



South Kesteven District Council

**Equality Analysis
(Stage 1)**

**Allocations Policy
V2**

Service Area: Housing	Lead officer: May Read	Date of Analysis 12.02.13
	Assessors: Liz Bishop	
	Neutral Assessor: Carol Drury	

1. Name and description of policy/service/function/strategy :

Allocations Policy- the policy sets out the council's scheme for managing allocations of social housing in the district. The policy aims to make best use of social housing vacancies to meet housing needs. The policy sets out how all applications will be assessed based on current housing need.

Is this a new or existing policy?

New- replaces existing policy

2. Complete the table below, considering whether the proposed policy/service/function/strategy could have any potential positive, or negative impacts on groups from any of the protected characteristics (or diversity strands) listed, using demographic data, user surveys, local consultations evaluation forms, comments and complaints etc.

Equality Group	Does this policy/service/function/strategy have a positive, or negative impact on any of the equality groups? Please state which for each group	Please describe why the impact is positive, or negative. If you consider this policy etc is not relevant to a specific characteristic please explain why
Age	Positive	The policy has a positive impact on 16- 18 year olds. A person under 18 may not hold a tenancy but the policy states how the council will help affected young people under 18, despite this barrier.
Disability	Positive	The policy prioritises people with mobility needs for ground floor accommodation. Very high priority is given to households who no longer need the adaptations in their home, to release it for someone who does need the facilities.

		There is a link to the Tenancy Policy- where a tenant dies and their home was adapted to meet their needs, but the successor to the tenancy does not need the adaptations, the council can request that they move to alternative accommodation, to release the accommodation for someone who does need it.
Race	Negative	There will only be a negative impact where person is not eligible for housing assistance as defined by law.
Gender Reassignment	Neutral	No impact noted
Religion or Belief	Potential Negative	Changing demographics may result in instances where accommodation may be offered which does not meet household's needs on religious or cultural grounds. In such instances refusal of an offer of accommodation would be managed with sensitivity.
Sex	Neutral	No impact noted
Sexual Orientation:	Neutral	No impact noted
Pregnancy and Maternity	Positive	The policy recognises the need for a bedroom for a new born child.
Marriage and Civil Partnership	Neutral	No impact noted

Carers	Positive	The policy recognises that a bedroom may be required for a <i>resident</i> carer within a household.
Other Groups (e.g. those from deprived (IMD*) communities; those from rural communities, those with an offending past)		
Any applicant not resident in the area for 6 months or more	Negative	Such applicants are not eligible to have their housing need assessed (they would be placed in the lowest band) until they have been resident for 6 months. Any such applicant who is homeless may be eligible for assistance where we choose to disregard local connection.
Those with offending past	Negative	Such applicants may not be accepted on to the register if they have been guilty of anti social behaviour, or an offence which could potentially lead to the loss of a council tenancy. In such circumstances the applicant will be advised of the decision, and there is a review process in place should they wish to appeal the decision.
Homeless households	Positive	The needs of homeless households are recognised. Those the council has a legal duty to accommodate have very high priority, but those we have no duty to help are also awarded some level of priority.

*(IMD = Indices of multiple deprivation)

3. What data/information did you use to inform the outcomes of the proposed policy/service/function/strategy? (Note any relevant consultation who took part and key findings)

The following feedback has been taken into account in developing the policy:

Feedback from Stakeholder Consultation Event- 5 December 2012:

- Stakeholders considered that applicants with no local connection should be

accepted on to the register, but that consideration should be given to other factors, including their housing history, support needs and previous tenancy conduct when assessing applications. Stakeholders recognised that there is a need to manage expectation and avoid excessive burden in managing the housing register.

- Stakeholders thought that those in greatest housing need should be prioritised. It was also considered that previous unacceptable behaviour should be taken into account when assessing applications and that greater use should be made of mutual exchange for existing tenants who are not in housing need.
- Stakeholders further considered that, where possible, the wider impact on sustainable communities should be taken into account; recognising the contribution made to the achievement of mixed, sustainable and thriving communities by the economically active. No prescriptive mechanisms for achieving this were suggested for inclusion in the policy framework.
- Stakeholders considered that the policy should have some regard for economic contribution, but qualified this support with concerns that those not working through no fault of their own should not be disadvantaged.
- There were concerns that transport to work should be taken into account (referring to poor transport links in rural areas); helping people to move to towns where there is more likely to be employment.
- Stakeholders recognised the challenge of taking such an approach- almost a moral or means tested approach to allocations – and no prescriptive mechanisms for achieving this were suggested.

Feedback from Communities PDG 10.01.13

- Consultees were keen that something like the status quo in relation to local connection should continue- that applicants with family resident in the area, or those who have lived here previously, might have the opportunity to return. The particular value of family connection in rural areas was referred to. Continued acceptance and registration of applications from those with no assessed housing need for a particular locality was supported, reflecting the fact that we might sometimes have low demand properties to let.
- Consultees were of the view that, whilst the primary aim is to address housing needs, there should be continued acceptance and registration of applications from those with no assessed housing need; reflecting the fact that we might sometimes have low demand properties to let.
- Consultees did not want to include 'voluntary contribution' as a basis for granting additional priority as this is considered too difficult to evaluate and manage.
- Consultees were uncertain about rewarding 'work', mindful of the practical difficulties of achieving a fair scheme and concerned about the message it might give to those who have recently lost jobs or are struggling to find work.
- Consultees supported moving to a 'banding scheme', rather than retaining a 'points scheme'; largely based on extensive discussion they have had on this in recent years.

Housing Strategy Survey Results 31 January 2013

The Housing Strategy survey, including questions relating to the Allocations Policy, was sent to a random selection of 1450 current tenants and 1000 randomly chosen housing register applicants. 11.9% (292) surveys have been returned.

- 82% thought that someone should be living, working or have family in the area to be accepted onto the housing register
- 60% thought we should only accept housing applications from people who have a priority need to move home
- 67% thought we should give additional priority to people who are working or have an offer of employment in the district.

If there are any gaps in the consultation/monitoring data, how will this be addressed?

CORE relet data will be used to monitor the households we are accommodating and ensure the outcomes are those intended by the policy.

A stage 3 assessment will be completed 6 months after implementation, and the policy will be formally reviewed 12 months following implementation.

4. Outcomes of analysis and recommendations (please note you will be required to provide evidence to support the recommendations made): Please tick one of the options.

a. No major change needed: equality analysis has not identified any potential for discrimination or for negative impact and all opportunities to promote equality have been taken

If you have ticked option (a) go to stage 3

b. Adjust the proposal to remove barriers identified by equality analysis or to better promote equality. Please complete the questions in the box below.

b.1 In brief, what changes are you planning to make to your proposed policy/service/function/strategy to minimise or eliminate the negative equality impacts?

b.2 Please provide details of whom you will consult on the proposed changes and if you do not plan to consult, please provide the rationale behind that decision.

If you have ticked option b go to Stage 2

c. Adverse impact but continue Please provide an explanation in the box below that clearly sets out your justification for continuing with the proposed policy/function/service/strategy. You should consider in stage 2 whether there are sufficient plans to reduce the negative impact and/or

plans to monitor the actual impact.

If you have ticked option c please go to Stage 2

d. Stop and remove the policy/function/service/strategy as equality analysis has shown actual or potential unlawful discrimination

Signed (Lead Officer): May Read, Housing Options Team Leader

Date completed: 12.02.13