

Equality Impact Screening



Title:	Housing Allocation Scheme		Status of the policy	Draft
<input checked="" type="checkbox"/> Policy	<input type="checkbox"/> Strategy	<input type="checkbox"/> Service	<input checked="" type="checkbox"/> Function	<input type="checkbox"/> Other (please state below)
Directorate:	People Services		Service Area:	Housing Options
Person responsible for the assessment			Date assessment completed	

1. What are the aims and objectives and purposes of the policy

This is a review and update of the existing Housing Allocations Scheme for the period 2023 -2028.

North Norfolk District Council, like all other authorities are required to have a mechanism to assess housing need, advertise available social housing and allocate properties to households in need.

This is done through a partnership with registered providers with housing stock in North Norfolk via our Housing Allocations Scheme.

The allocation scheme is a legislative requirement. Part VI of the Housing Act 1996 sets out that local authorities must have a mechanism for the allocation of social housing within its district. It also sets out that there are certain groups who must be given preference under any scheme.

The Authority has an existing scheme, however this was last reviewed in 2016, and since then there has been several legislative changes. The purpose of the review is to ensure that the Council has in place a policy that sets out how it will prioritise households and the procedures it will follow when allocating social housing, and to update the scheme to reflect the changes in legislation and deliver a scheme that is fit for purpose.

2. Does the policy support other objectives of the council?

Yes, within the Corporate Plan 2023 -2027, meeting our local housing need is one of the priorities.

3. Who is intended to benefit from the policy, and in what way?

Those households in the district who live here and who have a qualifying housing need to join the register – also provision for those who may not have a local connection to North Norfolk, but also do not have a local connection anywhere, such as homeless applicants or for those who are fleeing domestic abuse.

4. What outcomes are anticipated from the policy being in place

The desired outcome of the policy is to ensure that social housing is offered to those households who have a local connection to the district and a qualifying housing need. It also ensures that this is done in an open and transparent way that accords with our statutory and regulatory duties and makes best use of the housing stock in the district

5. What data have you gathered for this assessment? How have you analysed this data?

Source and Age of Data

The evidence that has been used to support our understanding of the impact of any changes is based on:

- Profiling information that is routinely gathered for people who apply to join the Housing Register and are allocated social housing in the district including mandatory statistical returns such as H-clic,
- Profiling information that is routinely gathered for people who approach the Council for assistance to prevent or relieve homelessness
- Government publications about the characteristics of those households most in need of affordable housing, including those to whom a reasonable preference must be given to join the waiting list and/or are homeless or at risk of homelessness
- The Housing Allocations Scheme Lettings Report 2022/23
- The Review of Homelessness and Rough Sleeping Strategy 2021/22
- 2021 CENSUS Data
- Case Law

An analysis of the equalities impact has been undertaken based on the detailed data available from the housing register and other sources. In relation to some groups, there is no or limited data available or the numbers are too small to identify any significant impact.

7. Who are the main stakeholders of this policy?

<input checked="" type="checkbox"/> NNDC Employees	<input checked="" type="checkbox"/> Service Users	<input checked="" type="checkbox"/> the Wider Community	<input type="checkbox"/> Members
<input type="checkbox"/> Commissioned Services	<input checked="" type="checkbox"/> Partners	<input type="checkbox"/> Stakeholders	

Additional Comments:

The scheme affects residents, registered providers of housing, community groups, statutory agencies and organizations with an interest in social housing in the district.

8. Are there any concerns that the policy could have a negative impact with Protected Characteristics?

The following table identifies any potential impact the proposed changes could have on people with a protected characteristic (Equality Act 2010). Where a negative impact has been recognised or where we have data that suggests they might be impacted we have highlighted the provisions within the proposed scheme which will help mitigate the impact.

Age: Young People

Potential Impacts:	<p>Young People -Care Leavers</p> <p>The statutory eligibility criteria includes age. People aged between 16 and 18 are not legally able to hold a tenancy in their own name</p> <p>This scheme states an Age qualification for applicants to be placed on the Council's Housing Register. This is applicants must be 18 years of age or over</p>
Mitigations	<p>Exception within the scheme allows for 16- and 17-year-olds to join the register, are actively working with Children Services and have a guardian to hold a hold a tenancy in trust for them if they were to be offered a home.</p>

Age: Older People

Potential Impacts:	<p>Those aged 65 or over make up % on the housing register.</p> <p>We are making a new proposal to award priority for downsizing, which means those who are in a larger home, who are under occupying will be eligible to apply to join the</p>
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	<p>housing register to move to a smaller home to allow the freeing up of larger homes for families on the housing register, thus making the best use of the existing stock.</p> <p>On-line applications have been the normal method for applicants to make their housing applications which may disadvantage some older people who do not use or are unfamiliar with digital technology.</p> <p>People with Financial means that are seeking housing with care/Housing for over 55s will be allowed access to this register but will be restricted to what properties that they can bid on.</p>
Mitigations	<p>A smaller property helps to counteract fuel poverty and restricted mobility, more prevalent as people get older. Releasing family sized homes in turn reduces the time that families typically with young children in urgent need of rehousing have to remain living in unsuitable accommodation.</p> <p>Support available within the Housing Options team to help with digital access. In addition to help address potential digital exclusion an application can also be taken over the phone. There is also an option for the council to set up 'auto-bids' for those unable to manage online bidding for themselves</p> <p>People will be eligible to join the register is they can demonstrate a local connection and the need to move into the district to give or receive care.</p>
Disability	
Potential impacts	Some people with a disability may find using the system difficult to use, and housing options available to them limited.
Mitigations:	<p>Under s166A for the Housing Act those with a medical need (including grounds relating to a disability such as mobility and requiring household adaptations) are given a statutory reasonable preference to join the register, their banding will be based on the severity or urgency of the need and medical need and ongoing care and support needs is reflected in bandings A- C .</p> <p>Targeted adverts – Where a property has had adaptations, priority can be given to those who need adapted accommodation.</p> <p>People who are occupying an adapted property and the adaptations are no longer required will have priority on the housing register. This could potentially release some more accessible homes.</p> <p>Increasing priority for under-occupying households, older households are more likely to be impacted by this change and are more likely to include disabled people. The policy will offer appropriate rehousing options that will aim to improve the living situation for disabled under-occupiers.</p> <p>Th scheme recognises people who are moving on from Supported accommodation (including North Norfolk District Council rough sleepers' accommodation) This will support vulnerable adults who may have complex needs such as mental health disability or a chronic condition) when they are ready for independent living.</p> <p>The scheme includes an exemption to the local connection criteria for disabled and injured armed forces personnel and veterans of the armed forces to reflect current statutory guidance. This includes divorced and separated household members and to allow access to the register to all who were in service.</p> <p>Support available within the Housing Options team to help with digital access. In addition to help address potential digital exclusion an application can also be taken over the</p>

	<p>phone. There is also an option for the council to set up 'auto-bids' for those unable to manage online bidding for themselves</p> <p>The new scheme has also been designed to be easier to understand, providing clarity. As is currently the case, officers can provide advice and assistance for people who may have difficulty understanding the scheme.</p>
Sex	
Potential impacts:	<p>Females make up an estimated 64% of the housing register. This is generally due to women being the main carer and are more likely as a result to come under one of the reasonable preference categories for a statutory housing need.</p> <p>Women are more likely to be victims of domestic abuse including financial Abuse.</p> <p>Women with dependent children make up the largest cohort of households in temporary accommodation.</p>
Mitigations:	<p>There is explicit inclusion of priority for victims of domestic abuse reflecting the current broader definition of abuse under the 2021 Domestic Abuse Act. This will improve opportunities for women who are statistically more likely to be affected by domestic abuse.</p> <p>To mitigate the risk that the local residence qualifying criteria may disadvantage those needing to move due to domestic abuse into another area, the scheme includes an exemption to the local connection criteria for those "at high risk of domestic abuse that is likely to continue or be carried out and cannot reside safely in any other local authority area where they have a local connection criterion.</p>
Gender reassignment	
Potential impacts	There is limited data to evaluate the impact of the Scheme on people with this defined characteristic.
Mitigations:	<p>Wording has been updated to recognise the fact that gender is not binary and the language within the scheme has been neutralised.</p> <p>The assessment of bedroom need under the new scheme now also allows for consideration of cases in which a child may have an established gender identity different to that which was assigned at birth.</p> <p>National research suggests that Trans people may be particularly at risk of housing crisis and homelessness arising from transphobic reactions and harassment by family, neighbours and members of their local community – whilst we have no evidence in North Norfolk to support this, our allocations scheme includes the provision to support people who are at risk of harm, including hate crime towards anyone with a protected characteristic.</p>
Sexual orientation	
Potential impacts	There is little data available as the disclosure of sexual orientation when applying for housing is optional.
Mitigations:	<p>Housing Options will always seek to ensure that services are able to meet individuals' needs with a consistent approach in line with good practice and relevant legislation.</p> <p>Provision has been made in new allocations scheme that recognises a more neutral approach in wording.</p>
Pregnancy / Maternity	

Potential impacts:	<p>Women with dependent children make up the largest cohort of households in temporary accommodation.</p> <p>Pregnant women are more likely to have become homeless due to being excluded from a family home, or homeless due to domestic abuse, or homeless due to being unable to continue to afford the rent on a private rented property</p>
Mitigations:	<p>Unborn children will be recognised as part of the household from six months into the pregnancy. 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.</p> <p>Homeless Households are given a high priority for housing under the Policy and therefore, pregnant women as a group are likely to be advantaged and not disadvantaged by the Policy</p>

Race

Potential impacts	<p>There may be issues for people for whom English is not their first language in understanding the Allocation scheme</p> <p>There are proposed changes to the residency criteria which may impact in terms of this protected characteristic.</p> <p>From case law there are cases that refugees and travellers fall within this protected characteristic group and that residency requirements can indirectly discriminate against these groups, as by virtue of their circumstances they are less likely to be able to satisfy a residency requirement.</p>
Mitigations	<p>Support is included for people who need additional services or support to full take part in the scheme e.g. language.</p> <p>Exemptions and consideration of exceptional circumstances for applicants who do not meet the residency requirements have been included in the scheme. the residency criteria can be waived if there is an application from someone who may not by virtue of their situation have a local connection criterion anywhere, and to anyone who we might owe a reasonable preference to under legislation.</p>

Religion or Belief

Potential impacts:	<p>There are no changes to the scheme which are anticipated to have any impact on Religion but we recognise that there is only generalised information for the housing information as the disclosure of a person's religion is optional when applying to join the housing register.</p>
Mitigations:	<p>The scheme offers a religion/faith neutral approach to making decision on the allocation of housing as this may not be known. The Policy will be carried out with an emphasis on equality of treatment.</p>

Marriage & civil partnership

Potential impacts:	<p>There are no changes to the scheme which are anticipated to have any impact on Marriage and civil partnerships.</p>
Mitigations:	<p>Minor change redefining who would reasonably be considered part of a household includes blended families though marriage /civil partnerships.</p>

9. Could the negative impact you have identified in questions lead to the potential for adverse impact if the policy is implemented?

Overall, it is felt that the impact of this revised Allocations policy will be positive for North Norfolk residents, including those with protected characteristics. However, it is recognised that the proposed changes can affect equalities groups in different ways and is based on identifying those most in housing need, it is expected that people from more disadvantage groups will be on the housing register.

Once the new policy is adopted, there will be a transition period where applicants will need to re-register on a new application form by a certain date.

This means all existing applications will be closed and there is a high chance that due to the changes in the overall eligibility rules there will be a high number of applicants who would no longer qualify to be on the housing register or qualify for rehousing. The applicants most impacted will be those who are on the Housing Options Register and Transfer Register and those who do not have a local connection.

For some applicants on the housing register, they may still be eligible to be on the but not all will receive the same level of overall priority.

Providing applicants do this and still qualify, they will retain their original qualifying date.

10. Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group?

In all cases, a justification for the proposed policy has been provided and certain mitigations and exceptions have been included. However, we recognise that the scheme will not meet the needs or the expectations of everyone and throughout the proposals we have included the opportunity to consider exceptional circumstances and all applicants have the right to appeal against our decisions.

11. Describe the arrangements for reporting and publishing this assessment.

A wider impact assessment will be completed following statutory consultation.
The impact of the changes will be monitored through existing quarterly performance. As part of the change process we are also aiming to make it easier to access information about Allocations in more user-friendly formats making the data more transparent and enabling better insights for both service users and staff.
A further impact analysis will be undertaken 12 months after the approval and implementation of the new policy to understand the effects.

