEA National households will be re-assessed at time of re-application to ensure they are eligible for housing.
Disability	Impact	The Allocations Policy will aim to ensure appropriate sized social housing is offered to households who require it.
	Mitigation	Direct lets on specific disabled accommodation will be an option to ensure disabled people can access appropriate adapted homes.
Religion or belief	Impact	The Allocation Policy aims to have a positive impact for all people regardless of their religion or belief.
	Mitigation	It seems there is little or no evidence in this area.
Gender reassignment	Impact	This Allocation Policy aims to have a positive impact for all people regardless of gender reassignment.
	Mitigation	It seems there is little or no evidence in this area.
Sexual Orientation	Impact	This Allocations policy aims to have a positive impact for all people regardless of their sexual orientation.
	Mitigation	It seems there is little or no evidence in this area.
<p>The Equalities Impact Assessment has been undertaken and there is no reason to state at this time that the content of the Allocations Policy will negatively impact on any groups with protected characteristics. In fact the Allocations Policy focuses on prioritising local residents within Thanet and re-categorising the banding system to give a greater opportunity for lower banded households to obtain housing.</p> <p>Opportunities to further the aims of the duty will be investigated during equality impact analysis of individual projects such as online registration.</p>		
Actions arising from analysis:		
Action	Responsible Officer	Deadline
To undertake equality impact analysis (EIA)'s yearly to assess the impact of the Allocations Policy where there is relevance to the Public Sector Equality Duty/protected characteristic(as defined within the Equality Act 2010)	Housing Options Manager	July 2014

## Acceptance

Name and signature of assessing officer and date of assessment.

**Name:** ..... **Position:** .....

**Signed:** ..... **Date:** .....

What to do now:

- Attach the EIA as an annex to your report to Members. Members must have all of the information before them at the time of making the decision. Also remember to complete the Equalities section in the report template.
- Send a copy of the EIA to the clerk to the Equalities Group – [claire.grant@thanet.gov.uk](mailto:claire.grant@thanet.gov.uk) to enable the review date and any actions arising to be added to the Equality Objectives Plan which is monitored by the Corporate Equalities Group and reported to SMT.

**Please be aware that this assessment will be published on the Council's web pages and must not contain any information that may identify individuals.**

- Add your actions to your service plan.
- Report your outcomes to the clerk to the Equalities Group, we are keen to publicise our equalities work and ensure that success is captured and good practice shared.