

Equality Impact Assessment

Directorate: Housing & Environment	
Service: Place Shaping	
Name of Officer/s completing assessment: Abyan Sharmake	
Date of Assessment: January 2017	
Name of service/function or policy being assessed: Allocations Policy	
1.	<p>What are the aims, objectives, outcomes, purpose of the policy, service change, function that you are assessing?</p> <p>Under the Housing Act 1996 all local housing authorities are required to have a Housing Allocation Scheme (HAS) which governs how social housing is allocated to people that are eligible. The HAS sets the criteria against which housing applications are assessed for inclusion on the Housing Register and to determine which, if any, priority an application is given. The current HAS was introduced on 1st January 2014 and updated on 1st April 2016 with the intention of rewarding residents who have made a positive contribution to their community through employment, voluntary work, being part of the fostering/adoption programme or having served in the Armed Forces.</p> <p>Social housing plays a vital role in meeting housing need in Slough with 20% of all homes in the borough being social rented (13% Council and 7% other social landlords). The council's most valuable asset is its 7400 tenanted and leasehold homes. These homes are already an essential resource to many vulnerable groups, with the changes to the scheme aiming to reward people who live and work in Slough by increasing their chance of being housed in affordable homes. Therefore, the effective use of social housing is essential to improving equality in Slough by providing housing to people with the greatest need.</p> <p>In 2015/16 46 applicants on the Housing Register were in Band A, of which 91 were allocated an affordable home. Applicants in Band B are deemed to have a need to move due to a reasonable preference and an 'additional preference'. In 2015/16 958 applicants on the housing register were in Band B, however just 335 were allocated an affordable home. In the same year 1,041 applicants on the housing register were in Band C, however only 35 were allocated an affordable home. This clearly demonstrates that Slough is facing increasing demand for affordable homes and short supply within a buoyant private rented sector with rising rent levels.</p> <p>It is difficult to explain the impact of the changes to the HAS without appreciating the many external variables affecting the housing market both locally and nationally. The housing situation in Slough reflects the national housing crisis in that people in the borough are being priced out of the private housing market (both home ownership and the private rented market) and as such further pressure is being placed on social housing to provide homes that are truly affordable to low income households. This pressure is especially prevalent in Slough due to its proximity to London and competition from London boroughs to source affordable homes close to the capital. The</p>

	<p>increasing rents and changes to Local Housing Allowance rates have contributed to the Council struggling to attract private landlords. This problem has been further exasperated by London authorities placing more and more people in Slough's private rented sector as they are readily able to pay the higher market rents plus an incentive to private landlords. As of the end of 31st March 2015 there were 2,045 applicants on the Housing Register compared to 1,780 the year before with over 200 households currently placed in temporary accommodation. In the same year the Council also let homes to 545 people. This disparity between supply and demand means that the average waiting time for social housing in the borough is 3.7 years, with a wait for a 1 bedroom property averaging 2.7 years. As such, the increasing demand for social housing and reduced availability of private rented accommodation has forced us to source homes outside of the borough in order to try and alleviate the problem.</p>
2.	<p>Who implements or delivers the policy, service or function? State if this is undertaken by more than one team, service, and department including any external partners.</p> <p>The Allocations Policy is jointly implemented by the Housing Demand Manager (collection of applications) and the Allocations Manager who is responsible for assessing applications, maintaining the Housing Register and managing the allocation of homes as they become available.</p>
3.	<p>Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc. Please consider all of the Protected Characteristics listed (more information is available in the background information). Bear in mind that people affected by the proposals may well have more than one protected characteristic.</p> <p>Age: Yes Disability: Yes Gender Reassignment: Yes Marriage and Civil Partnership: Yes Pregnancy and maternity: Yes Race: Yes Religion and Belief: Yes Sex: Yes Sexual orientation: Yes Other:</p> <p>The Allocations Policy will impact all equality strands as demonstrated above. However, those who have low incomes, or rely on benefits</p>

are most impacted by any change to Housing Allocations Scheme. In Slough this disproportionately affects those with disabilities, women (who are more likely to be lone parents) and some ethnic groups. The current Strategic Housing Market Assessment (SHMA) report indicates that 1/5 of all households in the SHMA area had an income of **less than £20,000** with a following 1/3 of households income between 20k and 40K per annum.

Please see section 6 for a full break down of available data sets. Although not all data sets are complete, the council collects monitoring information on Tenants, Leaseholders, Applicants and Temporary Accommodation Tenants.

4. **What are any likely positive impacts for the group/s identified in (3) above? You may wish to refer to the Equalities Duties detailed in the background information.**

The Council recognises that there are large segments of people in Slough who make a positive contribution to the borough but yet find it difficult to find affordable housing, for a variety of reasons. Therefore, the changes to the Housing Allocations Scheme introduced in April 2014, sought to recognise and encourage the positive contributions to communities by giving applicants an additional preference on the housing register and increasing the likelihood of them being offered a property.

Disability

The exact number of Slough's disabled population is unknown and is a gap in the Council's data. In 2011 around 18,787 (13%) adults in Slough had a limiting long term illness or disability according to the Census, and was projected to rise by over 50% by 2036, therefore, requiring particular attention. A total of 5.9% (395) of people on the Housing Register and 4.2% (37) of people placed in temporary accommodation (including household members) have a disability/medical condition.

An unintended positive consequence in the year following the changes to the HAS has been an increase in the number of applicants with a medical condition being housed. Before the change to the HAS in 2013/14 17 applicants in Band B (with a medical condition) were housed, whereas this number increased to 34 Band C applicants with a medical condition in 2014/15 even though there were 69 less lets in the year. However the number of lets to Band C applicants with a medical condition in 2015/16 dropped to 18, which is 1 more than in 2013/14. The Council will carry out further analysis to determine why there was a sudden spike in the number of lets to disabled applicants in 2014/15, why it dropped the following year and what can be expected in the years thereafter.

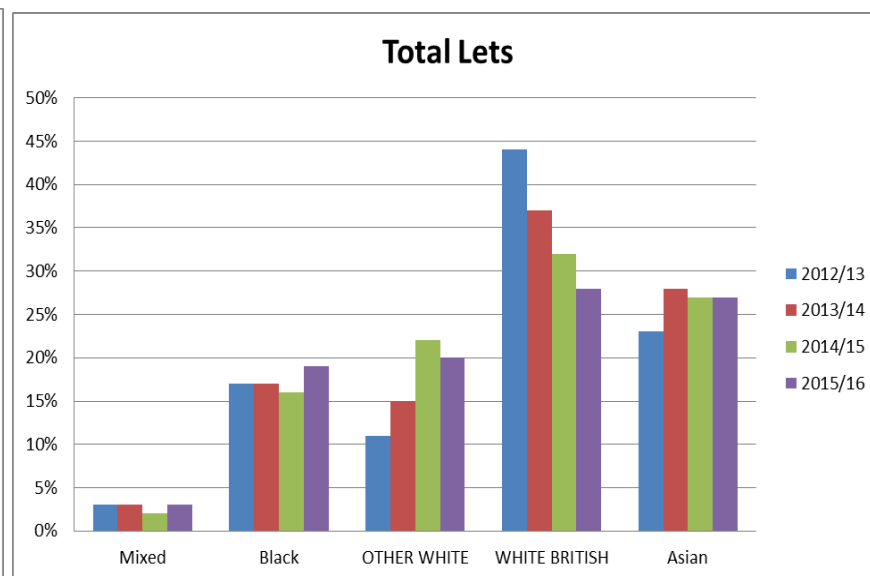
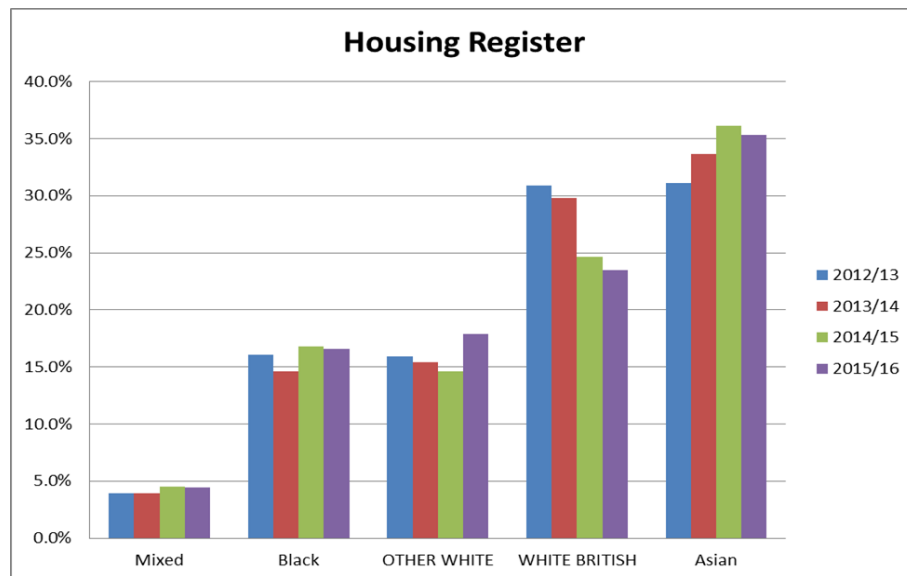
Race

Slough is one of the most ethnically diverse local authority areas outside of London and in the United Kingdom. Appendix B shows the ethnicity statistics for Slough from the 2011 Census (it is very likely to have increased in diversity over the past 5 years). Approximately

35% of the population identify themselves as white British, with nearly 10% defining as “white other” (largely from Poland and other parts of Eastern Europe due to in-migration). 40% of residents declared as Asian or Asian British and 9% declaring as Black or Black British.

It is clear that there is some overrepresentation from particular groups. At least 58% of housing register applicants (when looking at the lead tenants only) are from BME back grounds, with 13.5% declaring as “white other”, 35% as Asian and Asian British, and 17% as Black or Black other. The Pakistani cohort are the largest single group on the housing register with a total of 25.4%, compared to 23% white British.

The changes to the HAS have positively impacted BME groups as demonstrated by the increase in their representation on the housing register. However, this has only resulted in a slight increase in the total number of properties let to applicants from these groups. Since the changes to the HAS the most dramatic changes have been to the White British cohort who have decreased in number both in terms of the total percentage on the housing register and the total properties let to this cohort. Whereas, on the other hand the percentage of Asian applicants on the housing register has increased (in line with trends prior to the changes), yet the percentage of lets to this cohort slightly decreased and levelled off.



Pregnancy & Maternity / Marriage & Civil Partnership / Religion & Belief / Sexual Orientation / Gender Reassignment

There is insufficient data to assess the impact of the changes to the HAS on these protected characteristic, however, there is no significant reason to believe that it will impact people based on any of these characteristics.

5. What are the likely negative impacts for the group/s identified in (3) above? If so then are any particular groups affected more than others and why?

The changes to the Housing Allocations Scheme have not had a significant impact on the council's equality duties to date. However, there are some areas where due care needs to be taken in order to ensure that the changes do not negatively impact any specific group more than any other in the future. In order to mitigate any potentially adverse impact, the Council may consider using its discretion (following the changes to the schemes in April 2016) in exceptional circumstances where appropriate.

Age

An area of concern which may have a negative impact on age in Slough is the introduction of the additional preference. Young people make up a significantly larger proportion of Slough's population when compared with other south east local authorities. Young people are being priced out of the Slough homeownership market, including a swing to 'generation rent' in line with countrywide trends. Consistent with the rising house prices and low wage, high employment levels and the changes to housing benefits disproportionately targeting younger people the changes to the HAS may negatively impact younger people in Slough as they are less likely to be in employment and meet the additional preference requirement. However, Appendix C (a breakdown by age of all lets) shows that there was an increase from 14% in 2013 to 19% in 2016 in the number of properties let to 18-30 year olds.

A key group which the changes to the HAS may have negatively impacted is the 2.3% (153) older applicants on the housing register that are aged 60+. This is because older people are generally more disadvantaged in the job market, therefore, more likely to be trumped by applicants who are in working households, but who have a lower priority band. Appendix C shows a slight decline in the number of lets to applicants aged 61+ in the 2 years after the changes (6%), however, in 2016 it increased backed to the same levels as prior to the changes. Also, applicants seeking 50+ accommodation have a notably shorter waiting time (49 weeks) than any other group on the waiting list as a result of higher levels of suitable stock for older people in Slough.

Disability

Even though more applicants with a disability were housed following the changes to the HAS (see section 4 above), the changes may still have negatively impacted applicants with a disability. This is because some disabled applicants are more generally disadvantaged in the job market and as such would not meet the additional preference criteria due to their disability not allowing them to make the type of

positive contribution to their community that would give them an additional preference, for example, by working, attending training or volunteering. These applicants have been placed in Band C making the chance of them being housed very unlikely (unless seeking over 50 accommodation) when compared with those applicants prior to the changes in 2014 who were being placed in Band B and as such much more likely to be housed.

Race

Official statistics by the Department for Work and Pensions show that BME groups are generally more disadvantaged in the job market by 11.1 percentage points. As such it can be deduced that they are less likely to meet the additional preference criteria introduced in 2014. However, as identified above in section 4, BME groups have in fact not been negatively impacted overall.

Gender

Slough has more lone parent households with dependent children than the national average. Approximately 92.5% of these lone parent households are female and lone parent households tend to experience greater levels of deprivation and economic and housing need than households made of couples. Furthermore, lone parent women are also over-represented in homeless acceptances and temporary accommodation in Slough. Lone parent women who are over-represented in homeless acceptances and temporary accommodation are likely to be affected adversely by the requirement to work as they are typically less likely to be able to work due to childcare responsibilities and the high cost of childcare locally

These changes may negatively impact women who are unable to meet the additional preference as a result of being less able to secure employment due to being a lone parent with dependent children. Women in Slough according to data from the Office for National Statistics shows that only 67.2% (less than both South East and national averages) of women are economically active compared to 85.9% for men. An explanation for this may be due to women being significantly more likely to head up lone parent households with dependent children, coupled with a large proportion of young, pre-school age children on the Housing Register. Also as demonstrated by the same data 44.9% of people who are economically inactive in Slough is as a result of looking after a family member/home. The data since the changes to the allocations scheme shows that lone parent women may have been negatively affected. Appendix C shows that lets to women prior to the changes to the HAS in 2013 made up 60% of all lets and following the changes to the scheme this dropped to 52% in 2014. Although in the two years after this increased to 54% in 2015 and 57% in 2016 it was still below the levels prior to the changes.

Pregnancy & Maternity / Marriage & Civil Partnership / Religion & Belief / Sexual Orientation / Gender Reassignment

There is insufficient data to assess the impact of the changes to the HAS on these protected characteristic, however, there is no significant reason to believe that it will impact people based on any of these characteristics.

<p>6.</p>	<p>Have the impacts identified in (4) and (5) above been assessed using up to date and reliable evidence and data? Please state evidence sources and conclusions drawn (e.g. survey results, customer complaints, monitoring data etc).</p> <p>Yes. The following internal and external evidence and data sets have been used:</p> <ul style="list-style-type: none"> • Profile of Council residents • Profile of homeless households who the Council has a duty to rehouse (past 12 months) • Profile of applicants of the housing register (housing waiting list) • The Strategic Housing Market Assessment (SHMA) • The Joint Strategic Needs Assessment (JSNA) • The Slough Story • ONS data • 2011 Census • Public Health England’s Slough Profile <p>Data sets are included as Appendix A and B and C.</p> <p>There is insufficient data for housing register applicants with regard to sexual orientation, religion, and marital status and this has been disregarded.</p> <p>Sufficient data sets exist for age, gender, ethnicity and disability status although there are gaps due to “unknown” statuses and incorrect entries.</p> <p>There is a considerable margin of error when looking at the data sets which include all household members as many characteristics are only captured for the lead tenants. For example, in the ethnicity data sets for Applicants on the Housing Register and Temporary Accommodation Tenants, with up to 20% “unknown” (Appendix A). However, when only looking at the lead tenant this reduces considerably to 4.6%. Therefore, the data includes a breakdown of the two groups side by side.</p>
<p>7.</p>	<p>Have you engaged or consulted with any identified groups or individuals if necessary and what were the results, e.g. have the staff forums/unions/ community groups been involved?</p> <p>There has been no specific consultation for this equality impact assessment. However, there was extensive consultation for when the original equality impact assessment was completed in August 2013.</p>

	<p>The consultation consisted of the following.</p> <ul style="list-style-type: none"> • As well as the online and paper questionnaire which received around 400 responses, three drop in sessions were held which attracted around a dozen attendees. • The Customer Senate and Area Panels where both consulted. • The scheme was sent to registered providers of social housing in the borough, and housing advocacy groups in the borough. • Awareness of the methods of consultation was raised through the council's usual communication channels including press releases, Twitter messages, information on the website, articles in the Citizen magazine distributed to 46,500 households and Streets Ahead magazine which is distributed to all Slough Borough Council tenants and residents. • A letter was also sent to all applicants on the waiting list. <p>Feedback was positive by a large majority, with around 70-90% in support of the majority of the proposals. The proposals with the lowest level of supportive feedback where proposed for amendment to members. The respondents to the consultation showed a close correlation to the resident profile, for example 47% of respondents were white British, while 45.7% of the borough's population identify as white British. 19% of respondents identified as Asian/British Asian compared with 39.7% of the borough's population. 84% of respondents where on the waiting list, representing the greater interest from this group. Over 50% of respondents lived in the private rented sector, compared with 24% of the general population, however this accounted for the overrepresentation of those on the waiting list, who are more likely to be living in the private rented sector.</p>
8.	<p>Have you considered the impact the policy might have on local community relations? Allocations Policies, by their very nature, have an impact on community relations. When supply of affordable housing is out stripped by demand, it is essential that the allocation of social housing is seen to be fair and consistently applied. The impact of poor allocations policies where lots of the most vulnerable members of society are housed in the same block is evident – or a single problem family are moved into a street.</p>
9.	<p>What plans do you have in place, or are developing, that will mitigate any likely identified negative impacts? For example what plans, if any, will be put in place to reduce the impact? The Housing Allocations Scheme will undergo a review in the first quarter of 2017 and will be amended accordingly.</p>
10.	<p>What plans do you have in place to monitor the impact of the proposals once they have been implemented? (The full impact of the decision may only be known after the proposals have been implemented). Please see action plan below. The Housing Allocations Scheme will undergo a review in the first quarter of 2017 and will be amended accordingly. Also, a performance management monitoring process will be established to identify the outcomes of the scheme. Performance targets have been set up and the Housing team will monitor against the above key Equalities groups in order to feed into the annual review of the action plan and subsequent strategies.</p>

What course of action does this EIA suggest you take? More than one of the following may apply	✓
Outcome 1: No major change required. The EIA has not identified any potential for discrimination or adverse impact and all opportunities to promote equality have been taken	
Outcome 2: Adjust the policy to remove barriers identified by the EIA or better promote equality. Are you satisfied that the proposed adjustments will remove the barriers identified? (Complete action plan).	
Outcome 3: Continue the policy despite potential for adverse impact or missed opportunities to promote equality identified. You will need to ensure that the EIA clearly sets out the justifications for continuing with it. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact (see questions below). (Complete action plan).	
Outcome 4: Stop and rethink the policy when the EIA shows actual or potential unlawful discrimination. (Complete action plan).	

Action Plan and Timetable for Implementation

At this stage a timetabled Action Plan should be developed to address any concerns/issues related to equality in the existing or proposed policy/service or function. This plan will need to be integrated into the appropriate Service/Business Plan.

Action	Target Groups	Lead Responsibility	Outcomes/Success Criteria	Monitoring & Evaluation	Target Date	Progress to Date
Carry out a full review and assessment of the Allocations Scheme and, in particular, the eligibility criteria for accessing the Housing Register	All	Mike England				
Carry out further analysis to determine why there was a sudden spike in the number of lets to	Disabled applicants					

disabled applicants in 2014/15, why it dropped the following year and what can be expected in the years thereafter.						
Introduce measures to ensure that in the future the Council collates specific data on the age/gender of the applicants it lets its properties to in order to determine the impact of any changes to the scheme.	Young people, older people and women					
A review how the Council collects housing equalities data	All					
Develop performance monitoring framework for the key equalities groups identified above.	All					

Name:

Signed:Abyan Sharmake.....(Person completing the EIA)

Name:

Signed:(Policy Lead if not same as above)

Date: