

Equality Impact Assessment

Appendix C

This document is intended to act as a guide and point of reference. There is no requirement to use this document as part of the policy development or decision-making process; although it may help.

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What are you thinking of changing or implementing?			
<p>Fareham's draft Housing Allocations Policy (2023) will, once adopted, supersede Fareham Borough Council's previous Housing Allocations Policy that was introduced in 2020. The policy sets out how Fareham Council's social housing allocation scheme is administered, in partnership with housing associations (also known as Registered Providers) in the Borough. It clearly sets out:</p> <ul style="list-style-type: none">• Who is eligible to be included in the scheme and which groups of people will not qualify to be included• The priority band which an applicant will be placed in based on their housing need, once assessed <p>The Housing Act 1996 places a requirement on all housing authorities to determine local priorities and processes for the allocation of social housing. This policy complies with the Housing Act and subsequent amendments to ensure that current housing obligations are being met and future demands are incorporated.</p> <p>The Housing Allocations Policy (2023) will be applied in conjunction with the Affordable Housing Strategy (2019-2036), in which guiding principles are set out for the sustainable provision of affordable housing in the Borough, around three key objectives;</p> <ol style="list-style-type: none">1. To deliver more affordable homes through the planning system.2. To ensure those homes are the right homes in the right places and that they are truly affordable to those that need them.3. To directly deliver more affordable homes by Registered Providers and Fareham Housing, especially targeting those in greater need. <p>The draft Housing Allocations Policy and the Affordable Housing Strategy, together, aim to reduce numbers of individuals in the Borough waiting to be allocated social housing.</p>			
What is the expected or anticipated impact of this change?			
<p>The changes that have been identified so far between the draft Housing Allocations Policy 2023 and the previous 2020 version are to add clarity, explain processes and to increase transparency.</p>			

The draft Policy also contains within it some more specific criteria-based alterations which may positively impact on certain protected characteristics. These more specific amendments are;

- A child is now included as a close member of the family for an established local connection if a person needs to move to the area to be near a close member of their family to give or receive essential care and support.
- Applicants needing to move on from supported accommodation in the borough where they are ready to live independently but may not otherwise have an established local connection can apply.
- Some people under the age of fifty-five and who own their own property can now join if they find themselves in negative equity, unsafe to remain or their needs in terms of health and/or disability are not met.
- The qualifying income criterion does not apply to existing social housing tenants.
- The Council can now award higher priority to:
 - Existing tenants who wish to downsize
 - Existing tenants who are giving up adapted properties
 - Homeless families placed in B&B or other forms of temporary accommodation, and other homeless households in B&B for over 4 months
- Unborn children are now included in household numbers from 20 weeks pregnancy.

Whilst each of these amendments will have an impact on a protected characteristic, the details of which will be considered below, the draft Housing Allocations Policy (2023) incorporates these changes pragmatically. In this way, the draft Policy focuses on allocating social housing to those in greatest need, while supporting all to determine the housing solution that best fits their needs.

The potential positive impact that the draft Housing Allocations Policy (2023) offers is broad. It is, however, anticipated that it will be of particular benefit to individuals with certain protected characteristics due to prioritisation when allocating properties and the increased support it offers to guide them in identifying appropriate housing options.

Protected characteristic: Age (including children and young people)

Points to consider:

- How have you considered the potential impact on people with this protected characteristic?
- What, if any, is the expected impact on people with this protected characteristic?
- What steps or action is planned to mitigate any negative impact?

Fareham has a statistically high number of older residents when compared to both regional and national levels. In 2021, Fareham has seen an increase of 23.4% in people aged 65 years and over and Fareham has seen the second largest increase (35%) in the number of residents aged 85+ across the whole of Hampshire.

There are currently 26 Council run Sheltered Housing Schemes within Fareham and it is important that the limited spaces available go to those most in need. The current Housing

Allocations Policy (2020) provides clear qualifying criteria for applications to move into sheltered housing:

- The customer should be over 55 years and would benefit from the sheltered accommodation offered
- Their current home must be unsuitable for their needs
- They must have insignificant financial resources to meet their housing needs in the private market.

The draft Housing Allocations Policy (2023) retains these qualifying criteria. However, it also allows for the allocation of sheltered accommodation to applicants under 55 years of age in certain circumstances, where this is deemed to be the most appropriate housing solution.

Some people under the age of 55 who own their own property can now join the housing register if they find themselves in significant negative equity, it is unsafe for them to remain in their home, or it does not meet their needs in terms of health and/or disability; this group is excluded under the current Policy (2020). This more flexible approach to qualification criteria will ensure that vital accommodation is accessed by those who are most vulnerable.

The early advice and support provided by the Housing Options team aims to assist customers in identifying the housing outcome that is most appropriate to them. The availability of this support ensures that the draft Housing Allocations Policy (2023) represents a positive impact for the older person demographic.

Although the draft Policy does not consider specifically the needs of young people, it does specify that from the age of 16 years, young people are able to secure a licence to occupy premises, which can convert to a full tenancy when they turn 18. The policy also confirms that young people leaving local authority care are exempt from the local connection criteria and may still apply, whether they are under 18 and preparing to leave care or have just turned 18.

The support that will be on offer through the proposed procedures, will assist young people to understand whether a licence to occupy is the most appropriate solution for them and enable them to consider all their options. This additional support ensures that the draft Housing Allocations Policy (2023) will not have an adverse impact for this demographic.

The draft policy (2023) also has an increased emphasis on families with children. For example, adults with minors, staying in B&B accommodation or other forms of temporary accommodation, will be awarded a higher priority banding and can therefore be offered social housing sooner than under the current policy (2020).

Protected characteristic: Disability (including physical and those with mental health conditions)

Points to consider:

- How have you considered the potential impact on people with this protected characteristic?

- What, if any, is the expected impact on people with this protected characteristic?
- What steps or action is planned to mitigate any negative impact?

The 2021 Census revealed that the proportion of Fareham residents whose day-to-day activities were 'limited a lot' due to disability was 5.5% which is below the average for Hampshire.

Disability, of various forms, can restrict access to well-paid work (thereby increasing reliance on social housing) and make existing housing arrangements unfit for the resident's needs. Fareham's Housing Allocations Policy 2020 currently considers the impact that medical conditions, including disabilities, mental health and sensory conditions can have on an individual's housing needs. It also identifies the positive impact that suitable accommodation can have on the health and welfare of those with medical conditions.

To better understand the needs of the customer and ensure they are met with appropriate support during the process:

- Staff have regular access to training on different vulnerabilities they may need to support during the housing allocation process. Regular review of the key protected characteristics will help to inform staff as to whether additional staff training is needed to better support customers with the extended 'medical' criteria of sensory and mental health conditions.
- Staff work closely with partner agencies and other organisations to best understand the individual needs of the customer and support them into appropriate housing.

The current Housing Allocation process asks for the completion of a form to register a social housing need. Recognising that it can be a daunting task, a sympathetic and accessible approach continues to be promoted whereby tailored support from Housing Options staff is offered to ensure applicants are guided to identify housing solutions that are most appropriate for them.

Through this supportive approach, Housing Options staff also identify any vulnerabilities during the assessment process, enabling them to be flagged on the information system to ensure that future correspondence and housing opportunities reflect their needs.

The draft new policy offers a more flexible approach to eligibility requirements which will positively impact on this protected characteristic:

- Applicants needing to move on from supported accommodation in the borough where they are ready to live independently but may not otherwise have an established local connection will qualify to join the housing register. This change ensures more people with a disability or mental health condition are able to secure independent accommodation within the Borough.
- Some people under the age of fifty-five and who own their own property can now join the housing register if their needs in terms of health and/or disability are not met in their current property. Again, this more flexible eligibility criteria would have a positive impact on more people with disabilities or long term health conditions.

As a result, the evidence indicates that the draft Housing Allocations Policy (2023) will have a positive impact for this protected characteristic.

Protected characteristic: Gender reassignment

Points to consider:

- How have you considered the potential impact on people with this protected characteristic?
- What, if any, is the expected impact on people with this protected characteristic?
- What steps or action is planned to mitigate any negative impact?

No impact identified.

Protected characteristic: Marriage and civil partnership

Points to consider:

- How have you considered the potential impact on people with this protected characteristic?
- What, if any, is the expected impact on people with this protected characteristic?
- What steps or action is planned to mitigate any negative impact?

No impact identified.

Protected characteristic: Pregnancy and maternity

Points to consider:

- How have you considered the potential impact on people with this protected characteristic?
- What, if any, is the expected impact on people with this protected characteristic?
- What steps or action is planned to mitigate any negative impact?

The draft Housing Allocations Policy (2023) does contain within it one amendment that could have a positive impact on this protected characteristic, namely that unborn children are now included in household numbers from 20 weeks pregnancy.

Under the current policy (2020), unborn children are not considered in the household size until they are born. Therefore, this revision is an advantage as applicants who are pregnant will be considered for an allocation which is suitable for their future family size.

Protected characteristic: Race

Points to consider:

- How have you considered the potential impact on people with this protected characteristic?
- What, if any, is the expected impact on people with this protected characteristic?



- What steps or action is planned to mitigate any negative impact?

The Borough's population has a considerably higher proportion of the 'White British' ethnic group compared to regional and national figures, and a correspondingly lower proportion of other ethnicities.

The Housing Allocations Policy is intended to be socially inclusive and will be made available in alternative languages upon request. Council tenants who face language barriers in accessing information of the services available to them are able to request the support of a translator, through the Council.

There is no evidence to suggest that the draft Housing Allocations Policy will have an adverse impact on this protected characteristic group.

Protected characteristic: Religion or belief

Points to consider:

- How have you considered the potential impact on people with this protected characteristic?
- What, if any, is the expected impact on people with this protected characteristic?
- What steps or action is planned to mitigate any negative impact?

No impact identified.

Protected characteristic: Sex

Points to consider:

- How have you considered the potential impact on people with this protected characteristic?
- What, if any, is the expected impact on people with this protected characteristic?
- What steps or action is planned to mitigate any negative impact?

No impact identified.

Protected characteristic: Sexual orientation

Points to consider:

- How have you considered the potential impact on people with this protected characteristic?
- What, if any, is the expected impact on people with this protected characteristic?
- What steps or action is planned to mitigate any negative impact?

No impact identified.

Non-Protected characteristic: Socio-economic status



The draft Affordable Housing Policy (2023) aims to prioritise those in greatest need. Rather than relying on the artificial 'income threshold' to establish an individual's financial need, an assessment of the customer's disposable income is conducted using the enquiry and tailored support offered by the Housing Options Method. This ensures that considerable outgoings such as Child Support Agency payments are able to be considered, offering a far more realistic understanding of the affordability of housing for the customer.

People with lower incomes often find it particularly challenging to find housing that is affordable for them. During the Housing Options process, the Council will work in partnership with specialist organisations, such as the Department of Works and Pensions and local charities, to support people with financial concerns, in addition to ensuring these individuals' housing needs are met.

As a result of the additional support that is offered through the Housing Options Method, the evidence indicates that the more flexible eligibility criteria outlined in the Draft Housing Allocations Policy is likely to have a positive impact on this group.

