



Thanet District Council (TDC) Equality Impact Assessment

Step one: test for relevance

1 Person responsible for this assessment

Name:	Ashley Jackson		
Job title:	Head of Housing & Planning		
Phone:	01843 577280		
Service area:	Housing and Planning	Date of assessment:	12.11.2024

2 Others involved in carrying out the analysis

Name:	Mark James (Strategic Housing Manager)
Name:	Dominic Westhoff (Housing Strategy Officer)
Name:	

3. Description of strategy, policy, service, project, activity or decision

Title:	<p>Thanet District Council Housing Allocation Policy</p> <p>This policy sets out our priorities for how social and affordable rented housing in the Thanet district is allocated, and the guidelines that determine entitlement and eligibility to that housing. This will supersede any existing and former policy relating to the allocations of housing and is in accordance with the requirements of Section 167 of the Housing Act 1996, as amended by the Homelessness Act 2002.</p> <p>It also explains what help people can expect from us in meeting their housing needs, and sets out the system and processes by which we let council-owned homes and make nominations for housing owned and managed by housing associations.</p> <p>The policy sets out:</p> <ul style="list-style-type: none">• Who is eligible to be accepted onto the housing register• How homes are allocated• How to apply to Thanet's housing register
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- How priority for housing applicants will be given
- How transfer applications will be assessed
- Eligibility for different property types

Is it new?

Yes

No

 *

A review of existing?

Yes

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No

3.1 Aims and objectives

Consider: **what** you are doing? **why** you are doing it? **who** will benefit?

This policy sets out our priorities for how social and affordable rented housing in the Thanet district is allocated, and the guidelines that determine entitlement and eligibility to that housing. Sets out clearly the factors for acceptance onto the housing register and how the level of priority will be allocated within the register.

For Thanet residents to know their options when considering applying for social and affordable housing and what factors will determine their eligibility and priority for this housing. It is important that the Council is transparent about how this housing is allocated.

3.2 What outcomes are expected? Who is expected to benefit?

The outcome expected of the policy is to transparently explain the process and procedures behind the allocation of social and affordable properties. This is explained through the clear criteria for eligibility for the housing register and the process behind determining priority on the banding system.

All Thanet residents who may have housing needs or an interest in how social and affordable housing is allocated will benefit from the policy through the transparency and clear processes it outlines.

4 Who is affected?

4.1 Which groups or individuals does the strategy, policy, service, project, activity or decision affect? For example, the Council, employees (including temporary workers), other public authorities, contractors, partner organisations, wider community, others.

This decision will affect the council and Thanet residents either in social or affordable housing or would like to be considered for such properties.

This decision also affects households who have a housing need and are on Thanet District Council's Housing Register or would be interested in being considered for the housing register.

4.2 Does the strategy, policy, service, project, activity or decision relate to a service area with known inequalities? (Give a brief description).

A common theme is that low income households are more likely to find themselves in housing need. Housing needs are, therefore, likely to be greater for those people who share protected characteristics who live in poverty.

5 Equality Act 2010

How does the strategy, policy, service, project, activity or decision actively meet the public sector equality duties to:

Eliminate unlawful discrimination (including harassment, victimisation and other prohibited conduct)

The Thanet District Council Allocations Policy is not unlawfully discriminatory.

Advance equality of opportunity (between people who share a protected characteristic and people who do not share it)

The policy intends to support and provide transparency for those in Thanet with an identified housing need. Housing needs are likely to be greater for those people who share protected characteristics who live in poverty.

The allocations policy outlines specific criteria for who is eligible for the housing register and how priority is determined on the register through a banding system. This has been done to ensure those with the greatest needs get the greatest level of support and priority.

Foster good relations (between people who share a protected characteristic and people who do not share it). Could it have an adverse impact on relations between different diverse groups?

The proposal to dispose of these properties is inclusive and aims to foster good relations with those within the protected characteristics classifications, for instance in relation to meeting housing needs for all groups.

6 Priority

The following questions will help you to identify whether this 'service' is a high priority. Please answer all questions with particular reference to the protected characteristics; race, gender, gender reassignment, disability, religion or belief, sexual orientation, age, marriage and civil marriage/partnership and pregnancy and maternity.

Please provide a comment for each answer, providing evidence for your answer, regardless whether you have answered yes or no.

Questions	Yes	No
1. Are there any particular groups who may have trouble accessing the 'service'?	*	
Comments: The allocation of social and affordable homes is only available to those households who have an identified housing need and who are on the council's housing register. Therefore it excludes those who do not have a housing need or not in TA.		

2. Does your information suggest that some groups of people are less satisfied than others with this 'service'?		*
Comments:		
3. Will this service have a significant impact on any of our residents?	*	
Comments: The policy will have a significant impact on those who want to be considered for the housing register and those on the housing register by the determination of priority by a banding system.		
4. Do you have any evidence that discrimination, harassment and/or victimisation could occur as part of this service?		*
Comments: No discrimination, harassment or victimisation will occur because of this.		
5. Do you think the service will hinder communication and negatively impact relations between the organisation and its employees, residents, contractors or anyone else?		*
Comments: No, this will not hinder communication or negatively impact relations.		
6. Does this service need to improve the way in which it is communicated to people who have literacy, numeracy or any other access needs?		*
Comments:		
7. Does consultation need to be carried out?	*	
Comments: Subsequent to OSP and Cabinet approval, if granted, the policy as a whole will be consulted upon with all relevant stakeholders and anyone who has an interest in the document. This will help to refine and shape some of the areas of the policy further.		

In order to assess the priority of your 'service' please complete the table below by adding up how many questions you answered yes to and following the appropriate action.

Priority	Number of questions answered 'yes'	Rating	Action
High	3 or more	3	Continue to section 2
Medium	1 to 2		Please provide evidence to any questions you answered 'yes' to in section 1. Test for relevance complete (sometimes a full assessment may be required).
Low	0		Test for relevance complete.

If, following the completion of the test for relevance, a full assessment is not required, go straight to the declaration. If a full assessment is required, go to Step two: full equality impact assessment.

Step two: full equality impact assessment

1 Could the strategy, policy, service, project, activity or decision have a **negative, positive or neutral** effect on groups or individuals?

Consider:

What you are doing?

Why you are doing it?

How you are doing it?

Who can access the service easily and who may not be able to access the service and **why?**

The full analysis explores ways to reduce or eliminate barriers and/or negative impacts.

Protected characteristics	N e g a t i v e	P o s i t i v e	N e u t r a l	<p align="center">Evidence/Reasoning</p> <p align="center">(Consider any barriers which will have negative impact and/or good practices giving positive impact)</p>
<p>Age</p> <p>Consider:</p> <ul style="list-style-type: none"> • The way younger and older people access services may be different • Use of technology • Child care/care of other dependant • Timings/flexibility, such as work patterns • Transport arrangements • Venue location 				<p>Recommendations:</p> <p>Certain groups of children are at higher risk of living in poverty, including deaf and disabled children and those from single parent families. Those living in poverty are more likely to be in social or affordable housing or on the housing register. The policy outlines the criteria for access and how households can apply to the housing register and how their priority will be determined. This will ensure those with the greatest needs will get the greatest level of support. This could benefit these households and help to reduce this inequality.</p> <p>Younger people</p> <p>Younger people are more likely to be unemployed than adults aged between 25 and 64 and are more likely to face higher housing costs, relative to income. The policy outlines the criteria for access and how households can apply to the housing register and how their priority will be determined. This will ensure those with the greatest needs will get the greatest level of support. This could benefit these households and help to reduce this inequality.</p> <p>For older people the policy outlines what properties are available to those who require a carer or extra care or support needs.</p>

<p>Disability (Includes: physical, learning, sensory (deaf/blind), mental health)</p> <p>Consider:</p> <ul style="list-style-type: none"> ● Communication methods ● Accessibility – venue, location, transport ● Range of support needed to participate ● Hearing Loops/Interpreters ● Disability awareness training for employees 			<p>Recommendations:</p> <p>Households containing people with disabilities are more likely to experience poverty. The policy outlines the criteria for access and how households can apply to the housing register and how their priority will be determined. This will ensure those with the greatest needs will get the greatest level of support. This could benefit these households and help to reduce this inequality.</p> <p>The policy outlines the procedure and priority banding for those with disabilities. There are adapted houses available along with supported and extra care accommodation options.</p>
<p>Race (Includes; gypsy, travelling, refugee and migrant communities)</p> <p>Consider:</p> <ul style="list-style-type: none"> ● The size of the BME communities that your service/project affects. ● Language(s) spoken/understood. ● Culture, such as hygiene, clothing, physical activities, mixed gender activities. ● What access support can you offer? 			<p>Recommendations:</p> <p>Black, Asian and minority ethnic (BAME) groups are more likely to experience poverty, are less likely to own their own home and are disproportionately affected by overcrowding. The policy outlines the criteria for access and how households can apply to the housing register and how their priority will be determined. This will ensure those with the greatest needs will get the greatest level of support. This could benefit these households and help to reduce this inequality.</p>
<p>Religion, faith or belief</p> <p>Consider:</p> <ul style="list-style-type: none"> ● The diversity within the communities that your service/project affect ● Prayer times, meal times, food (some religions do not eat meat), cultural habit or belief, religious holidays such as Ramadan ● Awareness training for employees 			<p>Recommendations:</p> <p>The limited availability of data on the extent to which those who hold a particular religion or belief (including no religion or belief) are subject to particular housing problems, makes it difficult to reliably identify potential impacts.</p> <p>Those from backgrounds that tend to associate with larger households, e.g., multi-generational families, may find it much more difficult to get their housing needs met. Thanet, like many Local Authority areas, has a severe lack of affordable and social homes, this is particularly acute for properties with 3 or more bedrooms. There is only one 5-bed property in the affordable and social housing stock and zero properties containing 6 or more bedrooms. Every effort will be made to support those with larger</p>

			households and a housing officer can discuss the options available to those households.
<p>Pregnancy and maternity</p> <p>Consider:</p> <ul style="list-style-type: none"> • Flexible hours of the service/project • Is there access to private area for breastfeeding mothers? 			<p>Recommendations:</p> <p>The limited availability of specific data on this group makes it hard to identify impacts, beyond those that affect households including children.</p>
<p>Gender</p> <p>Consider:</p> <ul style="list-style-type: none"> • The impact on men and women • Child care/care of other dependant • Mixed/single gender groups/activities • Timing of services/projects 			<p>Recommendations:</p> <p>Women are more likely to be economically inactive, low paid, and/or subject to the poverty that affects single parent families. Female-headed households are also more vulnerable to statutory homelessness. The policy outlines the criteria for access and how households can apply to the housing register and how their priority will be determined. This will ensure those with the greatest needs will get the greatest level of support. This could benefit these households and help to reduce this inequality.</p>
<p>Sexual orientation (Includes: lesbian, gay, bisexual)</p> <p>Consider:</p> <ul style="list-style-type: none"> • LGB people should feel safe to disclose their sexual orientation without fear of prejudice • Make it clear you recognised civil marriage and partnerships • Awareness training for employees 			<p>Recommendations:</p> <p>There is an absence of data on the extent to which those who identify as LGBTQ+ experience difficulties covering housing costs or occupy particular types of housing. There is evidence that those who are LGBTQ+ may experience discrimination when seeking to rent or buy a home. Younger LGBTQ+ people are also more vulnerable to homelessness. There is also evidence of demand from older LGBTQ+ people for specialist provision care and retirement housing. The policy outlines the criteria for access and how households can apply to the housing register and how their priority will be determined. This will ensure those with the greatest needs will get the greatest level of support. This could benefit these households and help to reduce this inequality.</p>
<p>Transgender</p> <p>Consider:</p> <ul style="list-style-type: none"> • Trans people should be able to disclose their gender identity without fear of prejudice 			<p>Recommendations:</p> <p>The limited availability of specific data on this group makes it hard to identify impacts,</p>

<ul style="list-style-type: none"> • Making it clear you have a Trans policy and process • Awareness training for employees 				
<p>Marriage and civil marriage/partnership</p> <p>Consider:</p> <ul style="list-style-type: none"> • All couples or partners, regardless of gender, should be able to access services 				<p>Recommendations:</p> <p>The limited availability of data on the extent to which those who married or in a civil partnership are subject to particular housing problems, makes it difficult to reliably identify potential impacts.</p>

Outsourced services	
If your policy/process is partly or wholly provided by external organisations/agencies (such as Civica or Capita), please list any arrangements you plan to ensure that they promote equality and diversity. Include this in your improvement plan	N/A
Relations between different equality groups	
Does your assessment show that a strategy, policy or process may amount to potential adverse impact between different equality groups? If yes please explain how the improvement plan is going to tackle this issue	No
Consultation responses	
Summary of replies from individuals and stakeholders consulted including any previous complaints on equality and diversity issues about the strategy, policy or process	N/A at this stage.

Summary of recommendations		
Actions	By Who	By When
Work with communications to ensure effective management of clear messages.	Housing Strategy & Projects Team	November 2024

Declaration

I am satisfied that a Test for Relevance has been carried out on the matter named in this Analysis and conclude that a full Equality Impact Assessment **is not required**.

Yes

No

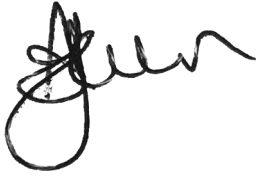
If you do not think that a full Equality Impact Assessment is required – please give your reasons:

I confirm that a full Equality Impact Assessment has been completed.

Yes

No

Signature of Head of Service:



Date:

X 2024

Recommendations agreed:

Yes

No

Signed:
(Director):

EIA date: