

Equality Impact Assessment [version 2.9]



Title: Housing Allocations Policy	
<input checked="" type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input checked="" type="checkbox"/> Already exists / review <input checked="" type="checkbox"/> Changing
Directorate: Housing and Landlord Services	Lead Officer name: Paul Sylvester
Service Area: Housing Options	Lead Officer role: Head of Housing Options

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

There is a commitment in the Council's current [Corporate Strategy](#) to 'review the system for allocating social housing' and this policy refresh is the outcome of that review. The original allocations review started pre-Covid, but was put on hold during the pandemic and subsequently continued in 2021.

The proposed changes to the existing allocations policy have been produced through widespread consultation, both internally and with partner organisations and the wider public. The main aims of the Allocations review and public consultation were to:

- House those in the greatest need
- Be more efficient and user friendly for applicants, the council, housing associations and other partner organisations
- Give realistic expectations about being housed to those who have joined the Home Choice Bristol register.
- Support more mixed, balanced and sustainable communities

Public consultation took place between 15th July and 7th October 2022 with a further seven days allowed for the capture of late returning paper surveys. There were 1,653 responses to the public consultation. The results were used to inform a number of changes to the existing policy, which are summarised in section 3.1 of this EqIA.

This proposal is the implementation of actions that have been decided to be taken forward in light of the policy refresh. This is part of a process that is already in place but that is constantly evolving.

1.2 Who will the proposal have the potential to affect?

<input checked="" type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
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<input checked="" type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations
Additional comments:	

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: <https://www.bristol.gov.uk/people-communities/measuring-equalities-success>.

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment Form](#)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
Bristol Housing Stock (general), Population and Deprivation	
Project 1000: Affordable Housing Delivery Plan 2022 to 2025	The Plan outlines how the council will focus its land, time, money, and influence to improve the way affordable housing is delivered in Bristol. The council's ambition is to work with partners, local communities and developers to deliver 1000 new affordable homes each year by 2024.
Bristol Residential Development Survey Report 2020	The Residential Development Survey is undertaken by City Planning and outlines the changes in the size of Bristol's housing stock each year, taking into account new builds as well as changes of use and demolitions.

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
Valuation Office Agency: Council Tax Statistics	Council Tax statistics provide another method of assessing the total number of residential properties in Bristol each year
BRE Integrated Dwelling Level Housing Stock Modelling and Database for Bristol City Council	Large scale housing condition survey commissioned from Building Research Establishment (BRE) by Bristol City Council to look at private sector housing. The report brings together information from the Local Land and Property Gazetteer (LLPG), tenure, benefits, Houses in Multiple Occupation (HMO), Housing Health and Safety Rating System (HHSRS) records data provided by Bristol City Council and Energy Performance Certificate (EPC)1 data. The report also uses a variety of different data sources including the Tenancy Deposit Scheme, Council Tax, Ordnance Survey and Land Registry data to identify private rented housing in the city, including Houses in Multiple Occupation (HMOs).
First results from 2021 Census	Summarises the first population results from the 2021 census. See also the Census 2021 Dashboard
Deprivation in Bristol Report (2019)	Summary findings of the 2019 English Indices of Deprivation (IoD) within Bristol Local Authority Area. The report highlights that: <ul style="list-style-type: none"> • A slightly lower proportion of Bristol’s population live in the most deprived areas in England in 2019 than in 2015 - 15% of residents1 (70,400 people) live in the most deprived 10% of areas in England (1 percentage point lower than in IoD2015), including 18,900 children and 7,900 older people. • Bristol has 41 LSOAs in the most deprived 10% in England for Multiple Deprivation (one less than in 2015), including 3 LSOAs in the most deprived 1% in England (3 less than in 2015). • One LSOA ‘Hareclive’ in Hartcliffe and Withywood ward is in the most deprived 100 neighbourhoods in England. ‘Hareclive’ is ranked 91st most deprived neighbourhood nationally compared to 67th most deprived in 2015. ‘Bishopport Avenue’ also in Hartcliffe and Withywood was ranked 65th most deprived in 2015 and is now ranked 182nd.

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
<p>Map showing the overlap between the location of existing Council Housing stock and areas of deprivation in the city</p>	<p> Council Houses 2019 Indices of Deprivation National deciles 1% - 10.0% 10.1% - 20.0% 20.1% - 30.0% 30.1% - 40.0% 40.1% - 50.0% 50.1% - 60.0% 60.1% - 70.0% 70.1% - 80.0% 80.1% - 90.0% 90.1% - 100.0% </p> <p> Avonmouth & Lawrence Weston Harbourside & Bristols Southmead Westbury-on-Trym & Henleaze Horfield Stoke Bishop Redland Bishopston & Ashley Down Clifton Down Cotham Ashley Eastville Frome Vale Hillfields Clifton Central Easton St George's West St George's Central St George's Troopers Hill Hotwells & Harbourside Lawrence Hill Southville Winhill Hill Bedminster Knowle Brislington East Filwood Brislington West Stockwood Bishops'cote Hengrove & Whitchurch Park Hartcliffe & Withywood </p> <p> Source: MHCLG 2019 Indices of Deprivation © Crown Copyright and database rights 2019. Ordnance Survey 100023406. Contains National Statistics data © Crown copyright and database rights 2022. </p>

Population health and wellbeing (general)	
<p>Joint Strategic Needs Assessment (JSNA): Data Profiles</p>	<p>Collates statistics on the Bristol population relating to a broad range of health conditions and the wider determinants of health. Data Profiles (and their sub-categories) which are of particular relevance here include:</p> <ul style="list-style-type: none"> • Long Term Conditions • Mental Health and Wellbeing • Older People • Population • Wider Determinants (includes a range of sub-categories, such as domestic abuse, food and fuel poverty, homelessness, housing etc)
<p>Mayoral Commission on Domestic Abuse Report</p>	<ul style="list-style-type: none"> • In 2020, 7,382 offences were flagged as involving domestic abuse in Bristol.

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
	<ul style="list-style-type: none"> • We estimate that in 2019, 17,000 adults in Bristol experienced domestic abuse (including over 11,000 women) and 6200 could have experienced sexual assault (including 4,000 women). • The Home Office estimate that domestic abuse costs UK businesses over £14 billion from lost output related to time off work and reduced productivity. • Approximately 176,000 older women living in the South West have experienced sexual violence at some point in their life. (SARSAS, The Chilling Silence, 2020) • During the first lockdown between April-June 2020, the National Domestic Abuse Helpline logged 40,397 contacts – a 65% increase on the previous three months. • In 2020, Somerset and Avon Rape and Sexual Abuse Support (SARSAS) handled over 1000 calls from Bristol residents through their helpline. • In 2019, 3202 children known to Bristol’s Children and Family Services were living in a home where domestic abuse took place. • In 2018, only 18% of women who experienced abuse from their partner reported this to the police. • On average the police in England and Wales receive over 100 calls relating to domestic abuse every hour.
Drug and Alcohol Strategy for Bristol 2021-25	<ul style="list-style-type: none"> • There are an estimated 6,500 alcohol-dependant adult drinkers in Bristol. • During the year 2018/19, Bristol had 10,773 admissions to hospital for alcohol related conditions, equivalent to a rate of nearly 3,000 admissions per 100,000 people. This was the highest rate in the South West, and higher than the England average of 2,367 admissions per 100,000 people. • There are an estimated 5,000 users of opiates and crack cocaine in our city. This is equal to a rate almost double the national average. • Deaths from alcohol and other drugs in Bristol are increasing. Nearly 200 people in Bristol die each year from an alcohol related condition; over the three-year period covering 2017 and 2019, there were 99 drug related deaths. • A quarter of Bristol’s 14-15 year old’s consumed alcohol, when asked, over the previous month. The rate of under-18’s being admitted to hospital because of alcohol in Bristol has been above the national average since 2017. • 29% of year 10 pupils say they have been offered cannabis, and 15% report trying cannabis at least once
Bristol – Quality of Life	
Quality of Life Annual Report 2021/22	<p>Community and Living</p> <p>Satisfaction with “your local area” fell significantly (74% from 80%) but rose slightly to 51% in the most deprived areas; it continues to have a “Deprivation gap” (23% points) that is one of the highest of all QoL indicators, though is less than the gap last year. 63% feel they belong to their neighbourhood and 70% feel “people from different backgrounds get on well together” in their neighbourhood, both about the same as last year overall. However, whilst both are significantly lower in the most deprived areas, they have improved there (47% belong, up from 39%; 57% “get on well”, from 52%).</p> <p>Health and Wellbeing</p> <p>People reporting being satisfied with life (68%) continued to fall significantly overall but did improve slightly in the most deprived areas (55%). People reporting below average mental wellbeing (via a detailed suite of questions) remained high at 20% and remained higher (32%) in the most deprived areas (though slightly less than last year).</p>

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	<p>11% of households in the most deprived areas experienced “moderate or worse food insecurity” (via a detailed suite of questions) and 5% of people living in these areas went to a food bank (or charity) in the last year; both figures are significantly worse than the city average, but both are slightly better in deprived areas than last year.</p> <p>Housing</p> <p>Overall, the percentage of people satisfied with their current accommodation has fallen (82% from 87%), though improved slightly in the most deprived areas (to 71%, from 68%). Satisfaction with the cost of rent or mortgage has also fallen significantly (down to 53% from 60%) and also fell in deprived areas (51% from 60%).</p>																															
Allocations Related																																
Housing and Landlord Services- Housing Register Equalities Data Profile	<p>As of 5th December 2022, there were over 19,000 people on the Housing Register.</p> <p>Citywide comparisons will be made with the 2021 census if such data is currently available. If the data is not currently available, comparisons will be made with the 2011 census.</p> <p>Ethnicity</p> <table border="1" data-bbox="464 1059 1015 1261"> <tbody> <tr> <td>BAME</td> <td>5746</td> <td>29.56%</td> </tr> <tr> <td>Not Known/ Stated</td> <td>451</td> <td>2.32%</td> </tr> <tr> <td>White British</td> <td>11669</td> <td>60.03%</td> </tr> <tr> <td>White Other</td> <td>1571</td> <td>8.08%</td> </tr> <tr> <td>Total</td> <td>19437</td> <td>100.00%</td> </tr> </tbody> </table> <p>White British are underrepresented on the Register compared to the Bristol average (71.6% in 2021 Census). Black, Asian and Minority Ethnic applicants are overrepresented (18.9% BAME in 2021 Census). White Other ethnicities (8.3% in 2021 Census) are broadly proportionate to the Bristol average in their representation on the register.</p> <p>Age</p> <table border="1" data-bbox="464 1581 943 1901"> <tbody> <tr> <td>18-25</td> <td>11.66%</td> </tr> <tr> <td>26-35</td> <td>29.78%</td> </tr> <tr> <td>36-45</td> <td>26.19%</td> </tr> <tr> <td>46-55</td> <td>15.68%</td> </tr> <tr> <td>56-65</td> <td>10.14%</td> </tr> <tr> <td>66-75</td> <td>4.14%</td> </tr> <tr> <td>Over 75</td> <td>2.23%</td> </tr> <tr> <td>Under 18</td> <td>0.19%</td> </tr> </tbody> </table> <p>As can be seen, the greatest percentage of those on the Housing Register are aged between 26-35, 36-45 and 46-55. This is broadly in keeping with the demographic profile of the city.</p>	BAME	5746	29.56%	Not Known/ Stated	451	2.32%	White British	11669	60.03%	White Other	1571	8.08%	Total	19437	100.00%	18-25	11.66%	26-35	29.78%	36-45	26.19%	46-55	15.68%	56-65	10.14%	66-75	4.14%	Over 75	2.23%	Under 18	0.19%
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	<p>Initial results from the 2021 census indicates that Bristol continues to have a relatively young age profile, with more children aged 0-15 than people aged 65 or over. The median age of people living in Bristol is 32.4 years old, compared to the English and Wales median of 40.3 years old.</p> <p>Disability</p> <table border="1" data-bbox="464 450 943 568"> <tr> <td>No</td> <td>53.78%</td> </tr> <tr> <td>Yes</td> <td>44.02%</td> </tr> <tr> <td>(blank)</td> <td>2.20%</td> </tr> </table> <p><i>Note: The responses to disabled status are provided by the applicant when completing the Housing Register application form (or when making changes to their individual circumstances). This information is not based on a formal assessment by the Council's Health and Housing Team.</i></p> <p>Disabled applicants on the Housing Register are significantly over-represented versus the general population of Bristol. Some 44% of those on the Housing Register have declared a disability compared to 16.7% who identified as having a long-term health problem or disability in the 2011 census.</p> <p>Gender</p> <table border="1" data-bbox="464 1032 979 1151"> <tr> <td>Female</td> <td>58.34%</td> </tr> <tr> <td>Male</td> <td>41.40%</td> </tr> <tr> <td>Prefer not to say</td> <td>0.27%</td> </tr> </table> <p>Female residents are over-represented on the Housing Register, proportionally, compared to the Bristol population as a whole. The 2021 census indicates a far more even split between males and females living in the city - 234,500 males (49.6%) and 237,900 (50.4%) females.</p> <p>Sexuality</p> <table border="1" data-bbox="464 1442 1090 1637"> <tr> <td>Heterosexual</td> <td>79.74%</td> </tr> <tr> <td>Lesbian, Gay or Bi-sexual</td> <td>3.87%</td> </tr> <tr> <td>Other</td> <td>2.54%</td> </tr> <tr> <td>Prefer Not To Say</td> <td>13.47%</td> </tr> <tr> <td>(blank)</td> <td>0.37%</td> </tr> </table> <p>Transgender</p> <table border="1" data-bbox="464 1749 1062 1906"> <tr> <td>No</td> <td>90.81%</td> </tr> <tr> <td>Would rather not state</td> <td>7.07%</td> </tr> <tr> <td>Yes</td> <td>0.40%</td> </tr> <tr> <td>(blank)</td> <td>1.72%</td> </tr> </table> <p>Traditionally, information on sexuality has not been recorded in census data and any more detailed information that may be included in the 2021 census is not available at the time of writing. Stonewall (national) data indicates than people who identify as being Lesbian, Gay or Bi-sexual represent approximately 6% of the population. No robust data on the UK trans population currently exists.</p>	No	53.78%	Yes	44.02%	(blank)	2.20%	Female	58.34%	Male	41.40%	Prefer not to say	0.27%	Heterosexual	79.74%	Lesbian, Gay or Bi-sexual	3.87%	Other	2.54%	Prefer Not To Say	13.47%	(blank)	0.37%	No	90.81%	Would rather not state	7.07%	Yes	0.40%	(blank)	1.72%
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	<p>Religion</p> <table border="1" data-bbox="464 309 1062 745"> <tbody> <tr><td>Buddhist</td><td>0.66%</td></tr> <tr><td>Christian</td><td>25.52%</td></tr> <tr><td>Don't know/not sure</td><td>7.91%</td></tr> <tr><td>Hindu</td><td>0.17%</td></tr> <tr><td>Jewish</td><td>0.07%</td></tr> <tr><td>Muslim</td><td>13.27%</td></tr> <tr><td>None</td><td>37.94%</td></tr> <tr><td>Other</td><td>3.90%</td></tr> <tr><td>Sikh</td><td>0.40%</td></tr> <tr><td>Would rather not state</td><td>9.79%</td></tr> <tr><td>(blank)</td><td>0.37%</td></tr> </tbody> </table> <p>The highest percentage of Housing Register applicants identified as having no religion, followed by those who identified as Christian, then Muslim. Proportionally, this broadly mirrors the findings of the 2021 census, though the percentage of those identifying as Muslim on the Housing Register is somewhat higher than the citywide average while the percentage of those identifying as Christian or having no religion were somewhat lower. In the 2021 census, some 51% stated that they had no religion. This was followed by those who identified as Christian (32.2%) and then Muslim at 6.7%.</p>	Buddhist	0.66%	Christian	25.52%	Don't know/not sure	7.91%	Hindu	0.17%	Jewish	0.07%	Muslim	13.27%	None	37.94%	Other	3.90%	Sikh	0.40%	Would rather not state	9.79%	(blank)	0.37%
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2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Gender Reassignment
<input type="checkbox"/> Marriage and Civil Partnership	<input checked="" type="checkbox"/> Pregnancy/Maternity	<input checked="" type="checkbox"/> Race
<input checked="" type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input checked="" type="checkbox"/> Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

We know that there are gaps in our diversity data for some protected characteristics citywide, especially where this has not historically been included in census and statutory reporting. No robust data on the UK trans population exists. We will develop trans-inclusive services. However, we will not be able to adequately compare our data against UK statistics.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See <https://www.bristol.gov.uk/people-communities/equalities-groups>.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing change or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

For the allocations review we undertook desk-based research, obtained academic papers from experts in Housing and, in March 2020, held a series of Community based engagements in Knowle West, Lawrence Weston, Redcliffe and St Pauls. These events were devised to hear views from the city's more excluded communities. A more extensive consultation was planned to be completed before the outbreak of the Covid pandemic prevented further progress.

When work on the Allocations review re-convened in 2021, we consulted with Housing advisory services such as the Bristol Law Centre and Shelter and conducted a series of customer journey mapping exercises to engage stakeholders (officers, customers and organisations) in an end-to-end walkthrough of the existing Housing Allocations process. A Housing consultant was brought in to provide an outside view on our current Allocations scheme and a series of focus groups were organised, gathering specialist views from those delivering services to people with experience of domestic violence and hate crime, Adult Social Care, young people, older people, healthcare, people living with disability, people experiencing homelessness and various staff groups.

A stakeholder event was held on 25th May 2022 to gather views on possible changes to the Allocation scheme from Housing professionals, registered providers (Housing Associations) and other stakeholders with an interest in the Allocation scheme.

The formal public consultation on some proposed changes started on the 15th July 2022 and ran for 12 weeks until 7th October 2022. There were 1,653 responses to the public consultation (representing approximately 9% of number on housing register at the start of consultation. Around 77% of responses were from people on the register). A further 60 people also submitted comments via email during the consultation. The results of the consultation have been used to inform the changes being taken forward.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

The updated policy is only one aspect of the Allocations Review – work is ongoing to:

- **Review, rewrite and resign the partnership agreement:** In consultation with our Registered Provider (Housing Association) partners we will update data, information sharing and other regulatory aspects, but also to re-align principles and operating practices between BCC and our housing partners.
- **Application** – We will simplify, streamline and shorten the application form and process making it easier to understand and complete in line with comments made during the public consultation.
- **Improve communication** – We will add pro-active communications (progress/ explanations/ hints and tips), introducing additional delivery channels (videos, diagrams, checklists), and signposting to alternative methods to getting housed.
- **Improve information and guidance** - For example, process explanations (e.g. application, health needs, care needs, bidding, what to expect during and after allocation etc), revising the Tenancy Preparedness offering, providing information on managing debt/ the legacy impacts of ASB, and on improving the

consistency and quality of assistance provided by staff by reviewing the current HCB training approach, content and delivery.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)

The main changes to be introduced to the Allocations policy are:

- Adoption of a 'Managed Choice' model – which maintains applicant choice but also allows for up to 50% of allocations by means of direct offer.
- Improving access to social housing for those exiting adult social care.
- Increasing the priority of a defined set of under-occupiers to Band 1.
- Increasing the priority of qualifying Care Leavers to Band 1 – to improve their ability to transition to independent living.
- In line with the intent of the Homelessness Reduction Act, there is a need to increase the priority of homelessness prevention and therefore we propose consolidating all homelessness situations to Band 2, rather than having main duty homelessness cases as Band 2 and homelessness prevention and relief duties as Band 3 as was the case previously. This would ensure there is a 'level playing field' between applicants owed the main homelessness duty and applicants awarded other homelessness duties.
- Implementing a 'new deal for the homeless at home' that places those who are faced with eviction from the family home on an equal footing with those in main homelessness (so they don't lose out by remaining at home) and incentivises them to stay put provided it is safe to do so. The current scheme does not sufficiently recognise the housing need of people who live in the home of their parents, or extended family, and looking to move on because they already have a child or are pregnant. Being told to leave by parents, family or friends is one of the main reasons for households presenting as homeless in Bristol.
- Changing the rules regarding 'effective date' to allow retention of date when applicants move down a band and, in some cases, when they move back up. Currently when applicants are reassessed and move between bands as a result, their 'effective date' (i.e. the date when an application is assessed into a band) is reset to the date of the change. This is seen to be unfair. Those who have waited for a long time on the list and whose circumstances have worsened feel the date reset penalises them despite their increased priority they lose out to newer entrants in the higher band.
- Changing the rules on how we prioritise those with composite (multiple) needs. Composite need is when an applicant has more than one housing need that effectively makes their situation worse than someone else in the same band. Factors currently taken into consideration include over-crowding, where someone's health is made worse by their accommodation, domestic violence and/or harassment. The current process gives such applications greater priority within the band by increasing their 'time waiting' date (i.e. backdates) by a maximum of six months. The policy change aims to backdate the effective date of those with three or more qualifying needs by an additional six months (i.e. 12-month backdate).
- Extending the use of Local Lettings Policies. While most allocations for social housing will be made from the general allocations scheme, different parts of a city may have localised issues which aren't directly addressed by the scheme. To address these situations a Local Lettings Policy (LLP) may be introduced. The

benefits of LLPs include maintaining family and extended support networks, supporting the economic sustainability and growth of an area, community cohesion, and supporting local service provision.

- At some point in the future, look at the option of restricting bidding for band 4 for age restricted properties only.
- Running a 12-month Pilot Project to test ways of extending downsizing support and using vacancy chain management.

As noted in section 2.1 above, a number of groups with protected characteristics are currently over-represented on the housing register rather than under-represented. Disabled people, for example, comprise around 44% of those on the housing register, compared to 16.7% identifying as having a long-term health problem or disability citywide in the 2011 census (2021 census data on this issue is not available at the time of writing). As social housing is primarily aimed at those in greatest need, an over-representation of more disadvantaged groups on the housing register is not surprising.

A number of the proposed changes, such as an increase in the number of care leavers being allocated social housing and an increase in the numbers of people leaving Adult Social Care moving into general needs housing will likely further increase over-representation of those with additional care and support needs on the register. Therefore, there may be incidences where some other groups with protected characteristics may see their representation reduce due to such changes. However, this is more likely to be a case of them becoming 'less over-represented' rather than them being disadvantaged disproportionately compared to the Bristol population as a whole.

Overall, it is felt that the impact of this revised Allocations policy will be positive for Bristol residents, including those with protected characteristics. However, it is recognised that the proposed changes can affect equalities groups in different ways which will be explored in more detail here.

PROTECTED CHARACTERISTICS

Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	No negative impacts identified
Mitigations:	<ul style="list-style-type: none"> • The law doesn't allow anyone under 18 to hold a tenancy but those aged 16-17 may be offered accommodation by Children's Services. • The revised Allocations policy includes positive changes for young people such as moving more care leavers into Band 1. • In accordance with the Public Sector Equality Duty (PSED), Bristol City Council assess applications according to the applicant's needs; an application will not be treated less favourably on the grounds of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> • Those aged 65 or over make up only a relatively small percentage of those on the housing register. There is, however, an over-representation of older people who are currently Bristol city council tenants. ONS data for those aged 65 and over in the Bristol population is around 13%. Yet the proportion of BCC tenants aged 65 or over is just over 20%. • There is a change in the revised Allocations scheme which will award Band 1 to a defined set of under occupiers. This may have an impact on older people, as well as those who have care and support needs related to age or disability who may be living in larger properties. • On-line applications have been the normal method for residents to make their housing applications which may disadvantage some older people who do not use or are unfamiliar with digital technology.
Mitigations:	<ul style="list-style-type: none"> • People can also use the phone to make housing applications or come to the Citizen's Service Point at 100 Temple Street, where they can be assisted to make an application. We also work with advice agencies/support organisations (such as Age UK Bristol) to publicise these alternative approaches. Part of the Allocations review is to not only update the policy, but also look at the processes and the application form to identify ways to make it easier for people to make an application.

	<ul style="list-style-type: none"> • Awarding Band 1 to a defined set of under-occupiers should help older applicants/those with a disability as it means certain properties more suitable for their needs may be vacated faster. • Other under-occupation change proposals are to explore different methods of providing <i>incentives</i> to under occupiers – this will be done via a 12-month pilot scheme and is aimed at encouraging rather than compelling under-occupiers to move. A smaller property helps to counteract fuel poverty and restricted mobility, which can be more prevalent as people age. In turn, releasing family sized homes reduces the time that families, typically with small children, in urgent need of rehousing have to remain living in unsuitable accommodation. • In accordance with the Public Sector Equality Duty (PSED), Bristol City Council assess applications according to the applicant’s needs; an application will not be treated less favourably on the grounds of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> • Disabled residents are over-represented versus the general population of Bristol. Some 44% of those on the Housing Register have declared a disability, compared to around 16.7% in the population as a whole (according to 2011 census). This is unsurprising given that social housing is aimed at those in greatest need, so people with disabilities are more likely to be on the housing register. • As noted, there is a change in the revised Allocations policy which will award Band 1 to a defined set of under occupiers. This may have an impact on Disabled people or those with care and support needs. • Other proposed changes, such as increasing the numbers leaving Adult Social Care into independent living in general needs housing, will likely further the increase the numbers of people with physical or mental health needs on the housing register. • On-line applications have been the normal method for residents to make their applications which may disadvantage some Disabled people who do not have access or are unfamiliar with digital technology.
Mitigations:	<ul style="list-style-type: none"> • The Housing Register is geared towards housing those most in need, so it is unsurprising that the most disadvantaged groups are over-represented. • We do provide alternative format versions if requested (such as BSL) and we also work with support/advice agencies to publicise our services. • People can also use the phone to make applications or come to the Citizen’s Service Point at 100 Temple Street, where they can be assisted to make an application. Frontline staff have all had disability equalities training to ensure they engage appropriately with customers. • Part of the additional changes to the Allocations process includes changes to make the allocations form and process quicker and easier for people. • Awarding Band 1 to a defined set of under-occupiers should help older applicants/those with a disability as it means certain properties more suitable for their needs may be vacated faster. • Other under-occupation change proposals are to explore different methods of providing <i>incentives</i> to under occupiers – this will be done via a 12-month pilot scheme and is aimed at encouraging rather than compelling under-occupiers to move. A smaller property helps to counteract fuel poverty and restricted mobility, which can be more prevalent as people age. In turn, releasing family sized homes reduces the time that families, typically with small children, in urgent need of rehousing have to remain living in unsuitable accommodation. • Suitable floating support will be available for more vulnerable tenants. The Supportive Tenancy Management process (STMP) is already in place for those tenants where there are serious concerns regarding tenancy sustainment which needs intensive management. It may also be used for new tenants where Housing Management & Estate Services are working with the tenant to prevent tenancy

	<p>failure. Such concerns can be in relation to them seriously neglecting themselves, their property or where they are at risk of being exploited.</p> <ul style="list-style-type: none"> • In accordance with the Public Sector Equality Duty (PSED), Bristol City Council assess applications according to the applicant’s needs; an application will not be treated less favourably on the grounds of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
Sex	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> • Female residents are over-represented on the Register, proportionally, compared to the Bristol population as a whole. • A number of those applying to the housing register will be women fleeing domestic abuse. The Joint Strategic Needs Assessment (JSNA) notes that In Bristol, females over the age of 16 are 3.2 times more likely to be a victim of a domestic abuse related crime than males. The JSNA notes that women in the 30-39 year-old age bracket are most likely to experience a domestic abuse related crime. • The current scheme does not sufficiently recognise the housing need of people who live in the home of their parents, or extended family, and looking to move on because they already have a child or are pregnant. One of the proposals is to introduce a ‘new deal for the homeless at home’ that places those who are faced with eviction from the family home on an equal footing with those in main homelessness (so they don’t lose out by remaining at home) and incentivises them to stay put provided it is safe to do so. We will, however, need to ensure that the ‘new deal’ does not result in people remaining in places where they are potentially not safe.
Mitigations:	<ul style="list-style-type: none"> • The Housing Register is geared towards housing those most in need, so it is unsurprising that the most disadvantaged groups are over-represented. Female single parents account for a significant proportion of the households accepted as homeless by the City Council and this would subsequently be reflected in the Housing Register. • Bristol was already treating domestic abuse survivors as ‘priority need’ homelessness cases prior to the introduction of the Domestic Abuse Act (DAA) 2021, which made this a legislative requirement. Other changes introduced to Housing and Landlord Services (HLS) as a result of the DAA, such as the appointment of Independent Domestic Violence Advisors (IDVAs) will ensure that we can offer greater support and assistance to all victims/survivors of domestic abuse. • With respect to the ‘new deal for the homeless at home’ we will explain that where it is necessary to ensure their safety people do still have the option of entering temporary/emergency accommodation. • On the Housing register, those fleeing domestic abuse are awarded Band 2 in cases where we are satisfied there is a risk of domestic abuse. However, in cases where a Multi Agency Risk Assessment Conference (MARAC) had identified a high level of risk, a domestic abuse victim/survivor may be awarded Band 1 (the highest band). • In accordance with the Public Sector Equality Duty (PSED), Bristol City Council assess applications according to the applicant’s needs; an application will not be treated less favourably on the grounds of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> • We will need to ensure that the ‘new deal for the homeless at home’ does not result in people remaining in places where they are potentially not safe. National data from Safe Lives indicates that LGBT+ victims of domestic abuse are twice as likely to have experienced historic abuse by a family member (6% compared to 3%).
Mitigations:	<ul style="list-style-type: none"> • With respect to the ‘new deal for the homeless at home’ we will explain that where it is necessary to ensure their safety people do still have the option of entering temporary/emergency accommodation.

	<ul style="list-style-type: none"> In accordance with the Public Sector Equality Duty (PSED), Bristol City Council assess applications according to the applicant's needs; an application will not be treated less favourably on the grounds of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	No negative impacts identified
Mitigations:	<ul style="list-style-type: none"> The existing scheme does not sufficiently recognise the housing need of people who live in the home of their parents, or extended family, and looking to move on because they already have a child or are pregnant. One of the proposed changes is to introduce a 'new deal for the homeless at home' that places those who are faced with eviction from the family home on an equal footing with those in main homelessness (so they don't lose out by remaining at home) and incentivises them to stay put provided it is safe to do so. We will explain that where it is necessary to ensure their safety people do still have the option of entering temporary accommodation. In accordance with the Public Sector Equality Duty (PSED), Bristol City Council assess applications according to the applicant's needs; an application will not be treated less favourably on the grounds of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> One of the proposed changes is to introduce a 'new deal for the homeless at home' that places those who are faced with eviction from the family home on an equal footing with those in main homelessness (so they don't lose out by remaining at home) and incentivises them to stay put provided it is safe to do so. We know that domestic abuse can occur in transgender relationships¹. Research by the Scottish Transgender Alliance suggests that up to 80% of trans people have experienced emotionally, sexually or physically abusive behaviour from a partner or ex-partner, and that professionals are concerned that trans women are being let down when they seek support. One survey found that 19 percent of respondents were subject to domestic violence at the hands of family members <i>because</i> they were transgender or gender nonconforming.
Mitigations:	<ul style="list-style-type: none"> In accordance with the Public Sector Equality Duty (PSED), Bristol City Council assess applications according to the applicant's needs; an application will not be treated less favourably on the grounds of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation. Housing and Landlord Services will always seek to ensure that services are able to meet individuals' needs with a consistent approach in line with good practice and relevant legislation. We will develop services that are inclusive of trans and non-binary people, drawing on best practice wherever possible and ensure all Housing and Landlord Services staff have relevant equalities training.
Race	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> Data indicates that there is an over-representation of both Black, Asian and Minority Ethnic and White Other ethnicities on the Housing Register when compared ONS data on ethnicity profiles for the city as a whole. White British tend

¹ [Briefing - Transgender Victim-Survivors' Experiences of Domestic Abuse Final.pdf \(safelives.org.uk\)](#)
[lgbt in britain - trans report final.pdf \(stonewall.org.uk\)](#)
[Trans people in the UK \(publishing.service.gov.uk\)](#)
[Hate crimes against transgender and non-binary individuals - Office for National Statistics \(ons.gov.uk\)](#)

	<p>to be under-represented on the housing register (60% on the register, but 77.9% of Bristol population in the 2011 census. 2021 data is not available at time of writing).</p> <ul style="list-style-type: none"> • Black and Minority Ethnic residents are also over-represented in Temporary Accommodation (TA) compared to the Bristol average. • Residents from the broad ethnicity grouping 'White Other' are proportionally over-represented amongst TA applications where the applicant's prior accommodation was noted by the assessor as 'rough sleeping'. • Proportionally to the Bristol population as a whole - White British residents are over-represented in Band 1 on the Housing Register, but in Bands 2-4, both Black, Asian and Minority Ethnic and White Other groups are over-represented. • It generally takes longer for Black, Asian and Minority Ethnic lead applicants to be housed compared to White British in all Bands apart from Band 4. • There may be issues for people for whom English is not their first language in understanding the Allocation scheme.
Mitigations:	<ul style="list-style-type: none"> • The Housing Register is geared towards housing those most in need, so it is unsurprising that the most disadvantaged groups are over-represented. • The Allocations phone service is available 24 hours a day and is available in the following languages: English, Arabic, Bengali, Chinese, Farsi, Gujarati, Hindi, Kurdish, Polish, Portuguese, Punjabi, Somali, and Urdu. • As part of the wider changes being made to the Allocations process, we will simplify, streamline and shorten the application form and process making it easier to understand and complete in line with comments made during the public consultation. We will also add pro-active communications (progress/ explanations/ hints and tips), introducing additional delivery channels (videos, diagrams, checklists), and signposting to alternative methods to getting housed. • We are proposing to run a 12-month Pilot Project to test ways of extending downsizing support and using vacancy chain management. This is intended to free up some of the larger (3+ bedroom) properties, which will assist in housing those in the allocation scheme with larger families. • In accordance with the Public Sector Equality Duty (PSED), Bristol City Council assess applications according to the applicant's needs; an application will not be treated less favourably on the grounds of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	No negative impacts identified
Mitigations:	<ul style="list-style-type: none"> • In accordance with the Public Sector Equality Duty (PSED), Bristol City Council assess applications according to the applicant's needs; an application will not be treated less favourably on the grounds of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	No negative impacts identified
Mitigations:	<ul style="list-style-type: none"> • In accordance with the Public Sector Equality Duty (PSED), Bristol City Council assess applications according to the applicant's needs; an application will not be treated less favourably on the grounds of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation.
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> • Residualisation is the concentration of lower income/more disadvantaged households in social housing. This is a process that has been occurring since the 1970s. It accelerated in the 1980s and 1990s.

	<ul style="list-style-type: none"> • Much of our housing stock is in the most deprived areas of Bristol and BCC tenants are more likely to be impacted by socio-economic factors. • In the Quality of Life survey report 2021-22, 11% of households in the most deprived areas experienced “moderate or worse food insecurity” (via a detailed suite of questions) and 5% of people living in these areas went to a food bank (or charity) in the last year; both figures are significantly worse than the city average, but both are slightly better in deprived areas than last year. • In the Quality of Life Survey report 2021-22, the deprivation gap in Bristol shows a difference of 12% for those with below average mental wellbeing between the most and least deprived.
Mitigations:	<ul style="list-style-type: none"> • On the existing housing register, a number of groups with protected characteristics are currently over-represented rather than under-represented. • The Housing Register is geared towards housing those most in need, so it is unsurprising that the most disadvantaged groups are over-represented. • One of the aims of the review is to try and increase mixed and balanced communities within social housing. • One of the features in the revised Allocations policy is the inclusion of more local Local Lettings Policies. These restrict the Council’s allocations scheme within a small geographical area in order to achieve certain desirable outcomes and can benefit particular disadvantaged groups within that locality.
Carers	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	No negative impact identified
Mitigations:	<ul style="list-style-type: none"> • Band 1 is currently awarded following a referral from the Council’s children’s services to those foster carers and adopters who have been assessed and approved and who require an extra bedroom to able to start or continue to provide foster care to a Bristol City Council looked after or former looked after child. • Band 1 will also be awarded to special guardians, holders of a residence order and family and friend carers who have been formally approved by Bristol City Council’s Children’s services to provide long term care of a child(ren) because the parents are unable to provide care and there is a potential for the child(ren) to become a Bristol City Council looked after child and there is a need to move to larger accommodation in order to accommodate the child(ren).
Other groups [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Looked after Children / Care Leavers; Homelessness]	
Potential impacts:	<ul style="list-style-type: none"> • There may be issues for people for whom English is not their first language in understanding the scheme. • Much of our housing stock is in the most deprived areas of Bristol and BCC tenants are more likely to be impacted by socio-economic factors. • In the Quality of Life survey report 2021-22, the deprivation gap in Bristol shows a difference of 12% for those with below average mental wellbeing between the most and least deprived.
Mitigations:	<ul style="list-style-type: none"> • The Allocations phone service is available 24 hours a day and is available in the following languages: English, Arabic, Bengali, Chinese, Farsi, Gujarati, Hindi, Kurdish, Polish, Portuguese, Punjabi, Somali, and Urdu. • The new Scheme has been designed to be more straightforward and easier to understand, providing clarity and managing people’s expectations more realistically. As is currently the case, Officers can provide advice and assistance for people who may have difficulty understanding the policy. • One of the features in the revised Allocations policy is the inclusion of more local Local Lettings Policies. These restrict the Council’s allocations scheme within a small geographical area in order to achieve certain desirable outcomes and can benefit particular disadvantaged groups in that locality. Local Lettings Policies are required to have their own Equalities Impact Assessment. • There are several proposals that will benefit homeless households, such as the ‘new deal’ for the homeless at home and the decision to place all homelessness cases no matter the homeless duty owed, into Band 2.

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

- The existing housing register, as it is based on identifying those most in housing need, already favours disadvantaged groups, who are often over-represented rather than under-represented when compared to the Bristol population as a whole.
- Care leavers will benefit from the new proposals as they are placed in Band 1 (highest priority Band). This should mean that the likelihood of them receiving an offer of social housing is improved.
- Increasing the numbers leaving Adult Social Care into independent living in general needs housing, will further increase the numbers of people with physical or mental health needs on the housing register.
- The change proposals also increase the priority of a defined set of under-occupiers to Band 1. This is likely to benefit under-occupying households experiencing affordability issues as a result of bedroom tax and also people with larger families who will have to spend less time in temporary accommodation.
- The Allocations scheme already benefits those homeless households with a main housing duty by offering them band 2. Those owed other homelessness duties (prevention or relief) are currently placed in band 3.
- One of the change proposals implements a 'new deal for the homeless at home' that places those who are faced with eviction from the family home on an equal footing with those in main homelessness (so they don't lose out by staying put) and incentivises them to stay put provided it is safe to do so.
- One of the change proposals is the inclusion of more Local Lettings Policies. These restrict the Council's allocations scheme within a small geographical area in order to achieve certain desirable outcomes and can benefit disadvantaged groups in that area.
- Changes to the rules around composite need will benefit those with a range of housing needs. Composite need is when an applicant has more than one housing need that effectively makes their situation worse than someone else in the same band. Factors currently taken into consideration include over-crowding, where someone's health is made worse by their accommodation, domestic violence and/or harassment. The current process gives such applications greater priority within the band by increasing their 'time waiting' date (i.e. backdates) by a maximum of six months. The policy change aims to backdate the effective date of those with three or more qualifying needs by an additional six months (i.e. 12-month backdate).
- Changes to the rules regarding 'effective date' will benefit a range of groups. Currently when applicants are reassessed and move between bands as a result, their 'effective date' (i.e. the date when an application is assessed into a band) is reset to the date of the change. This is seen to be unfair. The change will allow retention of date when applicants move down a band and, in some cases, when they move back up.

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:
No significant negative impact identified – the policy aims to address issues for equalities groups.
Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:
The policy will promote equality of opportunity through overall improvements to the Housing Allocations service.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Phase 1: Short term changes that will be introduced as soon as possible and which are included in the initial rewrite of the Policy.	HCB Team	1 st Quarter 2023
Phase 2: Medium term changes that may be introduced ahead of the new technology.	HCB Team	Over next 18 months
Phase 3: Long term and tech dependent. These are changes that are fully dependent on technological enablement and which we cannot introduce until such time as the new technology becomes available.	HCB Team	After implementation of new IT

4.3 How will the impact of your proposal and actions be measured?

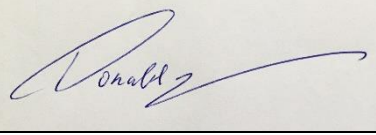
How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

The impact of the changes will be monitored through existing quarterly performance metrics. As part of the change process we are also aiming to make it easier to access information about Allocations in flexible, user-friendly formats making the data more transparent and enabling better insights for service users, staff, leadership and other interested parties through the use of new Microsoft Power BI tools.

Some proposals, such as extending downsizing support and using vacancy chain management – will be tested and assessed first using a 12 month pilot programme.

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the Equality and Inclusion Team before requesting sign off from your Director².

Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i>	Director Sign-Off: Donald Graham, Director Housing and Landlord Services 
Date: 27.01.2023	Date: 06/02/2023

² Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.