

HARLOW DISTRICT COUNCIL
EQUALITY IMPACT ASSESSMENT FORM

Name of service, function or policy being assessed	Housing Allocations Policy
Service/Department	Housing
Names and roles of officers completing the assessment (indicate Lead officer)	Lisa Whiting, Housing Options & Advice Manager
Contact telephone number of Lead officer	01279 446371
Date assessment completed	December 2023

1.

Appendix 4

2. Aims of the policy/service/function and how implemented

	Key Questions	Notes
1.1	Is this a new policy/service/function or a review of an existing one?	Review of existing Allocations policy
1.2	Briefly state the main purpose of the policy/service/function?	<p>The Allocations Policy is the policy by which the Council lets its own homes and the Registered Provider (housing association) properties it has nomination rights to. It establishes the priority that a housing applicant has when registering for social housing and sets out exactly how homes will be let when they become vacant.</p> <ul style="list-style-type: none"> •
1.3	Briefly state the main activities of the policy/service/function?	The Council lets in the region of 590 properties a year , including its own and housing association properties. There are currently around 5000 households on the housing register – awaiting one of these lets.
1.4	Who are the main beneficiaries? Whose needs is it designed to meet?	<p>The policy is designed to meet the needs of housing applicants, and the Councils own tenants wishing to transfer to alternative accommodation.</p> <p>It is designed to ensure homes are let fairly to those on the housing register, the majority of whom will be local residents of Harlow.</p>
1.5	Which staff carry out the policy/service/function?	The Councils Housing Options and Advice Team administer the Allocations Policy, and advertise and let homes as they become vacant.

Appendix 4

Appendix 4

2. Information Gathering and Data Collection

	Key Questions	Notes	If further data collection is needed – state by whom, when and how is it going to be done?
2.1	<p>What quantitative (numerical) data do you already have (e.g. national and local demographic data, equality monitoring data, employee data, customer profile data etc) about those who use or will use the policy or service?</p> <p>What gaps are there in the data?</p> <p>What else do you need?</p>	<p>We are able to capture data about the make up and profile of applicants on the housing register and our own tenants – both the main groups that will be affected by these proposed changes.</p> <p>We know the breakdown of those who are registered on the housing register:</p> <ul style="list-style-type: none"> • 64% white British • 6% white non British • 16% refused to say <p>All other groups are represented in very small numbers below 2.1%</p> <p>The gender breakdown of housing register applicants is as follows:</p> <p>Add</p> <p>Add</p> <p>We also know that of the new lettings made around 60% of households are reliant on benefits as a source of income</p>	

Appendix 4

2.2	<p>What qualitative data do you already have (e.g. results of customer satisfaction surveys, results of previous consultations, staff surveys, analysis of customer complaints/comments, feedback from community groups or individuals etc) about those who use or will use the policy or service? What gaps are there in the data? What else do you need?</p>	<p>No qualitative data is collected from applicants or potential applicants.</p> <p>The Council has carried out a status survey of tenants on a regular basis but the requirement to do was withdrawn by the Government and so this has not continued</p> <p>Applicants can appeal against their priority assessment and there is a complaints procedure</p>	<p>Consideration could be given to seeking further customer feedback. However the service is to some extent individualised and each individual's entry point and experience is different. Each customer does have access to an appeals system and complaints procedure which is monitored.</p>
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Appendix 4

3. Consultation

Please state below what formal or informal consultation has taken place or that you are planning to hold with appropriate stakeholders in relation to this policy/function			
	Key Questions	Notes	If further consultations are needed/ planned – state with whom, by whom, when and how is this going to be done?
3.1	<p>What consultations have been held and with whom did you consult?</p> <p>What were the main issues raised?</p>	<p>A stakeholder workshop was held in September, and a separate staff workshop. There were xx stakeholder organisations represented at the workshop. Those who could not attend were invited to a one to one TEAMS meeting with the Council representatives – two of these were held. The main issues raised were the lack of affordable housing options locally, and a need to ensure that the affordable housing supply was allocated to those most in need.</p> <p>A comprehensive consultation with the general public was launched on xxx and ran for a period of 6 weeks. There were 298 respondents to this online survey. Respondents raised the need for fairness in letting homes and the need to ensure that they were let to those with a strong connection to Harlow.</p>	<p>No further consultation is planned.</p>

Appendix 4

3.2	<p>What consultations were held specifically with the equality target groups? What were the main issues raised?</p>	<p>Consultations will take place with the following organisations:</p> <ul style="list-style-type: none"> • All Housing Associations with stock in the area • Harlow Homelessness Partnership (group of approx 30 partner agencies from in and around Harlow) • Mental Health services • Domestic Abuse Service Providers • Streets2Homes who represent single non priority homeless and rough sleepers. <p>These agencies were able to comment from the point of view of a number of key groups – existing tenants, rough sleeps, the homeless, survivors of domestic abuse, young people, those with mental and physical health challenges and general needs clients.</p>	<p>No further consultation in addition to that specified is currently thought to be required.</p>
	<p>Key Questions</p>	<p>Notes</p>	<p>If further consultations are needed/ planned – state with whom, by whom, when and how is this going to be done?</p>

Appendix 4

3.3	<p>Is the Council working in Partnership with other organisations to implement this policy/function? Should this be taken into consideration? (E.g. Agreeing the equalities monitoring categories) Should the partnership arrangements have an EIA?</p>	<p>The policy change will largely be implemented by the Council, although it works closely with housing associations on all allocations policy issues because it affects the people that are rehoused in their properties in the borough.</p> <p>Harlow Council will therefore be working in partnership with Registered Providers (Housing Associations) to implement the proposed changes to policy.</p>	<p>No further consultation in addition to that specified is currently thought to be required.</p>
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Appendix 4

4. Assessment of Impact

Based on the data you have analysed and provided, and the results of the consultation or research you have undertaken, list below how the policy or function will or does work for each of the following equalities groups.

Identify any differential impact and consider whether the policy/function meets any particular needs identified for each of the six equalities groups.

		State evidence of impact or potential impact/How helps to promote equality
4.1	<p>Gender – identify the impact/potential impact of the policy/function on women, men and transgender people</p> <p style="text-align: center;">And/or</p> <p>Proposed measures to mitigate any adverse impacts</p>	<p>There is no anticipated specific impact of the new policy on men, women or transgender people. The housing register is made up of a mix of all these categories and the policy will be implemented consistently for all housing applicants.</p> <p>Priorities for housing is based on the Governments reasonable preference categories set out in the legislation.</p>
		State evidence of impact or potential impact/How helps to promote equality

Appendix 4

4.2	<p>Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration of a range of impairments including visual and hearing impairments, mobility impairments, learning disability etc)</p> <p style="text-align: center;">And/or</p> <p>Proposed measures to mitigate any adverse impacts</p>	<p>There is no anticipated impact of the new policy on disabled people. None of the proposals will specifically affect this group.</p> <p>The policy makes specific provision for people with a disability to be assessed to enable provision of an adapted property.</p> <p>Priorities for bands within the allocations policy largely remain unchanged in this proposed policy and are based on the Governments reasonable preference categories set out in the legislation.</p>
4.3	<p>Age – identify the impact/potential impact of the policy/function on different age groups</p> <p style="text-align: center;">And/or</p> <p>Proposed measures to mitigate any adverse impacts</p>	<p>There is no specific quality impact of the proposed policy changes on different age groups. Priorities for bands within the allocations policy largely remain unchanged in this proposed policy and are based on the Governments reasonable preference categories set out in the legislation.</p> <p>Communication of complex changes may disproportionately concern older residents</p> <p>In explaining the policy changes, once implemented, the Council will ensure that staff at Contact Harlow are fully trained to explain the changes to all people, especially older people who may find changes to be more complex.</p>
4.4	<p>Race – identify the impact/potential impact of the policy/function on different black and minority ethnic groups, including Gypsy and Traveller communities</p> <p style="text-align: center;">And/or</p> <p>Proposed measures to mitigate any adverse impacts</p>	<p>We know that 64% of the applicants on the housing register are white British, 16% refused to say what their race was and any other group is represented as less than 2%.</p> <p>There is a chance that the introduction of a longer residency qualification – requiring applicants to have a 7 or 10 year connection with Harlow before applying for accommodation – will disadvantage those from outside Harlow. However, this will be regardless of race – it will apply to all applicants. But it is more likely to impact on non white British households.</p>

Appendix 4

		<p>There is no other specific quality impact of the proposed policy changes on people as a result of their race, as the policy will be applied consistently. Priorities for bands within the allocations policy largely remain unchanged in this proposed policy and are based on the Governments reasonable preference categories set out in the legislation.</p> <p>There may be an adverse communication impact about the proposed changes for people for whom English is not their first language. This will be addressed through language translation services provided through Contact Harlow.</p>
		<p>State evidence of impact or potential impact/How helps to promote equality</p>
4.5	<p>Sexual orientation – identify the impact/potential impact of the policy on lesbians, gay men, bisexual and heterosexual people</p> <p style="text-align: center;">And/or</p> <p>Proposed measures to mitigate any adverse impacts</p>	<p>There is no specific equality impact on this group as the proposed policy changes will be applied regardless of sexual orientation. Priorities for bands within the allocations policy largely remain unchanged in this proposed policy and are based on the Governments reasonable preference categories set out in the legislation.</p> <p>Joint tenancies will equally be offered to same sex partners who have a long term commitment to each other, as to non same sex partners</p>
4.6	<p>Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no faith</p> <p style="text-align: center;">And/or</p> <p>Proposed measures to mitigate any adverse impacts</p>	<p>There is no specific quality impact of the proposed policy changes on people as a result of their religion or beliefs, as the policy will be applied consistently.</p>

Appendix 4

4.7	<p>Socio-economic disadvantage – identify any impact on those who have a low income, or whose family circumstances/history may affect their ability to access services eg. carers and the cared for; pensioners; single-parents; long-term unemployed; history of abuse/domestic violence; benefits claimants; housebound; chronically ill;</p>	<p>We know from CORE data that around 60% of applicants moving into Harlow Council properties are reliant on benefits as a form of income.</p> <p>However, because the policy changes will be applied consistently, we do not anticipate that there will be an adverse equalities impact on this group.</p> <p>Where applicants for housing are excluded because of previous housing debt, we will make sure that the reasons for this debt are genuine and accurate and that each excluded applicant is aware of the action that he / she needs to take in order to be considered for the housing register in the future.</p>
4.8	<p>Any other groups, if appropriate e.g. children leaving care; pregnant or breast-feeding mothers; carers etc</p>	None identified
		Notes
4.9	<p>Are there any additional measures that could be adopted to further equality of opportunity in the context of this policy/service/function and to meet the particular needs of equalities groups that you have identified?</p>	None identified

Appendix 4

5. Summary Overview of EIA

As a summary overview of information and findings provided in the earlier sections of this Equality Impact Assessment, please tick the relevant boxes as appropriate to denote the OUTCOME of this process for each of the Equality Characteristics.

Equalities category	No adverse impact AND promotes equality and diversity <i>Please tick ✓ if appropriate</i>	No adverse impact BUT equality and diversity NOT promoted <i>Please tick ✓ if appropriate</i>	Evidence of adverse impact <i>Please tick ✓ if appropriate</i>
Gender and transgender		✓	
Race		✓	
Disability		✓	
Age		✓	
Sexual orientation		✓	
Religion and belief		✓	
Socio-economic disadvantage		✓	

Appendix 4

Note

- If you are unsure of any aspect of this Equality Impact Assessment process you can seek guidance from your service representative on the Corporate Equalities Group or from the HDC Community Liaison Officer who can be contacted on equalities@harlow.gov.uk and extension 6388.
- Once the EIA form has been completed please ensure all enclosures are attached then sign and date the form, ensure it is countersigned by your Head of Service, keep a copy for your records and send a PDF to equalities@harlow.gov.uk

Signed
Project Manager

Countersigned
Head of Service

Print Name

Print Name

Date

Date

Under the Freedom of Information Act, this completed EIA form will be placed on the Harlowweb and be available on request to the general public.