

Full Equality Impact Analysis



Title of review	Allocations Policy
Service	Thanet District Council ,Community Services
Date of review	September 2018
Date of next review	September 2019
Lead officer, Job Title and Service	Victoria May, Housing Options Manager, Thanet District Council
Review team	Corporate governance
Scope of the analysis	<p>The council must ensure that its Housing Allocations Policy complies with all legislative requirements, as set out within Part 6 of the Housing Act 1996 (as amended by the Homelessness Act 2002), case law and national and local housing policies. The policy was last updated in 2013 and is overdue a review.</p> <p>The Localism Act 2011 introduced significant amendments to Part 6 of the Housing Act to enable housing authorities to better manage their housing registers by giving them the power to determine their policy for allocating social housing locally.</p> <p>The current Allocations Policy was adopted by the council in July 2013 and a review has been undertaken. New legislation has been introduced called The Homelessness Reduction Act 2017 (HRA) which has a focus on homeless prevention. The HRA has extended the time available to work with customers to prevent homelessness and introduced personal housing plans for households seeking assistance from the council due to homelessness.</p>
Beneficiaries	Residents of Thanet who apply or are on the Council's housing register.
Stakeholders	<p>Stakeholders to include</p> <ul style="list-style-type: none"> ● East Kent Housing ● Allocations, Housing options - Thanet District Council ● Applicants on the Housing Register ● Residents ● Councillor ● Officers
Relevant data and research	<p>As of the 11 September there are 2573 households on the housing register, in the following bands:</p> <p>Band A - 95</p>

	<p>Band B - 227 Band C - 2198 Band D - 53</p> <p>There are currently 152 households on the housing register in band B for transfer incentive scheme meaning they are living in social housing larger than required. There are also 52 households in band B for major overcrowding who allege to be lacking more than 2 bedrooms. There are a number of households affected by the benefit cap and more household in receipt of welfare benefits and working are making applications for affordable housing as the private sector is becoming more difficult to access.</p>
Access complaints	No specific complaints have been received relating to the Allocations Policy.
Consultation	<p>Consultation has taken place within TDC with the Housing Options staff and in November the Housing Options Manager will be attending a tenants board through East Kent Housing. CMT have been presented with the draft Allocations Policy on 18 September.</p> <p>The Allocations policy will be subject to a 6 week public consultation from 22 October - 30 November.</p>
Results of consultation	All responses will be reviewed and relevant changes made if applicable
<p>Relevance to the Duty:</p> <p>Applicants wishing to be considered for homes including existing tenants seeking a transfer must be included on the Council's housing register. When vacant properties are advertised, applicants should bid in the usual way. At the close of bidding, a shortlist of applicants that have placed bids will be produced. The highest priority applicant will usually be offered the property. In the event of two or more applicants sharing the priority band, their registration date order will be used to determine priority. 50% of the units will be offered to applicants on the housing register as detailed above, and 50% will be allocated by the criteria stated on this Local Lettings Plan.</p> <p>No allocations will be allowed to an applicant if they are more than 1 band lower than the highest priority applicant, for a particular property.</p>	
<p>1. Eliminate unlawful discrimination – harassment, victimisation and any other conduct prohibited by the Act;</p> <p>The Allocations Policy does not harass, victimise or contradict any other conduct prohibited by the act. It aims to make long term improvements to the policy to enable social housing to be allocated to those most in need.</p> <p>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>	

2. **Advance equality of opportunity** – between people who share a protected characteristic and people who do not share it by;

The policy seeks to have a consistent approach to households faced with health issues and ensures that for those requiring specialist accommodation and/or who require additional rooms for specific reasons it is clear how their needs can be addressed.

3. **Foster good relations** – 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.

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.

Equality impacts raised or identified:

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.

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 update of the Allocations Policy will have a positive outcome irrelevant of gender.
	Mitigation	None needed
Race	Impact	The update of the Allocations Policy will have a positive outcome irrelevant of race.
	Mitigation	None needed
Disability	Impact	The Allocations Policy will aim to ensure appropriate size and type of social housing is offered to households who require it.
	Mitigation	None Needed
Religion or belief	Impact	This Allocations Policy will have a positive outcome irrelevant to religious beliefs.
	Mitigation	None needed
Gender reassignment	Impact	This Allocations policy aims to have a positive impact for all people regardless of gender reassignment.
	Mitigation	None needed
Sexual Orientation	Impact	This Allocations policy aims to have a positive impact for all people regardless of their sexual orientation.
	Mitigation	None needed
Marriage &	Impact	This Allocations policy aims to have a positive impact for all

Civil Partnership (Aim 1 only)		people regardless of marriage or civil partnership.
	Mitigation	None needed
Pregnancy & Maternity (Aim 1 only)	Impact	This Allocations policy aims to have a positive impact for all people regardless of pregnancy and maternity.
	Mitigation	None needed
<p>Overall conclusions and options to be put before decision maker (if contributing towards a report) or to take forward to develop your service (if reviewing a service)</p> <p>The Equalities Impact Assessment has been undertaken to ensure that the proposal to update and amend the Allocations Policy does not have a negative impact on its existing customer, thanet residents, and future customers. The proposal will not have a negative impact on any groups with protected characteristics.</p>		
Actions arising from analysis:		
Action	Responsible Officer	Deadline
To undertake equality impact assessments annually to ensure the Allocations Policy does not have a negative impact to customers.	Victoria May Housing Options Manager	September 2017

Acceptance

Name and signature of assessing officer and date of assessment.

Name: Mrs Victoria May

Position: Housing Options Manager

Signed: V.May

Date: 21 September 2018