

# Housing Allocations Policy 2021 Equality Impact Assessment

## Part 1 – Description of the policy and its relevance to equality

| Name of Project  | Changes to the Housing Allocations Policy  |
|--|--|
| <b>Trigger for EQIA</b>  | <p>The Equality Impact Assessment (EQIA) is being undertaken in light of changes to the Council's Housing Allocations Policy. The EQIA aims to identify, address and monitor any differential or adverse impacts on any specific equalities' groups.</p>   |
| <p><b>Brief description of the project including:</b></p> <ul style="list-style-type: none"> <li>• its purpose and aims</li> <li>• main stakeholders (i.e. beneficiaries, service users, staff)</li> </ul> | <p>The Council's Allocations policy is devised to ensure that this service is delivered in a fair and transparent way to applicants who are eligible and who qualify to join the housing register.</p> <p>The Council's Housing Allocation policy was last consulted on in 2019 to reflect changes from the Homeless Reduction Act 2017. The current, second stage consultation is on a limited number of proposed changes.</p> <p>The main focus of the revised policy is to only allow applicants who have a priority need to come on to the register. Other changes include increased priority for the armed forces. This will ensure that we are best able to meet our housing duty and make the most effective use of the limited housing nominations of affordable homes for rent. The proposed changes will give greater priority to those most vulnerable through age, disability, medical condition, families with children and our own care leavers.</p> <p>The Legislative Framework for the Council's Allocations Policy is:</p> <ul style="list-style-type: none"> <li>• S166A Housing Act 1996 (as amended by the Localism Act 2011) requires local authorities to make all allocations and nominations in accordance with a published allocation policy.</li> <li>• Under Part 6 of the Housing Act 1996 Local Authorities are required to give reasonable preference to certain applicants.</li> </ul> <p>This Policy has been drafted taking into account: -</p> <ul style="list-style-type: none"> <li>a) The Statutory Guidance – Allocation of accommodation: guidance for Local Housing Authorities in England 2012</li> <li>b) The Council's Homelessness Strategy</li> <li>c) The Councils Housing Strategy</li> <li>d) The Mayor of London's Housing Strategy 2018</li> <li>e) Equality Act 2010 and Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017</li> <li>f) All relevant legislation</li> </ul> |

|  |  |
|--|--|
|  | <p>The changes to the Allocations Policy are required to assist the Council in meeting its housing challenge in the context of:</p> <ul style="list-style-type: none"> <li>• a current Choice Based Lettings (CBL) system with Housing Association partners in Bexley to give applicants in housing need a choice over where they may want to live. However, this housing is hugely oversubscribed</li> <li>• the acute challenge of increasing numbers of households in temporary accommodation</li> <li>• the economic situation and implications of the pandemic.</li> <li>• demographic change</li> <li>• reduction in supply of affordable housing to meet our identified housing need not only the need for affordable rent but affordable options for first time buyers.</li> <li>• The increasing importance of the Private Rented Sector (PRS) not only in size (the 2018 Household Survey, carried out for the SHMA, found that the private rented sector accommodates around 12.3% of households in Bexley) but as an alternative tenure to social rent for those in housing need. Offers in the private sector will also be made where they are deemed an appropriate solution.</li> </ul> |
| <b>Equality Relevance</b>  | Highly Relevant to Equality  |
| <b>Previous EQIAs</b>  | No   |
| <b>Summary of actions from previous EIQA(s) and update on delivery</b> | NA   |

**Part 2 – Evidence collected**

|   |   |
|---|---|
| <b>Evidence used to make assessment</b> | <p>There is national, regional and local evidence available which shows that people with certain protected characteristics can face barriers to Housing.</p> <p>The 2011 Census (ward profiles available on the council website), and the 2014 ONS mid-year estimates and equality related evidence from Bexley’s Joint Strategic Needs Assessment (JSNA) have been used in this assessment.</p> <p>A service area review of the London Borough of Bexley’s Housing Register details that there were 6,365 households (as of March 21) on the register. In contrast there are</p> |
|---|---|

|  |  |
|--|--|
|  | <p>approximately 400 lettings a year – as such, it is clear that, in common with other London boroughs, demand will not be met by supply with Councils reliant on the PRS to help meet need.</p> <p>The London Borough of Bexley Strategic Housing Market Assessment (SHMA) 2020 which identifies the scale and mix of housing in the Borough and unmet need was also used as a significant piece of evidence to make this assessment. The content and structure of the SHMA comprised: a major Household Survey in 2018 which was completed by 3,408 households (representing an 11% response rate from the sample surveyed), an online survey of stakeholders, engagement with people requiring supported housing, interviews with supported housing, adult social care and older person professionals; interviews with estate and letting agents, and a review of existing (secondary) data.</p> <p>The following sources have proved useful as sources of evidence that have guided the assessment:</p> <ul style="list-style-type: none"> <li>• London Borough of Bexley – Strategic Housing Market Assessment (2020)</li> <li>• SHMA Household Survey (2018)</li> <li>• Bexley Housing Register March 2021</li> <li>• 2011 Census</li> </ul> |
|--|--|

| Protected Characteristic | Evidence  |
|--------------------------|---|
| Age                      | <p>The reduction in priority from Band 1 to Band 2 for under-occupiers will have an impact on those households headed by an older resident who are generally over-represented in this group. At end of March 2021, this group represented 3% of households on the housing register.</p> <p>Young people leaving care represented 1% of households on the housing register at the end of March 2021. The banding has not changed for this client group, so no adverse impact is expected from the changes to the Allocations Policy.</p> <p>Disability Households with medical need (including sheltered with medical need) represented 7% of applicants on the housing register at the end of March 2021.</p> |

|                       |  |
|-----------------------|--|
|                       | It is not expected there will be any adverse impact on the grounds of disability as a consequence of the changes to the Allocations policy.  |
| Sex                   | It is not expected there will be any adverse impact on the grounds of sexuality as a consequence of the changes to the Allocations policy.   |
| Gender reassignment   | No evidence available for gender reassignment.   |
| Pregnancy & Maternity | It is not expected there will be any adverse impact on the grounds of Pregnancy or Maternity as a consequence of the changes to Bexley's Allocation policy.  |
| Race                  | Bexley is becoming more diverse and this trend is expected to continue. In the 2011 Census, the Black, Asian and multi-Ethnic (BAME) population accounted for 18%, this is estimated to rise to 30% of the population by 2050. <sup>4.1</sup> Populations of some ethnic groups (Black, Asian, and Mixed) are predicted to more than double from the Census to 2050. 39% of social housing lettings in 2020/21 were to BAME applicants. It not expected there will be any adverse impact on the grounds of race as a consequence of the changes to the Allocations policy. In 2020/21. 44% of people who were accepted as homeless under our main housing duty stated they were of Black, Asian or other multi ethnicity |
| Religion & Belief     | For the Bexley population in the 2011 Census, 62% are Christian, 2% are Sikh, 2% Hindu, 2% Muslim and 1% Buddhist. 31% either stated no religion or did not state an answer. Two key statistics emerging are that 24% people said they had no religion and 7% chose not to state their religion  |

|                               |  |
|-------------------------------|--|
|                               | <p>1 GLA Population Projections – Central trend 2017-based population projections (published 2019)</p> <p>No adverse impact is foreseen on grounds or religion or belief as a consequence of the changes to Bexley Housing Allocations Policy.</p> |
| Civil Partnerships & Marriage | <p>No adverse impact is foreseen on grounds civil partnerships and marriage as a consequence of the changes to Bexley Housing Allocations Policy.</p>  |
| Sexual Orientation            | <p>No adverse impact is foreseen on grounds sexual orientation as a consequence of the changes to Bexley Housing Allocations Policy.</p>   |

**Part 3 (optional) – Consultation and engagement – Views of consultees**

|  |   |
|--|---|
| <p><b>Summary of consultation/engagement with service users/interested parties likely to be affected by the policy</b></p> | <p><b>Housing Allocations Review 2019</b></p> <p>In revisiting the revised allocations policy consideration has been given to the local priorities and needs identified in the draft Strategic Housing Market Assessment 2018. Research into local housing services data and allocations policies of neighbouring boroughs has been undertaken. Councillors have also contributed to the creation of the draft policy through a specially formulated Scrutiny sub-group on allocations.</p> <p>Engagement included:</p> <ul style="list-style-type: none"> <li>• Press release</li> <li>• Article in Bexley Magazine</li> <li>• Webpage with summary of changes and link to Survey Monkey questionnaire</li> <li>• Direct email to all key RPs in the borough</li> <li>• Briefing note to Members outlining key changes</li> </ul> <p><b>Housing Allocations Consultation 2021</b></p> <p>The Pandemic restrictions has meant that the consultation on the changes to the Allocations Policy was carried out within the restrictions imposed as a result of the pandemic. Key engagement has been:</p> <ul style="list-style-type: none"> <li>• an online survey format posted on the London</li> </ul> |
|--|---|

|  |   |
|--|---|
|  | <ul style="list-style-type: none"> <li>• Borough of Bexley website.</li> <li>• press release</li> <li>• social media activity on Twitter and Facebook</li> <li>• consultation with Registered Providers</li> <li>• the link to the survey sent to relevant stakeholders and been open for engagement for a 6-week period – this was also made available across the Council’s digital and social media platforms.</li> <li>• email newsletters</li> <li>• FAQs were available on the Bexley website.</li> </ul> <p>The Council received 81 responses to the survey. There was widespread agreement with the proposed changes to the Allocations Bandings, with all but one survey question receiving a majority agreement option (whether that be ‘strongly agreed’ or ‘somewhat agree’).</p> <p>The enhanced emphasis on direct offers saw views more finely balanced. A combined 41.97% either ‘strongly agreed’ or ‘somewhat agree’ with this intention, whilst 35.80% selected ‘strongly disagree’ (and a further 16.05% ‘somewhat disagreed’) for this survey question.</p> <p><b>Target audiences:</b></p> <ul style="list-style-type: none"> <li>• London Borough of Bexley residents</li> <li>• Local Stakeholders: LB Bexley service areas, Councillors, Bexley Clinical Commissioning Group</li> <li>• RPs (incl. Peabody, London &amp; Quadrant, Orbit, Hexagon, Moat, Hyde)</li> <li>• Bexley Voluntary Service Council, Citizens Advice Bexley</li> </ul> |
| <p><b>Input to policy by client group/service users/interested parties</b></p> | <p>The policy has been developed and engagement has taken place with a wide array of stakeholders.</p> <p>Councillors contributed to the creation of the policy through a specially formulated Scrutiny sub-group on allocations – this was part of the initial 2019 Housing Allocations Review.</p> <p>Local residents and interested parties (e.g., RPs) have additionally been consulted through means of a further</p>  |

|  |   |
|--|---|
|  | <p>public survey made available to them via SurveyMonkey for a six-week period and actively promoted by the Council through a number of channels of communication: press release, email newsletters, social media etc.</p> <p>An Overview and Scrutiny Committee Member Briefing on 14 June 2021 also provided members with further opportunity to scrutinise the updated policy.</p> |
| <b>Details of contact with traditionally hard to reach/hear groups</b> | <p>Local residents and interested parties were given an opportunity to feed into the survey via the actively promoted survey.</p> <p>The Allocations Policy is fully accessible in accordance with the Government’s accessibility standards.</p>  |

**Part 4 - Analysis of evidence and description of impact**

***(a) Aim 1 of the PSED – the duty to eliminate discrimination***

| <b>Characteristic</b> | <b>Actual or likely impacts (negative/positive/no impact) and justification</b>   | <b>Actions to be taken to mitigate potential negative impacts</b>   |
|-----------------------|---|---|
| Age                   | <p>The Housing Allocations Policy promotes independence and will look to help younger people, many of whom will be on a lower income/ have less savings, to be able to access affordable housing by assisting with a deposit through the Resettlement Team and Kent Savers scheme.</p> <p>Young people may also benefit from homelessness prevention measures – particularly those to whom we have a statutory duty such as Care Leavers where we will help prepare young adults to live independently.</p> <p>In addition, the reduction in priority from Band 1 to Band 2 for under-occupiers will have an impact on those households headed by an older resident who are</p> | <p>Whilst there continues to be significant pressures arising from an increase in the numbers of care leavers and the associated demand for safe and ‘homely’ one bed properties with appropriate support. This will be mitigated by the LB Bexley Leaving Care team – who will continue to work closely with housing services colleagues to properly assess young people and their ability to fully manage a tenancy, providing the appropriate level of support to achieve this and to sustain their tenancy.</p> <p>Whilst the banding priority for under-occupiers has been</p> |

|                       |   |   |
|-----------------------|---|---|
|                       | generally over-represented in this group. At end of March 2021, this group represented 3% of households on the housing register. This decision to reduce the banding was taken given the other competing priorities in the top band of need – however this group still receive a high banding grade.  | reduced by a band – this group are still in a high- priority banding on the Housing Register. |
| Disability            | It is not expected there will be any adverse impact on the grounds of disability as a consequence of the changes to the Allocations policy. Conversely, the policy will have a positive impact on those with disabilities – with categories of need including; ‘Emergency Medical or welfare needs’ and ‘Releasing an Adapted Property’ given a high level of priority banding in order to cater for the needs of this group.   | N/A   |
| Sex                   | It is not considered that this proposal will impact disproportionately on one sex more than the other   | N/A   |
| Gender reassignment   | The England/Wales Census and Scottish Census have not asked if people identify as transgender. The charity GIRES estimated in their Home Office funded study in 2009 the number of transgender people in the UK to be between 300,000 and 500,000. Although Gender Reassignment is a protected characteristic under equalities legislation, there is insufficient data and no evidence that the proposal will have a negative impact on any individual or group due to gender reassignment. | N/A   |
| Pregnancy & Maternity | It is not considered that this proposal will impact disproportionately on one sex more than the other.  | N/A   |

|                               |  |     |
|-------------------------------|--|-----|
| Race                          | Any impacts, positive or negative, will impact BAME groups disproportionately due to the population profile. Of people who were accepted as homeless under our main housing duty in 2020/21 - 44% stated they were of Black, Asian or other multi ethnicity.<br>However, it is not expected there will be any adverse impact on the grounds of race as a consequence of the changes to the Allocations policy. | N/A |
| Religion & Belief             | There are no differential impacts identified for this equalities strand.   | N/A |
| Civil Partnerships & Marriage | There are no differential impacts identified for this equalities strand.   | N/A |
| Sexual Orientation            | There are no differential impacts identified for this equalities strand.   | N/A |

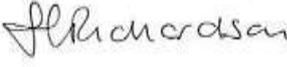
***(b) Aims 2 and 3 of the PSED – the duty to advance equality of opportunity & foster good relations***

| Protected Characteristic | How can this project be designed to advance quality of opportunity   | How can this project be designed to foster good relations between groups  |
|--------------------------|--|---|
| Age                      | <p>Across the age spectrum the Council's approach will focus on prevention - supporting those at risk of losing their homes to stop that happening, being clear about the option to discharge the core duty by sourcing homes to rent in the private sector and assisting with benefit claims to ensure this is affordable.</p> <p>The reduction in priority from Band 1 to Band 2 for under occupiers – will slightly impact older residents who are prepared to move to a property with less bedrooms.</p> | <p>The Housing Allocations policy clearly outlines the priority banding and category of need which residents would come under so that it can be viewed as a fair and transparent service</p> <p>The policy also encourages individuals to source their own accommodation - as the legislation promotes, assisting with deposits where relevant.</p> |

|                                  |   |  |
|----------------------------------|---|--|
|                                  | However, this group will still have significant priority on the register.   | The Council does this via the Resettlement Team and Kent Savers Scheme which gives individuals access to savings and loans products, helping residents, including care leavers, to achieve financial goals and increase savings. The Council also utilises Prevention Funds to prevent clients from becoming homeless. |
| <b>Disability</b>                | As above.<br><br>The policy is designed to have a positive impact on people such as those that fall within this protected characteristic – with categories of need that are given significant priority on the register including areas such as; ‘Emergency Medical or welfare needs’ and ‘Releasing an Adapted Property’. | As above   |
| <b>Sex</b>                       | There are no differential impacts identified for this equalities strand.  |  |
| <b>Gender reassignment</b>       | There are no differential impacts identified for this equalities strand.  | As above   |
| <b>Pregnancy &amp; Maternity</b> | There are no differential impacts identified for this equalities strand.  | As above   |
| <b>Race</b>                      | There are no differential impacts identified for this equalities strand.  | As above   |
| <b>Religion &amp; Belief</b>     | There are no differential impacts identified for this equalities strand.  | As above   |
| <b>Sexual Orientation</b>        | There are no differential impacts identified for this equalities strand.  | As above   |

**Part 5 – Completion and authorisation**

|                                  |                 |
|----------------------------------|-----------------|
| <b>Directorate &amp; Service</b> | Place - Housing |
|----------------------------------|-----------------|

|  |   |
|--|---|
| <b>Date EQIA completed</b>                             | 06.07.21  |
| <b>Department completing EQIA</b>                      | Housing Strategy & Enabling (New Initiatives)   |
| <b>Describe how impact of policy will be monitored</b> | Impact and delivery against changes to the policy will be monitored corporately and reported to Public Cabinet.                     |
| <b>Department responsible for monitoring impact</b>    | Housing Services  |
| <b>Date EQIA is scheduled to be reviewed</b>           | 1 year  |
| <b>DD responsible for policy</b>                       | <br><b>Signature</b><br><br><b>Date: 07.07.21</b> |