

# Equality Impact Assessment and Analysis in relation to the proposed amendments to the HomeChoice rehousing policy

## SECTION 1 – INTRODUCTION

The HomeChoice Rehousing policy sets out how the Council assesses applications for housing and the process for letting to social housing that the Council has nomination rights to. Currently the policy contains three (3) assessment bandings which are broadly based and accord different circumstances the same level of priority. All housing that becomes available to let is advertised through Choice Based Lettings and housing applicants can bid for properties they are interested in. All bidders are shortlisted according to priority banding and time waiting.

There is no proposal to change the biddings process. What is proposed is a change to the housing assessment and moving from three (3) to four (4) bands, mainly by separating out circumstances in Band B. This would create a bigger distinction between those whose needs are more complex and those who would come under the duties introduced in the Homelessness Reduction Act 2017, from those who have some housing need however they can continue to live where they are without any significant detriment.

## SECTION 2 –RESEARCH AND CONSULTATION

### 2.1 Applications

At time the proposals were worked up, an analysis was done of the housing register and how this could change under the new bandings.

Comparison of current and predicted housing register live applications				
Type	09.10.2017		predicted	
	Number	% of total HR	Number	% of total HR
Live applications	4,706		4,706	
Priority Cards	29	1%	29	1%
Band A	243	5%	306	6.5%
Band B	1,892	40%	494	10%
Band C	N/a	N/a	1,300	28%
Registered Applicant	2,542	54%	2,557	54%

Table 2 – Comparison of current and predicted housing register live applications				
Type	03.04.2018		predicted	
	Number	% of total HR	Number	% of total HR
Live applications	3,908		3,908	
Band A	226	6%	303	8%
Band B	1,622	42%	373	10%
Band C	N/a	N/a	1,172	30%

Registered Applicant	2,012	51%	2,012	51%
Priority Cards	48	1.2%	48	1.2%

A breakdown has also been completed of housing applicant by disability, ethnicity, gender and age under current and proposed bandings. This information in itself isn't conclusive however this will be repeated when any proposed amendments are implemented to consider what the impact is on housing applicants at that time. Where this shows that there may be unintended detrimental consequences to any group with a protected characteristic, consideration will be given as to how to mitigate these.

The tables below show a breakdown of bandings and give indicative impacts on the groups identified:

### Disability:

In total, 875 of housing applicants recorded a disability. The following tables compares the current and predicted bandings for those recording a disability to those recording that they do not have a disability:

Disability	Current banding				Predicted banding				
	PC	A	B	RA	PC	A	B	C	RA
Yes	1%	7%	41%	52%	1%	10%	17%	20%	52%
No	0.5%	4%	40%	55%	0.5%	4%	9%	30%	56%

Having a disability in itself does not indicate a housing need. The assessment rests on how someone's disability is impacted by their housing. This analysis shows that those with a disability are more likely to be reassessed as Band A, and that disabled applicants in Band B (i.e. those whose disability does relate to their housing) will have a higher instance of bidding successfully compared with applicants who are not disabled.

### Ethnicity:

In total, 732 (16%) of housing applicants recorded that they were from a BME group. The table below compares the bandings of those from a BME group with those who are not.

BME	Current banding				Predicted banding				
	PC	A	B	RA	PC	A	B	C	RA
Yes	24%	19%	16%	15%	24%	16%	16%	17%	15%
No	76%	81%	84%	85%	76%	84%	84%	83%	85%

The table shows that BME applicants more likely to be reassessed into Band C, though this is marginal. This will be analysed again following implementation.

### Gender:

In total, 3,334 (71%) of housing applicants recorded that the main applicant was female, compared with 1,371 (29%) male. The table below sets out the proportion of each banding of female applicant compared with male.

	Current banding				Predicted banding				
	PC	A	B	RA	PC	A	B	C	RA
Female	70%	68%	70%	72%	70%	71%	66%	72%	71%
Male	30%	32%	30%	28%	30%	29%	34%	28%	29%

The table shows that the proportions of applicants in each banding is expected to be consistent.

**Age:**

A breakdown of the housing register by age shows that the age of the main applicant is as follows:

16-24 - 670 / 14%,  
 25-60 - 3,376 / 72%  
 61+ - 660 / 14%

The table below shows the proportion by age of each banding across these age groups:

	Current banding				Predicted banding				
	PC	A	B	RA	PC	A	B	C	RA
16-24	17	20	19	9	17	15	16	20	11
25-60	62	71	74	70	62	66	72	77	70
61+	21	9	7	20	21	19	11	3	19

The table shows that older people are more likely to be reassessed into Band A, which is likely to relate to under-occupation of general needs properties. This will release larger houses for younger families. The younger age groups could be reassessed into lower bandings however this means that where there is a higher degree of housing need, the applicant will be more likely to be successful in bidding. The table shows that applicant in the youngest age category are disproportionately assessed as higher bands.

Table 2 in the main report identifies that a repeat analysis of applications at 4 April 2018 compared with 9 October 2017 shows that the proportion of applications predicted bands is as follows:

	09.10.2017	04.04.2018
Band	% of total HR	% of total HR
PC	1%	1.2%
A	6.5%	8%
B	10%	10%
C	28%	30%
RA	54%	51%

This means that the proportion of applications recognising a housing need is higher in the later analysis.

2.2 An analysis has been conducted of all lets to general needs properties 1 April 2017-30 June 2017 to establish the impact of the proposals on offers of tenancies taking into account the new bandings. This predicted that of 137 new tenancy starts, 18 would be to a different housing applicant.

## SECTION 3 - IDENTIFICATION & ANALYSIS OF EQUALITIES ISSUES AND IMPACTS

**As a result of the information in Sections 1 and 2, what will the likely impact be in relation to the nine protected characteristic groups?**

The analysis of the housing register indicates that of the 42% of current Band B, these applications would become 2% Band A, 10% Band B and 30% Band C. This means that those applicants with more complex or multiple needs will be in Band A or B and will be placed higher than Band C bidders on any shortlist. It is reasonable to expect that this will include those with health and welfare issues that could be related to having a protected characteristic.

The analysis of new lets shows that of a total of 137 new tenancy starts, 18 would be to different applicants, and that all of these arise out of the proposal to separate the current single Band B and create two Bands from this. Of those who would no longer be considered, none were experiencing issues that could be related to any protected characteristic, and of those who would gain an offer of a tenancy, a breakdown of circumstances is set out below:

- DV - 2
- No fixed abode - 1
- Prevent duty - 3
- HHSRS cat 1 - 1
- Young parent in supported housing - 4
- Under-occupying - 3
- Bedroom short + Health and welfare – 4

Total = 18

These circumstances for most of the 18 could be considered to be related to at least one of the nine protected characteristics, for instance those experiencing domestic violence and young parents in supported housing are likely to be female; the first 4 circumstances relate to homelessness and BME groups are over-represented in the homelessness population; those who are one bedroom short and experiencing health and welfare issues now are considered to have a higher priority than those who are just affected by the lack of a bedroom. Those who are under-occupying would release larger accommodation that would become available for other households with a need.

It is acknowledged that the priority proposed for young parents in supported housing is not also being offered to single people in supported housing. The reasons for this include:

- South Gloucestershire has a lower proportion of supported housing spaces for young parents compared with single people and the proposals should improve move-on from those schemes, and therefore increasing the number of spaces that become available. This applies typically to young mothers;
- many young people occupying supported housing do not have a priority need for assistance and are offered a comprehensive support package, including resettlement, from the provider service. This should enable them to seek accommodation, and be supported to do so, when they are ready to move-on. Where young people do have a priority need, for example they are care leavers or have other needs arising from a protected characteristic and/or complex needs, and have a particular requirement for social housing, then this is assessed in its own right.

## SECTION 4 - EqIAA OUTCOME

Outcome	Response	Reason(s) and Justification
Outcome 1: No major change required.	<input checked="" type="checkbox"/>	The proposals promote those with a greater need to move to access housing that is available. People with a protected characteristic and/or complex needs are more likely to have a greater need to move.
Outcome 2: Adjustments to remove barriers or to better promote equality have been identified.	<input type="checkbox"/>	
Outcome 3: Continue despite having identified potential for adverse impact or missed opportunities to promote equality.	<input type="checkbox"/>	
Outcome 4: Stop and rethink.	<input type="checkbox"/>	

## SECTION 5 - ACTIONS TO BE TAKEN AS A RESULT OF THIS EqIAA

Equality analysis is an ongoing process that does not end once a policy has been agreed or implemented.

As set out in Section 2, a breakdown analysis of the housing register would be repeated at the time that any proposed amendments are implemented to consider what the impact has been on housing applicants at that time. Monitoring bidding and lettings is an ongoing process, and the reporting of homelessness data to the Department of Communities and Local Government is required quarterly and includes equalities information.

## SECTION 6 - EVIDENCE INFORMING THIS EqIAA

All information obtained to complete this form is taken from the HomeChoice rehousing system. This records all housing applications and information on bidding and properties let through choice based lettings.