

Equality Impact Assessment (EIA) Form

Please read EIA guidelines when completing this form

1. Name of Service Area/Directorate

Name of Head of Service for area being assessed	Richard Gabb
Directorate	Economy and Place

Individual(s) completing this assessment	Name	Job Title
	Trea Connon	Housing Strategy officer
Date assessment completed	13 th November 2019	

2. What is being assessed

Activity being assessed (eg. policy, procedure, document, service redesign, strategy etc.)	Revised Housing Allocation scheme for Herefordshire 2020			
What is the aim, purpose and/or intended outcomes of this activity?	<p>The main purpose of the scheme is to meet the requirement under s166A Housing Act 1996(as amended) for every local housing authority in England to have an allocation scheme for determining priorities and the procedure to be followed in allocating social housing. For this purpose 'procedure' means all aspects of the process. The scheme is similar to the policy approved by Cabinet in April 2018, although procedures have changed to reflect the reversion to a choice based lettings scheme.</p> <p>There are revisions to the policy notably:</p> <ul style="list-style-type: none"> • The change of banding positions for prevention of homelessness (from band C to band B) and the relief of homelessness (from band B to band C) • The deletion of sharing siblings from the banding criteria • The addition of Band E for existing tenants and general applicants who do not have a housing need identified in the council's banding criteria • Amendments to the additional preference criteria for military personnel to improve clarity • The introduction of a suspension process for unacceptable behaviour, breaches of tenancy or other agreements, and housing related debt • Applicants will be able to bid on two properties at any one time • Operational arrangements 			
Name of lead for activity	Trea Connon/Andy Churcher			
Who will be affected by the development and implementation of this activity?	<input checked="" type="checkbox"/> Service Users <input type="checkbox"/> Patients <input type="checkbox"/> Carers	<input checked="" type="checkbox"/> Staff <input type="checkbox"/> Communities <input checked="" type="checkbox"/> Other __Registered providers__		

	<input type="checkbox"/> Visitors
Is this:	<input checked="" type="checkbox"/> Review of an existing activity <input type="checkbox"/> New activity <input type="checkbox"/> Planning to withdraw or reduce a service, activity or presence?
What information and evidence have you reviewed to help inform this assessment? (name sources, eg demographic information for services/staff groups affected, complaints etc.	<p>1. Understanding Herefordshire 2018</p> <p>The mid 2018 population estimates that 51% of the population are female, outnumbering men in almost all age groups over 40. People over 65 comprise 24% of the population, although Hereford city has a younger age profile. The BAME population also has a younger profile with 77% being under the age of 45, compared to 50% of the total population.</p> <p>Herefordshire has a small but growing BAME population which does not seem to be represented on the register. It may be that this group of applicants prefer different housing tenures, there are problems with the data collected from the housing register applications but this is an area that needs further investigation.</p> <p>2. Service user information from the current housing register, where available.</p> <p>The current register holds about 900 applications with an average of just over 60 households joining monthly. Register applicants are typically on low incomes and/or benefits who find it difficult to rent affordable accommodation in Herefordshire.</p> <p>Herefordshire Council does not have its own social housing stock and is reliant on private registered providers (commonly known as housing associations) to fulfil its statutory duties in respect of housing homeless households and those in priority need. An average of just under 60 households per month accept an offer.</p> <p><u>Housing register demographics</u></p> <p>As at 30th October 2019 the 900 applicants on the register included:</p> <ul style="list-style-type: none"> a) Age <ul style="list-style-type: none"> • Under 25's = 116 • Over 65 = 164 including 52 80 and over b) Ethnicity <ul style="list-style-type: none"> • 795 White British • 64 other white/Irish(white) • 8 other British (BAME) • 4 Gypsy/Roma/traveller c) Gender <ul style="list-style-type: none"> • 549 female lead applicants • 351 male lead applicants d) Disability <ul style="list-style-type: none"> • 390 registered disabled • Of these 121 identified as having mental health issues, 26 hearing impaired/deaf, 25 blind/visually impaired and 64 with learning difficulties/disabilities. e) Households that required: <ul style="list-style-type: none"> • 1 bedroom = 447 • 2 bed = 277 • 3 bed =134 • 4 bed = 31 • 5 bed = 6
Summary of engagement or consultation undertaken (eg. who	Legislation requires consultation with the housing associations and this has been undertaken.

<p>and how have you engaged with, or why do you believe this is not required)</p>	<p>The procedures of the choice-based lettings scheme are not changing substantially though they are detailed to a greater extent in the scheme. Statute requires this information to be included and little of this can be changed. To do so would affect the working of the IT system without which the scheme cannot be implemented. Similarly, the changes to the banding criteria, qualification are largely required under legislation and the code of guidance. Therefore there has not been consultation with service or potential service users on this occasion.</p>
<p>Summary of relevant findings</p>	<p>There is some discrepancy between the profile of applicants to the register and residents of Herefordshire as a whole. It is not clear why this is the case but is likely to reflect how housing need changes over through the life cycle and the income/wealth of households.</p> <p>It is not possible at the time to provide information on whether people with some of the protected characteristics are on the register. It is also not currently possible to provide diversity information on the applicants that have been housed.</p> <p>Changes in the policy will change the priority for housing of people in many of the groups but it is not believed that any one group will be more affected than another.</p> <p>The upgrade of the IT system is expected to improve reporting capabilities which should provide a better understanding of the effect of the policy on households in the protected characteristics groups. However, the final decision on who is offered a property is made by the housing association and it is possible that information will be lacking or that their policies will have an impact for some of the protected characteristics groups, although this is not expected to have an impact.</p>

3. The impact of this activity

Please consider the potential impact of this activity (during development and implementation) on each of the equality groups outlined below. **Please tick one or more impact box below for each Equality Group and explain your rationale.** Please note it is possible for the potential impact to be both positive and negative within the same equality group and this should be recorded. Remember to consider the impact on staff, public, patients, carers etc. in these equality groups.

Equality Group	Potential <u>positive</u> impact	Potential <u>neutral</u> impact	Potential <u>negative</u> impact	Please explain your reasons for any potential positive, neutral or negative impact identified
Age		×		Applicants already have to use an online system and there is some evidence that older people use of the internet less regularly than others and therefore may be disadvantaged by an online system.
Disability	×			The customer housing portal was developed to improve accessibility and so is expected to have a positive impact on people with disabilities.
Gender Reassignment		×		Data to gender reassignment is not currently collected but the changes are not expected to affect this group more than any other.
Marriage & Civil Partnerships	×			Although not new, as it was recognised in the 2018 policy there is now a criterion for relationship breakdown where children are involved which is likely to help stabilise families at this time.
Pregnancy & Maternity	×			As in 2018 policy, the scheme does recognise the potential need for an additional bedroom where a household is pursuing fostering or adoption.
Race (including Travelling Communities and people of other nationalities)		×		The changes are considered likely to have a neutral impact, although there may be language barriers, due to a racial or nationality dimension for recent immigrants. It is not clear why there is such a small percentage of BAME applicants on the register and further work will be needed to ensure this is not due to unidentified barrier.
Religion & Belief		×		Further data will need to be collected to assess impact. However, it is not anticipated that the changes will have either a positive or negative impact on this group.
Sex	×			Additional priority available to those subject to domestic abuse. This was in the 2018 policy also.
Sexual Orientation		×		The scheme is not expected to have an impact on this group. However work to collect data in respect of sexual orientation and gender reassignment to ensure there is no negative impact will require guidance and sensitivity.
Other Vulnerable and Disadvantaged Groups (eg. carers, care leavers, homeless, social/ economic deprivation, etc)			×	People in rural areas without direct access to the internet may be disadvantaged by the change from a weekly advertising cycle to one where an advert is placed on the system for a week on any day of the week.
Health Inequalities (any preventable, unfair & unjust differences in health status between groups, populations or individuals that arise from the unequal distribution of social, environmental & economic conditions within societies)	×			As with current (2014) and the non-implemented 2018 policy health issues are provided for in the scheme with additional criteria such as hospital discharge being added to support appropriate housing.

What actions will you take to mitigate any potential negative impacts?	Risk identified	Actions required to reduce/eliminate negative impact	Who will lead on the action?	Timeframe
	Effect on rural applicants without access to internet	Housing associations maintain minimum 7 day per week advertising. Potential use of auto bidding (using IT system to automatically bid for properties of required size and location). Continued liaison with parish councils. Review potential use of other rural service hubs	Housing strategy officer	12 months

4. Monitoring and review

How will you monitor these actions?	Internal monitoring meetings will occur every three months after implementation with a formal review 12 months after implementation.
When will you review this EIA? (eg in a service redesign, this EIA should be revisited regularly throughout the design & implementation)	The scheme will be reviewed formally 12 months after implementation. However monitoring meetings will occur every 3 months after implementation and, subject to availability, protected characteristic data will be part of this monitoring.

5. Equality Statement

- All public bodies have a statutory duty under the Equality Act 2010 to set out arrangements to assess and consult on how their policies and functions impact on the 9 protected characteristics.
- Herefordshire Council will challenge discrimination, promote equality, respect human rights, and design and implement services, policies and measures that meet the diverse needs of our service, and population, ensuring that none are placed at a disadvantage over others.
- All staff are expected to deliver services and provide services and care in a manner which respects the individuality of service users, patients, carers etc, and as such treat them and members of the workforce respectfully, paying due regard to the 9 protected characteristics.

Signature of person completing EIA	T Connon
Date signed	14.11.2019