

Allocations Scheme 2022-2027

Equality Impact Assessment

1. Under s.149 of the Equality Act 2010, when making decisions, Epping District Council must have regard to the Public Sector Equality Duty, i.e. have due regard to:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sexual orientation.
3. In addition to the above protected characteristics you should consider the cross-cutting elements of the proposed policy, namely the social, economic and environmental impact (including rurality) as part of this assessment. These cross-cutting elements are not a characteristic protected by law but are regarded as good practice to include.
4. The Equality Impact Assessment (EqIA) document should be used as a tool to test and analyse the nature and impact of either what we do or are planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. Use the questions in this document to record your findings. This should include the nature and extent of the impact on those likely to be affected by the proposed policy or change.
6. Where this EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. **All Cabinet, Council, and Portfolio Holder reports must be accompanied by an EqIA.** An EqIA should also be completed/reviewed at key stages of projects.
8. To assist you in completing this report, please ensure you read the guidance notes in the Equality Analysis Toolkit and refer to the following Factsheets:
 - Factsheet 1: Equality Profile of the Epping Forest District
 - Factsheet 2: Sources of information about equality protected characteristics
 - Factsheet 3: Glossary of equality related terms
 - Factsheet 4: Common misunderstandings about the Equality Duty
 - Factsheet 5: Frequently asked questions
 - Factsheet 6: Reporting equality analysis to a committee or other decision-making body

Section 1: Identifying details
Your function, service area and team: Housing Strategy Manager Communities and Wellbeing
If you are submitting this EqIA on behalf of another function, service area or team, specify the originating function, service area or team:
Title of policy or decision: Allocations Scheme 2022-2027
Officer completing the EqIA: Janice Nuth Tel: 01992 564 000 Email: Jnuth@eppingforestdc.gov.uk
Date of completing the assessment: 22.02.2022

Section 2: Policy to be analyzed	
2.1	Is this a new policy (or decision) or a change to an existing policy, practice or project? This is a review and update of the existing Housing Allocations Scheme for the period 2022 -2027.
2.2	Describe the main aims, objectives and purpose of the policy (or decision): The purpose of the Housing Allocations Scheme is to determine the priorities and procedures to be followed when allocating social housing within the District between 2022 -2027. What outcome(s) are you hoping to achieve (i.e. decommissioning or commissioning a service)? The intended outcome of the Allocations Strategy 2022-2027 is to ensure everyone has and is seen to have fair transparent access to social housing in the district; that accords with our statutory and regulatory duties as a Local Housing Authority, and makes the best use of housing stock to meet the needs of our residents.
2.3	Does or will the policy or decision affect: <ul style="list-style-type: none"> • service users • employees • the wider community or groups of people, particularly where there are areas of known inequalities? The scheme affects residents and other registered providers of housing, community groups, statutory agencies and organizations with an interest in social housing in the district. Will the policy or decision influence how organizations operate? The policy will influence how organizations operate.
2.4	Will the policy or decision involve substantial changes in resources? The scheme will not involve substantial changes in resources.
2.5	Is this policy or decision associated with any of the Council's other policies and how, if applicable, does the proposed policy support corporate outcomes? The Allocations Scheme is linked to: <ul style="list-style-type: none"> • Epping Forest District Council Corporate Strategy 2018-2023

- The Social Recovery Map for Epping Forest District
- The Homelessness and Rough Sleeping Strategy 2022-2027 (draft)
- The Tenancy Policy 2022-2027 (draft)
- The Overarching Housing Strategy 2022-2027 (draft)
- Levelling Up Essex – An Essex White Paper 2022
- The Health and Wellbeing Strategy 2018-2028 (which is due to be refreshed in 2022)
- The Essex County Council Housing Strategy 2021-2025
- The Local Plan
- The More than Bricks and Mortar Estate Improvement Program 2020

The Scheme supports the following Corporate outcomes:

- People live longer, healthier and independent lives
- Adults and children are supported in times of need
- People and communities achieve their full potential
- Delivering effective core services that people want
- Improving the districts Housing offer

Section 3: Evidence/data about the user population and consultation¹

As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).

3.1	<p>What does the information tell you about those groups identified?</p> <p>The evidence to support the Council's understanding of the impact of the Strategy is based on:</p> <ul style="list-style-type: none"> • 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 HClic, and Core • profiling information that is routinely gathered for people who approach the Council for assistance to prevent or relieve homelessness • government and industry 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 Epping Forest Social Housing Annual Lettings Report 2020/21 • The Review of Homelessness and Rough Sleeping 2020/21(draft)
3.2	<p>Have you consulted or involved those groups that are likely to be affected by the policy or decision you want to implement? If so, what were their views and how have their views influenced your decision?</p> <p>Yes, open consultation was carried out in two phases with the following groups:</p> <ul style="list-style-type: none"> • Residents • The Tenant and Leaseholders Panel • Registered providers of social housing in the district • The clerks to the town councils and parish councils in the district • The Community Safety Partnership and other statutory services • Community groups including the Faith Covenant • Essex County Council and the district, borough and city councils in Essex • Third sector partners with an active interest in Housing in the district • All elected Members of the Council and Council staff <p>Phase 1 consultation sought views on the circumstances or reasons qualifying applicants should be awarded 'Emergency Need' i.e. priority Band A, 'Urgent Need' i.e. priority Band B or Moderate Need' i.e. priority Band C for social housing.</p> <p>The report on the outcome of the phase 1 consultation is available on the Council's website.</p> <p>This information was considered in conjunction with legislation, regulatory guidance on housing allocations, the Corporate Strategy and management information including the Social Housing Annual Report 2020/21 and the draft Review of Homelessness and Rough Sleeping 2020/21 to produce a draft Allocations Scheme, along with a draft Tenancy Policy and a draft Homelessness and Rough Sleeping Strategy.</p>

	<p>Phase 2 consultation sought views on a range of proposed major changes and minor changes to the existing scheme (which covered the period 2018 – 2022) that were highlighted in the draft scheme.</p> <p>The report of the outcome of the phase 2 consultation is currently in draft form and will be published alongside this Equalities Impact Assessment subject to approval by Stronger Communities Select Committee and Cabinet in March 2022.</p>
3.3	<p>If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary:</p>

Section 4: Impact of policy or decision

Use this section to assess any potential impact on equality groups based on what you now know.

The proposals included in the draft Allocations Scheme for 2022-2027 includes five major changes and eleven major changes to the existing scheme.

In summary the proposed major changes are:

- Increasing the two medical priority bands to three
- Improving the incentives for under-occupiers to downsize
- Awarding homeless households to whom the Council has a main housing duty Band B and the opportunity to bid on properties advertised through choice-based lettings
- Introducing the ability to consider local lettings plans in exceptional circumstances to promote mixed communities
- Replace the 7-year disqualification rule for serious unacceptable behavior or rent arrears with a risk-based assessment on a case by case basis

The proposed major changes along with the eleven minor changes are listed in greater detail in the Reports to 1 March 2022 Stronger Communities Select Committee and the 7 March 2022 Cabinet on the Review of the Housing Allocations Scheme.

Description of impact	Nature of impact Positive, neutral, adverse (explain why)	Extent of impact Low, medium, high (use L, M or H)
Age	<p>Positive – The opportunity to downsize to a property with a spare bedroom is likely to apply to older tenants as their families move away. A smaller property helps to counteract fuel poverty and restricted mobility, more prevalent as people get older; and a spare bedroom promotes wellbeing and family life. The additional financial incentive to move to sheltered accommodation.</p> <p>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>	H
Disability	<p>Positive – The increase from two medical priority bands to three to account for those long-term disabilities or illnesses that mean an applicant has an urgent need for moving, that is greater than a moderate need but is not an emergency.</p> <p>Although there is a wide variation a disproportionate number of applicants with learning disabilities, physical disabilities or a</p>	H


	<p>history of mental illness, are more likely to be on a low income, face longer periods of unemployment and/or have experience clinically defined crisis which may have affected their ability to manage a tenancy.</p> <p>The risk-based approach to a history of serious unacceptable behavior or rent arrears takes account of the cause of the behavior or arrears and support mechanisms for the applicant including mental and physical health problems.</p>	
Gender	<p>Positive – Women are more likely to be victims of domestic abuse including financial abuse, and the risk-based approach to a history of serious unacceptable behavior or rent arrears takes account of financial abuse.</p> <p>Women with dependent children make up the largest cohort of households in temporary accommodation. The ability to bid for suitable available accommodation and removing the restriction for flatted accommodation with a view to re-applying for a house at a later date promotes equitable choice, independence and stability.</p>	
Gender reassignment	<p>Neutral – There is limited data to evaluate the impact of the Scheme on people with this defined characteristic.</p>	L
Marriage/civil partnership	<p>Positive – The minor change redefining the term 'Household' removes the two-year requirement with who would reasonably be considered part of a household which would include blended families through marriage /civil partnership.</p>	H
Pregnancy/maternity	<p>Positive – Women who are pregnant or have a child under 12 months in temporary accommodation can exercise increased choice over where their offer of settled accommodation may be.</p>	M
Race	<p>Positive – People from minority ethnic backgrounds are more likely to be in low income jobs and make up a disproportionate number of key workers in the health and care services. A fair transparent Allocations scheme which includes the option to introduce local lettings plans to promote cohesion in exceptional circumstances is likely to have a positive impact on people with this protected characteristic.</p>	M
Religion/belief	<p>Positive – some belief systems emphasize the role of extended family members in the</p>	H

	provision of support and care for elderly, vulnerable or young relatives in times of need. The ability to downsize but keep a spare bedroom can support this.	
Sexual orientation	Neutral – There is limited data to evaluate the impact of the scheme on people with this defined characteristic.	L

Section 5: Conclusion			
		Tick Yes/No as appropriate	
5.1	Does the EqIA in Section 4 indicate that the policy or decision would have a medium or high adverse impact on one or more equality groups?	No <input type="checkbox"/>	No
			If ' YES ', use the action plan at Section 6 to describe the adverse impacts and what mitigating actions you could put in place.

Section 6: Action plan to address and monitor adverse impacts

What are the potential adverse impacts?	What are the mitigating actions?	Date they will be achieved.

Section 7: Sign off I confirm that this initial analysis has been completed appropriately. (A typed signature is sufficient.)	
Signature of Head of Service: 	Date: 23.02.22
Signature of person completing the EqIA: Janice Nuth	Date: 22.02.22

Advice

Keep your director informed of all equality & diversity issues. We recommend that you forward a copy of every EqIA you undertake to the director responsible for the service area. Retain a copy of this EqIA for your records. If this EqIA relates to a continuing project, ensure this document is kept under review and updated, e.g. after a consultation has been undertaken.