

## Appendix 5 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	
<b>Equality Analysis title: Housing Allocation Policy</b>	
<b>Date of Equality Analysis (EA): 24/04/2025</b>	
<b>Directorate: Adult Care, Housing and Public Health</b>	<b>Service area: Housing Options</b>
<b>Lead Manager: Carol Wordsworth</b>	<b>Contact number: 01709 823146</b>
<b>Is this a:</b> <input checked="" type="checkbox"/> <b>Strategy / Policy</b> <input type="checkbox"/> <b>Service / Function</b> <input type="checkbox"/> <b>Other</b>  <b>If other, please specify</b>	

**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 (e.g. service user, managers, service specialist)
Carol Wordsworth	RMBC	Housing Advice & Assessment Team Manager
Helen Caulfield-Browne	RMBC	Housing Options Operational Manager
Richard Leighton-Cox	RMBC	Housing Options Development Officer

**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)**

The Council is committed to continuing to provide a high-quality Housing Options service that enables all residents in housing need to access social housing. It is a statutory requirement to have a Housing Allocation Policy, the Housing Act 1996 VI specifies groups of people who must be given reasonable preference in the scheme. Subject to these provisions being met, the Council can decide the principles on which the scheme is to be framed. The Policy provides the framework for ensuring this function is carried out fairly, consistently, and in line with local and national policy and legislation. The Council's current Housing Allocation Policy was adopted in 2014, since then, it has undergone periodic revisions and additions.

There are certain circumstances when the Allocation Policy needs to be adjusted. These include when there are legislative changes, if there are changes in supply and demand, or where equality data suggests that the Council may need to change the way in which properties are allocated. The review will seek to ensure that the Policy reflects national and sub-regional good practice and responds to the changing profile of demand for housing.

The proposed changes to the Housing Allocation Policy will affect all households currently on the Housing Register. It will also affect current residents in housing provided by the Council. Within this, it may affect individuals or groups who are identified by protected characteristics.

Under the Equality Act (2010) the Council has a legal duty to fulfil the requirements of the Public Sector Equality Duty (PSED). Through this duty and in the application of this Policy, the Council will carry out its functions in a way that:

- Removes discrimination, harassment, victimisation, and any other conduct that is unlawful under the Equality Act (2010).
- Promotes equal opportunities between people who have a protected characteristic(s) and those who don't.
- Encourages good relations between people who have a protected characteristic(s) and those who don't.

A Table of Changes has been drafted, outlining the proposed changes, what area it sits under within the Housing Allocation Policy, who it will affect and why the changes are being proposed.

Policy area	Why change?	Recommended policy change
<p><b>Local connection criteria</b></p> <p>The current Allocation Policy includes the following local connection criteria for applicants:</p> <ul style="list-style-type: none"> <li>• lived for the last 3 years in Rotherham Metropolitan Borough Council's geographical boundary through their own choice.</li> <li>• currently employed in Rotherham and have been for the last 3 years.</li> <li>• have a close family relative or primary carer who live in Rotherham and have done so for the last three years.</li> </ul>	<p>Demand for social housing is significantly higher than was the case when the current local connection criteria were agreed.</p> <p>Currently applicants in other local authority areas are able to join Rotherham's housing register if they have a family connection. Proving this connection can be challenging.</p> <p>Government policy supports local authorities taking the view that, in deciding who qualifies or does not qualify for social housing, applicants who can demonstrate a close association with their local area should be prioritised.</p>	<p>Implement a residency connection to Rotherham with 3 out of the last 4 years.</p> <p>Remove 'family connection' as a means to comply with local connection criteria.</p> <p>Retain exemptions, including:</p> <ul style="list-style-type: none"> <li>- employment in Rotherham and have been for the past three years.</li> <li>- care leavers under the age of 25.</li> <li>- applicants fleeing domestic abuse.</li> </ul>
<p><b>Tenancy related debt and tenancy breaches</b></p> <p>Applicants are excluded from joining the housing register if they have a tenancy-related debt exceeding £800. The debt criteria also apply to existing social housing tenants who wish to downsize to more affordable accommodation.</p>	<p>The figure of £800 was set in 2014 and does not reflect the current cost of housing, particularly in the private rented sector.</p> <p>Currently some existing social housing tenants are prevented from applying for re-housing where they are subject to the under-occupancy charge (bedroom tax), and would like to downsize to smaller, more affordable accommodation. This also prevents larger properties being freed up through a tenant downsizing.</p>	<p>Amend the debt criteria from £800 to 'the equivalent of 8-weeks rent'.</p> <p>Where current social housing tenants are eligible to downsize and subject to the under-occupancy charge (bedroom tax), the debt shall not prevent them from joining the housing register.</p>
<p><b>Applicants who do not qualify</b></p>	<p>Breaches in tenancy can include anti-social behaviour or damage to their property.</p>	<p>Retain the five-year exclusion for applicants who have been evicted</p>

<p>Applicants who have been evicted from a council or housing association tenancy are not able to re-join the housing register for five years from the date of eviction. This includes tenancies outside of Rotherham.</p>	<p>Applicants who have breached the conditions of their tenancy may voluntarily terminate their tenancy to avoid the eviction process, and then rejoin the housing register.</p>	<p>from a council or housing association tenancy and include council or housing association tenancies where a court possession order has been attained, but prior to eviction, the applicant has voluntarily handed back their tenancy.</p>
<p><b>Qualification for owner occupiers or applicants with savings</b></p> <p>Applicants who own their own home, or applicants with savings over £16,000 are currently eligible to join the housing register in band 4. Where the applicant has a medical need this is considered on a case-by-case basis.</p>	<p>The demand for social housing is increasing and the Council does not have enough properties to house everyone on the housing register.</p> <p>Applicants who have assets by either owning a property, or savings over £16,000 will more often than not be able to resolve their own housing circumstances.</p> <p>The figure of £16,000 is taken from the DWP's threshold for housing benefit.</p>	<p>Introduce a new qualification criterion that would mean an in-depth assessment of any applicant who owns a home, or formerly owned a home, or has savings over £16,000, to identify if the applicant is in housing need and if they have assets to resolve their own housing circumstances.</p> <p>The assessment will assume that applicants who have equity, savings, or assets worth over a quarter of the average property price for Rotherham can resolve their own housing circumstances and not qualify to join the housing register, unless there are mitigating circumstances.</p>
<p><b>'Next Steps Plan'</b></p> <p>The Next Steps Plan was introduced to give homeless applicants who were not eligible for the housing register a second chance at securing accommodation.</p>	<p>Section 2.4 of the Allocation Policy seeks to safeguard vulnerable adults with debt and can be considered when applicants are not eligible for the housing register and in housing need. This can include applicants who are homeless or at risk of homelessness. The 'Next Steps Plan' section therefore constitutes repetition.</p>	<p>Delete the 'Next Steps Plan' section and amend Section 2.4 in the existing Policy to include that all applicants not eligible for the housing register and in urgent housing need, will be required to commit and engage with appropriate services and evidence presented to Housing Assessment Panel for consideration.</p>

<p><b>Tenancy fraud</b></p> <p>Section 3.2 of the current Policy covers declaration, verification of identity, and providing false information. The content is relatively limited.</p>	<p>The Council has a dedicated Housing Fraud Officer and is strengthening its housing fraud prevention and detection approach. The review of the Allocation Policy offers an opportunity to clearly set out the Council's approach to dealing with tenancy fraud.</p>	<p>Include further information regarding tenancy fraud and investigation.</p>
<p><b>Pre-tenancy interviews</b></p> <p>The current policy mandates that all housing register applicants must undergo a pre-tenancy interview.</p>	<p>All applicants are required to have a pre-tenancy interview when joining the housing register, including those households with little realistic chance of being rehoused. This creates additional administrative burden and is an inflexible approach.</p>	<p>Due to the demand on the housing register allow flexibility regarding when a pre-tenancy interview is carried.</p>
<p><b>Allocation of new build properties</b></p> <p>New build properties are currently prioritised for existing Council tenants.</p>	<p>Advertising properties to existing Council tenants excludes applicants in all other tenures, including those who are in greater housing need who may be living close to newly developed homes. Some Council tenants prioritised for new build homes are not in housing need.</p>	<p>Remove the council tenant priority for new build properties and allocate them in the same way as any other property.</p> <p>Landlord references will continue to be obtained. Where there are breaches in tenancy or unsatisfactory references are received, or a history of anti-social behaviour, the Council reserves the right not to offer a property.</p>
<p><b>Local Lettings Policies</b></p> <p>A Local Lettings Policy (LLP) is an additional criterion (or quota) for a specific area, estate, or block of apartments. It means that the LLP properties affected will be allocated in a different way to the usual approach.</p>	<p>The lack of flexibility in the Allocations Policy makes it challenging to introduce a new LLP to meet the particular needs of a local area or to address sustainability and community issues, which is particularly relevant when allocating to a large new build affordable housing development.</p>	<p>Include a provision to agree local lettings policies for larger new build schemes, allowing the Council to introduce specific allocations criteria in future.</p>

<p>There are only two LLPs in our current Allocation Policy which cover Sensitive Lettings and Rural Lettings.</p>		
<p><b>Age restricted properties</b></p> <p>Currently there are properties and housing complexes within Rotherham that are advertised with an age restriction.</p>	<p>These properties are not publicly available.</p>	<p>List all properties and complexes that are advertised with an age restriction within the Allocation Policy.</p>
<p><b>Making best use of stock</b></p> <p>Section 3.4 of the current Allocation Policy sets out the size and type of properties different household types are eligible for.</p>	<p>The aim of the Allocation Policy is to help those in greatest housing need whilst making best use of our housing stock. Rotherham's existing Allocation Policy is relatively generous in terms of allowing under-occupation, meaning the available stock is not utilised efficiently in all cases. This is more difficult to justify in the context of higher levels of housing need and demand. In particular, there are severe shortages of some types of homes including bungalows, four bed houses and 'parlour' houses.</p>	<p>The proposed new Policy includes updated permitted occupancy levels detailing the size and type of each type of property each type of household is eligible for. Please refer to the proposed new Policy Section 4.5.</p>
<p><b>Shared care of children</b></p> <p>Section 3.4 of the existing Housing Allocation Policy states:</p> <p><i>If the arrangement is 50/50 shared care e.g., 1 week with one parent and one week with the other parent, both parents will be eligible for family accommodation, subject to affordability.</i></p>	<p>The aim of the Housing Allocation Policy is to help those in greatest housing need, whilst making the best use of our housing stock. Larger accommodation is in high demand. In allowing both parents with 50% care responsibilities to be eligible for houses, larger family accommodation is under-occupied for 50% of the time. The Council has also faced issues with verifying care arrangements.</p>	<p>Allocate houses to the main carer. The main carer will be established using the following test:</p> <ul style="list-style-type: none"> <li>• which parent/guardian receives benefits, such as child benefit/ Universal Credit.</li> <li>• the home address and next of kin</li> </ul>

	<p>At the same time, there is a high number of families homeless or overcrowded which need larger family accommodation.</p>	<p>which the child/ren's school and GP have registered for them.</p> <ul style="list-style-type: none"> <li>• and by checking the identity of the parents/guardian shown on the birth certificate(s), and if necessary, carrying out a home visit.</li> </ul> <p>In exceptional cases, the Council will have the discretion to allocate houses to applicants with shared care. Evidence will be sought via a multi-agency approach and where there is a proven need for the additional space.</p> <p>The other carer will still be eligible for a flat that is large enough to accommodate dependents.</p> <p>This approach also reduces the risk of tenancy fraud as formal verification will have been undertaken by HMRC and the DWP.</p>
<p><b>Direct lets</b></p> <p>The use of direct lets is detailed in the current policy under Section 5 Housing Management Lettings. Direct lets are where the Council allocates a property outside of choice-based lettings. It is commonly used to discharge a homelessness duty.</p>	<p>The use of direct lets has increased as the Council has had to deal with more urgent rehousing requests, including under its homelessness duties, to support care leavers, and to rehouse current council tenants who must move urgently.</p>	<p>Strengthen the approach in the policy in order to give the Council more flexibility in utilising direct lets where appropriate and provide more transparency about how this is done. This will include emphasising the Council's right to make a single, direct offer of appropriate accommodation in order to</p>

		<p>fulfil a statutory homelessness duty.</p> <p>This would mainly apply to applicants who are homeless and in temporary accommodation and owed a section 189B(2) relief duty or 193(2) main duty.</p> <p>As a landlord, the Council has discretion to facilitate management moves for its own tenants and this is detailed in a separate decant procedure.</p>
<p><b>Band One bidding criteria.</b></p> <p>Band One is the highest level of prioritisation awarded. The current policy specifies that Band One is time limited to three-months and bids are restricted to areas of Rotherham with sufficient stock and turnover.</p>	<p>Applicants awarded Band One are recognised as being in greatest housing need, yet currently they are restricted in which areas they can bid for properties in. This does not support the choice-based lettings principle and is not applied to applicants in all other bands. In some cases it can prevent applicants securing a rehousing in their local area.</p>	<p>Retain the three-month timescale but remove restriction that Band One applications can only bid in areas of high stock and turnover.</p>
<p><b>Housing need categories</b></p> <p>The aim of the Allocation Policy is to help those in greatest housing need and applicants are placed in a band depending on their circumstances.</p> <p>The three housing need categories are Band One (highest priority), Band Two and Band Three.</p> <p>The Housing Act 1996 part VI stipulates which housing need categories are required to be given 'reasonable preference'.</p>	<p>Benchmarking has evidenced that Rotherham's Allocation Policy has a high number of housing need categories in bands one, two, and three. This has made the Policy challenging to apply and understand.</p> <p>Current bandings do not always reflect or support the Council's homelessness responsibilities. For example, homeless households that are not in priority need currently receive the same level of priority on the</p>	<p>Reduce the number of housing need categories across Band One, Band Two and Band Three.</p> <ul style="list-style-type: none"> <li>- Band One will focus on the most urgent rehousing cases, including where a main homelessness duty is owed and/or where there is a significant and pressing safeguarding risk that can only be managed through urgent rehousing.</li> <li>- Band Two will focus on the statutory</li> </ul>

<p>Once these are met, the Council can then set the framework for its Allocation Policy.</p> <p>Band Four is reserved for applicants with no housing need.</p>	<p>housing register as those who are in priority need.</p> <p>Band One is the Council's highest priority band and time limited to reflect the urgency to be re-housed, yet the current Policy includes a large number of categories within Band One.</p>	<p>'reasonable preference' housing need categories.</p> <ul style="list-style-type: none"> <li>- Band Three will focus on households who are in housing need but where statutory thresholds may not be met.</li> </ul> <p>Please refer to the new proposed Allocation Policy Section 5 which details which housing need categories will fall into which bands.</p> <p>Retain Band Four to enable applicants with no housing need to remain on the housing register.</p>
<p><b>Transfer Band</b></p> <p>Council tenants in no housing need are eligible to re-join the housing register 12 months after securing their tenancy. The criteria applied is no tenancy breaches and a clear rent account. Currently 10% of all properties are advertised with a preference to the transfer band including all new build developments.</p>	<p>Applicants in the transfer band are not in housing need and are adequately housed. They have already benefited from at least one allocation to social housing. Despite this, currently 10% of properties are advertised with a preference to the transfer band.</p>	<p>Remove the transfer band and place council tenants with no housing need in Band Four.</p> <p>Council tenants will be assessed the same as all applicants, and where they meet the criteria for a housing need category, will be placed in the appropriate band.</p>
<p><b>Advertising quotas</b></p> <p>Advertising quotas are used to assign a 'preference' to applicants in certain bandings. Quotas are used to ensure that applicants in lower bands have a route to secure rehousing, which supports the principle of an open housing register and can</p>	<p>Without advertising quotas there would be reduced housing options for applicants outside of bands one and two, so retaining quotas is considered an important feature of any open housing register.</p> <p>While the current system provides a route to council lettings for existing social tenants not in housing need,</p>	<p>The proposal is to retain advertising quotas to the following:</p> <ul style="list-style-type: none"> <li>• 60% to band two (no change)</li> <li>• 30% to band three (no change)</li> <li>• 10% to band four (increase as no quota is currently</li> </ul>

<p>contribute to mixed and balanced communities.</p> <p>The current advertising quotas are:  60% to Band Two  30% to Band Three  0% to Band Four  10% to Transfer Band</p> <p>Band One applicants are always placed at the top of any shortlist and therefore no advertising quota is required.</p>	<p>it does not do so for private rented tenants not in housing need and this group is more likely to be experiencing challenges with housing costs.</p>	<p>applied to this band)</p>
<p><b>Deliberate worsening of circumstances</b></p> <p>Currently there is no ability in the Policy to suspend and investigate an applicant where we have reason to believe they have deliberately worsened their circumstances to get housing priority. Examples includes owner occupiers who have “gifted” their property and approached the Council for re-housing.</p>	<p>The demand for social housing is growing, resulting in the number of households on the housing register increasing. It is therefore important that applicants utilise other housing options available to them.</p>	<p>Insert new section in the Policy allowing the Council to suspend applications and conduct investigations.</p> <p>Any applicant who has deliberately worsened their circumstances will not be awarded additional priority and the Council would reserve the right to cancel their application.</p>
<p><b>Auto-bid</b></p> <p>Auto-bid is a facility that enables bids to be placed automatically where applicants may not wish to or be incapable of bidding themselves. All other applicants receive two offers on the housing register, and if both offers are refused their housing application is cancelled. This does not apply to those set to auto-bid.</p>	<p>Because applicants set to auto-bid are currently not restricted to two suitable offers, some applicants receive considerably more than two offers and remain on the housing register. As the Council operates a housing register of need, all applicants should be actively bidding on properties that meet their requirements.</p>	<p>The proposal is that auto-bid is retained, however if the property offered meets the applicant’s requirements for re-housing, this will be counted as an offer if refused. If two auto-bids are refused, auto-bid will be removed, and applicants will be required to bid themselves.</p> <p>Where there are known advocates or support services, if consent has been given, we will also discuss re-housing preferences and review</p>

		the requirements of the applicants re-housing needs and amend auto-bid as appropriate so that a second offer should be suitable.
<p><b>Failure to bid.</b></p> <p>The current Policy does not cover applicants failing to bid.</p>	<p>The Council operates a housing register of need and therefore applicants are expected to be actively bidding. Currently this is not always the case.</p>	<p>Where no bids have been placed within 12 months, the application will be automatically cancelled, and applicants will be required to re-join the housing register. The applicant will receive a letter advising them of this decision.</p> <p>Where applicants re-approach within a six-month period, if there have been extenuating circumstances such as bereavement, or long-term illness, which has led to no bids being placed, their application will be reinstated to their original band and effective date.</p>
<p><b>Assignments, successions and mutual exchanges</b></p> <p>Some applicants are eligible to assign, succeed, or mutually exchange social housing tenancies. There is no reference to these processes in the current Allocation Policy.</p>	<p>Setting out the process for assignments, successions, and mutual exchanges supports transparency and provides information on further housing options.</p>	<p>Re-introduce and include a description of the criteria and processes for assignments, successions, and mutual exchanges.</p>
<p><b>Fixed term tenancies</b></p> <p>The Council currently issues fixed term tenancies in the following circumstances:</p>	<p>Fixed term tenancies help to ensure people move to a suitable property when they no longer require a larger or adapted council house, freeing up suitable properties to enable the Council to continue to meet the needs</p>	<p>To review and amend the Strategic Tenancy Policy.</p> <p>To retain existing approach and additionally apply fixed term tenancies in the following circumstance:</p>

<ul style="list-style-type: none"> <li>• Accommodation with four or more bedrooms.</li> <li>• Specialist adapted properties.</li> </ul>	<p>of overcrowded families and families with a disabled household member, in priority need.</p>	<ul style="list-style-type: none"> <li>• Applicants who do not have indefinite leave to remain but are eligible by virtue of their inclusion in a class set out in the Allocation of Housing and Homelessness (Eligibility)(England) Regulations 2006. The length of a fixed-term tenancy will depend on individual circumstances and will be reviewed in-line with their immigration status.</li> </ul>
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**What equality information is available? (Include any engagement undertaken)**

The following data has been extracted from the Councils records on current households on the Housing Register, existing council tenants, 2021 UK Census data, and lettings completed between 1<sup>st</sup> of April 2024 to 1<sup>st</sup> October 2024.

As of 1 April 2025, there was 7064 active applications on the Council’s housing register. Demand for council housing is outweighing the turnover of housing stock.

- New tenancies let 2023/2024 = 1398
- New tenancies let 2024/2025 = 1236

The UK Census data recorded in 2021 shows the population of Rotherham was 265,800. Census data allows comparison between council data on Gender, Age, Ethnic Origin, Religion, Sexual Orientation and Disability. More information on the 2021 UK Census can be found at [Census Maps - Census 2021 data interactive, ONS](#).

Through 2023/24, 1,429 households were owed a duty under homelessness legislation in Rotherham, an increase from 1,236 (15.6%) in 2022/23. This increased further in 2024/2025 to 1752.

Data submitted via HCLIC to central government provides a demographic breakdown of the homeless cohort, which can be used to demonstrate where certain protected characteristics have a higher prevalence of homelessness. Homeless data on all protected characteristics is not available. Below, the information available outlines where groups are at higher risk of homelessness.

The rate of people aged 18-24, 25-34 and 35-44 becoming homeless was higher than the rate of people within these age categories across Rotherham in the 2021 Census. Residents of the BAME community make up 8.9% of the total population of Rotherham, however,

21.8% of homeless households were BAME. People identifying as LGBTQ+ made up 2.3% of the 2021 Census, however, made up 5.0% of homeless households in 2023/24, again demonstrating a group that is disproportionately affected within housing.

Protected characteristic	Evaluation/analysis																																													
Gender	<p>The gender breakdown of those on the housing register show that 52.2% of applicants are female, while 47.6% male, with the remaining 0.2% not recorded, or stating they preferred not to say/expected child. This is based on 7,743 applications.</p> <p>Census data recorded in 2021 shows the population of Rotherham to be split as 51% female and 49% male. This demonstrates that the rate of females on the housing register are slightly above the expected rate, whilst males are slightly below.</p> <p>New lettings for females accounted for 59.4%, which is lower than the percentage of all females in council housing (61.8%). New lettings for males accounted for 38.4%, higher than the percentage of all males in council housing (37.9%). 2.2% of new lettings were signed to households who preferred not to disclose gender identity, higher than the 0.4% of council tenants.</p>																																													
Age	<p>The table below provides a breakdown comparison of age category information. It compares the proportion of each group as per information on households on the housing register, 2021 UK Census data, current council tenants and new lettings from 01/04/2024-01/10/2024.</p> <table border="1" data-bbox="459 1227 1477 1619"> <thead> <tr> <th>Age</th> <th>Housing register</th> <th>Census</th> <th>Council tenants</th> <th>New lettings</th> </tr> </thead> <tbody> <tr> <td>16-24</td> <td>8.5%</td> <td>13.0%</td> <td>3.1%</td> <td>14.4%</td> </tr> <tr> <td>25-34</td> <td>27.6%</td> <td>15.8%</td> <td>13.5%</td> <td>26.0%</td> </tr> <tr> <td>35-44</td> <td>23.9%</td> <td>14.7%</td> <td>17.5%</td> <td>20.8%</td> </tr> <tr> <td>45-54</td> <td>14.1%</td> <td>16.5%</td> <td>17.0%</td> <td>14.4%</td> </tr> <tr> <td>55-59</td> <td>6.0%</td> <td>8.5%</td> <td>9.3%</td> <td>7.4%</td> </tr> <tr> <td>60-64</td> <td>5.0%</td> <td>7.5%</td> <td>9.1%</td> <td>6.4%</td> </tr> <tr> <td>65-74</td> <td>8.3%</td> <td>12.9%</td> <td>15.1%</td> <td>6.7%</td> </tr> <tr> <td>75+</td> <td>6.7%</td> <td>11.0%</td> <td>15.4%</td> <td>4.0%</td> </tr> </tbody> </table> <p>Housing register information is based on 7,743 applications.</p>	Age	Housing register	Census	Council tenants	New lettings	16-24	8.5%	13.0%	3.1%	14.4%	25-34	27.6%	15.8%	13.5%	26.0%	35-44	23.9%	14.7%	17.5%	20.8%	45-54	14.1%	16.5%	17.0%	14.4%	55-59	6.0%	8.5%	9.3%	7.4%	60-64	5.0%	7.5%	9.1%	6.4%	65-74	8.3%	12.9%	15.1%	6.7%	75+	6.7%	11.0%	15.4%	4.0%
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75+	6.7%	11.0%	15.4%	4.0%																																										
Ethnic origin	<p>78.8% of households on the housing register are stated as being White ethnic origin, lower than the demographic total for Rotherham in the 2021 Census (91%). 19.7% of households are stated as being BAME, higher than the demographic total of 8.9% of the overall population. 1.5% of households were either unknown or not recorded. Housing register information is based on 7,749 applications.</p> <p>90.1% of council tenants are of White background, however 82.1% of new lettings were for the same background. 6.1% of council tenants are BAME, compared to a higher percentage of 11.3% of new lettings for</p>																																													

	<p>BAME residents. 3.8% of tenant's ethnic background is either not known or not disclosed – 6.6% of new lettings are of the same category.</p>
Marital status	<p>56.7% of households on the housing register are single households. 45.6% of council tenants are single, whilst 50.9% of new lettings were for single households.</p> <p>27.7% of households on the housing register are married, in a civil partnership, living with a partner or co-habiting. 27.4% of council tenants are also recorded within this group. 35.4% of new tenants are in this group.</p> <p>8.9% of households on the housing register are either divorced or widowed. 13.1% of council tenants are in this category. 6.2% of new lettings were for households in this category.</p> <p>6.7% of households on the housing register recorded they would prefer not to say. 14.6% of council tenants recorded the same response, whilst 7.5% of new lettings were also in this group.</p> <p>Census data was recorded into different categories, making it harder to draw comparisons with the wider population.</p> <p>Housing register information is based on 3,506 applications.</p>
Sexual orientation	<p>Households identifying as heterosexual or straight made up 78.2% of households on the housing register. This is slightly higher than the 77.6% of council tenants also identifying in this category. 78.6% of new lettings were also identified as heterosexual or straight. 2021 Census data recorded 91.6% of people in Rotherham identify as being heterosexual or straight.</p> <p>3.9% of households on the housing register identify as part of the LGBTQ+ community. Only 1.6% of council tenants identify as being LGBTQ+, whilst 4.9% of new lettings were recorded for this group. Census data recorded 2.3% of the population identify as part of the LGBTQ+ community.</p> <p>8.2% of households on the housing register preferred not to disclose sexual orientation. 4.0% of council tenants also preferred not to disclose. 11.2% of new lettings also recorded that they would prefer not to disclose. 6.0% of people in Rotherham chose not to disclose sexual orientation in the 2021 Census.</p> <p>Housing register information based on 4,450 applications.</p>
Religion	<p>47.7% of households on the housing register stated they have no religion, compared to 39.8% of the overall population in Rotherham as per 2021 UK Census data. 24.9% stated they were Christian (all denominations) on their housing register application, compared to 49% of the population. 6.6% stated they were Muslim on their housing register application, compared to 5.1% of the population. 6.9% stated they preferred not to disclose on their housing register application, compared</p>

	<p>to 5.2% of the population. 1.7% were recorded as other religions on their housing register application, compared to 1.3% of the total population, whilst 12.3% of households on the housing register were unknown.</p> <p>35.4% of council tenants stated they have no religion, compared to 48.1% of new lettings stating this. Christian (all denominations) was recorded for 37.4% of council tenants, whilst only recorded for 25.0% of new lettings. 2.5% of council tenants stated they are Muslim, whereas 5.3% of new lettings stated they were Muslim. 1.5% of council tenants are recorded as other religions, whereas 1.0% of new lettings record this category. 3.4% of council tenants preferred not to disclose their religion compared to 11.7% of new lettings. 19.9% of council tenants religion is unknown, similarly 9.0% of new lettings also do not have a recorded religion.</p> <p>Housing register information based on 4,357 applications.</p>
Identify as transgender	<p>96.6% of households on the housing register do not identify as transgender, compared to 0.7% that state they do identify as transgender. 2.6% of households state they prefer not to say.</p> <p>97.4% of council tenants do not identify as transgender, whilst 99.3% of new lettings also do not identify as being transgender.</p> <p>0.5% of council tenants identify as being transgender, whilst 0.7% of new lettings also identify as being transgender.</p> <p>1.9% of council tenants preferred not to say.</p> <p>Census data is not available to draw comparisons between to the overall population.</p> <p>Housing register information based on 1,351 applications.</p>
Disability	<p>88.9% of households on the housing register stated no disability, compared with 78.8% of the overall population (2021 Census data). 72% of council tenants also stated they had no disabilities.</p> <p>11.1% of households on the housing register stated they did have a disability, compared to 21.1% of the overall population (2021 Census data). 28% of council tenants stated they had disabilities.</p> <p>Housing register information based on 3,237 applications.</p>
Pregnant	<p>94.1% of households on the housing register stated they were not pregnant, compared to 5.4% stating they were pregnant. 0.7% of households preferred not to say.</p> <p>Pregnancy is not recorded in Census data.</p> <p>Housing register information is based on 1,351 applications.</p>

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

Some gaps exist in the dataset, as outlined in the table above. This is where applicants have not recorded a response when completing the Housing Register application.

Other gaps in comparisons on the data exist, as the 2021 Census data that is used to allow comparison on proportion of a particular protected characteristic against the wider population does not record all the information required to make a full comparison against council recorded data.

Within the homelessness data that is submitted via HCLIC to central government, only some of the protected characteristics information is submitted. This means a comparison of each protected characteristics prevalence of homelessness cannot be made to the rate within the general population. This means that we can only identify certain groups as being disproportionately affected by homelessness and housing insecurity.

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

Once approved by the Council, the Housing Allocation Policy will be monitored internally. The monthly updates will include progress in relation to the demand on the housing register, the number of lettings, and housing need categories.

An annual report will also provide updates to the Improving Places Select Commission.

Analysis of equality and diversity data will be frequently undertaken by the service manager to identify any changing trends and the need to respond differently.

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

A formal 12-week consultation commenced on 13 January 2025 and ended 6 April 2025. The Council engaged with a range of customers and ensured that the views represented a diverse range of customer views. The consultation included a public survey which was widely promoted. The Council worked together with the Tenant Engagement team, to ensure that our tenants view is taken into consideration on the proposed changes of the housing allocations Policy.

A number of drop-in sessions was facilitated at various local libraries, providing an opportunity for all residents to share their views and access support to complete the survey. Consultation included phone surveys and face to face sessions.

Staff from Housing Options attended a number of venues including Clifton Learning Partnership, Chatham Villas and SHILOH, to ensure harder to reach groups have their voices heard and have the opportunity to discuss what the changes to the Housing Allocation

Policy might look like for them. These sessions were coordinated in line with the service delivery lead, as opposed to being ran as drop-in sessions.

RotherFed were also involved in planning the communication delivery, to ensure that a wide pool of residents was reached.

<b>Name</b>	<b>Session type</b>	<b>Date</b>
Strategic Housing Forum	Stakeholder engagement	22/01/2025
Wath Library Consultation	Public drop-in	29/01/2025
Clifton Learning Partnership	Public drop-in	30/01/2025
Riverside House	Public drop-in	06/02/2025
Armed Forces Covenant	Stakeholder engagement	17/02/2025
Housing Improvement Panel	Community Involvement	19/02/2025
Clifton Learning Partnership	Public drop-in	27/02/2025
Turner Close Neighbourhood Centre	Community engagement	27/02/2025
Riverside House	Public drop-in	05/03/2025
Citizens Advice	Public drop-in	06/03/2025
Aston Library	Public drop-in	10/03/2025
Asylum & Refugee	Public drop-in	18/03/2025
Citizens Advice	Public drop-in	20/03/2025
Clifton Learning Partnership	Public drop-in	27/03/2025
Turner Close Neighbourhood Centre	Community engagement	27/03/2025
Hollowgate – staff session	Stakeholder engagement	01/04/2015
Rush House – Young People	Community involvement	03/04/2025
Shiloh	Community involvement	04/04/2025

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

A range of consultation with different staff including the Council's senior leadership team has taken place. Elected Members have also contributed to the

	<p>development of the draft housing allocation policy through a specially formulated sub-group.</p> <p>The engagement with staff has enabled a draft proposal of the Housing Allocation policy with 22 proposed changes identified. Consultation shows that there is broad support for the proposals and the impacts across the range of equality groups.</p> <p>To enable further input from staff, half day sessions were delivered to Housing Options staff to provide thoughts and feedback about proposed changes. Group activities provided different areas of focus that were relevant to key issues steering the proposed changes to generate a diverse range of opinions from staff who see key issues in practice.</p> <p>Following the 12-week consultation, in addition to response rates, supplementary comments were also considered, 4 amendments to the original proposals have been submitted and detailed in the Cabinet report.</p> <p>The results of the 22 proposals are shown below and evidence that there is support to implement the 22 proposals and adopt a new Housing Allocation Policy and Strategic Tenancy Policy.</p>
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	NUMBER OF RESPONDERS					% OF RESPONDERS					% RESPONDERS	
	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	Total Disagree	Total Agree
	Change 1 - Local connection	27	19	23	54	97	12.3%	8.6%	10.5%	24.5%	44.1%	20.9%
Change 2 - Debt policy	12	17	29	75	87	5.5%	7.3%	13.2%	34.1%	39.5%	13.2%	73.6%
Change 3 - Applicants who do not qualify	19	10	32	56	103	8.6%	4.9%	14.5%	25.5%	46.5%	13.2%	72.3%
Change 4 - Owner occupiers with savings	18	19	32	48	103	8.7%	8.6%	14.5%	21.8%	46.8%	16.8%	68.6%
Change 5 - Next steps plan	7	5	60	73	75	7.3%	27.3%	33.2%	34.1%		5.5%	67.3%
Change 6 - Tenancy fraud	3	2	16	45	154	7.3%	20.5%		70.0%		2.3%	90.5%
Change 7 - Pre-tenancy interviews	21	19	32	65	83	5.5%	8.6%	14.5%	29.5%	37.7%	18.2%	67.3%
Change 8 - Allocation of new build	15	19	26	61	99	5.5%	8.6%	11.8%	27.7%	45.0%	15.5%	72.7%
Change 9 - Local lettings policy	7	14	49	73	77	5.4%	22.3%	33.2%	35.0%		9.5%	68.2%
Change 10 - Age restricted properties	8	8	35	86	83	5.5%	15.9%	39.1%	37.7%		7.3%	76.8%
Change 11 - Making best use of stock	7	6	30	66	111	5.5%	13.6%	30.0%	50.5%		5.9%	80.5%
Change 12 - Shared care of children	16	9	36	63	96	7.3%	4.1%	16.4%	28.6%	43.6%	11.4%	72.3%
Change 13 - Direct lets	12	5	50	81	72	5.5%	22.7%	36.8%	32.7%		7.7%	69.5%
Change 14 - Band One bidding criteria	8	9	31	63	109	4.1%	14.1%	28.6%	49.5%		7.7%	78.2%
Change 15 - Housing needs	7	10	44	73	86	5.5%	20.0%	33.2%	39.1%		7.7%	72.3%
Change 16 - Transfer band	13	12	38	68	89	5.9%	5.6%	17.3%	30.9%	40.5%	11.4%	71.4%
Change 17 - Advertising quota	7	12	56	70	75	5.5%	25.5%	31.8%	34.1%		8.6%	65.9%
Change 18 - Deliberate worsening of circumstances	5	3	30	52	130	5.5%	13.6%	23.6%	59.1%		3.6%	82.7%
Change 19 - Auto-bid	12	8	26	71	103	5.5%	11.8%	32.3%	46.8%		9.1%	79.1%
Change 20 - Failure to bid	25	10	14	69	102	11.4%	4.9%	6.4%	31.4%	46.4%	15.9%	77.7%
Change 21 - Assignments, successions and mutual exchanges	3	4	57	74	82	5.5%	25.9%	33.6%	37.3%		3.2%	70.9%
Change 22 - Fixed term tenancies	3	9	51	74	83	4.1%	23.2%	33.6%	37.7%		5.5%	71.4%

#### 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 analysis is to identify whether the proposed amendments to the policy are fair and do not disadvantage any customer group. The proposed changes will improve housing stock provision for residents in Rotherham who are eligible to access the Housing Register and in greatest housing need. This will provide better access for groups who are disproportionately disadvantaged within the community, such as those who are at risk of or already are homeless.

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

A 12-week public consultation was carried out, alongside this the draft policy was published including a table of changes which outlined the 22 proposals and how the proposals differ

from the existing policy. This approach created transparency in the decisions the Council is wanting to take.

Overall, the proposed policy is positive for those with protected characteristics. The Housing Allocation Policy is designed to help those with the greatest housing need and make best use of council housing stock. Applicants in greatest housing need are more likely to have protected characteristics.

However, we have identified some areas which potentially may have a negative impact on some applicants.

### **Residency test**

Introducing a residency test before applicants qualify for the housing register potentially means that there are households who the Council will be unable to help into social housing. In general terms the adverse impact is likely to impact disproportionately on any group which is overrepresented among rehousing applicants, including BME households.

The main justifications for this adverse impact are directing housing towards those households with the greatest connection with the local area and managing demand in circumstances where demand for social housing greatly outweighs supply. By way of mitigating, the policy proposes a number of exemptions to the residency test for applicants in certain groups or housing need. These include:

- Where the Council agrees there are very exceptional circumstances requiring a move into the area. These will be assessed on case-by-case basis.
- Care Leavers under the age of 25.
- Armed Forces Covenant
- Applicants fleeing abuse.
- Homeless applicants who satisfy the local connection requirements in accordance with homelessness legislation.

### **Couples with shared care of children**

The proposal that houses are only allocated to the main carer could potentially have a negative effective on this group. To mitigate the impact, the Policy will enable the other parent with overnight access to still be able to bid for two-bed flats and maisonettes if affordable.

This impact is considered proportionate when considering the demand for larger accommodation from applicants on the housing register in urgent housing need, including families who are homeless and being accommodated in temporary accommodation.

### **Housing need categories and bandings**

To achieve the aim of the Policy by helping those most in housing need, the Council has reviewed the housing need categories across all bands. The proposals include a reduction to the categories in band one and removing the transfer band.

The transfer band is for existing social housing tenants within Rotherham who are not in housing need, the proposal is to remove this band and place these applicants in band four.

This will bring parity to residents who are not in housing need, whereas currently those residents not in housing need who are council tenants are favoured by the allocations Policy because of the existence of a transfer band with a quota. Because council tenants are more likely to exhibit some protected characteristics than the general population or than households on the Housing Register, this change could have an indirect negative impact on some groups – but this is justified on the basis that overall, it will help ensure that the Policy is supporting those in greatest need which will have a positive impact on many protected characteristics groups.

### **Changes to auto-bid**

Applicants with some protected characteristics are more likely to utilise auto-bid (e.g. older people, people with a disability or a support need), so the proposed change to auto-bid could have a disproportionate negative impact on these groups. However, this change would ensure that the underlying principles of the Housing Allocations Policy are met, including that applicants cannot pass up all offers including those made via auto-bid.

Overall, this will ensure that the administration of the Housing Register is fairer and more consistent. To mitigate this risk, if auto-bid is required, we will discuss and review with the applicant their requirements. Where there are known advocates or support services, we will also discuss re-housing preferences if consent has been given to ensure that the applicant is supported in making this decision.

### **Age restricted properties**

There are properties and complexes within the borough that are advertised with a minimum age preference. This will impact applicants who do not meet the preferred age criteria.

The justification is that some of these properties are ex-sheltered accommodation which were designed and designated for applicants of a certain age.

### **Qualification for owner occupiers or applicants with savings**

The qualification for owner occupiers and applicants with savings over £16,000 will include a robust assessment to identify if they have the means to resolve their own housing issues. Where the assessment evidence this, applicants will not be able to join the housing register.

The impact is considered proportionate as the Council operates a housing register of need and will ensure that properties are allocated to applicants with fewer financial resources. Applicants requiring social housing are more likely to have protected characteristics.

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

### **Changes to the debt policy**

Through updating financial values, this change will benefit groups of applicants with certain protected characteristics because people sharing certain protected characteristics are disproportionately likely to have lower incomes or be in debt, and experience problems related to these. For example, people from ethnic minorities are at far higher risk of being in poverty than white people and are more likely to be living in private rental accommodation; low-income single parents, typically women, are more likely to face in-work poverty.

### **Changes to the allocation of new build properties**

On balance this change will ensure more lettings go to those in housing need and we know that certain groups with protected characteristics are more likely to be in housing need, for example applicants with a disability or assessed medical need and living in accommodation which is unsuitable.

**Direct lets**

In being offered a direct let, homeless households will have been assessed as being in priority need, as such, will be more likely to have protected characteristics such as pregnancy, dependent children, and disability. This will improve our ability to quickly rehouse them so will be a positive impact.

**Advertising quota's**

Without advertising quotas there would be reduced housing options for applicants outside of bands one and two, so retaining quotas is considered an important feature of any open housing register. While the current system provides a route to council lettings for existing social tenants not in housing need, it does not do so for private rented tenants not in housing need and this group is more likely to be experiencing challenges with housing costs. 10% of properties will be advertised with a preference to band four.

**Making best use of stock**

It is important that the Council makes best use of its housing stock to enable more letting to be undertaken. The Housing Occupational Therapy Team are seeing an increase in families approaching for re-housing to suitable accommodation. This is due to disabilities, which can be physically or mentally, and a household member requiring their own room. Families living in overcrowded or unsuitable housing are more likely to have some protected characteristics, in which case this change should have a positive impact for those groups because it will free up larger accommodation which will then be allocated in accordance with need.

**Band One criteria**

While difficult to quantify, this change should mean applicants in the most severe housing need, who are more likely to have a protected characteristic will be better supported to be rehoused in an area of their choice.

**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)

The Policy is borough wide and will set the criteria for joining the housing register. As of 31/03/2024 the Council has 19,879 properties across the Rotherham area. Where there are areas with a higher proportion of council properties this is likely to have a higher impact on those communities.

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.

<b>Title of analysis: Housing Allocation Policy</b>
<b>Directorate and service area: Housing, Housing Options</b>
<b>Lead Manager: Carol Wordsworth</b>
<b>Summary of findings:</b>
<b>The 12-week public consultation results evidence that there is support for the 22 proposals. In making these changes the Council will have an improved Policy that assists people in greatest housing need, whilst making the best use of stock.</b>

Action/Target	State Protected Characteristics as listed below	Target date (MM/YY)
Review lettings quotas within the first 12-months of implementation	All	06/10/2026
Monitor the impact of the policy change by analysis the number of lettings in each Band according to their protected characteristic.	All	06/10/2026
Monitor the number of households on the housing register in each Band including the protected characteristics	All	06/10/2026

\*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
John Holman	Assistant Director	12/05/2025
Ian Spicer	Strategic Director	20/05/2025
Councillor Sarah Allen	Cabinet Member	12/05/2025

## 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](mailto: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.

<b>Date Equality Analysis completed</b>	24 April 2025
<b>Report title and date</b>	Housing Allocation Policy – 7 July 2025
<b>Date report sent for publication</b>	24 April 2025
<b>Date Equality Analysis sent to Performance, Intelligence and Improvement</b> <a href="mailto:equality@rotherham.gov.uk">equality@rotherham.gov.uk</a>	24 April 2025