

PART B – Equality Analysis Form

As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality and diversity.

This form:

- Can be used to prompt discussions, ensure that due regard has been given and remove or minimise disadvantage for an individual or group with a protected characteristic
- Involves looking at what steps can be taken to advance and maximise equality as well as eliminate discrimination and negative consequences
- Should be completed before decisions are made, this will remove the need for remedial actions.

Note – An Initial Equality Screening Assessment (Part A) should be completed prior to this form.

When completing this form consider the Equality Act 2010 protected characteristics Age, Disability, Sex, Gender Reassignment, Race, Religion or Belief, Sexual Orientation, Civil Partnerships and Marriage, Pregnancy and Maternity and other socio-economic groups e.g. parents, single parents and guardians, carers, looked after children, unemployed and people on low incomes, ex-offenders, victims of domestic violence, homeless people etc. – see page 11 of Equality Screening and Analysis Guidance.

1. Title	
Equality Analysis title: Amendments to the Housing Allocation Policy and Strategic Tenancy Policy	
Date of Equality Analysis (EA): 11/1/2021	
Directorate: Adult Care, Housing and Public Health	Service area: Housing Options
Lead person: Sandra Wardle	Contact number: 07786335840
Is this a:	
<input checked="" type="checkbox"/> Strategy / Policy	<input type="checkbox"/> Service / Function
	<input type="checkbox"/> Other
If other, please specify	

2. Names of those involved in the Equality Analysis (Should include minimum of three people) - see page 7 of Equality Screening and Analysis Guidance

Name	Organisation	Role (eg service user, managers, service specialist)
Sandra Tolley	Rotherham Council	Head of Housing Options
Sandra Wardle	Rotherham Council	Housing Advice & Assessment Manager
Carol Wordsworth	Rotherham Council	Housing Advice Coordinator
Wendy Swallow	Rotherham Council	Housing Assessment Coordinator

3. What is already known? - see page 10 of Equality Screening and Analysis Guidance

Aim/Scope (who the Policy/Service affects and intended outcomes if known)

This may include a group/s identified by a protected characteristic, other groups or stakeholder/s e.g. service users, employees, partners, members, suppliers etc.)

This Equality Analysis has been produced in support of an upcoming Cabinet report proposing revisions to the Housing Allocation Policy.

The Council is required to allocate Social Housing according to a published Allocations Policy which has been drawn up according to the Housing Act 1996, Part VI and Part VII as amended by the Homelessness Act 2002, the Homelessness Reduction Act 2017 and the Localism Act 2011.

The Council's Allocation Policy focuses on helping people in greatest housing need to gain access to suitable and appropriate accommodation. The proposed amendments will ensure that the policy is brought in line with the subregion, assists with homelessness assessments and responds to changing demand, so that households are considered for the most appropriate type of property.

All council homes are let in accordance with the Housing Allocation Policy, this will ensure homes are allocated fairly and that no groups with protected characteristics are disadvantaged.

What equality information is available? (Include any engagement undertaken)

263,400 people live in Rotherham Borough, about half living in and around the main urban area of Rotherham. The remainder live in smaller towns such as Wath, Dinnington and Maltby, and in numerous large villages and rural communities, all of which have their own distinct identities.

As of 31/12/2020 there are 6802 applications on the Housing Register. The number of applications in each band is broken down as follows:

- Band 1 = 255
- Band 2 = 1631
- Band 3 = 2058
- Band 4 = 1833

- Transfer = 1028

The ethnicity is:

Any other ethnic group	84
Any other white background	232
Asian - any other	93
Asian - Indian	9
Asian - Pakistani	195
Black African	98
Black any other	30
Black Caribbean	10
Chinese	7
Irish	14
Mixed other	28
Mixed white and black African	10
Mixed white and black Asian	13
Mixed white and black Caribbean	21
not stated	100
Welsh/English/Scottish/Northern Irish	5858
	6802

In April 2018, the Homelessness team's case load was 132 cases, this has increased to 419 by 25 September 2020. The number of new homeless applications made between 1 April 2020 and 30 September 2020 was 692.

- (84.2% are White British and 12.5% Black or Minority Ethnic (BME) background.
- The number of new cases with dependent children are 212 (25.8%)
- Number of new homeless cases for support whose primary applicant was aged;
 - 16-24 = 184
 - 25-40 = 422
 - 41-64 = 199
 - 65+ = 14
 - Age not recorded = 3

The policy review considered demographic information, supply and demand for properties. An assessment of waiting time to be rehoused was undertaken for those households with a medical need and for those who are homeless.

There are 900 applicants with a medical Priority band 2 of these 627 require a ground floor property, 609 are eligible for a bungalow and 197 are families who require an adapted property.

The average time spent in temporary accommodation before they are moved on into permanent solutions

Time spent in temporary accommodation.	Number of
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	cases
Less 56 days	35
56-84 days	13
Over 84 days	21
Over 168 days	14

There is no statutory maximum for how long people should be in temp. Unfortunately, the time spent in temporary accommodation has hit a critical trigger with 21 cases over 84 days and 14 cases over 168 days. This is due to the lack of move on options during the pandemic and the complex needs of the customers.

The lack of 'move on' options has been due to several factors including:

- The private sector being unwilling to accept households in receipt of benefit.
- The pipeline of properties has reduced, in the private sector due to private renters receiving greater protection evictions. During the pandemic, the government took action to protect tenants and landlords, these measures did not allow the market to operate
- The complex needs of those accommodated, many are not eligible to join the housing register due to previous behaviour. Those who are eligible are subject to a robust assessment by the Area Teams to ensure the letting is suitable and sustainable.
- Housing Association lettings were also put on hold up to June 2020

Between 23rd March 2020 and 1st June 2020 lettings have only been made to those facing homelessness and those ready to move on from their temporary emergency accommodation. This impacted on the availability of accommodation as general transfers were put on hold, thereby there were fewer empty properties to move into.

Are there any gaps in the information that you are aware of?

None identified following wider discussion with colleagues, and the Council is mindful to ensure that future changes to the Housing Allocation Policy meet the needs of those with identified protected characteristics.

What monitoring arrangements have you made to monitor the impact of the policy or service on communities/groups according to their protected characteristics?

Weekly monitoring of demand and supply of accommodation is provided to the Cabinet Member for Housing, Assistant Director of Housing, and the Senior Leadership Team.

The monitoring arrangements identified that there was an increase in demand for temporary accommodation by those at risk of being street homeless. In response, the number of available units of temporary accommodation has been increased the original portfolio of temporary accommodation was 64 units and it is now 114 units. An agreement was received to temporarily increase the portfolio of temporary accommodation by a further 25 units by 1 December 2020.

A temporary accommodation action plan is being developed and aligned to the Homelessness Prevention Strategy. The recommendations of the needs analysis will be implemented and inform the type of TA that will be needed to enable the Council to meet its legal duties. It will reflect the need to expand accommodation options for single people with and without complex needs to meet the new prevention and relief of homelessness duties arising out of the Homelessness Reduction Act.

Engagement undertaken with customers. (date and group(s) consulted and key findings)

Extensive consultation has been undertaken, meetings have been held with partners including Shiloh, Crisis UK, Rotherham Federation, the Housing Involvement Panel and at the Strategic Housing Forum with Housing providers.

Timeline of consultation:

Stakeholders	Date
Providers /Service Users	2 meetings held in July 2020
Quality Standards and Challenge Group	23 September 2020
Officers	September/October 2020
Rotherham Federation	28 September 2020
Applicants and Tenants	October and November 2020
Strategic Housing Forum - providers	1 December 2020
Improving Places Review Group	8 January 2021
Cabinet	15 February 2021

If the proposed recommendations are approved the policy will be adopted 28 days from the date of approval. The changes will be communicated to customers via an easy read version of the Policy. The Council's Housing Allocation Policy will also be formally amended to reflect the changes and the new version published on the website.

Engagement undertaken with staff (date and group(s) consulted and key findings)

The Cabinet Member for Housing has been engaged in the proposed revisions to the Allocation Policy from the start. A formal briefing session was held with the Cabinet Member on 21st July 2020 and 7th September 2020. Two ward members who are members of the Housing Assessment Panel were also invited.

On 10/09/2020, all staff within Housing Options, Housing Management and Housing Income received a copy of the proposed revisions and were invited to give

	<p>feedback. Discussions have taken place at team meetings. Feedback has been considered and captured into the amendments.</p> <p>An Improving Places Scrutiny review working group considered the report on 8 January 2020.</p> <p>Following approval, the changes to the Allocation Policy will be effectively communicated to staff and members and training will be undertaken in-house by the Housing Advice and Assessment Manager.</p>
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4. The Analysis - of the actual or likely effect of the Policy or Service (Identify by protected characteristics)

How does the Policy/Service meet the needs of different communities and groups? (Protected characteristics of Age, Disability, Sex, Gender Reassignment, Race, Religion or Belief, Sexual Orientation, Civil Partnerships and Marriage, Pregnancy and Maternity) - see glossary on page 14 of the Equality Screening and Analysis Guidance)

The changes made to the Allocation Policy should have a positive impact on all communities. However, the impact will need to be reviewed based on specific need.

The changes will have a positive impact on homelessness by removing the 6 months threshold will help to reduce the time spent in temporary accommodation. Local homeless people will receive a higher priority than those with no local connection to Rotherham and those who have made themselves intentionally homeless will not be awarded the highest priority.

By removing the 6-month threshold will help Care Leavers to move into their own accommodation sooner.

The majority of single homeless people are male – the proposed changes support this group, and the proposed changes also support disabled people by ensuring that they receive priority to suitable accommodation. The changes also helps to free up adapted properties for those who need it most.

The changes will improve the Council’s ability to respond to the demand for accommodation from homeless households and for those people with a medical need.

Does your Policy/Service present any problems or barriers to communities or Groups?

It is not envisaged that the proposed revisions will have a detrimental impact upon any communities or groups.

The Allocation Policy changes should remove barriers to Social Housing.

Does the Service/Policy provide any positive impact/s including improvements or remove barriers?

The proposals will have a positive impact on those who are most in housing need.

These include:

- Children
- Looked after Children who are ready to live independently
- Households in temporary or supported accommodation. Removing the current 6-month rule will remove barriers from accessing permanent accommodation.
- Vulnerable applicants at risk of repeat homelessness. There is a requirement to engage in a pathway to seek a second chance.
- Those with an assessed medical need and over the age of 60 who require purpose-built properties.

What affect will the Policy/Service have on community relations? (may also need to consider activity which may be perceived as benefiting one group at the expense of another)

No negative impacts have been identified/are anticipated.

Please list any **actions and targets** that need to be taken as a consequence of this assessment on the action plan below and ensure that they are added into your service plan for monitoring purposes – see page 12 of the Equality Screening and Analysis Guidance.

5. Summary of findings and Equality Analysis Action Plan

If the analysis is done at the right time, i.e. early before decisions are made, changes should be built in before the policy or change is signed off. This will remove the need for remedial actions. Where this is achieved, the only action required will be to monitor the impact of the policy/service/change on communities or groups according to their protected characteristic - See page 11 of the Equality Screening and Analysis guidance

Title of analysis: Revisions to the Housing Allocation Policy
Directorate and service area: Adult Care, Housing & Public Health. Strategic Housing & Development Service
Lead Manager: Sandra Tolley
Summary of findings:
The policy itself will not have a negative or adversely affect any communities or individuals. Therefore, an action plan is not required, however the Council will continue to monitor demand on the housing register and outcomes of lettings annually.

Action/Target	State Protected Characteristics as listed below	Target date (MM/YY)
Monitor the number of households on the housing register in each Band including the protected characteristics	All	Annual on 31/3/2021 and 31/3/2022
Consider homelessness statistics relating to the protected characteristics	All	Annual on 31/3/2021 and 31/3/2022
Monitor the impact of the policy change by analysis the number of lettings in each Band according to their protected characteristic.	ALL	Annual on 31/3/2021 and

		31/3/2022
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*A = Age, D= Disability, S = Sex, GR Gender Reassignment, RE= Race/ Ethnicity, RoB= Religion or Belief, SO= Sexual Orientation, PM= Pregnancy/Maternity, CPM = Civil Partnership or Marriage. C= Carers, O= other groups

6. Governance, ownership and approval

Please state those that have approved the Equality Analysis. Approval should be obtained by the Director and approval sought from DLT and the relevant Cabinet Member.

Name	Job title	Date
Tom Bell	Assistant Director of Housing	22/1/2021
Anne-Marie Lubanski	Strategic Director of Adult Care, Housing & Public Health	25/1/2021
Councillor Dominic Beck	Cabinet Member for Housing	25/1/2021

7. Publishing

The Equality Analysis will act as evidence that due regard to equality and diversity has been given.

If this Equality Analysis relates to a **Cabinet, key delegated officer decision, Council, other committee or a significant operational decision** a copy of the completed document should be attached as an appendix and published alongside the relevant report.

A copy should also be sent to equality@rotherham.gov.uk For record keeping purposes it will be kept on file and also published on the Council's Equality and Diversity Internet page.

Date Equality Analysis completed	11/01/21
Report title and date	Revision to the Housing Allocation Policy
Date report sent for publication	25/1/2021
Date Equality Analysis sent to Performance,	21/1/2021

Intelligence and Improvement equality@rotherham.gov.uk	
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