## Stage 6 – Validation Decision Notice

<table>
<thead>
<tr>
<th>Title of policy/proposal etc. and EIA number</th>
<th>Housing Allocations Policy (16)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of assessment</td>
<td>15/05/2014</td>
</tr>
<tr>
<td>Job titles of assessors</td>
<td>Policy Officer, Monitoring and Liaison Officer (Housing) and Assistant Manager (Housing and Benefits)</td>
</tr>
</tbody>
</table>

### Consider:

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Was discrimination or disadvantage identified?</td>
<td>✔</td>
<td></td>
</tr>
<tr>
<td>If so, was this overcome/can this be overcome?</td>
<td>✔</td>
<td></td>
</tr>
<tr>
<td>Is the service promoting equality?</td>
<td>✔</td>
<td></td>
</tr>
<tr>
<td>Could the service be improved in promoting equality?</td>
<td>✔</td>
<td></td>
</tr>
<tr>
<td>Were the Initial Assessment / Screening and Scoping exercises satisfactory?</td>
<td>✔</td>
<td></td>
</tr>
<tr>
<td>Is there good evidence/reasoning to support the decisions made?</td>
<td>✔</td>
<td></td>
</tr>
<tr>
<td>Are the customers’ needs understood and met?</td>
<td>✔</td>
<td></td>
</tr>
<tr>
<td>If actions have been identified, do they address the main issues raised?</td>
<td>✔</td>
<td></td>
</tr>
<tr>
<td>Does the summary report properly reflect the key findings of the assessment?</td>
<td>✔</td>
<td></td>
</tr>
</tbody>
</table>

*If you have and comments, please note them here:*

*Due to banding, changed some categories of applicant won't change. This needs to be clearly communicated & monitored.*

### The decision is to:

- **Validate** [ ]
- **Not validate** [ ]

*If not validated, please explain:*

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**Signed**:

[Signature]

**Designation**: DIRECTOR

**Name**: [Name]

**Date**: 30/3/14
### Equality Impact Assessment

#### Stage 1

<table>
<thead>
<tr>
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#### The Assessment

This Equality Impact Assessment (EIA) considers the impact of the Housing Allocation Policy on the protected characteristics and other groups, in line with the Public Sector Equality Duty (PSED) and the Equality Act 2010. Where any adverse impact is identified, mitigating actions will be considered.

The impetus for revising the current scheme arose from the following issues:

- A new statutory framework
- Strategic considerations and priorities
- Perceived complexity and unfairness of current system by applicants
- The development of Housing Options approaches and delivery of housing advice services
- A need to modernise the measure of overcrowding

Obtaining the views of key stakeholders, applicants and members of the public was vital in order to frame a revised allocations scheme. In any event, the council has a statutory duty to take reasonable steps to notify applicants likely to be affected by any major change of policy.

In July 2012 a widespread consultation was launched on the options for revising the Allocations scheme based on the flexibilities now available under the Localism Act 2011 and framework set out within the Code of Guidance 2012. The options raised were:

- Managing the waiting list more effectively by removing applicants with no housing need
- Restricting access to the register only to applicants who have a strong local connection by way of residence
- Removing applicants whose only connection is through employment
- Banning or penalising applicants for bad behaviour or who deliberately worsen their circumstances
- Removing access to applicants who have significant incomes or savings
Equality Impact Assessment

Stage 1

- Excluding home owners except in exceptional circumstances
- Simplifying the Banding system and moving to 2 or 3 bands.

The consultation methodology involved:

- Focus group with key Registered Providers
- Face to face work with service users
- Members workshop
- Staff focus group
- Online survey on the council's website

Assessment Findings

A full and detailed equality impact assessment is required.

Justification

Our initial assessment showed that some aspects the policy may have a negative impact on some of the protected groups as well as some being affected in a positive manner.
Stage 5 – Summary Report

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Assessment Summary

This Equality Impact Assessment (EIA) considered the impact of the housing allocations policy on the protected characteristics and other groups, in line with the Public Sector Equality Duty (PSED) and the Equality Act 2010. Where any adverse impact has been identified, mitigating actions have been considered.

Details of assessment and key findings

This assessment revealed that there will be a significant impact of the new policy as people deemed not to be in housing need will be removed from the housing register. Those who remain on the register will be ranked in priority and then date order. The vast majority of applicants, who attract one or more reasonable preference will be in Band 2 and will be housed in strict date order.

Applicants will no longer be able to improve their position on the register priority by having cumulative housing need points and this will have a negative impact on a small percentage of applicants who currently have fall into more than one reasonable preference category.

Differentially positive impacts have been identified for people who are pregnant/on maternity leave and those with caring responsibilities. The proposed policy suggests that pregnant women (28 weeks or more) should be eligible for two bedroomed flats. Currently, pregnant women are only eligible for one bedroomed properties. In addition, people who need to move locally to give or receive care and support will qualify to join the housing register. The level of care and support will need to equal that provided by an adult services commissioned care package.

A potentially differentially negative impact of the policy has been identified for gypsies and travellers as it requires a ‘strong local connection’. However, the Housing team has confirmed that gypsies and travellers that approach the council for housing support are normally not on the housing register and would be protected in the policy because they can apply for consideration under homeless legislation. There could also be an adverse impact on some disabled people who are on (or that join) the housing register. This is due to the fact that the proposed change to the policy does not allow applicants to gain ‘cumulative priority’ that is
Equality Impact Assessment

based on different measures of need. However, under the updated policy, all applicants that are defined as being in urgent housing need (the assessment of which includes a consideration of the impact of a person's disability) will be placed in Band 1 and housed with overriding priority.

To overcome any potentially negative impacts of the changes, applicants will be given support by the housing team and those people who no longer qualify for social housing will still be able to access a full range of support and advice services via the council and its' partners.

The specific impact of the policy on any protected groups will be closely monitored and any necessary changes will be made to address the issues.

**Summary of consultation/research results**

Obtaining the views of key stakeholders, applicants and members of the public was vital in order to frame a revised allocations scheme. In any event, the council has a statutory duty to take reasonable steps to notify applicants likely to be affected by any major change of policy.

In July 2012 a widespread consultation was launched on the options for revising the Allocations scheme based on the flexibilities now available under the Localism Act 2011 and framework set out within the Code of Guidance 2012. The options raised were:

- Managing the waiting list more effectively by removing applicants with no housing need
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- Banning or penalising applicants for bad behaviour or who deliberately worsen their circumstances
- Removing access to applicants who have significant incomes or savings
- Excluding home owners except in exceptional circumstances
- Simplifying the Banding system and moving to 2 or 3 bands.

The consultation methodology involved, focus group with key Registered Providers, face to face work with service users, Members workshop, staff focus group and an online survey on the council’s website. A detailed report and analysis of the results of the consultation is set out in Appendix 7. The online survey questions generated a significant amount of responses - 408 in total. A summary of online survey results is included as an appendix to this EIA.

**Recommendations for action**

- Review the impact of the policy 6 months after implementation with specific reference to the protected groups adversely affected.
- Review the impact of the policy 12 months after implementation with specific reference to workloads, homeless applications and the provision of more detailed advice.
- Produce a FAQ leaflet for customers to compliment the policy document
- To ensure that all groups are informed about the proposed changes, contact should be maintained with local representative groups such as Basingstoke Multicultural Forum and the Over 55s Forum.