

## **Gateway to Homechoice Allocations Policy**

### **Equality Impact Assessment Form - An Analysis of the Effects on Equality**

#### Section 1: Initial Equality Impact Assessment

Name of policy to be assessed:

- Gateway to Homechoice Allocations Policy  
<https://www.gatewaytohomechoice.org.uk/content/Information/Allocationspolicy>

#### **1. What is the main purpose of the policy?**

- To allocate social housing according to need and ensure that housing need assessment is fair and does not discriminate on unreasonable grounds.

#### **2. What main areas or activities does it cover?**

- The policy aims to assess the needs of everyone who makes an application for housing based on their individual circumstances. Each applicant will be placed into a Band between A and E, with those who are in most urgent housing need will be placed in Band A. Priority is also given to applicants who will release accommodation in high demand, for example, applicants who want to downsize.
- The policy aims to promote equality and equal opportunities for access and participation by everyone and to assess applications for housing against the same criteria.

### **3. Are there changes to an existing policy being considered in this assessment? If so what are they?**

The policy has now been reviewed and a number of changes have been made to the policy. Areas for review were identified in the following ways:

- a) Analysis of trends and data from the housing register and lets
- b) Consultation with the Project Board
- c) Consultation with frontline staff
- d) Carrying out a formal review meeting with representatives from all local authority partner and finalising proposed changes to wording with this review group

In December 2020, the Ministry for Housing, Communities and Local Government issued new a new Code of Guidance called, *Allocation of accommodation: guidance for local authorities*. This clarifies new eligibility criteria for European applicants following on from Brexit. This guidance has also been considered while developing and updating the Allocations Policy.

Changes made to the Allocations Policy include:

- Disregarding local connection criteria for spouses and civil partners who are required to leave accommodation provided by the Ministry of Defence following a breakdown in their relationship with their Service spouse or partner;
- Clarification on how properties in rural parts of the Gateway may be restricted so that only applicants with a specific type of local connection are eligible for allocation of these properties; and
- Clarification that when completing financial assessments on households to ascertain whether they are able to meet their own housing need, will now include all adult members of the household, not just the main applicant's income.

### **4. Who are the main audience, users or customers who will be affected by the policy?**

- Applicants for social housing who perceive themselves to be in need of social housing, some of whom are very vulnerable
- Local authorities and registered housing providers will also need adhere to the content of the policy to ensure that it is consistently applied across the Gateway area of operation

### **5. What outcomes do you want to achieve from the policy?**

- To meet the legal requirements for letting social housing
- To assess all customers fairly based on their need for housing and to enable those in greatest housing need to access social housing
- To make best use of existing housing stock
- To provide a consistent lettings process across the sub region, so properties are let in a fair and transparent way

- To provide increased choice and information to customers in the allocation of social housing
- To support vulnerable customers accessing available homes
- To ensure that customers are not discriminated against, whether directly or indirectly
- To improve mobility across the sub region by allowing customers to apply to be housed in any of the seven local authority areas
- To promote social inclusion and help achieve sustainable communities

**6. Are other service areas or partner agencies involved in delivery? If so, please give details below:**

Local authority partners are:

- Babergh District Council;
- Braintree District Council;
- Colchester Borough Council;
- East Suffolk Council;
- Ipswich Borough Council;
- Maldon District Council; and
- Mid Suffolk District Council.

Registered housing provider partners are:

- Anchor Hanover
- Broadland Housing Association
- CDS Coop
- CHP
- Clarion
- Cotman Housing Association
- Eastlight Community Homes
- English Rural Housing
- Estuary
- Flagship Homes (including Suffolk Housing)
- Guinness
- Habinteg
- Hastoe
- Havebury Housing

- Home Group
- Housing 21
- London and Quadrant Housing
- Moat
- Notting Hill Genesis
- Orbit Group Ltd
- Orwell Housing Association
- Peabody
- Places for People
- Riverside
- Saffron Housing Trust
- Sage Housing
- Salvation Army Housing Association
- Sanctuary Housing
- Swan Housing
- Winsleys
- Winnocks & Kendalls

**7. Are you aware of any relevant information, data, surveys or consultations<sup>1</sup> which help us to assess the likely or actual impact of the policy upon customers or staff?**

- General monitoring is carried out by the scheme’s project board every quarter to ensure that the scheme is running effectively and that properties are being let to those in need
- An annual report on the scheme is also published and available on the customer website

**8. The ‘general duty’ states that we must have “due regard” to the need to:**

(a) eliminate unlawful discrimination, harassment and victimisation

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<sup>1</sup>Click on [surveys or consultations](#) for more information. The Council's surveys and consultations include 'equality monitoring information' to help us identify any particular concerns or views expressed by any particular group or 'protected characteristic'. It can also help us to assess how representative of our customers the respondent group is. Local Data on the Protected Characteristics is available [on this page](#) of the Hub.

- (b) advance equality of opportunity between people who share a 'protected characteristic'<sup>2</sup> and those who do not<sup>3</sup>
- (c) foster good relations between people who share a protected characteristic and those who do not<sup>4</sup>

Not all policies help us to meet the 'general duty', but most do.

**Where applicable, explain how this policy helps us to meet the 'general duty':**

The allocations policy adheres to the 2010 Equalities Act and allows for a consistent, fair and transparent approach to making social lettings which takes account of each person's need for social housing.

The scheme and policy are overseen by a Project Board, which regularly monitors available equalities data from the scheme.

**The policy helps us to 'eliminate unlawful discrimination, harassment and victimisation' in the following way(s):**

Applicants to the scheme are assessed and prioritised according to their need for housing. Where applicants have been subject to harassment in their current/previous homes, they can be given a high priority on the housing register.

**The policy helps us to 'advance equality of opportunity...' in the following way(s):**

Equality of opportunity may be advanced for people in the following ways

- People with disabilities are assessed and may be given a higher band due to their medical needs
- Those in BME groups may be given high priority awards in cases of harassment
- Older people have access to specialist accommodation to meet their needs

**The policy helps us to 'foster good relations...' in the following way(s):**

There is clear information on the Gateway to Homechoice website which outlines how clients' housing applications will be prioritised as well as showing which properties are let to which type of applicant each week.

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<sup>2</sup> The Equality Act's 'protected characteristics' include age, disability, gender reassignment, pregnancy and maternity, race, religion or belief and sex and sexual orientation. It also covers marriage and civil partnerships, but not for all aspects of the duty.

<sup>3</sup> This involves having due regard, in particular, to the need to: (a) remove or minimise disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic; (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it, and (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

<sup>4</sup> This involves having due regard, in particular, to the need to (a) tackle prejudice, and (b) promote understanding.

**9. The Council has an important role in improving residents' health under the Health and Social Care Act 2012.** This relates to both its 'core functions' (such as housing, leisure, green spaces and environmental health) and to its 'enabling roles' (such as economic development, planning and engaging with communities)

. The Council recognises that its Public Sector Equality Duty and its role in improving health are interrelated and mutually supportive. This is especially true across the 'protected characteristics' of age and disability.

*"Health inequalities are the unjust and avoidable differences in people's health across the population. They come from the unequal distribution of income, wealth and power and influence the wider determinants of health such as work, education, social support and housing. Currently, in England people living in the least deprived areas will live around 20 years longer in good health than those in the most deprived areas. Reducing health inequalities means giving everyone the same opportunities to lead a healthy life, no matter where they live or who they are."*

Where applicable, explain how this policy helps us to improve health/ reduce health inequalities for residents:

The law regarding the allocation of affordable housing sets out that Allocation Policies must have a means for determining priority between applicants and specifies five groups of applicants who must be awarded reasonable preference over other applicants, within the allocation scheme. The groups particularly relevant to improving health and reducing health inequalities are:

- Applicants occupying unsanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions.
- Applicants who need to move on medical or welfare grounds (including grounds relating to disability).

Housing legislation also gives local authorities the ability to give additional preference to applicants if they meet the statutory reasonable preference categories and have an urgent housing need. The Gateway to Homechoice Allocations Policy gives additional preference to the following groups which would help improve the health of and reduce health inequalities:

- Applicants who need to move urgently because of a life-threatening illness or sudden disability - will be assessed for additional priority on medical and/or welfare grounds
- Families with severe overcrowding which poses a serious health hazard –will be assessed for additional priority on medical or welfare grounds.

There is extensive literature on the relationship between housing and health. The Allocations Policy seeks to give access to housing which is of good quality and design; affordable; has security of tenure and can be a setting for care, all of which can impact directly on health, as well as indirectly on health determinants

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<sup>1</sup> The King's Fund: [The district council contribution to public health: a time of challenge and opportunity, 2015](#)

**10. This section helps us to identify any disproportionate impacts. Please indicate in the table below whether the policy is likely to particularly benefit or disadvantage any of the ‘protected characteristics’.**

*Remember to include reference to any relevant consultation, data or information.*

'Protected characteristic' group		Positive Impact	Explain how it could particularly benefit the group	Negative Impact	Explain how it could particularly disadvantage the group
Age	Older people (60+)	X	<p>Priority for sheltered accommodation gives greater opportunity and choice of housing.</p> <p>Older applicants who wish to downsize are also given high priority on the housing register to enable them to move as quickly as possible</p>	X	<p>Primary access to the application and bidding process is via a website which those over 60+ may not have regular access to or may not feel comfortable using this type of technology</p>
	Younger people (17-25) and children (0-16)	X	<p>Under 16s are treated as dependent children and are therefore in a priority need group</p> <p>16 and 17 year olds are also considered to be in priority need</p> <p>Those who are under 21 years old who were in local authority care between the ages of 16 and 18 and those aged 21 and over who are vulnerable as a result of leaving local authority care are in a priority need group</p> <p>17 – 25 year olds can also access supported housing</p>	X	<p>Under 16s may be expected to share a bedroom with a sibling of the same sex even if there is a large age gap between them</p> <p>17 year olds can't hold a tenancy</p>

'Protected characteristic' group		Positive Impact	Explain how it could particularly benefit the group	Negative Impact	Explain how it could particularly disadvantage the group
Disability	Physical	X	<p>Physical needs can be taken into account during the application process and applicants can be given a higher banding than usual due to their physical needs.</p> <p>Adapted properties are also available to those who need it</p> <p>Some new properties built within the Gateway adhere to the Lifetime Homes standards</p>	X	<p>Some properties will be inaccessible to those with physical disabilities – e.g. top floor flat with no lift</p> <p>Live-in help will not automatically be considered to be part of a household.</p>
	Sensory	X	<p>Sensory needs can be taken into account during the application process and applicants can be given a higher banding than usual due to their sensory needs.</p> <p>Adapted properties are also available to those who need it</p> <p>Some new properties built within the Gateway adhere to the Lifetime Homes standards</p>	X	<p>Some properties will not be appropriate for those with sensory needs.</p> <p>Live-in help will not automatically be considered to be part of a household.</p>
	Learning	X	<p>Learning disabilities can be taken into account during the application process and applicants can be given a higher banding than usual due to their learning disability</p>	X	<p>Online scheme could disadvantage this group which may find it more difficult to access the service.</p> <p>Live-in help will not automatically be considered to be part of a household.</p>



'Protected characteristic' group		Positive Impact	Explain how it could particularly benefit the group	Negative Impact	Explain how it could particularly disadvantage the group
	Mental health issues	X	Mental health needs can be taken into account during the application process and applicants can be given a higher banding than usual due to their mental health needs	X	Live-in help will not automatically be considered to be part of a household.
	Other – <i>specify</i>		n/a		
Ethnicity <sup>5</sup>	White				
	Black	X	The policy may particularly help to protect Black and Minority Ethnic Groups from harassment through high priority awards on welfare grounds.		
	Chinese	X	The policy may particularly help to protect Black and Minority Ethnic Groups from harassment through high priority awards on welfare grounds.		
	Mixed Ethnic Origin	X	The policy may particularly help to protect Black and Minority Ethnic Groups from harassment through high priority awards on welfare grounds.		
	Gypsies/ Travellers	X	The policy may particularly help to protect this group where they have been the victim of harassment.		
	Other – <i>please state</i>				
Language	English not first language	X	Local authorities provide translation services where necessary, for example, The Gateway website and application form can also be translated into all languages	X	Online scheme could disadvantage this group. Potential issues of accessibility and possible difficulty around understanding how the scheme operates.

<sup>5</sup> National Census 2011 categories are: Bangladeshi, Indian, Pakistani, Other Asian (Asian or Asian British), African, Caribbean, Other Black (Black or Black British), White and Black African, White and Asian, White and Black Caribbean (Mixed), British, Irish, Other White (White), Chinese, Other (Other Ethnic Group).

'Protected characteristic' group		Positive Impact	Explain how it could particularly benefit the group	Negative Impact	Explain how it could particularly disadvantage the group
Pregnancy and Maternity	Women who are pregnant or have given birth in last 26 weeks	X	Women who are pregnant and those who dependent children are in a priority need group  This group may also benefit from an additional bedroom housing need being awarded as a result of pregnancy or childbirth.		
Religion or Belief	People with a religious belief (or none)	X	Applicants could be awarded a higher banding under the welfare award if they need to move due to suffering from religious harassment		
Sex	Men	X	90% of those currently serving in the armed forces are men and this group is given additional preference for housing within this scheme	X	Men with a child who does not permanently reside with them are not awarded priority under the policy.
	Women	X	Priority is awarded to families with children, and women are disproportionately the main carer of dependent children.	X	Women who are victims of domestic abuse and who do not have children may not be considered to be in priority need and may not be given a high priority under the scheme
Gender Reassignment <sup>6</sup>	Transgender/ Transsexual	X	The policy helps to protect this group from harassment through high priority awards on welfare grounds		

<sup>6</sup> The protected characteristic of gender reassignment is defined by the Equality Act 2010 as “a person proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex.” This is a personal process that may involve medical interventions such as counselling, psychotherapy, hormone therapy or surgery, but does not have to. NB: It is generally held that transgender people disguise their features or clothing to resemble their preferred sex, whereas transsexual people wish to change their body to completely resemble their preferred sex.

'Protected characteristic' group		Positive Impact	Explain how it could particularly benefit the group	Negative Impact	Explain how it could particularly disadvantage the group
Sexual Orientation	Bisexual, Heterosexual, Gay or Lesbian	X	The policy helps to protect this group from harassment through high priority awards on welfare grounds		
Marriage and Civil Partnership	People who are married or in a civil partnership	X	The lettings made through this scheme take account of individual needs and help to ensure that none of the protected characteristics are discriminated against either directly or indirectly.		

**11. If you have identified any negative impacts (above) how can they be minimised or removed?**

*(This is a key section: Please deal with each negative impact noted above in turn.)*

<b>Older people - negative Impact</b>	<b>Method to minimise or remove</b>
<ul style="list-style-type: none"> <li>Some older people do not have the knowledge or access to benefit from the online system.</li> </ul>	<ul style="list-style-type: none"> <li>Local authorities provide a telephone call service to customers who are experiencing difficulties in completing the online application form.</li> <li>Officers telephone the customer and work through the questions and complete the application form on behalf of the customer. Officers may also bid on behalf of customers who can't bid for themselves</li> </ul>

<b>Under 16s – negative impact</b>	<b>Method to minimise or remove</b>
<ul style="list-style-type: none"> <li>Under 16s may be expected to share a bedroom with a sibling of the same sex even if there is a large age gap between them</li> </ul>	<ul style="list-style-type: none"> <li>Children are often expected to share bedrooms. If children are over the age of 10 and the opposite sex to their sibling, they are then entitled to their own bedroom</li> </ul>

<b>17-25s - negative Impact</b>	<b>Method to minimise or remove</b>
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<ul style="list-style-type: none"> <li>• 17 year olds can't hold a tenancy</li> </ul>	<ul style="list-style-type: none"> <li>• If a 17 year old has a guarantor who is over 18, they can be given a tenancy</li> </ul>
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<b>People with disabilities (physical and sensory) - negative impact</b>	<b>Method to minimise or remove</b>
<ul style="list-style-type: none"> <li>• Some properties will not meet be accessible to or appropriate for those who have physical/sensory disabilities</li> <li>• Live-in help will not automatically be considered to be part of a household.</li> </ul>	<ul style="list-style-type: none"> <li>• Local authorities will liaise with applicants to ensure that they are able to bid for properties which have already been adapted or can be adapted to meet an applicant's needs</li> <li>• Although live-in help will not automatically be considered part of the household, extra rooms for carers will be subject to assessment in conjunction with social services' supporting evidence.</li> </ul>

<b>People with learning disabilities - negative impact</b>	<b>Method to minimise or remove</b>
<ul style="list-style-type: none"> <li>• Online scheme could disadvantage this group which may find it more difficult to access the service.</li> <li>• Live-in help will not automatically be considered to be part of a household.</li> </ul>	<ul style="list-style-type: none"> <li>• Local authorities will support those who are experiencing difficulties in completing the online application form or can complete the form on behalf of the customer</li> <li>• Officers may also bid on properties on behalf of applicants</li> <li>• Although live-in help will not automatically be considered part of the household, extra rooms for carers will be subject to assessment in conjunction with social services' supporting evidence.</li> </ul>

<b>People with mental health needs - negative impact</b>	<b>Method to minimise or remove</b>
<ul style="list-style-type: none"> <li>• Live-in help will not automatically be considered to be part of a household.</li> </ul>	<ul style="list-style-type: none"> <li>• Although live-in help will not automatically be considered part of the household, extra rooms for carers will be subject to assessment in conjunction with social services' supporting evidence.</li> </ul>

<b>People who do not have English as a first language - negative Impact</b>	<b>Method to minimise or remove</b>
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<ul style="list-style-type: none"> <li>• Online scheme could disadvantage this group. Potential issues of accessibility and possible difficulty around understanding how the scheme operates.</li> </ul>	<ul style="list-style-type: none"> <li>• The Gateway website and application form can be translated into all languages so to enable those who don't have English as a first language to understand and participate in the scheme</li> <li>• Local authorities will also provide links to local community groups which can help those who need it to complete application forms/explain the scheme to them</li> <li>• Language line is also available to customers who need translation and interpretation services.</li> </ul>
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<b>Men - Negative Impact</b>	<b>Method to minimise or remove</b>
<ul style="list-style-type: none"> <li>• Men with access to children, where the child does not permanently reside with them are not awarded priority under the policy.</li> </ul>	<ul style="list-style-type: none"> <li>• Men with access to children are offered advice and information on all housing options.</li> </ul>

**e) Additional general points**

- Each case is assessed on an individual basis to avoid discrimination against protected characteristics
- Local Authorities identify vulnerable customers and send out newsletters giving details of properties in each cycle. The Local Authorities can also then place bids for properties on behalf of customers.

**12. Could the policy discriminate<sup>7</sup> against any 'protected characteristic', either directly or indirectly<sup>8</sup>?**

(Please read the footnotes below before completing this section.)

<sup>7</sup> The Council has a general duty to 'eliminate unlawful discrimination, harassment and victimisation'. Direct discrimination occurs when a person is treated less favourably than another in a comparable situation because of their 'protected characteristic' whether on grounds of age, disability, pregnancy and maternity, ethnicity; religion or belief; sex (gender), sexual orientation, or marriage and civil partnership. Indirect discrimination occurs when an apparently neutral provision or practice would nevertheless disadvantage people on the grounds of their 'protected characteristic'.

<sup>8</sup> If you answer 'yes' to question 11 (above) you will need to complete this section *and* go on to complete Section 2 in order to conduct a full Equality Impact Assessment.

- No. Applicants are only assessed according to their need for housing and against the same criteria. The policy does not discriminate against any protected characteristics either directly or indirectly.

### Summary and findings of Initial Equality Impact Assessment

13. Please put a tick in the relevant box to confirm your findings, and what the next step is:

Findings	Action required
No negative impacts have been identified <input type="checkbox"/>	Sign off screening and finish.
Negative impacts have been identified but have been minimised or removed <input checked="" type="checkbox"/>	Sign off screening and finish.
Negative impacts could not be minimised or removed <input type="checkbox"/>	Sign off screening and complete a full impact assessment – Section 2.
There is insufficient evidence to make a judgement. <input type="checkbox"/>	Sign off screening and complete a full impact assessment – Section 2.

13. Name and job title of person completing this form:

- Claire Beckett – Gateway to Homechoice Coordinator
- Tina Hinson – Housing Strategy Manager

14. Date of completion:

- 15/06/2021

15. Date for update or review of this screening:

- The EqIA will be reviewed when the Allocations Policy is next reviewed or within three year's time (June 2024) whichever is sooner.