

INITIAL EQUALITY IMPACT ASSESSMENT

| Name of Policy, Decision, Strategy, Service or Function, Other: (please indicate) | Adoption of a revised Common Allocations Policy | | | | |
|---|---|--|--|--|--|
| Lead Officer Name(s) & Job Title(s) : | Mick Coogan – Strategic Housing Manager Stephen Broughton – Housing Options Team Leader | | | | |
| Department/Service Area: | Strategic Housing | | | | |
| Telephone & E-mail Contact: | michaelcoogan@rossendalebc.gov.uk | | | | |
| Date Assessment: | Commenced:Completed:19thDecember 20193ed January 2020 | | | | |

We carry out Equality Impact Assessments (EIAs) to analyse the effects of our decisions, policies or practices. The EIA should be undertaken/started at the beginning of the policy development process – before any decisions are made.

1. Overview

The main aims/objectives of this policy¹ are:

The policy is required so the Council has a scheme to prioritise the allocation of social housing based on the needs of applicants. Such as scheme is required under part VI of the Housing Act 1996. The policy aims to prevent homelessness, and also promote sustainable communities in Rossendale by allowing applicants to exercise choice by proactively expressing an interest in properties they wish to live in.

(Refer to EIA Guidance for details)

Is the policy or decision under review (please tick)

New/proposed

Modified/adapted X

Existing

INTERNAL ONLY

MANAGEMENT ACTION REQUIRED (to be completed by the relevant Head of Service following review by Management Team / Programme Board)

- Outcome of EIA agreed/approved by Management Team / Programme Board: Yes ⋈ No □
- Is a full EIA required
 Yes □
 No ⊠
 No
 </
- Referred back to Assessor for amendment : (date)
- Published/made publicly available on: 10/01/2020 (date)

Signed: Cath Burns (Head of Service / Director) Date: 6th January 2020 Date of Review²: This EIA will be reviewed following consultation which ends 24th January 2020.

² This date will be set on an annual basis as default for review unless otherwise specified by you. **Responsible Section/Team** Strategic Housing Version 1

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¹ Policy refers to any policy, strategy, project, procedure, function, decision or delivery of service.

2. Equality Impact

Using the table below please indicate whether the policy/strategy/decision has a positive, negative or no impact from an equalities perspective on any of the protected equality groups listed below. Please also give consideration to wider equality of opportunity and community cohesion impacts within and between the groups identified. If you have identified any negative impact and mitigating actions are not sufficient, you *will* need to complete a Full Equality Impact Assessment.

| Equality | | Positive Impact (It could benefit) | Negative Impact (It could disadvantage) | Reason and any mitigating actions already in place (to reduce any adverse /negative impacts <u>or</u> reasons why it will be of positive benefit or contribution) | No Impact |
|----------|-----------------------------|---|--|---|--------------|
| Age | Older people | | | Home owners with over £120,000 equity are likely to be disqualified from joining B- with-us due to a change of policy, and older people are statically more likely to be home owners in Rossendale. Whilst home ownership is highest for 50-64 year olds in the borough there are slightly more 35-49 year olds who are home owners than those 65+. It is not though that the change will have a negative impact as those home owners with over £120,000 equity should not be in need of social housing, and if there current property is no longer reasonable for them to remain they can still qualify due to being owed a duty under homelessness legislation. Changes have been made to Community Contribution banding which make it possible for some older people who can't work or volunteer due to their age still receive this priority. | |
| | Younger people and children | | | There are no real changes expected to impact on younger people and children. It is worth noting that If a child age 16/17 is made an allocation, s/he must have an appropriate adult aged 18 or over to hold the tenancy in trust until the child reaches 18. This will be done in the form of an "equitable agreement" where the trustee will hold the legal estate, but is not liable | |

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| Equality | | Positive Impact (It could benefit) | Negative Impact (It could disadvantage) | Reason and any mitigating actions already in place (to reduce any adverse /negative impacts <u>or</u> reasons why it will be of positive benefit or contribution) | No Impact |
|------------------------|---------------------------------|---|--|--|--------------|
| Disability | Physical/learning/mental health | | | for rent. The child may also be expected to have the skills to sustain a tenancy and / or be willing to be referred for support to assist with tenancy sustainment. The Leaving Care band also remains to priority. Indirectly families with children are more likely to affected by the Benefit Cap and therefore could be more susceptible to rent arrears, however this applied before the clarification in the policy and those owed a homelessness duty will still qualify. Priority bandings relating to disability remain the same; however the Disabled Facilities Grant Policy makes it easier than ever before for disabled applicants to remain safe in their own homes. Within Strategic Housing it is established practice for the Housing Options Team to work closely with the Private Sector Renewal Team to find solutions to enable current or new accommodation to be safe and accessible to the applicants regardless of tenure. Changes have been made to Community Contribution banding which make it possible for some applicants who can't work or volunteer due to any disability to still receive this priority. | |
| Gender Reassignment | Transsexual people | | | No reason to believe there will be any additional positive or negative impact to this cohort due to the policy changes. There may be unforeseen impacts | \boxtimes |

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| Equality | | Positive Impact (It could benefit) | Negative Impact (It could disadvantage) | Reason and any mitigating actions already in place (to reduce any adverse /negative impacts <u>or</u> reasons why it will be of positive benefit or contribution) | No Impact |
|------------------------------------|-------------------------------|---|--|--|--------------|
| | | | | highlighted through the consultation process. | |
| Pregnancy and Maternity | | | | Changes have been made to Community Contribution banding which make it possible for applicants who are pregnant or at maternity stage, and are unable to work or volunteer to it, call still receive this priority. | |
| Race (Ethnicity or Nationality) | Asian or Asian British people | | | No reason to believe there will be any additional positive or negative impact to this cohort due to the policy changes. There may be unforeseen impacts highlighted through the consultation process. | |
| | Black or black British people | | | No reason to believe there will be any additional positive or negative impact to this cohort due to the policy changes. There may be unforeseen impacts highlighted through the consultation process. | |
| | Irish people | | | No reason to believe there will be any additional positive or negative impact to this cohort due to the policy changes. There may be unforeseen impacts highlighted through the consultation process. | |
| | White British | | | No reason to believe there will be any additional positive or negative impact to this cohort due to the policy changes. There may be unforeseen impacts highlighted through the consultation process. | |
| | Chinese people | | | No reason to believe there will be any additional positive or negative impact to this cohort due to the policy changes. | |

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|--------------------|--|---|--|--|--------------|
| | | | | There may be unforeseen impacts highlighted through the consultation process. | |
| | Gypsies & Travellers | | | No reason to believe there will be any additional positive or negative impact to this cohort due to the policy changes. There may be unforeseen impacts highlighted through the consultation process. | |
| | Other minority communities not listed above (please state) | | | None identified. | |
| Belief or Religion | | | | No reason to believe there will be any additional positive or negative impact on applications of any faith or belief due to the policy changes. There may be unforeseen impacts highlighted through the consultation process. | |
| Sex | Women | | | As statistically women are more likely to have caring responsibilities than men, the changes to Community Contribution allowing priority for those who can't work or volunteer due to caring responsibilities to be awarded, are more likely to benefit women. | |
| | Men | | | No reason to believe there will be any additional positive or negative impact to this cohort due to the policy changes. There may be unforeseen impacts highlighted through the consultation process. | |
| Sexual Orientation | Gay men, gay women / lesbians and bisexual people | | | No reason to believe there will be any additional positive or negative impact to this cohort due to the policy changes. There may be unforeseen impacts highlighted through the consultation process. | |

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|--|---|--|---|--------------|
| Marriage and Civil Partnership (employment only) Contribution to equality of opportunity | | | N/A The changes to Community Contribution does allow some increased equality of | |
| | | | opportunity, however these were needed to avoid any indirect discrimination following case law, and comply with the Public Sector Equality Duty and the Children Act 2004. | |
| Contribution to fostering good relations between different groups (people getting on well together – valuing one another, respect and understanding) | | | No impact expected. | \square |
| Human Rights http://intranet/site/scripts/documents_info.php?categoryID=86& documentID=251 | | | The relevant provisions of the Human Rights Act 1998 and the European Convention on Human Rights have been taken into account in the preparation of this report, particularly the implications arising from the following rights:- Article 8 – Right to respect for private and family life. A fair system to allocate social housing is conducive to the promotion of family life. | |

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