Equality Impact Assessment  
Part 2: Full

When reviewing, planning or providing services NBC needs to assess the impacts on people of how it works - or is planning to – work (in relation to things like disability). It has to take steps to remove/minimise any negative harm it identifies. It has to help people to participate in its services and public life. “Equality Impact Assessments” (EIAs) prompt people to think things through, considering people’s different needs in relation to the law on equalities. The first stage of the process is known as ‘screening’ and is used to come to a decision about whether and why further analysis is – or is not – required. EIAs are published in line with transparency requirements.

This form is for conducting a more in depth “full” assessment. It builds on the information required at the screening level so if you are completing this form you should start by transferring information from your screening form into this one.

Step 1: What this assessment will address

The assessment looks at actual or possible impacts of a policy or activity in relation to equalities and human rights – to make sure it works fairly for people. The first part of this form is to help understand the extent (or ‘scope’) of what this assessment covers.

<table>
<thead>
<tr>
<th>1 Name of policy/activity/project/practice</th>
<th>This is a proposed revision to an existing activity</th>
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<td>The Housing Allocation Scheme 2012</td>
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<th>2. Screening undertaken by: (please complete as appropriate)</th>
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<td>Director or Head of Service</td>
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<td>Lead Officer for developing the policy/activity/practice</td>
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<td>Other people involved in the screening (this may be people who work for NBC or a related service or people outside NBC)</td>
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Appendix 1 shows the list of organisations consulted on the new Housing Allocations scheme during the 3rd July 2012, to the 24th October 2012 period.

Review of policy December 2013

As the policy was a review only, the management team for Housing were consulted, and the operational teams using the policy were consulted (Applications and Rehousing). This was then passed on for an Executive decision with the Housing portfolio holder.

3. A: Brief description of policy/activity/project/practice: including its main purpose, aims, objectives and projected outcomes, and how these fit in with the wider aims of the organisation.

Northampton Borough Council is required under section 167 of the Housing Act 1996 to produce a Housing Allocation Scheme. The requirements of the policy are set out in Part VI Housing Act 1996 (as amended by the Homelessness Act 2002 and Localism Act 2011) giving reasonable preference to those applicants defined by the 1996 Act.

The demand for secure affordable housing in Northampton far outweighs the supply, in order to maximise the supply of affordable housing in the borough the Council work closely with a number of Registered Social Providers, they are also known as Housing Associations. The Registered Social Providers have joined a common housing register and Allocation Scheme where all void properties except those exempt within the Scheme are allocated. Northampton Borough Council is committed to offering choice to all applicants seeking housing and has sought to achieve this by introducing a Choice Based Lettings Scheme during 2008.

The Department for Communities and Local Government has published a new code of guidance, ‘Allocation of Accommodation: guidance for local housing authorities in England’ which has been considered as part of this Equality Impact Assessment.

The Guidance, which came into force on 29th June 2012, sets out the new freedoms in the Localism Act, which are intended to allow councils to better manage their waiting lists, to promote mobility for existing social tenants, to encourage work and mobility, and to tailor their allocation priorities to meet local needs and local circumstances.

The Government expects that social homes should go to people who genuinely need them, such as hard working families and those who are looking to adopt or foster a child in need.
of a stable family; and to ensure that Service families get the priority for social housing they deserve.

The guidance encourages councils to adopt a modern measure of overcrowding and encourages them to give appropriate priority to tenants who want to downsize, helping them move to smaller, more manageable properties and freeing up precious social housing for crowded families.

The Objectives of the Council’s Allocation Scheme 2012 are to:

- Offer as much choice as possible to customers.
- Offer customers information and advice to enable them to make informed choices about their housing options.
- Create an easy to understand, fair and transparent system.
- House those in priority need as determined by the law.
- Help prevent homelessness.
- Make the most effective use of the local housing stock.
- Respond to the circumstances of vulnerable individuals by joint working with other agencies.
- Ensure equality of opportunity in accessing the housing register and in the allocation of properties.
- Promote sustainable tenancies and communities by acknowledging the support needs where appropriate
- Support the principles of social inclusion, community cohesion and aim to meet customer expectations.
- Recognise residents who make a contribution to the local community
- Encourage residents to access employment and training

The desired outcomes of the policy are -

- To let vacant properties via the Choice Based Lettings Scheme, within target times, in accordance with the Allocation Scheme 2012.
- To make all allocations fairly, equitably and without any discrimination based on race, gender, sexual orientation, ethnic origin, nationality, religion, age disability or illness.
- To help develop community cohesion and employment

This full Equality Impact Assessment has been produced following guidance and opinion from counsel.

The Housing Allocations scheme proposes the criteria that will enable people to register on the Housing Register and be prioritised for social housing based on their individual circumstances and housing need consequently those registering for housing are likely to be the most economically disadvantaged and therefore contain an over representation of households in the protected groups including the elderly, families with children, single parent families, those with disabilities and households from ethnic minorities.

Identification of policy aims, objectives and purpose

- The Council have a large number of residents registered on The Council’s housing waiting list and we need to make sure we’re allocating social housing in a way that is fair.
- Lots of residents are working in low-paid employment and would benefit greatly from the subsidised rent in a social home.
• Our proposed changes to the allocations policy will recognise and reward those residents who are working hard – through paid employment or, for example, acting as full time carers.
• The Council aim to change the culture of the housing waiting list to show residents that making a positive step in their lives will be supported, rather than leading them further away from social housing.
• By changing the allocations policy we hope to create mixed and stable communities, avoiding estates becoming ghettos of worklessness.

**Scope / focus of the EIA**

A principal aim of this policy change is to rebalance communities and end the situation where public housing estates have a large proportion of households that are dependent on benefits. Northampton aims to create mixed and sustainable communities where people of different backgrounds and socio economic groups live side by side, as already happens in many streets of Victorian terraced housing in Northampton. In The Council’s view this fosters better community relations in the medium to long term.

**Changes to the Northampton Allocations Policy**

The Council is introducing residency qualification which governs eligibility to join the Housing Register

The Council is amending the local connection rules and they are also contained in the new Housing Allocations scheme

The Council will now take an applicant’s financial resources into account when deciding eligibility

Those in the Armed Forces and in housing need will be prioritised in the allocation of housing

Those in employment and in housing need will also be prioritised in the allocation of housing

The rules on the level of rent arrears permissible to those bidding for properties are being made more flexible to allow a greater degree of flexibility in the management of the housing stock

Rules are being introduced regarding the suspension of bidding rights for applicants/tenants who refuse 3 offers or who have failed to attend a viewing appointment

The Council is revising upwards the age at which children of the same sex/ opposite sex are expected to share a bedroom

Photographs of the applicants will need to be provided at the point of application

Removal of Band C and D customers from the Housing Register as these customers have historically not been re-housed through the Choice Based scheme.

Additional priority to customers who adopt or foster care for children

Income thresholds now introduced that will only allow customers below this range of income to join the housing register.
Additional priority for households making a contribution to the Northampton community

Homeless customers may be re-housed into the Private Rented sector allowing the Council to discharge its homeless duty

Adoption of the bedroom size criteria for the allocation of accommodation that complies with the Welfare Reform bedroom standard and prevents under occupation

The creation of a Band C for customers with reduced priority that have reasonable preference but have been demoted due to rent arrears, anti-social behaviour or other breach of tenancy.

Rules governing the allocation of social housing are in the main set by the government through primary legislation. Prior to recent changes in legislation, the Council and other local authorities were restricted when it came to setting rules about who was eligible to join a housing register and how it prioritised between applicants once they were put on the register.

Government policy has developed since the Ahmad case and some of the housing provisions in the Localism Act 2011 reflect the outcome of the case. The Act allows local authorities to allocate their housing in accordance with locally set qualification criteria and allows local priorities to be used alongside statutory preference criteria to determine priority for allocation.

The Localism Act 2011 allows us to move from an open Housing Register to a closed Housing Register. This means Northampton will no longer accept applications from people who live outside the Borough except in very limited circumstances e.g. a member of HM armed forces; or somebody moving to the Borough for employment reasons.

Northampton is also proposing an on line Housing Register from April 2013 to reduce the administrative burden of managing a large Housing Register. Special steps will be taken to support those without access to the Internet, and those who have difficulties using PCs.

These are outlined below in the mitigating measures. Our Choice-Based Lettings (CBL) system has been on line since 2008, over 90% of customers bid on the web and the Council are very experienced in assisting disadvantaged groups in using the CBL system.

In the Council’s view these policy changes could affect some groups differently but there are wider strategic issues that need to be addressed in relation to rebalancing communities, for example by reducing inequality and poverty over the long term by encouraging employment.

Relevant data, research and consultation

This EQIA looks at the changes listed above and assesses their impact on those applicants/households within the protected characteristic groups listed in the table above.

Where the precise number of those households affected is known these figures are presented in report below.

It is anticipated that the employment change will have a significant impact on those in the protected characteristic group and this is dealt with in detail in the report. The impact assessment then assesses the impact of the other changes which the Council is making to the new allocations scheme. The new Housing Allocations Scheme places considerable emphasis on the needs of people in the protected groups under the Equality Act. The report
Data to support this EQIA

The Council has a wide range of data that is relevant:

(i) A complete breakdown by most protected characteristics of the Housing Register. The Council does not have a comprehensive data on the number of people on the Register who are working. Northampton will be writing to everyone in January 2013 on the list asking them to declare if they were employed.

(ii) A complete breakdown by most protected characteristics of the Choice Based Lettings (CBL). This covers the bidding behaviour of people with the highest priority on the Housing Register who are currently bidding for property. The majority of lettings are made through CBL. From the data the Council can see if bidding is proportional to key characteristics of the Housing Register. The Council is aware of the need to ensure that allocation of social housing complies with relevant equalities legislation. Prior to 2008 the Council allocated properties to people on the waiting list. It was paramount then to ensure that officers did not indirectly discriminate against any particular groups and there was as such monitoring of the lettings outcomes in common with practices in other authorities. However following the introduction of Choice Based Lettings, the emphasis shifted to ensure that different groups (now described as sharing common protected characteristics) understand how to exercise choice and are assisted, wherever necessary, to do so.

Wider changes in government policy

The changes in the Council’s Allocations Policy have to be looked at in the context of the wider series of changes to the way Council’s generally manage the use of their limited housing resources. As well as the changes in the revised Allocations Scheme, other changes in the law are encouraging Councils to move away from lifetime secure tenancies in Council built homes. In future tenancies in Northampton are likely to be for a five year fixed term, renewable subject to certain conditions. Rents for Council homes are rising. New homes will be and let at affordable rents set in the range up to 80% of the prevailing market rents in the Borough. Existing homes when they are re-let will also see rent increases in many instances.

In the wider context, the government has re-launched the Right to Buy (RTB) scheme for Council owned homes. Discounts of up to 70% of market value are available after 5 years residence subject to a ceiling of £75k. This again means that working households may choose not to bid for affordable rent properties built and managed by a registered provider (an RSL or housing association) where there is no RTB but prefer to wait for a Council owned home. Bidding behaviour in this new housing regime of flexible rents and tenancies may be very different from what we have seen since CBL started in Northampton in 2008.

The Council will carefully monitor the changes in bidding patterns and collect the data it needs to ensure that it complies with its equalities duties.

A note on the proportion of households/applicants to be awarded additional priority because of employment in the new scheme

Government Guidance under the Equality Act was published in January 2011 and focuses on Proportionality which is a key principle. The following sections consider the issue of how conferring additional priority to people who have been in employment is proportionate to the aim of the policy set out above.

It is not anticipated that the numbers of households to be re-housed as a result of priority
for employment will dominate the allocation of housing in Northampton. It is accepted that a proportion of non-working households will wait longer as a result of this policy but the Council will ensure there is regular monitoring to ensure that the new Allocations Scheme is a proportionate response to the new freedoms and flexibilities enshrined in the Localism Act 2011. Outcome of bids will be regularly monitored to ensure that the allocations scheme complies with the requirement of section 166 Housing Act 1996.

Conclusion

This assessment is intend to inform the members about the impacts the proposed changes to the Allocations Scheme will have on those in the protected characteristic groups. It has been drawn up using a broad range of data and research available to officers about those on the Housing Register and those presently living in Council accommodation. In addition to the legislation and case law governing allocations, regard has been had to the government guidance on the allocation of housing, the Equality Act 2010 and recent case law on the operation of Section 149 of that act.

Overall, the Northampton Allocations Scheme has many provisions in place to meet the needs of particular households in the protected groups (disabled people; elderly; people with support needs), and we have provisions to exercise discretion in exceptional circumstances. Officers will monitor the effects of the changes to the Allocations Scheme to assess the impacts of these changes on an on-going basis.

B. Fit with the wider aims of the Council

The Corporate Plan

The Corporate plan policies

“Better homes for the future-Helping you to have a home” and “Responding to your needs”

The Sustainable Community Strategy for Northampton

The Housing Strategy

The vision that Northampton Borough Council has for its Housing Strategy is that:

“We will support well-maintained, affordable and environmentally sustainable homes of all tenures, and neighbourhoods where people choose to live
We will promote access, opportunity and choice for all sections of the community.”

The Allocation Scheme and Choice Based Lettings Scheme are key factors in providing choice to applicants in where they live and providing a framework for supporting vulnerable applicants to compete equally in bidding for properties to meet their individual housing aspirations.

The Black and Minority Ethnic (BME) Housing Strategy

This complements and fits within the overarching Housing Strategy and pulls together race equality and diversity issues in delivering housing services within the vision of the Community Strategy. The priority areas for the strategy are:

- Access and Customer Care
• Partnership Working and Service User Involvement
• Information and Addressing Housing Need
• Communication and Consultation/ Engagement
• Racial Harassment and Anti-Social Behaviour

The Allocation Scheme and Choice Based Lettings system directly relates to the delivery of the priority areas set out in above.

Our Approach to Equalities,
Customer Excellence Strategy

Tenant Participation Strategy

The Council works to ensure that tenants and leaseholders have the opportunity to influence decisions and are consulted in an appropriate manner. This includes providing support and training for traditionally underrepresented groups. Tenants have been consulted on the Allocation Scheme and Choice Based Lettings Scheme and their views taken into consideration in framing the way the schemes will operate.

C: List the main activities relating to the policy or activity and identify who is likely to benefit from it

In determining the rules within this Allocation Scheme, the Council has to comply with The Housing Act 1996, as amended by The Homelessness Act 2002, the Localism Act 2011, and the published Tenancy Strategy and the Homelessness Strategy. Additionally, the Council will have regard to case law, relevant legislation (including any amendments) relevant codes of practice, Statutory Instruments and local policies.

When anyone applies for an allocation of affordable housing or to join the Housing Register, the customer must be informed by Northampton Borough Council of their relevant statutory rights. (Housing Act 1996 section 166(2) and 167(4A)) as follows:

• The right to request such general information as will enable the applicant to assess their application is likely to be treated under the allocations scheme to include whether the customer is likely to fall within any of the groups entitled to a reasonable preference;
• The right to request such general information as will enable the customer to assess whether accommodation appropriate to the customer’s needs is likely to be made available and if so how long it is likely to be before an offer is made;
• The right to be notified in writing of any decision that the customer is not to be given any reasonable preference in accordance with (2C) and of the reasons for that decision;
• The right to ask Northampton Borough Council to inform the customer of any decision about the facts of the customer’s case which has been, or is likely to be, taken into account when considering whether to allocate accommodation;

The right to request a review of any decision that the customer is not to be given reasonable preference, any decision as to the facts of the customers case, or any decision that the customer is not eligible for an allocation under section 160A(9) and the right to be informed of the review decision and the grounds of it.

The Department of Communities and Local Government on the Allocation of Accommodation Guidance 2012, sets out the expectation upon the authority for providing support and assistance when adopting an Allocation Scheme which requires the active participation of housing applicants in choosing their accommodation.
Section 166(1) (b) of the 1996 Housing Act requires a housing authority to secure that any necessary assistance is made free of charge to persons in its district who are likely to have difficulty in making an application without assistance. Paragraph 6 of the Allocations Code provides that where authorities adopt an Allocation Scheme which requires the active participation of housing applicants in choosing their accommodation the level of assistance needed by those who are likely to have difficulty in making an application will normally be greater and housing authorities will need to provide for this. In providing for this, authorities are advised to consider:

- Which individuals or groups of applicants are likely to have difficulty in making an application without assistance:
- How to identify individuals who need assistance;
- What type and level of assistance are they likely to require; and
- Whether that assistance is currently available and from what organisation

Working families and those making a community contribution are the key groups intended to benefit from the changes to the Allocation Scheme as proposed in the light of the Localism Act 2011.

The shift to giving priority for allocations towards those in work or making a community contribution is a justifiable policy change designed to deliver the Council’s strategic aim of bolstering sustainable communities.

These changes are self-evidently likely to have an adverse impact on people having protected characteristics, in particular the disabled but also some ethnic minorities.

The population of the Borough of Northampton is projected to increase like the rest of the country.

The allocations scheme gives preference to older people and proposes increasing the options for mobility in sheltered housing.

The Housing Register is broken down as follows in comparison with the Borough population. As at the 31st October 2012, the number of households on the housing register was 10,120 as compared with 88,700 households in the Borough equating to 11.41%

4 What do you already know about the relevance of the policy? What are the main issues you need to consider?

A: Relevance to Equality and Diversity Duties

An initial assessment of the Allocation Scheme and Choice Based Lettings Scheme has shown that it has a high degree of relevance to the general duty as it relates to two of the requirements eliminating discrimination and promoting equal opportunities.

An earlier Equality Impact Assessment was carried out along with a full review of the allocation system during 2007/8. This was widely consulted on, with the result that Choice Based Lettings (CBL) was introduced in 2008. The Review concluded that the monitoring arrangements thereto in place for allocations in terms of equality were not sufficiently robust and that there would be an on-going need to closely monitor the impact of the new
Allocation and Choice Based Letting schemes.

A new computer system was introduced to coincide with the introduction of the new, more transparent scheme, providing good monitoring information to enable analysis and subsequent appropriate action to address any adverse trends that might be detected. The Allocation Scheme was again reviewed and updated on 31\textsuperscript{st} May 2010.

A main feature of this Equality Impact Assessment has been to consider in particular the changes being driven by the Localism Act and the extent to which the system has become more transparent as well as fair for all of its customers.

The Hills Report (Hills J (2007) Ends and Means: The Future Roles of Social Housing in England, (CLG), sets out the rationale for reform of social housing allocations. The report highlights that ‘Employment rates of those living in social housing with particular disadvantage or with multi disadvantage are substantially lower than those of people with a similar disadvantage but living in other tenures’. The effect of this is that Allocation policies create concentrations of poverty with a detrimental impact on both community cohesion and sustainability. The choice based lettings scheme and the Allocation Scheme 2012 adopts measures to address these issues.

The Allocation of Accommodation Guidance, which came into force on 18 June 2012, sets out the new freedoms in the Localism Act, which are intended to allow councils to better manage their waiting lists, to promote mobility for existing social tenants, to encourage work and mobility, and to tailor their allocation priorities to meet local needs and local circumstances. The Government’s expects that social homes should go to people who genuinely need them, such as hard working families and those who are looking to adopt or foster a child in need of a stable family; and to ensure that Service families get the priority for social housing they deserve. The guidance encourages councils to adopt a modern measure of overcrowding and encourages them to give appropriate priority to tenants who want to downsize, helping them move to smaller, more manageable properties and freeing up precious social housing for crowded families.

The shift to giving priority for allocations towards those in work or making a community contribution is a justifiable policy change designed to deliver the Council’s strategic aim of bolstering sustainable communities.

These changes are self-evidently likely to have an adverse impact on the likelihood of people having protected characteristics, in particular the disabled but also some ethnic minorities, in accessing the limited supply of social housing.

It remains critical that the revised Allocations and Choice Based Lettings Scheme aims to ensure that all residents are fairly and equally treated irrespective of race, gender, disability, sexual orientation, age, religion or belief or any other characteristic, including pregnancy and maternity, gender reassignment and socio-economic factors.

The code of practice on racial equality in housing specifically sets out the following areas of potential discrimination and disadvantage in the lettings and choice based lettings process. Most of these could apply equally to the other groups with protected characteristics:

- Information about services.
- Access.
- Elimination of discriminatory practices in Lettings and quality of offers.
- Nomination arrangements.
- Assessment of housing applicants.
- Segregation.
The Code of Practice also sets out the following key outcomes for any allocation process:

- Applicants from all racial groups are offered lettings in proportion to each group’s representation among all applicants, taking into account different preferences and needs.
- The housing organisation communicates effectively with all groups. Information about housing services is available, on request, in the languages used in the housing organization’s catchment area.
- The housing organisation has good links with local people from all racial groups and uses these to improve its services.
- The housing organisation can show that its housing systems work fairly and equitably for people from all racial groups.
- The housing organisation’s staff have received training on racial equality generally, as well as on the duty to promote race equality and other responsibilities under the RRA.
- The housing organisation’s monitoring systems work well, providing reliable information about local housing needs, and how these are met.
- People from all racial groups are treated fairly, and to high standards, at all stages of the housing and re-housing process.
- Ethnic minority households are proportionately represented on housing lists, based on census and other data. If they are not, and there are significant disparities, the housing provider can explain the reasons for this.
- Feedback shows that people are equally satisfied with the services they receive, regardless of racial group.

The Council recognises that it does not currently hold comprehensive details of which applicants are working, seeking work or training or actively engaged in Voluntary work.

Clearly the Council will need to collect this data along with our Registered Provider partners. Consideration also needs to be given on how jointly we can support training with the Voluntary and Community sector.

The earlier Equality Impact Assessment, conducted for the introduction of the 2010 scheme and CBL scheme, highlighted the need to maintain improved monitoring systems and to make use of them to refine allocation policies and practice. The Council will need to enhance its monitoring systems to provide a comprehensive framework capable of monitoring the specific outcomes of the Allocation Scheme 2012.

**How will the aims affect our duty to:**

**Promote equality of opportunity?**

**Eliminate discrimination, harassment and victimisation?**

**Promote good community relations?**

**Promote positive attitudes towards people with protected**
characteristics?
Encourage participation of people with protected characteristics?
Protect and promote Human Rights?

For example, think about the policy from the perspectives of different groups in society. Will the policy affect, positively or negatively, any group(s) differently to others? Will it differentially affect:
- Black, Asian or other ethnic minority and/or cultural groups?
- Disabled People? And their carers?
- Transgender people? (from pre-operation, through transition, to post-operation)
- Men and Women?
- Lesbians, gay men and/or bisexual people?
- Different religious communities/groups?
- People of a particular age e.g. older people or children and young people?
- Any other groups?
- For policies affecting staff, those with flexible or agreed working patterns?

Are there any aspects of the policy/activity/practice, including how it is delivered, or accessed, that could contribute to inequalities? (This should relate to all areas including Human Rights.)

“Changes to the Authority’s scheme are likely to have differential impacts on those with protected characteristics, in particular the introduction of the preference being given to working households and those demonstrating a community contribution. These are self-evidently likely to have an adverse impact on people having protected characteristics, in particular the disabled but also some ethnic minorities.”

We recognise the potential adverse impact on all applicants and the steps we have taken to mitigate these or to monitor actual trends in allocations are set out below.

Findings from any consultation already done (by your service area or any other service) which is relevant to the development of this policy.

Yes

It was always recognised that in moving to Choice Based Lettings, there are factors within the application of the process, which have the potential to impact negatively or discriminate against the different groups in the community. Conversely, sensitive application of the scheme can make a positive contribution to equalities.

It was evident from the initial screening exercise that choice based lettings have proved to be very successful and that in setting up the scheme, a great deal has been done to eradicate inequalities.

If you have indicated there is a negative impact on any group, is that impact:

Legal?

Yes - The more robust monitoring and transparency which exists within the new Allocation Policy and the choice based allocation process now enables equality impact assessment to form this view.

Intended?
Yes

NPC is entitled to make specific policy decisions to prioritise key groups. It is not required that NPC have a “no detriment” policy but that they evidence that it is neither unintentionally biased or illegal and that they have had due regard to monitoring the impact of the proposed changes.

What is important is the need to monitor the differential effects. We acknowledge the priority of this task and note the current dearth of information about disability and that monitoring systems generally must be enhanced. We will address this issue as a priority for the Council.

B: Are there any examples of existing good practice in this area – such as measures to improve access to the policy among particular groups? If so please say what they are.

The introduction of the IBS Computer system for Choice Based Lettings has given the opportunity to set up a series of reports that monitor the outcome of the new scheme by all the relevant equalities categories and to see how it was working in the following areas:

- Nomination and referral systems;
- Decisions about allocating housing between different types of applicant, for example applicants for transfer, homeless applicants, and applicants bidding or properties under ‘choice-based’ letting systems
- Lettings (including ‘choice-based’ lettings), analysed by time spent waiting for an offer, number of offers made, acceptances, refusals, preferences (for location and type of accommodation), and quality
- Local Letting Schemes.

In addition to this was the need to encourage all applicants to complete the ethnic monitoring data to allow the Council to be better informed about the residents for whom it is providing services. This monitoring system was in place when the new Allocation Scheme and Choice Based Lettings became operational in 2008 and has been instrumental in producing regular information since then.

The system has been developed to collect record and maintain performance information within the various protected characteristics and systems are in place to analyse and publish these findings through a document entitled “Social Lettings - Your questions answered.” The most recent being for the period 31.07.08 to 31.12.10, during which time some 2764 properties were allocated, taking on average 25 days to let with 41 bids received on average for each. This way of reporting is now undertaken on a quarterly basis, and the information is attached through the various quarterly leaflets produced as evidence for this work.

The document covers popularity of areas, reasons given for declining offers, a breakdown by sex, sexual orientation, age, race, and religion and property types. It also gives helpful information on the delay times to be expected for applicants in the respective bands. This information is also available on request in the most commonly used languages in Northampton. These bulletins are now aimed at being produced quarterly with a further edition to be available shortly.

As a means of further testing public opinion, Service User Panels are shortly to be introduced and it is also proposed to include participation by tenants who have been through the process and whilst having been successful in their bidding process, will be able to give a greater insight into how the service is perceived.
Further support to residents is through local surgeries held at different venues throughout the borough, where updated advice can be given on individual applicant prospects, including areas where bids are likely to be more successful.
5 Evidence Base for Screening

A: Please use the table below to outline what information or evidence you have in relation to each equality group.

The following evidence sources have been used to make the screening assessment (i.e. the known evidence):

- Web information
- Equality monitoring
- Lettings Bulletin – “your questions answered “ document
- 2008 Allocations Review and EIA
- 31st May Allocations and Choice Based Lettings review
- Customer satisfaction survey
- The existing nomination SLA with Social Housing landlords
- The meetings with the Registered Providers
- The meetings and outcomes of the Homelessness Forum

Potentially any of the following identified groups could be adversely affected by this Allocation Scheme, which still requires a human element in the allocation process. However, a significant work has been put in place in introducing the system to monitor the activities of the service to deal with potential negative impacts.

There is little or no evidence and little suspicion that there is any detrimental impact in respect of applicants and should complaints be made, these would be rigorously investigated through the complaints procedure and action taken as appropriate.

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<tr>
<th>Equality Group</th>
<th>Evidence</th>
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<tbody>
<tr>
<td>Age</td>
<td>There appear to be no specific issues relating to age.</td>
</tr>
<tr>
<td>Disability</td>
<td>There is potential for people with disabilities to be disadvantaged within the process, particularly those with mental health issues.</td>
</tr>
<tr>
<td>Carers (for elderly, disabled or minors)</td>
<td>The DCLG Code of Guidance prioritises families seeking to adopt and these families are likely to benefit from the proposed changes contained within the Housing Allocations scheme.</td>
</tr>
<tr>
<td>Sex</td>
<td>At 30.06.2012 – 4,784 (57%) applications were headed by women and 3,662 (43%) by men. Gender is an issue in relation to economic status with women being adversely impacted. Research nationally suggests that women experience lower levels of economic activity than men.</td>
</tr>
<tr>
<td>Gender Reassignment</td>
<td>Trangender people may be particularly at risk of housing crisis and homelessness arising from transphobic reaction by family, neighbours and members of the local community. This may make it difficult to obtain work or undertake formal voluntary work.</td>
</tr>
<tr>
<td>Pregnancy and Maternity (incl. breastfeeding)</td>
<td>There appear to be no specific issues relating to pregnancy &amp; maternity within this service.</td>
</tr>
<tr>
<td>Race</td>
<td>Geographical distribution of different racial groups across the stock is monitored in an attempt to ensure that choice</td>
</tr>
</tbody>
</table>
does not lead to segregation. However, as the system is based on choice this can be a difficult area to confront. Segregated pockets can and do become created because certain groups choose to live together and are able to do this where the voids become available. Unfortunately this can be in the least popular areas. However, because this is now monitored and information provided to the Strategy Team, it enables the issue to be considered strategically with a view to looking at necessary support that needs to be put in place.

As far as can be determined all applicants, regardless of racial group, are given access to the same information about lettings with translations being available on request.

All lettings are monitored by ethnic group and steps can be taken to make sure that the system for ‘bidding’ for properties under ‘choice-based’ lettings schemes does not put a particular racial group (or groups) at a disadvantage. A system also exists whereby anyone in a priority band who does not engage with the bidding process is followed up to ascertain specific problems. It is recommended this is carried out more frequently than at present.

It is not felt that the nomination system for referring housing applicants to other social landlords puts those from any particular racial group (or groups) at a disadvantage (for example, by disproportionately transferring applicants from a particular racial group to housing association properties, which are perceived to be ‘better) and housing applicants from all racial groups appear to be fairly represented among the nominations.

### Breakdown of customers on the Housing Register as at the 30th June 2012 via Ethnic Origin

<table>
<thead>
<tr>
<th>Ethnic origin</th>
<th>Total on Register</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asian or Asian British Bangladeshi</td>
<td>118</td>
</tr>
<tr>
<td>Asian or Asian British Indian</td>
<td>31</td>
</tr>
<tr>
<td>Asian or Asian British Other</td>
<td>71</td>
</tr>
<tr>
<td>Asian or Asian British Pakistani</td>
<td>29</td>
</tr>
<tr>
<td>Black or Black British African</td>
<td>595</td>
</tr>
<tr>
<td>Black or Black British Caribbean</td>
<td>189</td>
</tr>
<tr>
<td>Black or Black British Other</td>
<td>75</td>
</tr>
<tr>
<td>Chinese or Other Ethnic Group</td>
<td>23</td>
</tr>
<tr>
<td>Chinese</td>
<td></td>
</tr>
<tr>
<td>Chinese or Other Ethnic Group</td>
<td>11</td>
</tr>
<tr>
<td>Other</td>
<td></td>
</tr>
<tr>
<td>Irish Traveller</td>
<td>3</td>
</tr>
<tr>
<td>Mixed Other</td>
<td>27</td>
</tr>
<tr>
<td>Mixed White &amp; African</td>
<td>38</td>
</tr>
<tr>
<td>Mixed White &amp; Asian</td>
<td>15</td>
</tr>
<tr>
<td>Mixed White &amp; Black Caribbean</td>
<td>128</td>
</tr>
<tr>
<td>Romany Gypsy</td>
<td>3</td>
</tr>
<tr>
<td>Unwilling to say</td>
<td>91</td>
</tr>
<tr>
<td>White British</td>
<td>3942</td>
</tr>
<tr>
<td>White Irish</td>
<td>75</td>
</tr>
</tbody>
</table>
Religion or Belief

Data is kept in accordance with applicants` respective faith and in the period 31.07.2008 to 30.06.2012, records indicate that customers from the respective faith groups have been rehoused in relation to the number of bids made as follows:

<table>
<thead>
<tr>
<th>Faith</th>
<th>rehoused in relation to bids</th>
</tr>
</thead>
<tbody>
<tr>
<td>Buddhist</td>
<td>7.6%</td>
</tr>
<tr>
<td>Christian</td>
<td>4.7%</td>
</tr>
<tr>
<td>Hindu</td>
<td>1.6%</td>
</tr>
<tr>
<td>Jewish</td>
<td>0%</td>
</tr>
<tr>
<td>Muslim</td>
<td>2.9%</td>
</tr>
<tr>
<td>No religion</td>
<td>6%</td>
</tr>
<tr>
<td>No Religion stated</td>
<td>5.1%</td>
</tr>
<tr>
<td>Other</td>
<td>4.4%</td>
</tr>
<tr>
<td>Sikh</td>
<td>5.5%</td>
</tr>
<tr>
<td>Unknown</td>
<td>5.6%</td>
</tr>
<tr>
<td>Total</td>
<td>56216 bids</td>
</tr>
</tbody>
</table>

Breakdown of customers on the Housing Register as at the 30th June 2012 via Faith

<table>
<thead>
<tr>
<th>Religion</th>
<th>Total on Register</th>
</tr>
</thead>
<tbody>
<tr>
<td>Buddhist</td>
<td>34</td>
</tr>
<tr>
<td>Christian</td>
<td>3945</td>
</tr>
<tr>
<td>Hindu</td>
<td>36</td>
</tr>
<tr>
<td>Jewish</td>
<td>8</td>
</tr>
<tr>
<td>Muslim</td>
<td>624</td>
</tr>
<tr>
<td>None</td>
<td>2071</td>
</tr>
<tr>
<td>Not stated</td>
<td>127</td>
</tr>
<tr>
<td>Other</td>
<td>285</td>
</tr>
<tr>
<td>Sikh</td>
<td>11</td>
</tr>
<tr>
<td>Unknown</td>
<td>1305</td>
</tr>
<tr>
<td>Total</td>
<td>8446</td>
</tr>
</tbody>
</table>

Whilst this may pinpoint adverse trends in relation to individual faith groups, the information should be treated only as an issue for further investigation since much will depend on the respective priorities of applicants and the particular areas they are aspiring to. Therefore, close monitoring of how the working household and community contribution award impacts in this area is essential to identify any patterns that may arise.

Sexual Orientation

At 30.06.2012 63 (1%) were bisexual 55 (1%) gay 42 (0.6%) lesbian and 1,468 (17%) either not stated unknown or unsure.

Although clearly steps have been taken to accurately define the client base, it must be recognised that there is a reluctance on the part of some applicants to divulge this information and every effort should be made to encourage applicants to provide this information at the point of application.
There is however, little or no evidence that there is any detrimental impact in respect of applicants and should complaints be made, these would be rigorously investigated through the complaints procedure and action taken as appropriate.

Customer Feedback information and satisfaction should regularly be used to check whether sexual orientation is a factor or barrier in accessing services.

**Breakdown of customers on the Housing Register as at the 30\textsuperscript{th} June 2012 via Sexuality**

<table>
<thead>
<tr>
<th>Sexuality</th>
<th>Total on Register</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bisexual</td>
<td>63</td>
</tr>
<tr>
<td>Gay men</td>
<td>55</td>
</tr>
<tr>
<td>Heterosexual</td>
<td>6787</td>
</tr>
<tr>
<td>Lesbian</td>
<td>42</td>
</tr>
<tr>
<td>Not stated</td>
<td>696</td>
</tr>
<tr>
<td>Rather not say</td>
<td>299</td>
</tr>
<tr>
<td>Unknown</td>
<td>473</td>
</tr>
<tr>
<td>Unsure</td>
<td>31</td>
</tr>
<tr>
<td>Total</td>
<td>8446</td>
</tr>
</tbody>
</table>

Detailed statistical information on the LGBT community within Northampton is very limited. It is not captured in the 2011 census and the 2011 census data is not available at present.

**Human Rights**

There is no evidence that individuals are being disadvantaged in terms of their human rights.

**Marriage and Civil Partnership**

There are no specific issues which are felt could discriminate or disadvantage married couples or those in civil partnerships other than general matters detailed elsewhere in this report.

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**B: What further data or information do you need to carry out the assessment?**

Consider whether there are any significant gaps in the known evidence base and list here your recommendations for how and by when those gaps will be filled.

**Equality Group**

- Public website questionnaire will produce evidence of support for the policy changes and possible concerns over the changes. It will not gather reliable evidence of likely impact of the changes.

- RSLs and statutory partners are likely to be the best source of evidence about the immediate impact of the revised Housing Allocations Scheme.
Step 2: Involvement and Consultation

You need to think about people inside the council, contractors, partners and the wider community

Outline any previous involvement or consultation which is relevant to this policy

The Council consulted a wide group of stakeholders in drawing up the 2010 Allocation policy as set out in 2 above as well as the Boroughs Registered Social providers. In setting up Choice Based Lettings, the Council consulted with a number of partner organisations, the comments and concerns of whom were addressed through an action plan.

The Review concluded however, that the arrangements hitherto in place for monitoring allocations, nominations and the local lettings schemes in terms of quality and impact on equality groups were not robust enough. It also concluded that there would be an ongoing need to closely monitor the Impact of the Allocation and Choice Based Letting schemes.

A new computer system was introduced to coincide with the introduction of the new, more transparent scheme, providing good monitoring information to enable analysis and subsequent appropriate action to address any adverse trends that might be detected.

The Council has now reviewed its Allocation Scheme to include the new statutory and regulatory advice contained in the Localism Act 2011. Consultation has taken place with a range of stakeholders through the Homelessness Forum and with a meeting with all the Housing Associations in the Borough. Part of this Equality Impact Assessment has been to explore and confirm that these concerns have been taken on board and one of the actions set out in the new action plan attached is to further consult with each.

This Equality Impact Assessment focuses on the changes to the 31st May 2010 Allocation Scheme reflected in the April 2012 Allocation Scheme. A main feature of this Equality Impact Assessment has been to consider the extent to which the system has become more transparent as well as fair for all of its customers.

The consultation framework for the Housing Allocations scheme between 3rd July 2012 to the 24th October 2012 can be demonstrated below:

- All customers on the Housing Register received a letter relating to the consultation. This letter was distributed to 10,000 tenants.

- 37 drop-in surgeries have been conducted at the Guildhall and at various sheltered housing scheme community rooms across Northampton over the 16 week consultation period.

- One to one meetings were conducted with stakeholders.

- All stakeholders received a copy of the consultation questionnaire to complete.

- The Housing Solutions service attended the Diversity Forum, Disabled Persons Forum, the Lesbian, Gay and Bisexual Forum, the Pensioners Forum and the Homelessness forum to consult on the Housing Allocations scheme consultation.

- The questionnaire and information pack including Frequently Asked Questions were placed on the web site to allow all customers access to the consultation.
Press releases were issued to the local press relating to the consultation framework.

Radio interviews were conducted by the Cabinet Member for Housing advising the wider community of the Housing Allocations scheme consultation.

Drop in surgeries were conducted in the Northampton town centre outside market on 2 Saturday mornings in July and in September.

Drop in surgeries were conducted at various libraries, the Weston Favell shopping centre and 4 tenant forums across the Borough.

Employees of the Housing Solutions service were consulted on the new Housing Allocations scheme and initial findings.

Employees of Landlord Services were consulted on the new Housing Allocations scheme and initial findings

Unison and the GMB trade unions were formally consulted on the Housing Allocations scheme consultation.

The tenant’s open day was attended by the Housing Solutions Service to consult on the proposed new Housing Allocations scheme.

Articles appeared in the My Home tenant’s magazine advising customers of the Housing Allocations scheme consultation.

Focus Groups were undertaken with 1000 tenants and customers on the Housing Register to ensure the new Housing Allocations scheme meets the needs of the customers.

**What do previous consultations show about the potential take-up of any resulting activities or services?**

**The current consultation responses are as below:**

- There have been 276 completed questionnaires from the 10,000 questionnaires forwarded to customers representing a 3% response rate.
- 51% of customers agree that priority should be given in a fair and just way to employed applicants over those not employed with the same housing needs.
- 64.1% of customers agree that the Council should develop Local Lettings Plans only for significant new areas of residential development.
- 76.5% of customers agree that the Council should limit the access to the Housing Register to only customers who lived in Northampton for a minimum of 6 months out of the last 12 months or 3 years out of the last 5 years.
- 87.7% of customers agree that the Council should suspend tenants from bidding for new properties if they fail to keep the existing property in good condition until it is improved.
- 65.7% of customers agree that the Council should suspend housing register applicants for 12 months for refusing 3 offers of accommodation.
- 82.5% of customers agree that the Council should suspend housing register
customers for 12 months for failing to attend three viewing appointments

- 44.2% of customers agree and 43.7% disagree that the Council should remove Band C and D customers from the Housing Register.

- 44.4% of customers agree that the Council should allocate accommodation on a first come/first served basis. With 45.8% disagreeing with this approach.

- 56.1% of customers agree that employed residents should be given some priority in the allocation of social housing.

- 55% of customers agree that people in social housing on higher incomes should pay more towards their rent.

- 63.8% of customers agree that Council tenants moving in to the the Private Rented Sector, due to overcrowding, via the Local Lettings Scheme should remain on the Housing Register.

- 85.3% of customers agree that the definition of a household will be the applicant, partner and their children, and the Council will make exceptions for those with valid reasons such as dependant relatives who cannot live independently.

- 69.8% of customer agree that the Council to offer households transferred due to an emergency a property on a like for like basis

- 68.9% of customers agree that the Council should direct applicants with assets worth over £16,000 for a single person and £32,000 for a couple to home-ownership options rather than allocate a property via the Housing Register.

- 86.5% of customers agree that vulnerable people such as those with severe medical problems/disabilities/victims of domestic abuse should be given priority in the allocation of housing.

For previous consultation arrangements, please see Section 4 below.
Step 3: Data Collection and Evidence

What evidence or information do you have already about how this policy might affect equality and/or the elimination of discrimination for each of the equality groups? What does this tell you?

What does available data tell you about the potential take-up of any resulting activities or services?

The following evidence sources have been used to assess the potential take-up of service:

- Web information
- Equality monitoring
- Lettings Bulletin – “your questions answered” document
- 2008 Allocations Review and EIA
- 31st May 2010 Allocations and Choice Based Lettings review
- Customer satisfaction survey
- The existing nomination SLA with Social Housing landlords
- The meetings with the Registered Providers
- The meetings and outcomes of the Homelessness Forum
- The consultation framework for the 2012 review of the Housing Allocations scheme
- Stakeholder consultation on the current Housing Allocations review

Potentially any of the groups with protected characteristics could be adversely affected by this Allocation Scheme, which still requires a human element in the allocation process. However, significant work has been put in place in introducing the CBL and 2010 Housing Allocation system to monitor the activities of the service to deal with potential negative impacts.

There is little or no evidence and little suspicion that there is any detrimental impact in respect of applicants and should complaints be made, these would be rigorously investigated through the complaints procedure and action taken as appropriate.

What additional research or data is required to fill any gaps in your understanding of the potential or known effects of the policy? Have you considered commissioning new data or research?

The Housing Allocations scheme will be monitored on a quarterly basis to assess the changes. The Housing Allocations scheme will be reviewed after a 12 month period to ensure it continues to meet best practice examples and ensure there are no un-intended outcomes from the implementation of the new Housing Allocations scheme.

Have you got a ‘baseline’ position understanding? How well does what you know about who gave you views in consultations match with the profile for Northampton and your particular service?

As noted elsewhere in this report the basic monitoring data either does not exist or is not consistently collected. We do not have current knowledge of the participation rates of potential social housing tenants in community activities nor do we have sufficient data about employment rates amongst the different sub-groups of people with protected characteristics. However, all data relating to the protected equality characteristics is monitored on a quarterly basis. Equality Data from the customer consultation for the Housing Allocations scheme is available on request and this request should be directed to the Housing Solutions Manager, Northampton Borough Council, The Guildhall, St Giles.
Step 4: Assessing impact and strengthening the policy

What evidence do you have about how the policy will affect different groups and communities in relation to equality and human rights?

How does/will the policy/activity and resulting activities affect different communities and groups?

Some things to consider:
- Are proposed actions necessary and proportionate to the desired outcomes?
- What barriers are known to exist for each of the equality groups?
- Where appropriate, will there be scope for prompt, independent reviews and appeals against decisions arising from the proposed policy/activity?
- Does the proposed policy/activity have the ability to be tailored to fit different individual circumstances?
- Is there any potential for, or are there known, adverse or positive impacts of the policy?
- You should consider how the policy might impact on people affected by discrimination, specific interest groups such as small businesses, voluntary sector agencies and other service providers
- Are there examples of good practice that can be built on?
- You may wish to consider how the policy will be delivered or communicated.

| Equality Group | Risks (Negative)                                                                                                                                                                                                 | Opportunities (Positive)                                                                                                                                                                                                 |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Age            | Some older people are less likely to satisfy the Working Household criteria. Economic participation rates nationally vary amongst older people falling significantly post 50. However, increasingly many older people are now working beyond traditional retirement age. This will also mitigated by the community contribution award. | There is clearly potential for the elderly to be disadvantaged in a choice based lettings system. The Housing Solutions Team and support agencies such as Age Concern provide significant support to ensure this does not happen. Close monitoring of this sector will enable specific issues for different segments of the older population to be identified and addressed appropriately. Older people are generally less economically active, but the allocation of accommodation to people above the Pension Credit age will positively affect this section of society through the Sheltered Housing Scheme allocations. |
|                | There is evidence that younger people find it easier to engage with the Choice Based lettings process.                                                                                                                                                                      | Northampton Borough Council employs officers in the Housing Solutions service to assist older and vulnerable customers to bid for example those with limited access to                                                                                                 |

Internet accessibility for online advice in 2006 was 28% for people above the age of 65 has home internet access compared to UK average of 57%. Also older people are less likely to be computer literate.

There is evidence of upward trend in youth unemployment and the proposals of additional priority for working households may be a negative impact on your people aged 16-25.

**Disability**

There is potential for people with disabilities to be disadvantaged within the process, particularly those with mental health issues.

Records indicated that at 30 June 2012 – 729 or 9% of customers on the housing register needed properties that have had adaptations to allow them to improve their quality of life. There were 57 in mobility level 1 needing wheelchair access throughout. 354 in level 2 needing partial access (including ramps and level access) and 318 in level 3 needing properties with assisted access (including level or shallow steps with handrail)

It must be recognised however, that specially adapted properties are in short supply. Details of all those, which have been adapted, are recorded on the database and properties that have had major adaptations are advertised as available for applicants who have a need.

Information is not currently available on the number of applicants with a disabled member who will qualify under the working household policy or the community contribution award

Northampton Borough Council’s Housing Solutions employs officers to support customers through the bidding process, and free internet access is available at the Guildhall to assist customers with bidding.

The Housing Solutions services employs an officer to identify housing and employment, education and training options for this age group to improve housing and employment opportunities.

Significant steps are taken both to support applicants in making their initial application and subsequently in making their bids so as to ensure they suffer no disadvantage.

The Council has involved disabled people in developing a Disabled Go online guide to hundreds of buildings in Northampton, including publically accessed council buildings and those of providing services for the council. The Council has also obtained Positive about Disabled People accreditation and Mindful Employer for people with a mental health problem. Housing Solutions have also obtained the Chartered Institute of Housing Charter for Equality and Diversity.

Whilst properties, unsuitable for the disabled, are often adapted once offered, there is a need for a more joined up approach with the voids section, firstly to identify properties when they first come void that are likely to be suitable for adaptations, and then to do the work whilst the property is void.

However there is a need to balance these needs with the demands already placed on register. The cost of any such adaptations would however, come from DFG or Aids
Policy and clearly this is something that must be closely monitored when the scheme goes live.

There is evidence that employment rates for disabled people are lower than those who are not and the proposals around additional priority for employment may be a negative impact on this equality strand of customers.

and Adaptations money, and should not therefore, affect the void period as the property would remain in major works.

In order to help meet the shortfall of suitable available properties for families which may include the disabled, the Council has started a programme of adapting vacant one bedroom bungalows into two bedroom properties when they become vacant. In addition a very successful under-occupation scheme has been introduced, which has enabled 67 households from 5,4 and 3 bedroom accommodation to move into 1 and 2 bedroom properties, allowing larger families to accommodate the resultant vacated homes during the 2011/2012 financial year.

Data on physical disability is kept under three headings on the housing register. This automatically ensures that those with a disability or medical condition or long term limiting illness will be given appropriate level of housing if they are not living in suitable housing at the point of application. Continuous quarterly impact monitoring will continue.

Nationally, 53% of working age disabled people are in work compared to 70% of non-disabled people. Employment rates vary greatly according to the type of impairment a person has; for example people with severe or enduring mental health conditions have the lowest employment rate of any of the main groups of disabled people. According to the Office for Disability issues this is 16% for people with mental health issues compared to 43% for all disabled people of working age.

Northampton’s new Housing Allocations scheme actively promotes the needs of disabled groups by being designed to ensure that applicants with mobility needs are prioritised for accommodation.
| **Carers (for elderly, disabled or minors)** | The Children’s Act section 22G requires Northamptonshire County Council to make adequate provision for children to be looked after through the adoption and fostering arrangements. | The Housing Allocations scheme promotes this legislative requirement and will be a positive contribution to Northampton. |
| **Sex** | Gender is an issue in relation to economic status with women being adversely impacted. Research nationally suggests that women experience lower levels of economic activity than men. | Applicants who do not qualify under the working household policy may receive additional preference under the community contributions award scheme. This is an area which will need to be closely monitored once the Allocation Scheme goes live in April 2013. Please note Gender alone would not have any bearing on the ability to access social housing. |
| **Gender Reassignment** | Transgender people may be particularly at risk of housing crisis and homelessness arising from transphobic reaction by family, neighbours and members of the local community. This may make it difficult to obtain work or undertake formal voluntary work. | Applicants made homeless through a hate crime would be placed into emergency band and therefore achieve the highest banding under the scheme. However, gender re-assignment alone would not have any bearing on the ability to access social housing. Northampton has recently started collecting monitoring information for this group but has insufficient data at present. |
| **Pregnancy and Materning (incl. breastfeeding)** | There appear to be no specific issues relating to pregnancy & maternity within this service. | It is of course a disappointment to pregnant applicants that their case can only be awarded the increased priority after the birth of the child but the position taken by the Council to award priority after birth is reasonable given the demand on family sized accommodation and this will also comply with the Welfare Reform Act 2012. |
| **Race** | Nationally there is widespread concern about the allocation of scarce public housing resources across many ethnic groups. This can be damaging to community cohesion as a result of community perceptions of unfairness relating to the allocation of social housing. | The Allocation scheme contains specific rules about eligibility that are enforced for all applicants. The scheme incentivises voluntary work and employment that can both help to build community cohesion. It is also more transparent which in itself will help to communicate fairness. |
Local Lettings policies have the potential to impact the housing options of disadvantage groups and much has been written nationally on this. Ethnic communities often choose to live in close proximity. Reasons include being close to family and other cultural spaces such as religious and retail facilities. Local lettings schemes will therefore benefit those members of ethnic minority communities who are working and who wish to exercise their choice to remain within their communities. This also supports the local economy.

Larger properties with three or four bedrooms are often a requirement of some racial groups and lack of availability could disadvantage some families.

The inclusion of the access to social housing to people contributing to their communities positively through voluntary work and employment will encourage applicants to play a more active role in their communities to increase their opportunities for being re-housed. Despite initial findings that there are no areas of serious concern this can only be tested once the scheme has been running for a period. On-going monitoring and review is therefore essential.

Alongside this however, is the continuing need to encourage all applicants to complete the ethnic monitoring data to allow the Council to be better informed about the applicants it is providing services for. This will be made a compulsory field on the on line application that customers will have to complete this information to register on the housing waiting list. However, within the Allocation Scheme the Council has in the emergency band Applicants who are statutorily overcrowded as defined by the Housing Act and Homelessness Act. It also gives similar priority to applicants who are under-occupying a Northampton Borough Council or Housing Association property to free up large units for families who need them. In addition the Council will run an incentive scheme (subject to finances being available) to help people move to smaller properties again to free up larger properties for families who need them. It should be recognised that the Allocation Scheme cannot mitigate for the shortage of larger properties.

Applicants made homeless through a hate crime would be placed into emergency band therefore achieve the highest banding under the scheme.

This is an area where the Council will need to closely monitor the situation when the scheme goes live to
applicants who are already in band A or B and will receive one multiple needs star. Those with no other priority will be put in band B.

The lower levels of economic activity amongst some ethnic minority communities are well documented. This is the case both nationally and locally. The Allocation Scheme mitigates this by recognising the tendency for too few working households to be re-housed.

Residents who do not qualify under the working household policy may be awarded Community Contribution awards. However there are concerns that insufficient voluntary work and support exists in the Borough to allow some ethnic minority groups to engage in meaningful participation with organisations they feel are welcoming and inclusive to be able to effectively mitigate for this impact. Rules around immigration status have changed and some of the legislation appears complicated and ambiguous.

Poor quality information or language problems could impact negatively.

<table>
<thead>
<tr>
<th>Religion or Belief</th>
<th>Whilst the detailed recording of allocations by people of different faith groups can pinpoint adverse trends in relation to individual faith groups, the information should be treated only as an issue for further assessment.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The Council is a partner to the Northamptonshire Police Service Hate Crime work, which includes a commitment to identifying, reporting and responding to faith-based hate incidents, including on a multi-</td>
</tr>
</tbody>
</table>

This policy will help reduce inequality over the long term by encouraging such people to seek employment and thus starting to tackle areas of worklessness. This will have a positive impact on the majority of household across the Borough.

The policy recognises those employed as well as those seeking work and those recently employed for 16 hrs or more out of 9 of the last 12 months and therefore will not unduly penalise those affected by the recession.

The Community Contribution awards gives a similar level of priority to working households so will help those who do not work to also gain priority.

Staff have nevertheless tried to deal with this by jointly producing with customer services, a simple guideline for customers, which can be made available in alternative languages as required, and attended extensive training.

All forms and information can be made available in the languages most commonly used in Northampton.

The introduction of a 3 year residential qualification criteria will have a positive impact for local residents meeting the criteria, but will mean new resident arrivals to the Borough and or country will not be able to access the Housing Register.

Poor quality information or language problems could impact negatively.
investigation since much will depend on the respective priorities of applicants and the particular areas they are aspiring to. Therefore, close monitoring of how the working household and community contribution award impacts in this area is essential to identify any patterns that may arise.

agency basis where appropriate The Housing Solutions service has a dedicated worker who works with customers who have been victims of Hate Crime.

Please note religion or belief alone would not have any bearing on the ability to access social housing.

| Sexual Orientation | While many people identify as heterosexual, many people do not in the wider community the Government estimates that approximately 6% of the population are either gay men, lesbians or bisexuals. It is acknowledged that data on residents’ sexual orientation is unlikely to be accurate and on-going efforts should be made to encourage such information being given at the point of application. | The Council’s Housing Solutions team has achieved Stonewall and Albert Kennedy Trust Accreditation whilst the Housing Solutions service attend all Lesbian, Gay, Bisexual and Transgender Community Forum meetings. Therefore the organisation should be well placed to identify and deal with potential discrimination. Specific training has been given to staff on sexuality issues. Please note that sexual orientation alone would not have any bearing on the ability to access social housing. |

<p>| Human Rights | There is always the possibility in a personal service that people’s freedom and opportunities are limited and hindered by prejudice, discrimination or arbitrary restraint. | Human right considerations should now be “mainstreamed”. The service is designed to give support to all applicants in registering and making bids and it is an important aspect of the service that whilst protecting privacy, residents should not feel isolated or excluded from the process. They should be involved as much as possible in the way the service is delivered and have full opportunity to express any views through satisfaction surveys and user panels etc. As the elderly and vulnerable are traditionally population groups missed from routine statistical monitoring surveys etc, it is important that support is given where appropriate to understand and complete documentation. The proposals do not impact on Human Rights as defined by the Human Rights Act 1998. The proposals do not impact on the rights of children as defined by the |</p>
<table>
<thead>
<tr>
<th><strong>Marriage and Civil Partnership</strong></th>
<th><strong>UN Convention on the Rights of the Child.</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>There are no specific issues which are felt could discriminate or disadvantage married couples or those in civil partnerships other than general matters detailed elsewhere in this report.</td>
<td>This area will be monitored on a quarterly basis to ensure there are no un-intended consequences from the introduction of the new Housing Allocations scheme.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>General</strong></th>
<th><strong>The introduction of the IBS Computer system for Choice Based Lettings has given the opportunity to set up a series of reports that monitor the outcome of the new scheme by all the relevant equalities categories</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Failure to regularly review the outcomes, specifically those applicants in priority bandings who are not engaging with the bidding process could lead to certain applicants, with real problems, being disadvantaged. <strong>RSL</strong>’s in many cases reluctant to take certain applicants such as MAPPA clients. Although such cases are referred to an Appeals Panel the feeling is that the Council has little sanction and therefore it is important that negotiations around a new service level agreement are concluded as soon as possible. Inherent prejudice and/or lack of specialist training could lead to inequality in the treatment of customers.</td>
<td>Good support networks are in place in Northampton to ensure that those who may be disadvantaged are supported to compete equally with all other applicants. Staff make home visits or carry out office interviews to help residents, whilst the application forms themselves draw out any special needs, which are then referred to specialist support agencies. This process works in reverse with either the Gateway Service or other support agencies referring cases to the Housing Options Team.</td>
</tr>
</tbody>
</table>

Potentially any of the identified equality groups could be adversely affected by this choice based system which still requires a human element in the allocation process and further details by protected characteristics are specifically given in 4a above However, significant effort has been made to avert this by putting in place a system to monitor the activities of the service and to deal with potential negative impacts on all groups.  |

Although steps are taken through customer satisfaction survey to ensure that the service provided is perceived as being fair to all applicants, the opportunity is missed to measure satisfaction through the various equality strands and it is strongly recommended that this is done for future such exercises.  |

As a means of further testing public opinion, Service User Panels are shortly to be introduced and it is also proposed to include participation by tenants who have been through the process and whilst having been successful in their bidding process, will be able to give a greater insight into how the service has worked for them. |
<table>
<thead>
<tr>
<th>The changes to the banding system and the deletion of the former C and D Bands could have a potential impact.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northampton has an insufficient supply of larger suitable properties and this can impact negatively on larger families, which often can include those from some racial groups as well as those with members who have a disability.</td>
</tr>
<tr>
<td>Further support is provided through local surgeries held at different venues throughout the borough, where updated advice can be given on individual applicant prospects, including advice on areas where bids are likely to be more successful.</td>
</tr>
<tr>
<td>The Social housing lettings bulletin “your questions answered” Is an excellent tool in aiding transparency and fairness within the process but needs to be prepared on a quarterly basis.</td>
</tr>
<tr>
<td>The system requires that there is a named officer with specific responsibility for analysing the monitoring results and taking appropriate action to address any adverse trends detected It is important that this is robustly done on a regular basis.</td>
</tr>
<tr>
<td>Several measures are in place to mitigate this risk and it is important that these processes are maintained:</td>
</tr>
<tr>
<td>Staff performance is monitored through Supervisions, team meetings and the Feedback framework (Complaints, Concerns and Compliments). Customers have been engaged in a customer satisfaction survey. All staff are required to attend mandatory equality training. ‘Whistle-blowing’ - staff are encouraged to speak up if they hear their colleagues saying anything to customers or other staff members that would contravene our policies on equalities.</td>
</tr>
<tr>
<td>Practical steps are being taken to help meet the shortfall of larger suitable properties.</td>
</tr>
<tr>
<td>All applications and lettings are monitored quarterly against the diversity strands and compared with figures from the previous quarter and financial year, and lettings and applications are reflective of the</td>
</tr>
</tbody>
</table>
There are no specific issues which are felt could discriminate or disadvantage members of the Armed Forces or members of their family. This policy will ensure that NBC meet the requirements and responsibilities as set out in the Armed Forces Covenant.

7 Proportionality

Describe the scale and likelihood of these risks and opportunities

The service is very important to the Council in that it seeks to tackle housing need for some of the most vulnerable and marginalised sections of the community. It also sees the working household and community contribution award as central to delivering its community development and social cohesion objectives.

The Council has balanced the needs of the various categories of applicants within the statutory guidelines and needs of the Borough.

The initial screening process has shown that in setting up the new Allocation scheme and Choice Based Lettings scheme much has been done to enable all applicants to compete on a fair and open basis. Policy and procedures are in place to ensure that the service is compliant with necessary legislation and codes. Any failings that exist are more to do with the degree to which the considerable information now available is monitored.

The resources involved in carrying out such monitoring and receiving of feedback is considered to be proportional to achieving a fair and equal service for service users within the relevant equality strands.

In determining the Allocation Scheme, policy and procedures are in place within the Choice Based Lettings system to ensure that the service is compliant with necessary legislation and codes. However, monitoring of outcomes needs to be more robust to ensure that the desired outcomes are met and that no applicant is disadvantaged due to pressure of work.

8. What measures does, or could, the policy include to help promote equality of opportunity?

For example, positive measures designed to address disadvantage and reach different communities or groups?

What measures does, or could, the policy include to address existing patterns of discrimination, harassment or disproportionality?

What impact will the policy have on promoting good relations and wider community cohesion?

If the policy is likely to have a negative effect (‘adverse impact’), what are the reasons for this?
Including direct or indirect discrimination

What practical changes will help reduce any adverse impact on particular groups?

Consider changes in communication methods, providing language support, collecting data, revising programmes or involvement activities.

There are however, some areas of implementation that need strengthening. For example:

- Due in part to recent legislative changes introduced by Central Government, (including, the forces element of the policy, the social mobility and social welfare aspects, changes to the A8 rule and the Adult/children services issue), there is no current annual lettings plan and staff are therefore working to the previous year’s Allocations Plan. The new Housing Allocations scheme will be monitored quarterly and a 12 month review will be undertaken to address an un-intended consequences from the introduction of the scheme.

- A review of policy is currently being finalised which should enable an annual lettings plan to be produced that will address these issues, although it will at that stage be necessary to subject the changes to further Equality Impact Assessment

- It is understood also that Information to CORE is not currently being collated for 100% of cases and clearly it is important that this procedure should be reintroduced as early as possible not only to meet the council’s obligations but for internal analytical and reporting purposes

- Rules around immigration status have also changed and appear to be complicated and ambiguous. Staff have nevertheless, tried to deal with this by jointly producing with customer services, a simple guideline for customers, which can be made available in alternative languages as required, and extended extensive training in this area

- A greater number of application forms than previously are not properly completed and have to be referred back to applicants. This was thought to be largely due to the number of people who did not have English as their first language, but would also include those with mental health problems. Dealing with this issue placed greater reliance on home visits, personal interviews and telephone contact staff seemed happy to accept that this was their role and that such measures were necessary as an increasing number of applicants needed individual support. The application form specifically draws out any special need requirements. Staff are happy, however, with the liaison arrangements which exist with outside agencies to whom cases are referred for support in order to try and simplify process. Additionally, it is understood that the service is reviewing the way it manages the required documents, therefore not returning application forms. They have re-instated fast-path applications, which are just a skeleton application and can be cancelled easily. This allows staff to keep a track of new applications

- The gateway project introduced in late 2009 was a pilot, and operational procedures, which are not in a manual form as one would expect, need to be changed as necessary, particularly as the client base has increased

- As part of the setting up, there was to be a very detailed procedure for supporting disadvantaged applicants that is clearly an important aspect of ensuring that all applicants are able to compete equally. It appears that although the information is
collected, it is in fact actioned only periodically. It is important that this information is followed up and it is proposed this will happen monthly.

- It is also a requirement of the new system that there should be a named officer with a clear responsibility to carry out analysis of the outcome of the regular reporting monitoring reports and act on the findings. In practice this appears to be delegated to the Choice Officers for operational purposes but no evidence has been made available to highlight any actions, which have been taken in the light of the considerable information collected. It is understood that copies of these reports go to the strategy team.

- An issue that is not perhaps working as satisfactorily as required, and could impact negatively on certain groups is that of nominations to RSL’s, who are in many cases reluctant to take certain applicants such as MAPPA clients. Although such cases are referred to an Appeals Panel the feeling is that the Council has little sanction. In an attempt to improve the situation a revised service level agreement has been drawn up and negotiations on this are being finalised.

- The new Housing Allocations scheme allows for Local Lettings schemes to stabilise an area that has specific and particular issues. Local Lettings schemes must be reviewed on a regular basis and equality impact assessments undertaken with consultation with customers and communities before a scheme is agreed. The schemes must be published and revised or revoked where they are no longer appropriate or necessary.

- Northampton has an insufficient supply of larger suitable properties and this can impact negatively on larger families, which often can include those from some racial groups as well and those with members who have a disability. However, practical steps are being taken to help meet the shortfall of larger suitable properties.

**Have you considered including treating disabled people more favourably where necessary?**

Not applicable as the purpose of the revised scheme is to reward working families and those making a contribution to their community. We will define the criteria for awarding a preference in culturally neutral ways so as not to introduce an unintended differential bias against people with protected characteristics such as a disability.

**What evidence is there that actions to address any negative effects on one area of equality may affect other areas of equality or human rights?**

The justifiable intention to reward working families will inevitably in a sector of short supply have an adverse impact on the availability of social housing for other groups.

**What will be done to improve access to, and take-up of, services or understandings of the policy?**

Some things to consider:
- Increasing awareness of the policy among all staff and/or councillors and/or the community
- Encouraging wider public involvement in our work or communications activities
- Encourage different groups, including disabled people, to get involved in what we do

Staff
Inherent prejudice amongst staff could lead to inequality in the treatment of customers. In order to mitigate against this risk customers are engaged in satisfaction surveys and, regular feedback. However the satisfaction surveys need to be more sophisticated in terms of monitoring by the respective equalities characteristics which is not done at present. It is, however, a requirement that all staff have to attend mandatory equality training and Clients in all groups benefit from staff having customer specific training.

Notices are widely displayed encouraging staff to speak up if they hear their colleagues saying anything to customers or other staff members that would contravene policies on equalities.

There do not appear to be currently updated procedures although when CBL was set up manuals were produced. The team leader has introduced operational procedures but these are not written down in a procedure manual, as could be available for a new member of staff.

This needs to be addressed and a recommendation to this effect is in the attached improvement action plan.

An important feature in establishing that the service being provided is perceived as being fair to all applicants is to receive regular feedback through customer surveys etc. Whilst it was noted that the most recent of these was carried out with very favourable response in March 2011, it seems the opportunity was missed to measure satisfaction through the various protected characteristics and it is strongly recommended that this is done for future such exercises.

Customer satisfaction should be tested regularly both through surveys and Service User panels but it is important to measure satisfaction through the respective equalities categories

**Information services and access**

Poor quality information or language problems could impact negatively on various groups but in Northampton good support networks are in place to ensure that those applicants disadvantaged by choice based lettings process are supported to compete equally with all other applicants. Staff makes home visits or carry out office interviews to help residents, whilst the application forms themselves draw out any special needs, which are then referred to specialist support agencies. This process can also work in reverse with either the Gateway Service or support agencies referring cases to the Housing Options Team.

All forms and information can be made available in the languages most commonly used in Northampton.

It is a requirement of the new system that there is a named officer with a clear responsibility to carry out analysis of the outcome of the regular reporting monitoring reports and act on the findings to address any adverse trends. This includes a regular report on those applicants in priority groups who, for whatever reasons, are not engaging with the bidding process. Whilst this information is collected on the computer system, follow up has been periodic and needs to be carried out on a monthly basis to ensure those with real problems are not being disadvantaged.

Although records indicate that by far the largest number of bids are received through the web (89%) with only 4% by telephone and 6.6% by staff on behalf of customers,
it does appear that considerable support is made available to assist applicants bid on line and we are advised that the 89% figure will have included a large number of applicants who have in fact been assisted. The Social housing lettings bulletin “your questions answered” should be prepared on a quarterly basis as this is a good tool for dealing with transparency and demonstrating fairness.
Step 5: Procurement and partnerships

Consideration of external contractor obligations and partnership working

Is this project due to be carried out wholly or partly by contractors? If yes, have you done any work to include equality and human rights considerations into the contract already?

Not Applicable in this case as the scheme is administered by NBC staff.
### Step 6- Making a Decision

**Summarise your findings and give an overview of whether the policy will meet the council’s responsibilities in relation to equality and human rights**

The role of the EIA is to assess the likely impact of the revised preferences proposed under the new scheme and to identify the evidence that NBC must collect in order to satisfy itself that its policy is working as intended.

The key point here is that the Allocation Scheme (AS)2010 was subjected to a full EIA and so this EIA needs to focus on the potential impact of the specific changes in Allocations Scheme 2012, namely the intention to prioritise people in work and those making a contribution to their local community whilst withdrawing Bands C & D from the Allocations Scheme 2012 and the CBL system.

The Council is satisfied that in establishing the new Allocation Scheme 2012 and Choice Based Lettings System, much has been done to address equality issues. The scheme has been arrived at after full consultation with the key stakeholders and their views influenced the final scheme arrived at. Procedures are in place to ensure that the service is compliant with the necessary legislation and codes. Any failings that do emerge will be more to do with implementation.

The lack of a procedure manual is potentially significant. This should be addressed therefore, both as a matter of statutory duty, but also as a matter of ensuring operational fairness and equality.

The likely impact of the changes in priorities cannot be measured or estimated because of lack of data about current participation rates in relevant community activities. Nor can we predict the scale of changes to employment rates amongst groups with protected characteristics once the new preferential weightings are introduced.

Our conclusion is that we have to proceed with the sensitive implementation of the new scheme and review its impact having allowed at least a full 6 months operation. All reasonable steps and procedures to mitigate or avoid adverse impacts have been identified. It is the implementation of the draft Scheme where difficulties may arise, which will therefore require close monitoring once the new scheme is brought into action.

NBC is entitled to make specific policy decisions to prioritise key groups. It is not required that NBC have a “no detriment” policy but that they evidence that it is not unintentionally biased or illegal.

**We believe that No major change to the proposed Allocation Scheme is required.** The EIA has not identified any potential for discrimination or unintended adverse impact and all opportunities to promote equality have been taken.

**What practical actions do you recommend to reduce, justify or remove any adverse/negative impact?**

The Council have devised an improvement action plan, which should be implemented as soon as practically possible.
How will you monitor the impact and effectiveness of the policy or activity?

This could include adaptations or extensions to current monitoring systems, relevant timeframes and a commitment to carry out an EIA review once the policy or activity has been in place for a year.

It will be critical to monitor the differential effects of introducing the revised Allocation Scheme on those groups with protected characteristics.

Monitoring systems generally and completion of basic monitoring information must be enhanced. This issue needs to be addressed as part of the implementation and ongoing operation of the scheme.

Officers will develop proposals to:

- **Agree the new key metrics** for determining the impact of the new scheme and in particular whether it is successful in delivering the desired policy outcomes and avoiding adverse differential impacts on those with protected characteristics.

- **Define any required changes** to the CBL computer system in order to gather the required data.

- Determine and introduce an enhanced suite of **standard monitoring reports**.

- The Council will ensure there is regular monitoring to ensure the new Housing Allocations scheme is a proportionate response to the new freedoms and flexibilities enshrined in the 2011 Localism Act, for example number of customers meeting employment definition housed in the mouth and as a % of all lettings of which x were housing register customers.

- Ensure that older people and disabled people are not disadvantaged by moving to an online housing application process.

- The Council will further enhance the Accessible Housing Register by publishing a table of waiting times for adapted and wheelchair accessible properties as part of the Council's usual feedback on the Choice Based Lettings scheme.

Northampton Borough Council will commit to conducting an independent review of the full Equality Impact Assessment after one year of full operation of the proposed 2012 Allocation Scheme.

**How will the recommendations of this assessment be built into wider planning and review processes?**

Give details of how the results of the impact assessment will be published, including consultation results and monitoring information if applicable.

We will publish an approved copy of this assessment on the Northampton Borough Council internet under the Equalities – Assessments and Consultation category and under the Housing category for our service area to help members of the public to find it easily.
We will continue to produce and publish the monitoring outcomes from the CBL system so that the people of Northampton as well as potential housing applicants can see how the system is working in practice.
### Step 8 – Action Plan

Taking into consideration the responses outlined in Steps 1-7 above, complete the action plan below.

<table>
<thead>
<tr>
<th>Step 2: Involvement and Consultation</th>
<th>Actions</th>
<th>Target date</th>
<th>Responsible postholder and Directorate</th>
<th>Monitoring postholder and Directorate</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>To consult with a number of partner organisations to explore and confirm that their concerns have been taken on board.</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; April 2012 and then again 1&lt;sup&gt;st&lt;/sup&gt; November 2013</td>
<td>Housing Solutions Manager</td>
<td>Head of Strategic Housing Services</td>
</tr>
<tr>
<td></td>
<td>To undertake an online survey and consultation exercise in gauging the support for the proposed changes to the Allocation Scheme.</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; October 2013</td>
<td>Housing Solutions Manager</td>
<td>Head of Strategic Housing Services</td>
</tr>
<tr>
<td></td>
<td>Strengthen the transparency of the new scheme by engaging user panels and staff in:</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; April 2013</td>
<td>Housing Choice and Resettlement Manager</td>
<td>Housing Solutions Manager</td>
</tr>
<tr>
<td></td>
<td>Preparing the procedure manual</td>
<td></td>
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<tr>
<td></td>
<td>Clarifying the operational definition of ‘community contribution’.</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; December 2012</td>
<td>Housing Solutions Manager</td>
<td>Head of Strategic Housing Services</td>
</tr>
<tr>
<td></td>
<td>Proposing the weightings to be given for preference the factors of employment and community contribution.</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; December 2012</td>
<td>Housing Solutions Manager</td>
<td>Head of Strategic Housing Services</td>
</tr>
<tr>
<td></td>
<td>Improving the consistency of collecting the key monitoring data</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; April 2013</td>
<td>Housing Strategy and Performance Manager</td>
<td>Housing Solutions Manager</td>
</tr>
</tbody>
</table>

<p>| Step 3: Data Collection and Evidence | Agree the new key metrics                                               | 1&lt;sup&gt;st&lt;/sup&gt; April 2013               | Housing Strategy and Performance Manager | Housing Solutions Manager              |
|                                      | Define any required changes to the CBL                                  | 1&lt;sup&gt;st&lt;/sup&gt; April 2013               | Housing Strategy and Performance Manager | Housing Solutions Manager              |</p>
<table>
<thead>
<tr>
<th>Step 4 Assessment and analysis</th>
<th>Decide what “success” would look like – define the expected outcomes</th>
<th>1&lt;sup&gt;st&lt;/sup&gt; March 2013</th>
<th>Housing Solutions Manager and Housing Strategy and Performance Manager</th>
<th>Head of Strategic Housing Services</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Agree the performance management targets for the effective implementation of the new Allocation Scheme</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; March 2013</td>
<td>Housing Solutions Manager and Housing Strategy and Performance Manager</td>
<td>Head of Strategic Housing Services</td>
</tr>
<tr>
<td></td>
<td>Incorporate delivery of the scheme into the Directorate’s performance targets</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; April 2013</td>
<td>Housing Solutions Manager and Housing Strategy and Performance Manager</td>
<td>Head of Strategic Housing Services</td>
</tr>
<tr>
<td>Step 5 Procurements and partnerships</td>
<td>No actions</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Step 7 Monitoring, evaluating and reviewing</td>
<td>Monitor changing patterns to new housing applications, bidding patterns and allocations to determine if the policy is working as intended</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; July, 1&lt;sup&gt;st&lt;/sup&gt; October, 2013, 1&lt;sup&gt;st&lt;/sup&gt; January 2014, and 1&lt;sup&gt;st&lt;/sup&gt; April 2014</td>
<td>Housing Choice and Resettlement Manager</td>
<td>Housing Solutions Manager</td>
</tr>
<tr>
<td></td>
<td>Monitor the impact of new policy on who is no longer being allocated – identify any unintended consequences</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; July, 1&lt;sup&gt;st&lt;/sup&gt; October, 2013, 1&lt;sup&gt;st&lt;/sup&gt; January 2014, and 1&lt;sup&gt;st&lt;/sup&gt; April 2014</td>
<td>Housing Choice and Resettlement Manager</td>
<td>Housing Solutions Manager</td>
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</table>
Undertake a detailed evaluation of the impact of the 2012 Allocation Scheme in late 2013 – allowing at least 6 months of operation

For the record

The equality impact assessment should be signed off at Head of Service level before publication. Signing off means that the Head of Service will need to satisfy themselves that:
- You have consulted and involved stakeholders from each group
- You have gathered all relevant evidence
- You have an action plan

Date of sign off by Head of Service: 3/12/12

Name of Head of Service signing off this EIA: Fran Rodgers

The Housing Allocations and Choice Based Lettings scheme has been reviewed in December 2013. The Equalities Impact Assessment has been reviewed to ensure that no other groups or individuals will be negatively impacted as a result of any adjustments to the current policy.
Equality Duties to be taken into account include:

Prohibited Conduct under The Equality Act 2010 including:
Direct discrimination (including by association and perception e.g. carers); Indirect discrimination; Pregnancy and maternity discrimination; Harassment; discrimination arising from disability.

Public Sector Duties (Section 149) of the Equality Act 2010 for NBC and services provided on its behalf:
NBC and services providing public functions must in providing services have due regard to the need to: eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity and foster good relations between different groups. ‘Positive action’ permits proportionate action to overcome disadvantage, meet needs and tackle under-representation.

Rights apply to people in terms of their “Protected Characteristics”:
Age; Gender; Gender Assignment; Sexual Orientation; Disability; Race; Religion and Belief; Pregnancy; Maternity. But Marriage and Civil Partnership do not apply to the public sector duties.

Duty to “advance equality of opportunity”:
The need, when reviewing, planning or providing services/policies/practices to assess the impacts of services on people in relation to their ‘protected characteristics’, take steps to remove/minimise any negative impacts identified and help everyone to participate in our services and public life. Equality Impact Assessments remain best practice to be used. Sometimes people have particular needs e.g. due to gender, race, faith or disability that need to be addressed, not ignored. NBC must have due regard to the duty to make reasonable adjustments for people with disabilities. NBC must encourage people who share a protected characteristic to participate in public life or any other activity in which their participation is too low.

Duty to ‘foster good relations between people’
This means having due regard to the need to tackle prejudice (e.g. where people are picked on or stereotyped by customers or colleagues because of their ethnicity, disability, sexual orientation, etc) and promote understanding.

Lawful Exceptions to general rules: can happen where action is proportionate to achieve a legitimate aim and not otherwise prohibited by anything under the Equality Act 2010. There are some special situations (see Ch 12 and 13 of the Equality Act 2010 Statutory Code of Practice – Services, Public Functions and Associations).

National Adult Autism Strategy (Autism Act 2009; statutory guidelines)

Human Rights – under the Human Rights Act 1998 which gives effect to the European convention: right not to be subjected to degrading treatment; right to a fair trial (civil and criminal issues); right to privacy (subject to certain exceptions e.g. national security/public safety, or certain other specific situations); freedom of conscience (including religion and belief and rights to manifest these limited only by law and as necessary for public safety, public order, protection of rights of others and other specified situations); freedom of expression; freedom of peaceful assembly and to join trade unions; right not to be subject to unlawful discrimination; right to peaceful enjoyment of own possessions (subject to certain exceptions e.g. to secure payment of taxes or other contributions or penalties); right to an education; right to hold free elections by secret ballot. The European Convention is given effect in UK law by the Human Rights Act 1998.
## Appendix One Stakeholder organisation consulted

<table>
<thead>
<tr>
<th>Stakeholder Organisation</th>
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<tbody>
<tr>
<td>AGE UK</td>
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<td><strong>ACES</strong></td>
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<tr>
<td>Centre for Independent Living</td>
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<tr>
<td><strong>Care and Repair</strong></td>
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<tr>
<td><strong>Door to Door</strong></td>
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<tr>
<td>Gladstone Resource Centre</td>
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<tr>
<td><strong>Royal British Legion</strong></td>
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<tr>
<td><strong>Samaritans</strong></td>
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<tr>
<td>Berrywood Hospital</td>
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<tr>
<td><strong>SSAFA</strong></td>
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<tr>
<td>Stonham Housing</td>
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<tr>
<td><strong>Victim Support</strong></td>
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<tr>
<td><strong>Alzheimer’s Society</strong></td>
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<tr>
<td><strong>Aquarius</strong></td>
</tr>
<tr>
<td>Association for the Blind</td>
</tr>
<tr>
<td><strong>Berrywood Hospital</strong></td>
</tr>
<tr>
<td><strong>Bromford Floating Support</strong></td>
</tr>
<tr>
<td><strong>Campbell House</strong></td>
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<tr>
<td><strong>CMHT</strong></td>
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<tr>
<td><strong>CAN</strong></td>
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<tr>
<td><strong>Deaf Connect</strong></td>
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<tr>
<td><strong>Delos Community</strong></td>
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<tr>
<td><strong>Macmillan</strong></td>
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<tr>
<td><strong>MIND</strong></td>
</tr>
<tr>
<td>Motor Neurone Disease Association</td>
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<tr>
<td><strong>Northampton General Hospital</strong></td>
</tr>
<tr>
<td><strong>Northampton Dyslexia Association</strong></td>
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<td>Parkinson’s Disease Society</td>
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<td>Meals on Wheels</td>
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Midland heart

Job Centre

Home Group

Mayday Trust

Daventry District Council

Key 2

Bromford

Connexions