

EQUALITY IMPACT ANALYSIS FORM

STAGE1: INITIAL EQUALITY IMPACT ANALYSIS

This stage will establish whether a policy, strategy, plan, function or a change initiative (proposed step) is likely to have an adverse or positive impact on human rights or on the grounds of a protected characteristic i.e. race, gender, disability, age, religion or belief, sexual orientation. (Refer to [Guidance Document](#))

Title of Proposed Step	To adopt and implement a new scheme regarding the allocation of social housing in Thurrock
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Q 1. What is the aim of the proposed step? Is it likely to have a positive impact, such as promoting human rights, tackling discrimination, improving access, promoting community cohesion or addressing socio-economic inequality? If “yes”, summarise evidence from stakeholders, corporate diversity team, research or data:

In accordance with the Localism Act 2011, Thurrock Council has conducted a Review of its Housing Allocations scheme and produced a new scheme for implementation, subject to Cabinet approval.

The scheme determines who will qualify for social housing within the borough and how they will be prioritised.

The purpose of this Equality Impact Assessment is to assess the impact that the changes to Thurrock Council’s Housing Allocations scheme has on different equality groups.

The Allocations scheme is intended to be in place for an undetermined period of time. There is no legal requirement to review or revise the scheme at determined periods in the future but where a major change needs to be implemented the requirements to consult with local Registered Providers and to carry out a further impact assessment is triggered. In such circumstances the Council would also carry out a more extensive consultation involving all those groups that might be affected by any changes.

Once the scheme is adopted at Cabinet a period of implementation will take place. This will involve a comprehensive review of all applicants to determine their qualification for the scheme and their priority within its terms.

It is anticipated that all current applications will be cancelled and people will be invited to apply afresh.

The current bidding process will also be reviewed and changes to the IT systems implemented. This will take approximately 3 months.

Q 2. Can the positive impact be further enhanced to benefit a wider range of people than originally envisaged?

N/A

Q 3. Is there likely to be an adverse impact as a result of this proposed step? If **NO**, explain why here. If **YES** a more detailed analysis of impact will be required go to **Stage 2**.

Yes – see more detailed analysis in section 4.

STAGE 2: FULL EQUALITY IMPACT ANALYSIS

This stage examines the proposed step in more detail in order to obtain further information about its potential negative impact. It will help inform whether any remedial action needs to be taken, and may form part of a continuing assessment framework as the proposal develops.

Q 4. What research/data/information is there on any equality or human rights issues, or the relevant equality groups impacted? What differential impact is there between equality groups?

AGE:

The population in Thurrock is younger than the national picture.

20% of the population are aged less than 15 years compared to 17.5% nationally.

29.7% are aged over 50 years compared to 34.2% nationally and 15.8% are aged over 65 years compared to 19.4% nationally. The average age within the borough is 37 years compared to 39.5 nationally.

People applying for housing must be aged 18 years or over in order to comply with the legal requirement to hold a tenancy in their own right.

1. The new scheme offers 15% of all properties only for working households or those contributing to the community.

This could impact elderly applicants who are of pensionable age and not working but the provision would not apply to sheltered properties (i.e. properties for the over 60s).

In 2011/12 - 30% of properties available were sheltered properties. Only 19.4% of the population are aged over 65 years and therefore this mitigates any potentially adverse effect.

2. The scheme places a local connection restriction on potential applicants.

This could impact older people who wish/need to move closer to family living in the borough for support.

However, a local connection can be achieved via family living in the borough for at least 5 years. Any family with less than 5 years residence means that the applicant cannot apply.

There is a potentially adverse effect for applicants wishing to move into the borough that do not have the required family connection however; there is also a positive impact on those living within the borough that will not have to compete with out of borough residents.

The consultation clearly promoted the principle of providing housing for local people which mitigates any potential risk of discrimination.

GENDER REASSIGNMENT:

There is no evidence that gender reassignment impacts on people's ability to access housing services, or on the quality of service they receive.

There are no changes to the policy that will specifically impact this group

RACE

Thurrock's Annual Equality Report (2012) indicates that Thurrock has a lower proportion of ethnic minorities than the national average. Thurrock's ethnic minority population stood at 4.7% in the 2001 census, compared with a national average of 9%.

The largest BME group was recorded as Asian / Asian British (3.7%)

Research has established that the level of housing need within BME communities can in some cases be more acute than in other groups. This may be, for example, due to the prevalence of overcrowding due to extended family living, and the poor condition of some (particularly private sector) properties (Facing the Facts, Essex BME Housing Needs Study 2003).

The scheme changes the way in which overcrowding is assessed, and allows children less under 10 years to share a bedroom regardless of sex. Children over 10 years would only share where they are of the same sex.

Whilst BME communities may have more children sharing bedrooms, standards for overcrowding will be consistent for all race groups and priorities awarded where overcrowding meets these standards. There will also be a priority available for private sector properties which have housing hazards – again this is available to all households. Therefore there is no adverse impact for this strand.

The Council has a Service Level Agreement with TRUST (Thurrock Racial Unity Support Taskforce) to ensure better working arrangements in relation to BME communities, and more positive outcomes for them.

DISABILITY

According to the Annual Equality Report (2012) there are around 500 people of all ages with a learning disability in Thurrock.

91,000 people aged between 18 and 65 have some physical impairment with the vast majority living in the community.

3.85 in every 1000 of the population in Thurrock are using adult & elderly NHS secondary mental health services – e.g. community mental health service. This is significantly higher than the average figure for England (2.55 in every 1000)

1. The new scheme allows properties that have already been adapted for people with disabilities, to be advertised (when empty) only for those who have a need for the adaptations due to their disability. Such applicants are registered on an accessible housing register.

This is a positive discrimination for this group but is justified by the high cost of carrying out such adaptations and the low numbers of properties affected – it is anticipated to be less than 15 properties per year.

2. The new scheme offers 15% of all properties only for working households (or those contributing to the community).

This could negatively impact those who are unable to work because of their disability or health problems

The scheme has included the provision of making a contribution to the community to mitigate this negative impact.

Where applicants are so disabled that they cannot make any contribution, it is likely they would

require adapted properties and are therefore positively impacted due to the details at 1. above

SEXUAL ORIENTATION

There is limited statistical data on sexual orientation in Thurrock. However, an estimated 6% of the general population is lesbian/gay (according to a survey carried out by the Treasury Dept in 2005) and it is reasonable to assume that the trend is similar in Thurrock

There is no evidence that sexual orientation impacts on people's ability to access housing services, or on the quality of service they receive.

There are no changes to the policy that will specifically impact this group.

The scheme specifies that joint tenancies will usually be offered where members of the same household have a long-term commitment – this includes same sex partners

RELIGION OR BELIEF

The 2001 Census indicates that Christians are the largest faith group in Thurrock (forming 75.1% of Thurrock's population).

Other faith groups include Muslims (1.1%), Sikhs (0.7%), Hindus (0.6%), Buddhists (0.2%) and Jewish (0.2%). 15.5% indicated being of no religion.

There is no evidence that religion or belief impacts on people's ability to access services, or on the quality of services they receive.

The scheme changes the way in which overcrowding is assessed and allows children less than 10 years to share a bedroom regardless of sex.

Children over 10 years would only share, where they are of the same sex.

This could impact households whose religion does not allow members of the opposite sex to share bedrooms.

The changes are in line with national regulations for Housing Benefit and the Bedroom Standard for overcrowding. To make an exception on the basis of religion would therefore be a disproportionate response.

GENDER

The 2001 Census records Thurrock's population as being 51% female and 49% male.

There is no evidence that gender impacts on people's ability to access services, or on the quality of services they receive

The new scheme offers 15% of all properties only for working households or those contributing to the community.

Men are more likely to be working than women who are traditionally more likely to take up child care duties, and therefore women could be disadvantaged.

This is mitigated by the fact that part-time work of only 16 hours or more per week is required and that a contribution to the community is also acceptable.

MARRIAGE & CIVIL PARTNERSHIP

There is no evidence that marriage or civil partnership impacts on people's ability to access

services, or on the quality of services they receive.

There are no changes to the policy that will specifically impact this characteristic.

The scheme specifies that joint tenancies will usually be offered where members of the same household have a long-term commitment – this includes same sex partners.

PREGNANCY & MATERNITY

There is no evidence that pregnancy or maternity impacts on people’s ability to access services or on the quality of services they receive.

The new scheme has changed the time limit for when an applicant is entitled to an extra bedroom for an unborn child.

Previously when a pregnant applicant was 20 weeks pregnant their bedroom entitlement increased to recognise the unborn child.

The new scheme has increased the time limit to 28 weeks.

This will impact pregnant applicants with no other children since they would only be entitled to a one bedroom property until they reach 28 weeks of pregnancy when they would then become entitled to two bedrooms.

However the impact will be minimal since only those applicants who are actually offered a property whilst pregnant would be affected – likely to be less than 25 people per year.

This is further mitigated by the fact that overcrowding would not occur if a young child were to share a bedroom with an adult and this is common practice

Q 5. Have you received advice on equality requirements or issues? Provide a summary of the equalities and human rights advice received from the corporate diversity team:

Q 6. Have the proposed steps been revised following a consultation? What steps have been taken to mitigate any adverse impact/ reduce/eliminate inequalities? Give an analysis of any specific factors which have been taken into account? If no consultation was undertaken please say why.

An initial public consultation was carried out between 10th August and 10th November 2010 with the aim of analysing the views of participants regarding the current scheme for allocating housing.

The consultation involved applicants for housing, current tenants, local Registered Providers, statutory and voluntary agencies and Council Members and staff.

Subsequently, a new scheme was drafted and a further consultation period held between 1st December 2011 and 29th February 2012.

The consultation involved applicants for housing, current tenants, local Registered Providers, statutory and voluntary agencies and Council Members and staff.

A specific consultation meeting was held with members representing the equality strand groups including BME communities, disability groups, and older peoples groups. The purpose of the meeting was to specifically consider the impacts that proposed changes might have on these groups and how these could be mitigated if necessary.

The consultation was undertaken at a time when new legislation – The Localism Act 2011 was being implemented and a new Code of Guidance (draft) had been issued by the Department for Communities and local Government. The new provisions give local authorities greater freedoms over who they chose to house, whilst still recognising the need to assist those in greatest housing need.

A Task & Finish group involving cross party Members has also been instigated with the task of considering who the Council wants to house.

Q 7. Does the potential negative impact fall within the very **high** to **medium** range of the risk assessment - see risk assessment grid. What actions will be taken to reduce risk to **low** and improve outcomes?

No – low risk identified during consultation and mitigated by factors discussed in 4 above.

Q. 8. How will the proposed steps be monitored and evaluated, including its impact? Where appropriate, what data systems or methods will be introduced to support monitoring or evaluation?

Ongoing monitoring with regards to who is being housed via the new scheme will be implemented. This will include monitoring of equality strand groups.

Please send the form to The Corporate Diversity Team 3rd Floor Civic Offices or diversity@thurrock.gov.uk. We will complete the administration section and publish the document. The EqlA is not completed unless it is properly published.

Electronic signatures are acceptable

Corporate Diversity Team to complete	
EqlA Meeting Date:	EqlA Publication Date:
EqlA Submitted Date:	EqlA Review Date:

AUTHOR SIGNATURE:	
HEAD OF SERVICE SIGNATURE::	