

Equality Impact Assessment (EQIA)

The characteristics protected by the Equality Act 2010 are:

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| Disability | Age | Sex (gender) |
| Gender reassignment | Marriage/civil partnership | Pregnancy/maternity |
| Race | Sexual orientation | Religion/belief |

By law we must have due regard to the need to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act*
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it*
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.*

In effect, this means that we need to ensure that our policies and services are fair, equitable and proportionate and where possible mitigate against any adverse impacts on people from the different protected characteristics.

In addition to the above protected characteristics you should consider the impact of living in a **rural area** as part of this assessment. Where people live is not a characteristic protected by law, but for an organisation such as Babergh and Mid Suffolk District Councils it is good practice to consider carefully how location may affect people's experience of a policy or service.

The Rural-Urban definition, defines the rurality of very small census based geographies. Census Output Areas forming settlements with populations of over 10,000 (which are urban), while the remainder are defined as one of three rural types: *town and fringe, village or hamlet and dispersed*.

| Details | |
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| Service or policy title | Babergh & Mid Suffolk Amendments to the Choice Based Lettings Allocations Policy |
| Lead officer <i>(responsible for the policy or service/function)</i> | Justin King, Housing Needs & Standards Manager |
| Officers carrying out the EQIA <i>(at least one must have done EQIA training and it is recommended that an officer responsible for the policy or service/function is involved in completion)</i> | Justin King |
| Is this new or a revision? <i>(If revision state when previous EQIA undertaken)</i> | New |
| Is this the first time this policy or function has been assessed? | Yes (Updated Policy). Original Policy assessed in 2008/9. |
| Date of completing this EQIA | May 2022 |

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Description

What exactly is proposed? *(Describe the service/policy and the changes that are being planned)*

The Allocations Policy is used to assess applications for social housing and sets out the criteria, which should be used in the allocation of social housing.

Changes are required to the currently allocations policy. Some are related to government guidance, such as 'Improving Access to Social Housing for Victims of Domestic Abuse' and issued new a new 'Code of Guidance called, Allocation of accommodation: guidance for local authorities' and some amendments include clarifying wording in the policy so that key decisions are made fairly and consistently by all Gateway Local Authorities.

Some of the changes include:

- Addition and clarification of wording in relation to domestic abuse cases;
- Adding clear wording regarding Sensitive Lets;
- Adding wording regarding Care Leavers and their connection to the districts;
- Amending various inconsistencies around homelessness;
- Adding clear wording around effective dates for homeless applicants; and
- Various minor amendments

Why? *(Give reasons why these changes are being introduced)*

These changes are required to the Allocations Policy because of either legislative changes; such as legislation related to the Domestic Abuse Act 2021 and Allocation of Accommodation: guidance for local housing authorities in England and some amendments include clarifying wording in the policy so that key decisions are made fairly and consistently by all Gateway Local Authorities.

The changes do not directly impact on the EQIA as housing applications will continue to be assessed in the same way and banding awarded in accordance with current policy.

For Domestic Abuse cases, these will be referred to the Housing Solutions Team for support and assessment of immediate accommodation needs. E.g., Temporary Emergency Accommodation.

What will the effect of the changes be? *(Describe which people, communities, localities etc. will be affected by the changes)*

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| <p>The changes ensure the Local Authorities involved in the Gateway to Homechoice system meet all legislative requirements and that key decisions are made fairly and consistently by all officers using the policy.</p> |
| <p>How will it be implemented? <i>(Describe the decision making process, timescales, process for implementation)</i></p> <p>All Councils who form part of the Gateway to Homechoice Partnership will be presenting the proposed changes to Elected Members for approval.</p> |
| <p>When is it due to start? <i>(Planned start of new/revised policy/service)</i></p> <p>August 2022</p> |
| <p>Any other relevant details</p> <p>None</p> |

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| <p>Data about the population</p> <p>What is the demographic profile or make up of the community you are serving? <i>(A brief overview of quantitative data used and qualitative research undertaken, including customer surveys and focus groups, plus links to reports, local or national data that you have used, suggested sources of information can be found at the end of this document)</i></p> <p>The Allocations Policy covers any application made from a resident of the Districts, who is requesting assistance with accessing social housing.</p> |
| <p>What is the profile or make up of your service users by protected characteristics? <i>(Where this data is available. If it is not currently available state any plans to collect this in future)</i></p> <p>BMSDC Districts Population Data</p> <p>Age</p> <p>Babergh:</p> <ul style="list-style-type: none"> - 16 years or under: 18.14%; - 16 to 64 years: 60.48%; - 65 years and over: 21.38% <p>Mid Suffolk:</p> <ul style="list-style-type: none"> - 16 years or under: 18.43%; - 16 to 64 years: 61.44%; - 65 years and over: 20.13% |

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| <p>Implications for communities and workforce</p> <p>Disability</p> |
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| What is the impact on people with a disability (including children with additional needs) and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i> | There is no direct impact on anyone who is disabled. The policy details how applications from disabled persons will be considered and dealt with. |
| How does it have a positive or negative impact? | N/A |
| What could be done to mitigate any adverse impact or further promote positive impact? | N/A |
| Age | |
| What is the impact on people of different ages and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i> | Anyone age 16 plus can legally make a Social Housing Application. |
| How does it have a positive or negative impact? | N/A |
| What could be done to mitigate any adverse impact or further promote positive impact? | N/A |
| Sex (gender) | |
| What is the impact on people of different genders and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i> | The CBL Allocations Policy, does not take this into consideration when assessing or allocating housing. Any person of any gender is able to make an application for Social Housing. |
| How does it have a positive or negative impact? | N/A |
| What could be done to mitigate any adverse impact or further promote positive impact? | N/A |
| Gender reassignment | |
| What is the impact on people who have undergone gender reassignment (i.e. transgender people) and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i> | The CBL Allocations Policy, does not take this into consideration when assessing or allocating housing. Any person aged 16 plus is able to make an application for social housing. |

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| How does it have a positive or negative impact? | N/A |
| What could be done to mitigate any adverse impact or further promote positive impact? | N/A |
| Marriage/civil partnership | |
| What is the impact on people who are married or in a civil partnership and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i> | The CBL Allocations Policy, does not take this into consideration when assessing or allocating housing. Any person aged 16 plus is able to make an application for social housing. |
| How does it have a positive or negative impact? | N/A |
| What could be done to mitigate any adverse impact or further promote positive impact? | N/A |
| Pregnancy/maternity | |
| What is the impact on people who are pregnant women or those with a young child and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i> | Any person aged 16 plus is able to make an application for social housing. |
| How does it have a positive or negative impact? | N/A |
| What could be done to mitigate any adverse impact or further promote positive impact? | N/A |
| Race | |
| What is the impact on people from different races or ethnic groups and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i> | The CBL Allocations Policy, does not take this into consideration when assessing or allocating housing. Any person aged 16 plus is able to make an application for social housing. |
| How does it have a positive or negative impact? | N/A |
| What could be done to mitigate any adverse impact or further promote positive impact? | N/A |
| Sexual orientation | |

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| What is the impact on people according to their sexual orientation and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i> | The CBL Allocations Policy, does not take this into consideration when assessing or allocating housing. Any person aged 16 plus is able to make an application for social housing. |
| How does it have a positive or negative impact? | N/A |
| What could be done to mitigate any adverse impact or further promote positive impact? | N/A |
| Religion/belief | |
| What is the impact on people according to their religion or belief and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i> | The CBL Allocations Policy, does not take this into consideration when assessing or allocating housing. Any person aged 16 plus is able to make an application for social housing. |
| How does it have a positive or negative impact? | N/A |
| What could be done to mitigate any adverse impact or further promote positive impact? | N/A |

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| Rurality | |
| Where people live is not a characteristic protected by law: but for Babergh and Mid Suffolk District Councils it is good practice to consider carefully how location may affect people's experience of a policy or service. | |
| What is the impact on people according to whether they live in an urban or rural environment and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i> | The CBL Allocations Policy enables individuals to choose where they wish to live, so they are not prevented from living in certain areas. The only restriction relates to s106 sites, which are determined as part of the planning process and where an applicant needs to meet the strict local needs criteria. |
| How does it have a positive or negative impact? | N/A |
| What could be done to mitigate any adverse impact or further promote positive impact? | N/A |

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| Making Decisions | |
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| Having completed this equality impact assessment indicate which decision is recommended to be taken. | |
| Should the policy or service be implemented as the correct course of action? | Yes |
| Should the policy or service be amended as suggested by the report so that mitigating actions are taken to address an adverse or negative impact on any characteristic? | No |
| Should the policy or service be reviewed and revised more significantly to take into account its impact on different groups? | No |
| Should the policy or service not be actioned as there are too many negative impacts? | No |

| Monitoring Impact | |
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| Assessing the impact on equality is an ongoing process that does not end once a policy or service had been agreed or implemented. | |
| How frequently will the policy or service be reviewed? | The Policy is regularly reviewed, especially as new legislation is released. |
| Who will be involved? | Housing Solutions, Members |
| Will there need to be an action plan completed for any amendments? | No |
| What further evidence or consultation will be needed to check that the policy or service is working well? | No |

| Completion | |
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| Authors signature | Justin King |
| Date of completion | 3 rd May 2022 |

Additional sources of data can be found on the following links:

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[Suffolk Observatory – Welcome to the Suffolk Observatory](#)

<http://www.nomisweb.co.uk/>

<https://www.ons.gov.uk/>

<http://suffolkcf.org.uk/publications/hidden-needs-2016/>

<https://www.nao.org.uk/>