

Equality Impact Assessment (EIA)

Name of proposal/activity/policy to be assessed: Review of the Housing Allocations Scheme

Directorate: Environment and Neighbourhoods Services

Service: Housing Needs

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Job Title: Housing Needs Manager

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Version History

Version	Reason	Author	Date	Approved By

Scope your proposal

- What is the aim of your policy or new service/what changes are you proposing?
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The Council's Housing Allocations Scheme sets out the rules used to determine how priority is awarded for social housing and how properties are allocated.

There are certain legal requirements that the Council must follow in developing or reviewing an Allocations Scheme, set out by Part 6 of the Housing Act 1996. Beyond the legal requirement, it is important that Local Authorities keep their Allocations Scheme under regular review in order to ensure that it aligns with local and national strategic priorities whilst meeting the needs of residents and their communities. Local Authorities are encouraged to develop their Allocations Schemes to support broader public policy outcomes, such as:

- Encouraging greater social and economic mobility of social housing tenants
- Ensuring the most efficient use of the housing stock
- Responding to employment or skills needs specific to the area
- Creating more mixed communities and addressing the long-term sustainability of neighbourhoods
- Developing and maintaining balanced and stable communities
- Addressing specific issues at the neighbourhood level, such as anti-social behaviour and high-turnover through prioritising use of local lettings policies
- Countering misconceptions as to apparent unfairness of the allocation process
- Strengthening community cohesion, particularly in areas where tensions are known to be associated with the way housing is allocated

The last significant change to Reading's Allocations Scheme was carried out in 2016, when the Scheme was revised to include changes brought about by the Localism Act, including the application of Qualification Criteria for certain groups, for example a 3-year residency requirement in Reading for access to the Housing Register.

Following consultation with Members, Reading Borough Council carried out a public consultation considering a review of the Allocations Scheme under two main themes, Building Sustainable Communities, and Clear and Transparent Scheme. The changes to the scheme are the new mechanisms that support the delivery of these aims. The main changes have been identified as:

Building Sustainable Communities - Reading Borough Council identifies the need to create balanced and sustainable communities in order to improve outcomes for residents and reduce antisocial behaviour on our estates, whilst supporting the most vulnerable in the community. The following 3 mechanisms that were consulted upon to support this priority:

To improve tenant mobility by awarding a level of priority should they wish to move within social housing stock via the Housing Register.

To improve opportunities for accessing affordable home for key workers by removing the residency criteria and introducing an annual quota of homes for this group.

To increase tenant behaviour sanctions for those that have been evicted as a result of anti-social behaviour from 3 years to 5 - 10 years depending on the circumstances.

Clear and Fair Allocations Scheme - Reading Borough Council recognises that it is important to have an Allocations Scheme which is transparent, easy to understand and makes best use of housing stock to meet needs. The following mechanisms were consulted upon to support this priority:

To simplify the Allocations Scheme by reducing the number of bands that are used to prioritise people on the Housing Register from 6 bands to 5.

To separate the general needs Housing Register from those that require adapted homes.

- **Who will benefit from this proposal and how?**

Reading Borough Councils Housing Register is a register of local housing need. The Scheme determines how accommodation is let to those households who have registered for social housing. It is intended that RBC tenants, residents in housing need and our communities are able to benefit in the following ways:

Building Sustainable Communities - Reading Borough Council identifies the need to create balanced and sustainable communities in order to improve outcomes for residents and reduce antisocial behaviour on our estates, whilst supporting the most vulnerable in the community.

Improving tenant mobility can support local economies and tenant outcomes by improving tenants' physical access to work or specific services (for example hospitals or schools). Improved tenant mobility helps to make better use of stock (reducing under occupation), improves satisfaction and quality of life and give tenants a greater sense of fairness - giving tenants a sense of investment in their home and community.

Reading Borough Council wishes to ensure that key workers have access to affordable homes, whilst supporting the creation of more mixed communities as such addressing the long-term sustainability of neighbourhoods. These changes are proposed to help the Council and its partners to respond to employment and skills deficits within the town and supporting the recruitment of key roles.

Reading Borough Council's Allocations Scheme currently prevents those who have been evicted due to antisocial behaviour from accessing the Housing Register for 3 years. Since the introduction of this sanction a number of individuals have been identified that have been previously evicted due to serious, threatening or violent behaviours which have not been addressed, who have now seen this sanction expire and are now able to re-join the register.

Clear and Fair Allocations Scheme - Reading Borough Council recognises that it is important to have an Allocations Scheme which is transparent, easy to understand and makes best use of housing stock to meet needs. By reducing the number of bands RBC aims to support people who have an identified housing need to find suitable accommodation while making this process as clear as possible.

By separating the general needs Housing Register from those that require adapted homes it is intended to make the allocation of these properties simpler whilst making it easier and more straightforward for those who need adapted properties to access them. Strategically having a separate Adapted Housing Register will help to better identify what the need is for adapted properties in Reading and provide a more coherent data source for strategic decision making for future housing developments.

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- **What outcomes does the change aim to achieve and for whom?**

More efficient use of Council housing stock - benefit to tenants through letting housing more quickly and ensuring that people can access moves that are more suited to their needs. Supported by improving tenant mobility and the creation of the adapted housing register.

Create more sustainable communities and ensure our neighbourhoods are safer places to live, benefiting our tenants and those living in our communities. Supported by improving tenant mobility, increasing opportunities for key workers and changing tenant sanctions.

Fair and transparent lettings - benefiting those seeking homes, allowing them to better understand the process and countering misconceptions about the lettings process. Supported by reduction in bands and the creation of the adapted housing register.

Support the NHS and the public sector to deliver essential services to residents - benefiting key workers and public sector agencies. Supported by improving increasing opportunities for key workers.

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- **Who are the main stakeholders and what do they want?**
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The main groups of people that this change will affect will be those who are applying to RBC for Social housing and registered providers who let their properties through the Councils Housing register. Other interested parties include Reading residents in the community and partner agencies.

Assess whether an EqlA is Relevant

How does your proposal relate to eliminating discrimination; advancing equality of opportunity; promoting good community relations?

- **Do you have evidence or reason to believe that some (racial, disability, sex, gender, sexuality, age and religious belief) groups may be affected differently than others? Make reference to the known demographic profile of the service user group, your monitoring information, research, national data/reports etc.**

Yes - Given the nature of the Housing Allocations Scheme in relation to its impact upon residents' ability to access affordable housing it is considered relevant to carry out an Equality Impact Assessment.

- **Is there already public concern about potentially discriminatory practices/impact or could there be? Make reference to your complaints, consultation, feedback, media reports locally/nationally.**

Yes - Due to the pressure on housing in the borough, concern about how affordable housing is let is a likelihood.

Assess the Impact of the Proposal

An 8 week consultation ran from 22 March 2021 to 12 May 2021. A summary of the respondent shows a wide-ranging profile, as follows:

- 73% of respondents (505) were registered for social housing, the remaining were interested parties - support or social workers, employees of a Registered Provider (RP) or RBC, or those who had an interest in the development of the allocations scheme, either through residency in the borough or past experiences of an allocation.
- Approx. 35% applicants under 35 years old, 30% between 35 - 34 years old, 35% over 45 years old.
- 45% of applicants rented in the private rented sector, whilst approx. 36% were renting from a social housing provider (RP or RBC), the rest were mainly owner occupiers or living with friends and family.
- 58% of those who responded were White - British. 8% were Black or Black British - African with the next largest group being White - other White Background at 6%.
- 28% of those who responded considered themselves to have a disability, long-term illness or health problem which they have had for 12 months or more. 2 % did not respond to this question.

Consideration of the impacts of the proposed changes are discussed under the following headings:

Band reduction

The Council proposes reducing the number of bands to allow applicants to have a better understanding of the priority that their application attracts and expectation of their chance of rehousing.

Reducing the number of bands will mean that certain applications may be awarded a new band. The current 6 bands A,B,C, D, E and Non priority for housing, will be reduced to bands 1,2,3,4 and No Priority for housing. Applications will still attract priority for Additional and Reasonable preference criteria, although this will no longer be assessed in a cumulative way. Whilst in the majority of cases the priority level that applicants receive should remain the same relative to other applications on the housing register, there may be some where the level of priority is reduced.

Analysis of the housing register has shown that of the approximately 4,400 applicants on the housing register, this could adversely impact 56 applications by reducing their priority by one band. There are none where there is any greater reduction than one 1 band. While this is relatively small and makes up less than 1.3% of the total applicants on the Register it is understood that it would have a negative impact on the households affected.

In order to mitigate any negative impact brought about by the implementation of this change, Reading Borough Council will honour any priority for current

applicants that may occur as a result of this change, meaning that there will be no impact to any applicant or group as a result of this change.

The consultation found that overall 66% of respondents were in favour of this change to simplify the priority bands, with 80% of respondents who gave a yes or no answer agreeing to the change.

As any existing applications that are impacted by the implementation will continue to receive the same relative priority as under the old scheme, it is considered that there will be no negative impact resulting from this change.

Tenant mobility

In order to ensure that RBC council tenants are accommodated in homes that are suitable to their needs and in order to support our obligations as a landlord, RBC tenants will be awarded a level of priority under the new scheme. This does not mean that all tenants will be awarded the highest level of priority on the scheme, just that they have relatively higher priority in relation to others in their circumstances.

Overall almost 60% of respondents to the consultation were in favour of this change. Whilst it could be expected that those who currently rent social housing would agree with this (approx. 70% in favour of this proposed change), it is of interest to note that 52% of those who responded from private rented sector tenancies also agreed with this change. In addition, 83% of overall respondents were in favour of giving greater priority to severely overcrowded tenants of which it is estimated that there are fewer than 15 households currently on the housing register.

Analysis of the housing register shows that there are approximately 251 current applications from tenants which currently attract no priority for housing who will benefit from this change by receiving tenant priority.

Further analysis of the demographics between tenants and applicants on the Housing Register shows that there is no disproportionate difference in the demographic makeup of the two groups (applicants and tenants), with the exception of age. The majority of tenants are aged between 45-64, which is 42% of all tenants and the majority of applicants are aged between 25-44, which is 56% of all applicants.

On the face of it there may be concern that this change could adversely impact non tenant applicants by reducing the number of lettings to them, especially those in the younger age groups. However, it is worth noting any moves created from the additional priority received by tenants will create a resulting vacancy within RBC stock available to anyone on the register, meaning that over time there will not only be an increase in the overall number of lettings available, there will also be no net impact on the properties available.

The table below sets out the significant demographics, however this was also mirrored in religion and sexual orientation.

Demographic	Tenant	Applicants
Gender:		
Male	38%	32%
Female	62%	68%
Ethnicity (top groups):		
White British	60%	50%
White - other	4%	7%
Black African	6%	10%
Black Caribbean	4%	6%
Disability (top groups):		
Mental Health	10%	11%
Physical Disability	9%	4%
Mobility - non wheelchair user	9%	6%
Nationality (top groups):		
UK National	63%	67%
Other EEA National	4%	4%
Non EEA National	3%	6%

It is therefore considered that there will be no negative impact resulting from this change.

Tenant Sanctions

Increasing the period in which applicants are able to qualify to apply for the housing register may have a negative impact on those that have previously been evicted due to violent or threatening behaviours or serious antisocial behaviour.

The response rate supporting these changes was high, with 84% of people agreeing that the Council should have flexibility to assess applications of a case by case basis, with 76% further agreeing that the sanction preventing applicants from applying to the Housing register ought to be increased from 3 years to 5-10 years in cases of serious anti-social behaviour.

The number of applicants that have been found not to be qualifying for these reasons since this sanction was originally introduced is very low (approx. 4 applicants) however the impact on a community of the failure of a tenancy such as this can be very significant. It can lead to fear and intimidation for tenants and residents in the area, particularly those who are vulnerable or live alone and can lead to risk of physical harm for staff and professionals. Individual failure in tenancies can create problems in letting properties in the locality for subsequent years due to reputational damage to the area.

This group is not defined by any specific protected characteristic and those who may be perpetrators of this behaviour may be from any demographic. However, it is recognised that there may be concern that perpetrators of this type of behaviour may often have mental health concerns and so disability may be a characteristic that could typify individuals for whom this change could impact.

It is difficult to carry out meaningful analysis of this cohort as the numbers of people affected are very low. Analysis of this cohort shows 50% are female, an age range from 20 - 56 years old, and one applicants recorded as suffering with mental health problems. Whilst approx. 10% on the Housing Register of both tenants and applicants have advised that they suffer with mental health, and those sanctioned with mental health is 25% may appear disproportionate, it is important to note that this only equates to 1 applicant.

The change described is not changing who will be sanctioned, but the length of time the sanction will be in place, therefore this change will not lead to an increase in the number of different demographics of the applicants of people who are affected by this change.

Adapted Register

This change will not impact the number of adapted properties available to those that need them and will not affect the level of priority awarded to those who require them. It will ensure that applicants are more easily able to access them without competition from others on the housing register and that applicants are more clearly able see the properties that are available, thus providing more transparent service and better choice to those with a disability.

Properties that are let on the adapted housing register will include any properties that have had adaptations and those that may be suitable to be adapted to ensure that the creation of a separate register does not limit the number of properties available to this group.

Analysis of properties shows that 1,236 properties have some form of adaptation which is 18% of our overall stock. The number of adapted homes let in 2020-2021 was 27% of all lettings for that year.

Approx. 400 applicants on the Housing Register require some form of adaptation which equates to 10% of all applicants. However, the level of adaption will vary from the requirement for a stairlift to a fully wheelchair adapted home.

The Allocations Scheme sets out that if an adapted property becomes available it will first be advertised to those included on the Adapted Register and if not allocated from this list it will be advertised to the general housing register. It is anticipated that as our stock has been adapted for current tenants, not all of the properties will meet the needs of those included on the Adapted Register and will therefore not reduce the opportunities across the separate registers overall.

There was significant support for change in the questions relating to this issue. 88% of the respondents supported the creation of a separate Register for those who

require significant adaptations, with 83% of respondents agreeing that adaptable properties should only be made available to those that need them.

This change will allow the Council a clearer view of the needs of those who require adapted homes thus informing future development help to ensure that the needs of those with a physical disability are met in the long term.

Prior to implementation of the Adapted Register, a detailed analysis will be carried out on the structure of the register and a further Equalities Impact Assessment will be carried out specifically for this.

Key Workers

Key worker accommodation is a nationally recognised scheme that provides accommodation opportunities as identified within the planning framework. This change will allow the Council to let more accommodation to this group as required, identified by an annual need analysis (Allocations Plan) via an annual quota.

The number of properties annually identified within the quota will take into account the needs of the cohort and other groups on the housing register ensuring that no groups are disadvantaged.

There was a high level of respondents who felt that they ‘don’t know’ in response to the questions relating to these changes. Approx. 57% of those who gave a yes or no answer felt that the residency criteria ought to be removed for key workers (overall 20% responded ‘don’t know’). Approximately 75% of respondents who gave a yes or no answer felt that RBC should introduce a quota of properties for key workers.

It is considered that there will be no negative impact to any group resulting from this change.

Assess the Impact on Specific Groups

- Describe how this proposal could impact on racial groups
- Is there a negative impact? No

There is no negative impact on racial groups identified as a result of these changes.

- Describe how this proposal could impact on Sex and Gender identity (include pregnancy and maternity, marriage, gender re-assignment)

- **Is there a negative impact?** No
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There is no negative impact identified on sex and gender identity as a result of these changes.

- **Describe how this proposal could impact on Disability**
- **Is there a negative impact?** No

Increase in the length of tenant sanction for anti social behaviour. Due to low numbers of applicants that are sanctioned, statistical analysis of the impact on any group is not reliable. As discussed above, there could be a concern that those with mental health concerns would be impacted by the increase of the time the sanction will be in place. Whilst the proportion of applicants who have previously been sanctioned for this reason with mental health problems is relatively high 25%, it represents a very small number of people, only 1 applicant, therefore it cannot be proven to be statistically significant that there is a disproportionate impact on a certain group.

This change will not increase the number of applicants potentially affected by the sanction.

Those applicants sanctioned will be closely monitored to ensure that there is no disproportionate impact on any group.

Adapted Housing Register. Prior to implementation of the Adapted Register, a detailed analysis will be carried out on the structure of the register and a further Equalities Impact Assessment will be carried out specifically for this.

- **Describe how this proposal could impact on Sexual orientation (cover civil partnership)**
 - **Is there a negative impact?** Not identified
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There is no negative impact on sex orientation as a result of these changes.

- **Describe how this proposal could impact on age**
 - **Is there a negative impact?** Not identified
-

Tenant Mobility. It has been identified that there is difference in the profile of the ages of tenants and applicants. Therefore, there may be a concern that as a result of increasing priority being awarded to tenants this change will impact younger applicants by reducing the opportunity for them to access social housing. However, as detailed above, an allocation to an existing tenant will create a further vacancy which will be available to all applicants. Over time there will be an increase in the overall number of properties available and that there will be no net impact on the number of properties available.

All changes will be reviewed a year after implementation to ensure that it does not result in a negative impact on any group.

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- **Describe how this proposal could impact on Religious belief**
 - **Is there a negative impact?** No
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There is no negative impact on Religious belief identified as a result of these changes.

Make a Decision

If the impact is negative then you must consider whether you can legally justify it. If not you must set out how you will reduce or eliminate the impact. If you are not sure what the impact will be you **MUST** assume that there could be a negative impact. You may have to do further consultation or test out your proposal and monitor the impact before full implementation.

1. No negative impact identified

There has not been any negative impact identified as a result of this EIA.

- **How will you monitor for adverse impact in the future?**
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These changes will be reviewed a year after implementation to ensure that they do not result in any negative impact on any group.

Adapted Housing Register. Prior to implementation of the Adapted Register, a detailed analysis will be carried out on the structure of the register and a further Equalities Impact Assessment will be carried out specifically for this.

14/10/2021

X Bryony Hall

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Completing Officer
Signed by: Hall, Bryony

Lead Officer

