

Equality Impact Assessment (EqIA)

Before completing this EqIA please ensure you have read the guidance on the intranet.

Initial Information

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Date assessment started:	20 August 2020
Date of completion:	08 October 2020
Version Number:	1

Part 1: Background Information

Is this (please tick or expand the box to explain)

Existing	
Changing, updating or revision	√
New or proposed	
Other	

Is this (please tick or expand the box to explain)

Internal (employees only)	
External (residents, communities, partners)	
Both of the above	√

What is the name of your policy, strategy, project or service being assessed?

Housing Allocation Policy

What is the policy, strategy, project or service designed to do? (include the aims, purpose and intended outcomes of the policy)

The objectives of the housing allocation policy is:

- To explain how Dorset Council works with social landlords to maintain a housing register and manage housing stock to prioritise those most in need of affordable housing.
- To explain how our choice based lettings scheme works so that applicants understand how to register, the assessment process and property allocation process.
- To give explanations and examples of scenarios.
- To provide useful information for people who need support to participate.

The policy also provides clear information for housing officers carrying out their role. This ensures applicants are awarded the appropriate priority and mitigates customer requests for review.

The policy also provides a framework to collect an accurate and relevant data set to support future housing development in our area reflecting our community housing need.

What is the background or context to the proposal?

Local authorities are required under Part 6 of the Housing Act 1996(as amended) to have a housing allocation scheme and to ensure social housing is allocated accordingly. In accordance with the provisions in The Bournemouth, Dorset and Poole (Structural Changes) Order 2018 Dorset Council requires a new Dorset Council Housing Allocation Policy

Currently Dorset Council residents are subject to existing policies (Dorset Homechoice Common Allocations Policy and Christchurch and East Dorset Joint Housing Allocations Policy) that are not wholly aligned.

This Dorset Council Housing Allocations Policy will apply to all Dorset Council residents.

Part 2: Gathering information

What sources of data, information, evidence and research was used to inform you about the people your proposal will have an impact on?

Housing Register – currently shared amongst all legacy authorities

Public Consultation – any individual or organisation could respond – 766 responses were received

Stakeholders – housing service; social landlords; children's services; adult services; Executive Advisory Panel

What did this data, information, evidence and research tell you?

There are approximately 6000 current applicants on the housing register. This tells us there is a high level of demand for social housing in the Dorset Council area. The number of lets made during 2019/20 was 925. This tells us that the majority of applicants eligible to register will not be allocated a home quickly. This also tells us many people are living in homes that do not currently meet their need.

The data from the current housing registers illustrates the average waiting time for 1 bedroom homes ranges from 7 months to 15 months; 2 bedrooms from 5 to 15 months; 3 bedrooms from 9 months to 20 months; 4 bedrooms from 9 months to 20 months; (this does not illustrate all property types). The data also suggests there are regional variations in both property availability and need.

90% of responses to the public consultation were from members of the public including those on housing registers/social housing tenants/private rented tenants/owner occupiers. This tells us our residents have views about how social housing is allocated.

Other public consultation respondents are:

- Organisations
- Elected members
- Support workers
- Parish and Town councils
- Voluntary organisations
- Social landlords
- Community Land Trusts
- Charities

This tells us that our residents engage with these organisations. Our relationships with these organisations are established and their work includes supporting applicants, existing tenants and developing new homes.

The profile of residents in Dorset overall show 95.6% are white British and 4.4% black and minority ethnic group.

From those who engaged with the consultation 89.8% described themselves as white British and 3.3% stated they were from a BME background.

Respondents described themselves as:

White/British	89.8%
Other White/British	2.5%
Other Ethnic Group	0.5%
White Irish	0.5%
Other Mixed Background	0.3%
Mixed Ethnic Background – White and Asian	0.3%
Asian Background – Bangladeshi	0.1%
Asian/British - Indian	0.1%
Black/British – African	0.1%
Mixed Ethnic Background – White and Black African	0.1%
Mixed Ethnic Background – White and Black Caribbean	0.1%
Preferred not to say	4.8%

This tells us our feedback is comparable to Dorset's resident population.

159 people responding to the consultation described themselves as disabled. At 25.2% the number of people in this group compared to a Department for Work and Pensions figure for Dorset of 4.6% based on those claiming disability living allowance, personal independence payments or attendance allowance, is considerably higher. This tells us that people living with some form of disability and

who consider their current home unsuitable may not be claiming or entitled to financial support.

There were 35 responses to the consultation from the Armed Forces and a separate response from the Royal British Legion commenting on the statutory guidance issued June 2020. This tells us that members, former members of the Armed Forces and their families are engaging and consider themselves as committed members of the community. It also tells us that central government considers this group of special interest. Dorset Council has a commitment to this community which is reflected in the Armed Forces Covenant.

The consultation responses reflected a wide range of personal situations including people living at home with a parent; people who are homeless; landlords; people wanting to join the register and those living in conditions they found unsatisfactory or unsanitary. This tells us that a good cross-section of people and circumstances are represented in the response. Responses reflect personal opinions about suitable homes, homes of decent standard; affordability and choice about where you live.

70.2% of consultation respondents described their gender as female; 26.4% described their gender as male; 0% described themselves using another term and 3.3% preferred not to say. This tells us the response is typical of other council consultation responses.

There was a wide range of ages of respondents and a good geographical spread. This tells us there was good representation from our community

There was good overall support for proposals. This tells us the proposal has described the challenge of managing the allocation of social housing and describes a process that is fair.

Housing service information received focussed on the technical application of the policy as perceived by officers on both their behalf and customers. This told us that improvements to software are required to enable better self-service options. A procurement process is expected to be completed 2020/21 and includes accessibility for all processes.

The Housing service feedback also provided challenge regarding how processes will be supported. This told us that offering support for people accessing the service is accurate and is expected to improve successful allocations. A commitment to deliver enhanced training to staff was agreed.

Responses from engagement with social landlords were positive regarding the proposals. Feedback told us managing current housing stock is challenging depending on location and property type. Maintaining stock and keeping all types of social housing fully occupied is not always possible because of restrictions such as specified age requirements and financial pressures. This tells us people use the opportunity to make choices about where they live; property may be considered unsuitable because of location or type; personal circumstances such as access to services, environment and support affect whether a tenancy would be successful.

It also tells us we can support social landlords to maximise their housing stock by including options to offer direct lets to people that would otherwise be precluded and result in unoccupied properties.

Internal services such as Adult Services and Children's Services work with people with specific needs including young people leaving care; people ready to move on; those in need of supported care; for whom we have a corporate duty or parenting responsibility; foster carers or adopters. Advice received and researched confirms the role of housing services is to offer appropriate and suitable support and access to suitable affordable housing. This tells us including specific categories for each of these groups offers an appropriate level of prioritisation.

A member Executive Advisory Panel supported and advised the housing service to design the proposed policy. The group represented all Dorset Council areas and parties. The engagement illustrated how communities engage with their elected members and what experiences they had. The process reviewed current policies and considered the proposed omissions and new inclusions. This told us whether the proposals addressed the needs of the community and the Council.

Is further information needed to help inform this proposal?

No

Part 3: Engagement and Consultation

What engagement or consultation has taken place as part of this proposal?

Housing Register – currently shared amongst all legacy authorities
Public Consultation – any individual or organisation could respond – 766 responses were received. The consultation period is usually 12 weeks. This consultation ran for 20 weeks from 2 March 2020 to 20 July 2020 to mitigate any potential effects of the covid-19 pandemic. The consultation was available on line and as a hard copy. The consultation was promoted using council social media, community radio and local press. Formats included audio and video clips.
Stakeholders – housing service; social landlords; children's services; adult services

How will the outcome of consultation be fed back to those who you consulted with?

It will be published on the council website

Please refer to the Equality Impact Assessment Guidance before completing this section.

Not every proposal will require an EqlA. If you decide that your proposal does **not** require an EqlA, it is important to show that you have given this adequate consideration. The data and research that you have used to inform you about the people who will be affected by the policy should enable you to make this decision and whether you need to continue with the EqlA.

Please tick the appropriate option:

An EqlA is required (please continue to Part 4 of this document)	√
An EqlA is not required (please complete the box below)	

Part 4: Analysing the impact

Who does the service, strategy, policy, project or change impact?

- If your strategy, policy, project or service contains options you may wish to consider providing an assessment for each option. Please cut and paste the template accordingly.

For each protected characteristic please choose from the following options:

- Please note in some cases more than one impact may apply – in this case please state all relevant options and explain in the ‘Please provide details’ box.

Positive Impact	<ul style="list-style-type: none"> the proposal eliminates discrimination, advances equality of opportunity and/or fosters good relations with protected groups.
Negative Impact	<ul style="list-style-type: none"> Protected characteristic group(s) could be disadvantaged or discriminated against
Neutral Impact	<ul style="list-style-type: none"> No change/ no assessed significant impact of protected characteristic groups
Unclear	<ul style="list-style-type: none"> Not enough data/evidence has been collected to make an informed decision.

Age:	<i>Neutral</i>
What age bracket does this affect?	From age 16+
Please provide details:	No change – statutory eligibility criteria includes age. People aged between 16 and 18 are not legally able to hold a tenancy in their own name but are supported by appropriate representative e.g. social services. The policy includes reasonable preference categories for those who are leaving care; a corporate duty is owed; a corporate parenting responsibility is owed; older people.

Disability: (including physical, mental, sensory and progressive conditions)	<i>Neutral</i>
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Does this affect a specific disability group?	No
Please provide details:	Current policies include increased prioritisation for applicants who meet a minimum of 4 separate criteria. This is removed from the proposal. The effect is to award a priority level based on the highest need. Previously a household with 4 medium level needs would have been assessed at a level one higher. Now the level is not enhanced. A reasonable preference category is included for people who need adapted properties; with a high medical need; medium medical need and low medical need. People who have a need relating to disability may not be housed immediately if a suitable property is not available. This policy has not changed the availability of disabled properties but ensures priority is given to applicants with the highest need.

Gender Reassignment & Gender Identity:	<i>Neutral</i>
Please provide details:	Proposal continues current support. Accommodation suitability includes consideration about environment, community and support service accessibility. The proposal includes provisions to exclude households from meeting local connection criteria where there are threats, anti-social behaviour or other significant or immediate need. Households with this protected characteristic can be prioritised at the highest level if they are victim of serious or significant harassment relating to this characteristic.

Pregnancy and maternity:	<i>Neutral</i>
Please provide details:	Applicants or their partners who are pregnant and the due date is within 12 weeks and it is the first child are entitled to apply for properties with one additional bedroom. The current Dorset Common Allocations Policy applied this for any child if impacting the existing household requirement. The East Dorset and Christchurch policy did not allow this. This is not a significant impact and the proposal allows DC Service Manager to use discretion in exceptional circumstances.

Race and Ethnicity:	<i>Neutral</i>
Please provide details:	No change proposed. Support is included for people who need additional services or support to full take part in the scheme e.g. language.

Religion or belief:	Neutral
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Please provide details:	No change proposed.
Sexual orientation:	<i>Neutral</i>
Please provide details:	Proposal continues current support. Accommodation suitability includes consideration about environment, community and support service accessibility.
Sex (consider both men and women):	<i>Neutral</i>
Please provide details:	No change proposed. There is no effect on entitlement. Bedroom entitlement is calculated for adults in regard to whether the applicant is single or not. Entitlement in relation to bedrooms considers age and sex and uses age 16 as the entitlement to a separate bedroom. Prior to that bedrooms can be shared by two children of the same sex under 16 or of different sex up to age 10.
Marriage or civil partnership:	<i>Neutral</i>
Please provide details:	No change proposed. There is no effect on entitlement.
Carers:	<i>Neutral</i>
Please provide details:	No change proposed. Entitled to one additional bedroom for carers who are non-resident but required overnight
Rural isolation:	<i>Neutral</i>
Please provide details:	Opportunity to access the scheme and related services is maintained and enhanced including reference to the availability of user guides, supported applicants and bidding. Software and processes will support accessibility. Scheme continues to acknowledge rural location is a relevant suitability consideration.
Single parent families:	<i>Neutral</i>
Please provide details:	No change proposed.
Social & economic deprivation:	<i>Neutral</i>
Please provide details:	Proposal identifies people with income, savings, investments or capital of £60,000 or more as ineligible allowing for some specific exclusions. Previous policies capped this figure at 5 times the relevant Local Housing Allowance in the area at that time. The scheme aims commit to ensuring it is easy to use and that all people understand their options and are informed. Whilst some language is prescribed the policy is written in clear English wherever possible. The proposed policy reduces previous documents by more than a third. Homeless

	households are excluded from meeting local connection criteria in order to access the scheme. Reasonable preference categories for homeless households are included in Exceptional/High/Medium bands dependant on individual circumstances,
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Armed Forces communities	<i>Positive</i>
Please provide details:	Statutory guidance issued June 2020 has been incorporated into the proposal. Families of serving and former members of the Armed Forces are now included. The requirement for local connection criteria is currently 5 years in some parts of the area and the proposed requirement is reduced to 2 years or 3 years out of the last 5 years. The spirit of the guidance has been considered.

Part 5: Action Plan

Provide actions for **positive**, **negative** and **unclear** impacts.

If you have identified any **negative** or **unclear** impacts, describe what adjustments will be made to remove or reduce the impacts, or if this is not possible provide justification for continuing with the proposal.

Issue	Action to be taken	Person(s) responsible	Date to be completed by
Armed Forces Communities	Have regard for the spirit of the guidance 'Improving access to social housing for members of the Armed Forces' and apply Service Manager's discretionary if appropriate and reflect in annual monitoring.	Service Manager for Housing Solutions	Annually

EqlA Sign Off

Officer completing this EqlA:	Sharon Attwater	Date:	02.10.2020
Equality Lead:	Susan Ward-Rice	Date:	08.10.2020
Equality & Diversity Action Group Chair:	Rebecca Forrester	Date:	08.10.2020