

Equality Impact Assessment (EqIA)

Introduction – Please read


The Public Sector Equality Duty, introduced under the Equality Act 2010, requires all public bodies, including local authorities, to have due regard to the need to:

- Eliminate unlawful discrimination, harassment, and victimisation
- Advance equality of opportunity between those who share a protected characteristic and those who do not
- Foster good relations between those who share a relevant protected characteristic and those who do not

Equality Impact Assessments (EqIAs) allow the Council to:

- Show that we are meeting this legal duty by demonstrating due regard for the provisions of the Public Sector Equality Duty
- Identify possible negative impacts on individuals and groups with protected characteristics, plan mitigating action and seek to maximise opportunities to advance equality within our activities.

EqIAs provide a methodical approach to the assessment of impacts across the [nine protected characteristics](#) and should be completed during the development and review of all Council policies, strategies, procedures, projects or functions. Where there is any doubt, the completion of an EqIA is always recommended.

Throughout the course of this form, please hover over the [] symbol for guidance in relation to specific questions. When the form is completed, please send an electronic copy to equality.schemes@scambs.gov.uk. If you require any additional support completing the form, please email the above address.

Equality Impact Assessment Complete Form

Section 1: Identifying Details

- 1.1** Officer completing EqIA:
Heather Wood – Chair of Home-Link Management Board and Head of Housing Advice and Options for South Cambridgeshire District Council
- 1.2** Team and Service:
Housing Advice and Options Service – Allocations Function
- 1.3** Title of proposal:
Lettings Policy Review
- 1.4** EqIA completion date:
03/03/2021
- 1.5** Proposal implementation date:
01/04/2021
- 1.6** Who will be responsible for implementing this proposal:
Housing Advice and Options Service – Allocations staff

Section 2: Proposal to be Assessed

- 2.1** Type of proposal:
Policy
If other, please specify
Existing policy has been reviewed and updated.
- 2.2** Is the proposal:
Review of existing

2.3 State the date of any previous equality impact assessment completed in relation to this proposal (if applicable):

2018 and 2012

2.4 What are the headline aims of the proposal and the objectives that will help to accomplish these aims? (Approximately 250 words)

To allocate social housing fairly, consistently and in a transparent manner across the partnership area of Cambridgeshire and West Suffolk, ensuring that all statutory allocations requirements are that properties applicants are assessed in a manner which assists households in the highest level of need.

2.6 Which groups or individuals will the proposal affect:

- Service Users
 Councillors
 External Stakeholders
 Other
 Employees

If other, please specify [Click or tap here to enter text.](#)

2.7 How will these groups or individuals be affected? (you will be asked to provide more detail on the specific impacts on different protected characteristic groups later on in the form) (approximately 250 words)

The Allocations Policy applies to the way in which social housing is allocated and determines who can apply. Anyone living or wishing to live in the partnership will be affected (this includes the areas encompassed by Cambridge City Council, East Cambridgeshire District Council, Fenland District Council, Huntingdon District Council, South Cambridgeshire District Council and West Suffolk Council).

Certain categories of people are offered greater priority under the policy and so the policy will impact differently on groups of people depending on their circumstances.

2.8 How many people will this proposal affect? (Approximately)




Anyone is able to apply for social housing although there are eligibility and local connection criteria that will determine whether households can be accepted onto the register. As an indication of the levels of need there are approximately 10,288* households who currently have a live application for housing across the partnership area (*the exact number is fluid as new people register and existing applicants are housed, meaning the number changes on a daily basis).

- 2.9** If any part of the proposal is being undertaken by external partners, please specify how the Council will ensure that they will meet equality standards? (Approximately 250 words)

The Allocations Partnership includes 6 local authorities and 34 Registered Providers (RPs). The strategic direction of the partnership, including the allocations review, is overseen by the Home-Link Management Board comprising representatives from each council and RP representation. The day to day operational partnership work is undertaken by the Home-Link Manager.

Section 3: Evidence and Data


- 3.1** Describe any research (this could include consultation) and analysis you have undertaken to understand how [protected characteristic groups](#) are likely to be affected? Please list any key sources that you used to obtain this Information. 

(Approximately 250 words)

Existing measures identified during the 2012 Allocations Policy review are already in place to support applicants with protected characteristics. For example, processes are in place to identify and support people who may not have access to IT or lack the ability to place their own bids for properties. For those where English isn't their first or main language, translation and support is available on request. There is no plan to change any of the existing support measures identified during the [2012 Allocations Policy Review EqIA](#) to support applicants with protected characteristics. In terms of new impacts and mitigating measures, the 2020 policy review proposes very few




amendments and therefore the impact is not considered to be high. National legislation dictates much of the direction of the Allocations Policy including which groups of people should be given 'reasonable preference' for accommodation. During the re-drafting stage, Legal advice was sought from Bevan Brittain LLP to ensure the updated policy was legally compliant and was not unintentionally discriminatory. The legal advice was obtained in October 2020 and, based on this feedback, some small tweaks to wording were introduced to ensure the council did not inadvertently fetter its discretion (for example by allowing the minimum weekly employment criteria to be waived for people with disabilities). In addition, guidance was provided as to how the policy should frame its approach to dealing with allocations for people with housing related debt. These recommendations were also incorporated and included in the policy draft available as part of the public consultation. The public consultation ran for 8 weeks from 23rd October 2020 to 18th December 2020. No major issues, changes or areas for concern were highlighted as a result of the consultation process although some further small wording tweaks have been made to the final draft as a result. Overall there were high levels of agreement for the proposed changes to the policy.

- 3.2** Describe any research (this could include consultation) and analysis you have undertaken to understand any effects on any other groups of people not mentioned in the nine [protected characteristic groups](#) (for example people who live in rural areas, who live in areas of high growth, or from low income backgrounds). 

(Approximately 250 words)

Professional agencies (ie Criminal Justice, voluntary sector, Public Health colleagues and County Council colleagues) were contacted and invited to comment on the proposed amendments. Feedback was received from criminal justice colleagues which referenced the work already in place to create a bespoke accommodation pathway for offenders. (The Homeless Reduction Act requires bespoke accommodation pathways to be developed for specific groups of people

ie offenders, young persons etc. These pathways are already in place and are subject to regular monitoring and review. Minor amendments have been made to the draft Allocations Policy to better reflect the wider partnership and protocol working that exists). In addition, detailed feedback was received in relation to people experiencing domestic abuse and much of this has been incorporated into the final draft of the policy (for example minor wording tweaks to make it more explicit that people experiencing coercive control, including economic control, will not be adversely affected).


- 3.3** If you have not undertaken any consultation, please detail why not, or when consultation is planned to take place. 
(Approximately 250 words)
Click or tap here to enter text.

Section 4: Impact of proposal on those with protected characteristics

4.1 Age:

- 4.1.1** Has your research identified that the proposal will have an impact on this protected characteristic?
yes

If you have selected no – please move forward to question 4.2 Disability
If you have selected yes – please continue below (4.1.2)

- 4.1.2** Describe the impacts of the proposal on this protected characteristic group identified through your research, including
- whether each impact is positive, neutral or negative
 - whether it is a high, medium or low impact. 
 - approximately 250 words per impact

Positive impact as specialist provision is available for older people

4.1.3 Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

4.2 Disability:


4.2.1 Has your research identified that the proposal will have an impact on this protected characteristic?

yes

If you have selected no – please move forward to question 4.3 Gender Reassignment

If you have selected yes – please continue below (4.2.2)

4.2.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

The changes to the 'local connection' criteria which clarify employment expectations could negatively impact on some groups of people ie people with disabilities who may be unable to work for the required 16 hours per week. However, to avoid the council inadvertently fettering its discretion, the policy explicitly states that the council can waive this requirement if it chooses in order to prevent the possibility of discrimination.

4.2.3 Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?
4.3 Ensure employment criteria contain the appropriate wording to ensure the council does not fetter its discretion and can respond sensitively to individual circumstances.	Heather Wood	Completed October 2020	n/a – already completed

Gender Reassignment:


4.3.1 Has your research identified that the proposal will have an impact on this protected characteristic?

No

If you have selected no – please move forward to question 4.4 Marriage and Civil Partnership

If you have selected yes – please continue below (4.3.2)

4.3.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

Click or tap here to enter text.

4.3.3 Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

4.4 Marriage and Civil Partnership:

4.4.1 Has your research identified that the proposal will have an impact on this protected characteristic?


No

If you have selected no – please move forward to question 4.5

Pregnancy and Maternity

If you have selected yes – please continue below (4.4.2)

4.4.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

Click or tap here to enter text.

4.4.3 Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.


4.5 Pregnancy and Maternity:

4.5.1 Has your research identified that the proposal will have an impact on this protected characteristic?

Yes

**If you have selected no – please move forward to question 4.6 Race
If you have selected yes – please continue below (4.5.2)**

4.5.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

This is a positive impact as pregnant women are assessed as needing two rooms from week 24.

4.5.3 Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?

Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
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4.6 Race:


4.6.1 Has your research identified that the proposal will have an impact on this protected characteristic?

Choose an item.

If you have selected no – please move forward to question 4.7 Religion or Belief

If you have selected yes – please continue below (4.6.2)

4.6.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

Click or tap here to enter text.

4.6.3 Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

4.7 Religion or Belief:

4.7.1 Has your research identified that the proposal will have an impact on this protected characteristic?

no

If you have selected no – please move forward to question 4.8 Sex

If you have selected yes – please continue below (4.7.2)

4.7.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 📖
- approximately 250 words per impact

Click or tap here to enter text.

4.7.3 Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

4.8 Sex:


4.8.1 Has your research identified that the proposal will have an impact on this protected characteristic?

no

If you have selected no – please move forward to question 4.9 (Sexual Orientation)

If you have selected yes – please continue below (4.8.2)

4.8.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

Click or tap here to enter text.

4.8.3 Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

4.9 Sexual Orientation:


4.9.1 Has your research identified that the proposal will have an impact on this protected characteristic?

no

If you have selected no – please move forward to question 4.10 (Other)

If you have selected yes – please continue below (4.9.2)

4.9.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

Click or tap here to enter text.

4.9.3 Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

4.10 Other: (e.g. rurality, growth, socio-economic status etc.).


4.10.1 Has your research identified that the proposal will have an impact on this protected characteristic?

yes

If you have selected no – please move forward to question 5.1

If you have selected yes – please continue below (4.10.2)

4.10.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

An increase in applications for social housing is anticipated as people experience the social/financial impacts of the pandemic. For example, loss of income, marital breakdown etc. The Allocations policy is designed to allocate social housing fairly and consistently, including a recognition of people’s financial circumstances as well



as other relevant factors that may impact on housing need. The policy does not discriminate against people on low incomes. Demand for social housing outstrips supply and so Housing Advice teams have a range of other measures in place to support people accessing housing advice, these include access to specialist debt advice through arrangements with the CAB, specialist housing advice via local authority teams and a range of services for rough sleepers. In addition, each local authority can offer support to people who are unlikely to receive support via the social housing register and/or who wish to access housing in the private sector. These measures include the loan of rent deposits and rent in advance as well as access to private sector leasing schemes.

Although negative impacts have been identified, suitable mitigation measures are already in place within local authority Housing Advice teams.

4.10.3 Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Section 5: Summary

5.1 Briefly summarise the key findings of the EqIA and any significant equality considerations that should be taken into account when deciding whether or not to proceed with the proposal (this section can be included within the ‘equality implications’ section of any committee reports). (Approximately 250 words)



The 2020 review of the Allocations Policy did not lead to many significant changes in the policy itself. Previous policy reviews (in 2012 and 2018) identified equality implications which have already been addressed including mitigation measures which are still in place. (For example, assisted bidding for people unable to pace property bids online). In terms of the 2020 revisions, only significant two aspects have been identified in relation to this impact assessment; the first element is in respect of the proposed employment requirements which had the possibility to negatively impact on people with disabilities. The policy wording has therefore been amended to allow the council the ability to over-ride or lessen the employment requirement where appropriate. In terms of the second element, detailed feedback was received via the consultation process in relation to people experiencing domestic abuse. Further tweaks to the policy wording were made to ensure the policy was more explicit in its intention not to inadvertently discriminate against people experiencing financial abuse and other forms of coercive control. No further equality implications were identified. It should also be noted that the policy has to conform to legal requirements in terms of the allocation of social housing, including giving 'reasonable preference' to certain groups of people. This policy is legally compliant and additional minor changes to the wording have been incorporated to reflect other statutory requirements ie in relation to accommodation protocols and pathways.

5.2 Confirm the recommendation of the officer completing the EqIA:

- Proceed with the proposal with no actions identified as required within Section 4 of the EqIA: Analysis demonstrates that the policy is robust, the
- evidence shows no potential for discrimination and we have taken all appropriate opportunities to advance equality and foster good relations between groups.

- Adjust proposal and proceed: We will take steps to remove barriers or better advance equality as detailed in the action tables in Section 4.
- Where possible actions should be done before the proposal is implemented. Where this isn't possible, timescales for completion are included in Section 4 action tables

- Reject the proposal: Analysis demonstrates that the proposal will cause unlawful discrimination and it must be removed or changed

5.3 Signature of individual completing EqIA:

Heather Wood

5.4 Date of completion:

03/03/2021

Section 6: Sign Off

6.1 Approving officer EqIA review outcome:

- Proceed with the proposal with no actions identified as required within Section 4 of the EqIA: Analysis demonstrates that the policy is robust, the evidence shows no potential for discrimination and we have taken all appropriate opportunities to advance equality and foster good relations between groups.

Adjust proposal and proceed: We will take steps to remove barriers or better advance equality as detailed in the action tables in Section 4.

- Where possible actions should be done before the proposal is implemented. Where this isn't possible, timescales for completion are included in Section 4 action tables
- Reject the proposal: Analysis demonstrates that the proposal will cause unlawful discrimination and it must be removed or changed

6.2 Do you give permission to publish this EqIA on SCDC website (delete as appropriate)? If no, please state reason

Yes

6.3 When will this proposal next be reviewed and who will this be?

Click or tap to enter a date.

Click or tap here to enter text.



6.4 Approving officer signature:

Heather Wood – chair of Home-link Management Board

6.5 Date of approval:

03/03/2021

Please send a copy to Equality.Schemes@scambs.gov.uk

