

Title of policy / procedure / function / project / decision: Housing Allocations Policy

Evidence based equality analysis – can include documents, quotes, and web links for photos and videos

Main aims, purpose and outcomes and how does it fit in with the wider aims of the organisation:

Background

Under Part VI of the Housing Act 1996, the Council is required to have a Social Housing Allocation Scheme, the purpose of which is to determine priorities in allocating housing and to set out the procedures to be followed. The Allocation Scheme determines individual priority for housing. Cheshire West and Chester Council last reviewed the Policy in 2017. This is an extensive revision of the Policy with a number of changes.

The Policy has been subject to an extensive 12 week period of public consultation from September 2019 and closing on the 1st December 2019. The consultation incorporated a consultation document notified to all applicants on the Housing Register and sent to a wide range of relevant stakeholders. This is the Equality Impact Assessment (EQIA) and has been finalised in the light of the consultation responses. A copy of the consultation document is available on request.

As part of the consultation every relevant community group in Cheshire West and Chester was written to. This included specialist organisations working with groups and individuals owed a protected characteristic including organisations for disability, mental health, domestic abuse, older persons and race.

All relevant public sector bodies were written to including Health and Social Services.

Relevant staff members who work in allocations and lettings were consulted with and their comments were used to shape the questions in the consultation pack.

There were 566 responses received to the formal consultation. 16 from organisations and 550 from individuals.

Comments received were logged and considered against the Policy proposals. Some minor changes have been made as a result of the consultation, however the main proposals remain in place. Council Members considered this EQIA before deciding whether to give final approval to the revised Policy.

Under the Equality Act 2010, Cheshire West and Chester Council must have due regard to the need to:

- a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by, or under the Act
- b) Advance equality of opportunity between those with a protected characteristic and those without
- c) Promote good relations between those with a protected characteristic and those without

The 'protected characteristics' referred to are: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation. It also covers marriage and civil partnership with regard to eliminating discrimination. The equalities impact assessment set out below, considers the impact of the changes to the Allocation Policy on the protected groups and, where there is an impact, sets out the justification for continuing with the Policy change and any actions the Council will take to reduce any impact that has been identified.

Relevant information on the Housing Register and Allocations in Chester and Cheshire West

The Housing Register in Cheshire West and Chester as at September 2019 was 9500 households. There are approximately 600 new applications received each month. Applicants are typically on low incomes and many who are assessed as being in housing need are fully, or partially, benefit dependant. Many applicants will have to wait a considerable length of time before securing an offer of social housing. Many others without a statutory housing need have little prospect of being housed.

Other key facts and figures:

- a) 2400 properties advertised and over 80,000 bids (30/40 per property advertised)
- b) The total number housed in general needs accommodation in 2018/19 was 1474 (excludes older persons housing)
- c) The scheme is a 5 band A-E Scheme with Bands A-C being a statutory reasonable preference band. C = Older persons and E = no statutory need

- d) 94% lettings went to Bands A-C with only 84 housed from E (6%) yet applicants in band E made up one third of the total Housing Register
- e) The number of cases pending waiting to be assessed to be made live was 1027 demonstrating the significant administrative burden placed on the team in the Council assessing new applications and administrating a Housing Register of nearly 10,000 set against only 1500 new lettings per year

The Policy objectives of the review were to:

- a) Continue to support local people most in need of housing
- b) Address the limited housing options available
- c) Ensure the Policy is transparent, is fair and is seen to be fair
- d) Aims to be realistic with applicants on their housing prospects by removing households from the register who do not have a statutory housing need and have little, or no prospect of being housed
- e) Contributes towards mixed and sustainable communities where people of different backgrounds and socio economic groups live side by side. In The Council's view this fosters better community relations.

What are the changes to the Chester and Cheshire West Allocation Policy?

There are a number of important changes proposed to the Allocations Policy. These were consulted on.

These are the key changes in the draft Allocation Policy that it would be very helpful to have a discussion and views.

- 1. Members and officers had received feedback that the allocation policy is too complicated and perceived to be unfair. It is a complicated 5 Band system currently which encourages 'higher band chasing'**

The proposed solution is to move to a simple 3-band system with the time a person joined the register determining their place in the queue for that Band. A return to a 'waiting list' and 'fair queue' is what many applicants' say they want to see.

- 2. Everyone will still be able to apply to be included on the Housing Register but those applicants without a statutory housing need will be placed in the Housing Options Band C**

Time freed up by having a simple application and assessment process will mean officers can spend more time supporting applicants in the Housing Need Bands A and B.

3. The current policy on making a 'direct letting' will be made clearer so that it is applied where there are good management reasons, or a need for a sensitive let, or to best match an applicant to an adapted property, or where the Council needs to reduce overspend on temporary accommodation.

4. All applicants will continue to qualify for 3 reasonable offers.

However,

- Where an applicant is owed a homeless duty 1 suitable offer will end the homeless duty (this is required by the homelessness legislation) but they would still be able to receive 2 more offers if their housing need means they would still qualify for a Band A or B.
- There would be no restriction on the number of offers an applicant in Band C could receive

5. Applicants with former/current rent arrears who are in housing need will either not be allowed to qualify or allowed to qualify but not allowed to bid until the issue has been resolved. There will be clear criteria for what they have to do to resolve the issue and they will continue to 'move up the queue for their band'

The objective of this change is:

- A policy that is much fairer in being clear with applicants what the changed behaviour is that is required
- Means that applicants will no longer be arbitrary blocked from a chance of being allocated social housing
- But will not get that chance until they have demonstrated the changed behaviour required to be a good tenant

6. The criteria for when someone will qualify for the Housing Need Bands A and B will be far clearer. This will make it easier for applicants to understand if they qualify and easier and faster for officers to administer.

7. It is proposed that Cheshire West and Chester increase the threshold by requiring people or their families to have lived locally for longer - 2 years is suggested and is the option chosen by the majority of other local authorities in England.

- This would prioritise established local families.
- There would be exceptions for people without a local connection if they were homeless or victims of domestic violence

8. Local Lettings Policies would be used to manage problems in blocks, roads or estates such as the balance of working v non-working households or when there are too many households concentrated with complex needs. There would have to be an evidence base for any local letting policy and a clear process for agreeing these policies.

Many (but not all) applicants in the 2 active bidding bands (A and B) will come under a protected characteristic associated with their housing need, for example because of their disability, or being a victim of domestic abuse. This will mean these applicants will receive additional support in helping them to bid or to make choices about their housing options.

The EQIA assessment

This EQIA considers the changes to the Allocations Policy and assesses their impact on those applicants/households within the protected characteristic groups. The assessment considers whether any assessed impact is a positive, negative or neutral impact and sets out what steps Chester and Cheshire West Council have taken or will take to reduce any impact identified.

The Council has been careful to build into the Allocation Policy discretion to consider exceptional circumstances.

Data used to assess the EQIA

This assessment has been drawn up using a broad range of data available to officers about those on the Housing Register. 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.

The Council has considered a wide range of relevant data:

The key data is consideration of those on the Housing Register by the protected groups. This covers the numbers on the Register by each protected group and the numbers rehoused in 2018/19 by each protected group. However, it is recognised that Chester and Cheshire West does not have a comprehensive set of data for the households on the

Housing Register and for those rehoused. This is because a large number of applicants fail to complete the section of the application form that provides personal data.

Importantly, moving forward the Council needs to be able to consider a breakdown of those on the Register who are bidding for properties as well as housed under the Policy. This will allow the Council to consider if those housed by each protected group is proportional to the proportion from each group on the Housing Register.

To ensure that Chester and Cheshire West has better information to review the EQIA in the future the following actions will be taken:

- a) The on-line applicant form will be amended to encourage more applicants to fully complete the relevant sections,
- b) Officers will on contact with all applicants ask any applicant who has not completed the relevant section information so they are able to complete it.
- c) Changes will be made to the home page of the on-line account for all applicants to show a message explaining the importance of providing the information.
- d) At the point all applicants are written to asking them if they wish to remain on the Housing Register they will be prompted to complete the personal data section

However, it has to be recognised that there are some limitations. The data sets available are not comprehensive. For example, information on key aspects of the current allocations process is not comprehensive for all of the equality groups. This will be addressed so that information is more comprehensive. More information is needed about sexuality and gender reassignment, for example. Given that these are all reliant on the self-disclosure of sensitive issues the comprehensive gathering of this type of data may not be achievable but the information can be improved through a proactive approach by the Council.

Overall there is no reason to believe that certain groups will be over or under represented as a result of this decision. Data indicates that the following groups are already over-represented in the high priority groups on the Housing Register:

- Families with children
- BME households
- Households with disabled or long-term health problems.
- Female headed households

This is likely to remain the case under the new Allocation Scheme.

Lead officer: Allan Batty

Stakeholders:

West Cheshire Homes, Registered Providers, Members, Parish Councillors, Applicants, Tenant groups, Citizens Advice Bureaux, Forfutures, Occupational Health Teams, Childrens Services, Adult Social Care Services, Home Assistance Hub, Ellesmere Port and Neston Advisory Committee, Gypsy and Traveller Team, Health and Wellbeing Group including representatives from drug and alcohol teams, Housing Partnership, Homeless Working Group, Leaving Care Teams, Members/local MPs, Mental Health Teams, Older People Services, Age UK, Poverty Truth Commission, Domestic Abuse Partnership, Probation Service and Tenant groups/resident associations.

Equality analysis is a valuable tool to help embed equality into everything we do

While process is important, equality analysis is essentially about outcomes

Lack of evidence of discrimination is not evidence of a lack of discrimination

It is not acceptable to say that a policy is applied uniformly to all groups and is therefore fair and equal. Applying a policy or procedure consistently may result in differential outcomes for different groups.

For each of the areas below, an assessment needs to be made on whether the policy has a **positive, negative or neutral impact**, and brief details of why this decision was made and notes of any mitigation should be included. Where the impact is negative, this needs to be given a **high, medium or low assessment**. It is important to rate the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

High impact – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

Medium impact –some potential impact exists, some mitigating measures are in place, poor evidence

Low impact – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little

discretion			
	Neutral	Positive	Negative
Target group / area			
Race and ethnicity (including Gypsies and Travellers; migrant workers, asylum seekers etc.)			Medium Impact - The changes to the residency requirement for banding priority under the Housing Register may impact on refugees, non British nationals and Irish Travellers. A residency requirement of 2 years will impact on, refugees, non-UK nationals, Irish Travellers. The Council has sought to: a) Strike the right balance between disadvantage to some groups of a residency requirement and the policy aims of the residence requirement which is to prioritise applicants who can demonstrate a positive commitment to Cheshire West and

			<p>Chester and are settled in the area as defined by 2 years residence</p> <p>b) Mitigate any impact by building in exemptions and consideration of exceptional circumstances for applicants who do not meet the residency rules.</p> <p>This impact and mitigation is considered more fully below in the section on the impact of the Policy changes across all of the protected groups.</p> <p>Low Impact - On-line access for making an application and bidding will impact on applicants whose first language is not English.</p> <p>The website has information for people who need to contact or talk to the Council in</p>
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			<p>language other than English and there is a translation option for the on-line form and accompanying information.</p> <p>This is considered to be a low risk as if a person's command of English is particularly poor they are likely to have access to someone with interpretation skills; other less able people are likely to have access to professional support. There is an increased likelihood of this potential negative impact amongst residents for whom English is not their first language, or who have learning impairments or severe mental health problems. The new Policy has been designed to be more straightforward and easier to understand, providing clarity.</p> <p>As is currently the case,</p>
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			officers can provide advice and assistance for people who may have difficulty understanding the policy.
<p>Disability (as defined by the Equality Act - a person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities)</p>		<p>What is the impact of the Policy on the housing prospects of applicants?</p> <p>The new Allocations Policy actively promotes the needs of disabled groups by being designed to ensure that applicants with mobility problems are prioritised for accommodation that is suitable for them.</p> <p>The Register is made up of 21% of applicants who indicated that they had a disability (based on 8422 applicants who answered this question). For rehousing 27% of applicants with a disability were housed in 2018/19 a higher percentage than those registered (based on 1085 applicants who</p>	<p>Medium Impact - How accessible are the application and bidding processes for applicants with a disability?</p> <p>The intention is to review the website to ensure that it is fully compliant with all accessibility requirements. Actions include:</p> <ul style="list-style-type: none"> a) To ensure that the website is W3C 1.0 compliant b) Information is available on how to adjust type, font size, colour contrast and how to make the applicant's computer speak text aloud. c) There is currently a drop down menu for people who need to read information in a language other than

		<p>had been housed who had answered this question)</p> <p>Many applicants with a physical disability where their current housing circumstances impact on their disability will be prioritised for housing under the Policy. Disability is recognised in both Bands A and B.</p> <p>Many applicants with a severe mental health condition and are homeless will be prioritised under the Policy through being awarded reasonable preference for being owed a statutory homelessness duty</p> <p>The Council is also committed to capturing better information about social housing void properties to classify those that have or can be adapted.</p>	<p>English.</p> <p>d) The ability to receive a letter in audio.</p> <p>The Council will seek in the future, where the IT allows, to monitor data on the frequency of applicants accessing their account to check whether some applicants are being disadvantaged.</p>
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Gender			<p>High Impact - Potential gender bias in the proposals.</p> <p>Females make up an estimated 54% of the housing register. This is because women are likely to be the main carers and are more likely as a result to come under one of the reasonable preference categories for a statutory housing need. This is likely to continue.</p> <p>A large proportion of the register is made up of 'female headed' households. The changes will not impact on the proportions of female headed households owed a statutory housing need</p> <p>Married, civil partners and co-habiting couples, same sex couples, brothers and sisters who wish to live together, can make applications.</p>
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<p>Gender identity (gender reassignment)</p>	<p>Applicants who have undergone gender reassignment – can apply to join the housing register and will qualify as long as they meet the eligibility and qualification criteria</p> <p>14 applicants were housed in 2018/19 – the proportion equivalent to the numbers recorded on the Housing Register.</p> <p>There is reasonable information on the Housing Register re applicants who are Transgender.</p> <p>116 applicants indicated transgender or gender reassignment. The Council will continue to actively collect monitoring information for this group but has insufficient data at present.</p>		
<p>Religion and belief</p>	<p>It can be difficult to distinguish what are factors to do with a person's religion as opposed to their ethnic or cultural origins. The Council only has generalised data for the Housing Register. The only figure of note is that the last Census information for Cheshire West and Chester records a figure of 80% for Christian households compared to 37% for the Housing Register therefore applicants indicating they</p>		

	<p>are Christian are under represented on the Housing Register compared to the general population in Cheshire West and Chester. However there are likely to be socio-economic factors to explain their discrepancy and recording issues. For example on recording the Register indicates that 44% of applicants were recorded as having no religion against 11.5% in the census. It is possible that applicants who did not wish to say if they had a religion were recorded in the non-religion category.</p>		
<p>Sexual orientation (including heterosexual, lesbian, gay, bisexual)</p>	<p>Clearly, 73% of applicants did not complete this section making it difficult to draw any conclusions. This is common to many public sector recording systems where people decline to answer the question. Even when the 7000 applicants who did not answer the question or declined to say are removed then based on the information available the Cheshire West and Chester Register does not reflect national estimates for bisexual, gay and lesbian applicants. These figures are therefore likely to be a large underestimate Cheshire West and</p>		

	Chester will place more effort on collecting the information in order to be able to assess any impact as the policy and the EQIA is reviewed.		
<p>Age (children and young people aged 0 – 24, adults aged 25 – 50, younger older people aged 51 – 75/80; older people 81+. The age categories are for illustration only as overriding consideration should be given to needs)</p>		<p>There is evidence nationally that younger people find it easier to access services online rather than by filling out forms and may be disadvantaged by a system where access is by paper form. Considering the age profile of the Housing Register over 55% are applicants under 40. Delivering the application and bidding system on line is an advantage to younger people</p>	<p>Medium Impact - Cheshire West and Chester Council require applications to be made on-line as opposed to submitting a paper form.</p> <p>The impact could be that older people are less able to use an on-line application form and a system of bidding for properties through choice based lettings.</p> <p>On-line applications have been the normal method for residents to make their applications.</p> <p>The Council's Housing Team can assist older people to:</p> <ul style="list-style-type: none"> ➤ Fill out their on-line application and ➤ Help them to make bids under CBL

			<p>CBL bidding on-line has been operating for several years. There is no evidence from applicants or stakeholders that people are finding difficulty in applying for accommodation or using the CBL system.</p> <p>Medium Impact - Seeking to deliver more of the application and bidding process on-line will disadvantage those applicants without internet access and these tend to be older applicants, or applicants most impacted by poverty.</p> <p>Libraries have free public PC's. There are also free computer training and Cheshire West and Chester.</p> <p>Information is available from the Housing Team on the availability of free local public internet</p>
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			<p>access.</p> <p>There are numerous PCs in Council venues and venues of other public authorities.</p> <p>Currently on Cheshire West and Chester's CBL system over 90% of bids are placed electronically. There are however alternative ways to bid such as text/SMS.</p> <p>The office of National Statistics reported that In 2018, 90% of adults in the UK were recent internet users, up from 89% in 2017. 8.4% of adults had never used the internet in 2018, down from 9.2% in 2017. Virtually all adults aged 16 to 34 years were recent internet users (99%) in 2018, compared with 44% of adults aged 75 years and over.</p> <p>There is sufficient internet access points</p>
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			and support available in Cheshire West and Chester to help people without access to the internet.
Carers		Care leavers and young people ready to move on from supported accommodation benefit from the proposals as they are placed in Band A urgent priority and Band B statutory priority bands respectively. This should mean that they are provided with an offer of social housing in a relatively short time period.	
Rural communities		Rural communities - The Housing Allocation Policy supports the delivery of housing that supports sustainable rural communities. Where the Council has agreed a Section 106 agreement or Affordable Housing Statement regarding new affordable 'developments', the specific allocations	

		<p>criteria (regarding local connection to a defined rural area) as agreed as part of the planning consent for the site will take priority ahead of the broader criteria set out in the Common Housing Allocations Policy. Many rural communities have very limited access to affordable social housing. The Section 106 and Rural priority promotes the delivery of new housing that supports a more balanced housing mix and improves the tenure mix in areas of limited variety, thus promoting rural sustainability.</p>	
Areas of deprivation		<p>The Housing Allocation Policy seeks to align with the Council's Strategic Housing Plan and its place team working/ neighbourhood plans to deliver housing that supports sustainable communities, including</p>	

		<p>those in Cheshire West and Chester in deprived localities.</p> <p>Areas of deprivation suffer from lower demand resulting in social housing property being empty for longer periods of time compared to more affluent localities. Reducing the number of empty social housing properties in the borough increases the number of available dwellings, including affordable homes and improves the sustainability of such areas. Areas of deprivation are also likely to have housing that is in relatively poor condition and a higher proportion of privately rented homes; the Policy ensures that the Social Housing stock is let with tenants spending money often in the shops located in the</p>	
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		deprived communities.	
Human rights		<p>Article 8 of the Human Rights Act is engaged in respect of the Housing Allocation Policy. The courts have confirmed that in principle the imposition of a residence requirement as a qualifying criterion in an allocation policy is not unlawful by itself, and can be applied to individuals in reasonable preference categories. However, a local authority must be careful that such a requirement does not unlawfully discriminate under the European Convention on Human Rights (ECHR).</p> <p>Article 8 protects a person's right to respect for their private life, family life, and home. However, the right to respect for a persons home does not give you a right to housing. The unwritten Constitution of</p>	

		<p>the UK does not contain a “right to housing” per se. ...“ The present Covenant recognize the right of everyone to an adequate standard of living for himself and his family, including adequate food, clothing and housing, and to the continuous improvement of living conditions”. The Housing Allocation Scheme aims to contribute to the continuous improvement of residents living conditions but cannot provide housing for everyone.</p> <p>The Policy therefore balances the legitimate need to have a system that allocates the scarce resource of social housing in a fair and transparent way with the needs and rights of the individual and enables the authority to comply with its public duties in relation to the allocation</p>	
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		and management of its housing stock.	
<p>Health and wellbeing (consider both the wider determinants of health such as education, housing, employment, environment, crime and transport, as well as the possible impacts on lifestyles and the effect there may be on health and care services)</p>		<p>Access to housing is the cornerstone to improving the health of all people in Cheshire West and Chester through providing people with an affordable settled solution. It will have a multi- tiered positive impact on service users, their families and their communities.</p> <p>People are more likely to lead more healthy lifestyles (including a reduction in drug- and alcohol-related harm) Improved mental health, wellbeing and personal resilience for all residents. Older residents accessing Older Person's housing are likely to lead healthier and more independent lives, feel supported and have a better quality of life.</p> <p>There is a known</p>	

		<p>correlation between poor housing and poor health in any community. Providing opportunities to access affordable social housing and using the Allocation Policy priority system to ensure an adequate supply of accommodation for vulnerable people and those with special needs, will improve health outcomes by ensuring that vulnerable groups are able to access a sustainable housing solution</p> <p>Children living in poor housing conditions can be particularly adversely affected. The Policy prioritises social housing for families with young children who are living in poor housing conditions thereby substantially reducing the potential for negative impacts on children's health and wellbeing</p>	
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<p>Procurement/partnership (if project due to be carried out by contractors/partners etc, identify steps taken to ensure equality compliance)</p>		<p>Not applicable</p>	
<p>All Groups/Several Groups</p>	<p>The impact of the revised income, savings/assets thresholds on applicants with a protected characteristic under the Equality Act who will not be able to qualify for the register.</p> <p>There were income and savings qualification thresholds under the previous Policy. These have been revised and are:</p> <p>Income threshold Applicants whose total gross household income from all sources exceeds an annual income of £45,000 or more (for single persons) or joint income of £60,000 or more (for couples).</p> <p>Savings, Assets and Capital 1) Applicants (both single persons and couples) aged under 55 years who have total savings, investments and/or assets of £25,000 or more. 2) Applicants (both single persons and couples) aged 55 years and above who have total savings,</p>	<p>The specific change to include under the local connection rules family (normally mother, father, brother, sister, son or daughter) that have lived in the area for a minimum of the past five years. In addition the circumstances must be that the applicant needs to give or receive essential support for the foreseeable future.</p> <p>This rule allows an applicant who is not resident or employed in Cheshire West and Chester to qualify under the local connection rules if they have close family and they need to give or receive essential support.</p>	<p>Medium Impact - Amending the local connection rules for the priority band to be awarded.</p> <p>Where the rule is not met any applicant owed a reasonable preference will have their priority band reduced by 1 band</p> <ol style="list-style-type: none"> 1. Must be resident in settled accommodation within Chester and Cheshire West consecutively for the last 2 years 2. Be employed in permanent employment in the area. Employment is defined as paid employment for 16 hours or more per week for a period of

	<p>investments and/or assets of £125,000 or more. If there were exceptional circumstances which mean that an applicant would have to pay more for an appropriate property (if for example someone in the household has a severe disability requiring extensive adaptations) this would be taken into account when assessing financial resources.</p> <p>Applicants with capital/savings/assets/investments in excess of the figures set will not qualify to join Bands A or B of the housing register as they will be regarded as having sufficient resources to source alternative suitable accommodation.</p> <p>The Council propose that those with savings or income above the thresholds set will join the new Housing Options Band C and will be proactively advised on homeownership options and market and intermediate rent options.</p> <p>The changes will assist more applicants on low incomes to access social housing.</p>	<p>Essential support could be likely to include applicants who are in a protected group for example</p> <ul style="list-style-type: none"> • They may have a significant mental or physical health problem and require support from close family • They may be a single parent struggling to cope or work and require support from close family <p>The local connection rule is therefore likely to be positive for those applicants from a relevant protected group who live outside of the area and would be unable to qualify for another reason.</p> <p>Everyone will still be able to apply to be included on the Housing Register but those</p>	<p>one year, or self-employment where an applicant can demonstrate that the self-employed work they perform is in the Cheshire West and Chester area and is on average 16 hours a week or more.</p> <p>3. Have close family (normally mother, father, brother, sister, son or daughter) that has lived in the area for a minimum of the past five years. In addition the circumstances must be that the applicant needs to give or receive essential support for the foreseeable future.</p> <p>The local connection qualification rules have been strengthened. Previously they were:</p> <p>6 out of 12 or 3 years out of 5 residence, or</p>
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	<p>Although some applicants from a protected group will be impacted by this policy many other protected group applicants are on low incomes or have no savings and will benefit, as there will be fewer applicants on the register competing for housing.</p> <p>The Council is satisfied that:</p> <p>The new Policy contains a far wider range of exemptions to the income, savings and assets rules compared to the previous policy and that these exemptions are targeted at applicants likely to be from a protected groups for age or disability.</p> <p>Furthermore, any negative impact on protected groups is reduced by the fact that they will have the income level or savings to obtain an alternative housing solution and by the fact that there is a process in the Policy to consider exceptional circumstances.</p> <p>The new Policy includes the ability to apply local lettings policies.</p>	<p>applicants without a statutory housing need will be placed in the Housing Options Band C.</p> <p>Everyone will still be able to apply to be included on the Housing Register but those applicants without a statutory housing need will be placed in the Housing Options Band C.</p> <p>Under the previous Policy applicants assessed as not being in a statutory housing need could qualify for the Housing Register.</p> <p>The Policy change will mean that only people who are assessed as demonstrating that they have a statutory housing need to join the housing register will be able to actively bid for properties through the choice</p>	<p>Immediate family (mother, father, brother, sister, son, daughter) who were currently living in the area and had done so for at least the last 5 years, or Had a permanent contract of employment in the area</p> <p>These rules for residence, employment and family have been amended A) 2 year residence: The Localism Act allows local authorities to determine who may join their register. Statutory guidance from the Government's MHCLG Department strongly encourages all local authorities to adopt a minimum 2 - year residency test as part of their qualification criteria.</p> <p>In accordance with the underpinning philosophy of the Localism Act and</p>
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	<p>Although this isn't a change to the new Policy as local letting policies could be applied under the current policy, the new policy however sets out a clear framework for how these policies will be agreed and requires an evidence base and a strict timetable for reviewing the impact. The equalities impact of local lettings policies had not been assessed under the previous Policy therefore as policies are now agreed there will be a clear equalities consideration as part of the process for agreeing any policy and a clear equalities monitoring on the impact of any policy.</p> <p>Local lettings policies have the potential to have an impact on the housing prospects of a number of disadvantaged groups. Such a policy restricts allocations within a small geographical area in order to achieve certain policy and good management outcomes. An example might be lower child densities in certain block or road, or to restrict the number of vulnerable people allocated accommodation in a block where</p>	<p>based letting system. This change will ensure that scarce social housing resources go to those with the greatest need. The Council recognises the disappointment that this change will cause some of these applicants as many still operate under the misapprehension that they will eventually be re-housed if they wait on the register. This is not the case. The majority of these households are assessed as not having sufficient priority for re-housing to ever be offered a social housing tenancy and yet they remain on the Housing Register, some under a false sense of hope that they will get an offer in time. This situation is</p>	<p>Government Guidance Cheshire West and Chester intends to embrace the idea of giving greater priority to applicants in housing need with a local connection to the area based on either a 2 - year minimum residency, employment, or close family providing or receiving support. Local connection rules including length of residency were supported in the consultation and demonstrate a positive commitment to the area and contribution to the life of the local community in terms of settling in the area.</p> <p>This is particularly necessary given that the rental market in Cheshire West and Chester is an attractive and affordable option for those seeking to rent privately in the region, who can at</p>
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	<p>there are already a number of people housed with complex needs and there is evidence that the number is causing housing management issues for the Council and impacting on other residents.</p> <p>The Allocations Policy is framed to allow for individual lettings plans to be developed and approved on a case-by-case basis. Each local letting policy will have to have an evidence base and be approved through a clear transparent process. Any equalities impact must be considered as part of the assessment process when deciding whether or not to approve a local lettings policy.</p> <p>Where an applicant is owed a homeless duty 1 suitable offer will end the homeless duty but they would still be able to receive 2 more offers if their housing need means they would still qualify for a Band A or B.</p> <p>Where an applicant is owed a homeless duty 1 suitable offer will end the homeless duty (this is required by the homelessness</p>	<p>unfair and does not prompt people to look for other, more timely housing solutions.</p> <p>The new Housing Options Band is likely to benefit applicants without a statutory housing need. Lower demand properties and other housing options will be actively promoted to applicants on the new Housing Options Band C. Applicants in low housing need will be encouraged to register to join this new Band. The impact for those in low housing need who are in a protected group is likely therefore to be positive with more low need applicants able to obtain a solution to their housing need.</p> <p>This decision not to allow Band C cases to bid affects people</p>	<p>present then apply for social housing, and attract priority if they are owed a statutory reasonable preference and have lived in Chester and Cheshire West for as little as 6 months.</p> <p>However Cheshire West and Chester Council is mindful of a potential impact of introducing local connection rules on applicants who are classified as a protected group under the Equality Act.</p> <p>Therefore unlike many other local authorities who disqualify applicants from joining the Housing Register under their residency rule Cheshire West and Chester will allow applicants where the Council owes them a statutory homelessness relief or main duty will be allowed to qualify despite the 2-year rule.</p>
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	<p>legislation) but they would still be able to receive 2 more offers if their housing need means they would still qualify for a Band A or B.</p> <p>Even if they have no other statutory housing need they would still qualify for the Housing Options Band C and be able to access lower demand properties.</p> <p>The number of homeless households owed a statutory duty impacted by the Policy will be monitored.</p>	<p>across the board, with some protected characteristic groups being affected more than others in terms of numbers removed. However, these groups are not adversely affected in their chances of being re-housed and will be no worse of than when previously registered as the overwhelming majority did not have sufficient priority for re-housing to ever be offered a social tenancy.</p> <p>It is the Council's view that the removal/exclusion of these households will provide clarity and manage people's expectation realistically. Additionally, administration time and costs will be lowered and the additional time freed up for the Housing Team by this change will mean that applicants in the highest bands will be</p>	<p>The Council is satisfied that the 2 year residency rule, employment and close family connection rules are a proportionate means of achieving a legitimate aim which is to prioritise people with a local connection without preventing access to housing for those in housing need without a local connection.</p> <p>The Council is satisfied that it has brought in changes that achieve an appropriate balance and namely any indirect discrimination of the local connection rules on applicants from a protected group has been minimised through the actions analysed below and is proportionate.</p> <p>Importantly, the new Policy builds in safeguards and exemptions. The</p>
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		<p>assigned an officer to support them in their bidding actions and provide tailored advice and options. Many of the applicants in the highest 2 bands A or B are from a protected group under the Equality Act and will benefit for the bespoke support.</p>	<p>safeguards include the fact that an applicant will retain their local connection where they have left the area due to:</p> <ol style="list-style-type: none">1) Being in hospital.2) Having to move out of the area for care.3) Being accommodated in supported accommodation outside the district.4) Having been placed into temporary accommodation outside of the area by the Council.5) Applicants who are leaving an institution such as a prison or secure unit or a hospital, rehabilitation centre, refuge, hostel or supported accommodation scheme and were resident in settled accommodation within Cheshire West and Chester for the two years immediately before they moved into their current accommodation
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			<p>will be allowed to qualify as an exception to the two continuous years rule.</p> <p>Exemptions from the local connection rules for exceptional circumstances will also be considered for:</p> <ol style="list-style-type: none">1) Any application from a Gypsy or Traveller household that does not meet the continuous period of residence rule, as the period may have been broken by periods of travelling.2) Care leavers below the age of 21 years who are owed a duty under Section 23C of the Children Act 1989 by any local authority Children Services Department and have been accommodated within Cheshire West and Chester for a continuous period of at least two years
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			<p>3) Reasons of safety; i.e. when an applicant is fleeing domestic abuse or hate crime from another area, or</p> <ul style="list-style-type: none">a) Is on a witness protection program, orb) Where by not moving to the area this would be detrimental to their wellbeing or cause significant hardship. <p>The Council is committed moving forward to monitor and analyse the equality profile of households who will potentially be affected by the local connection rules and in particular the 2 year residency rule using the data available.</p> <p>A residency requirement of more than 2 years will impact on, refugees and non-UK nationals, Irish Travellers (though</p>
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			<p>safeguards have been built in for travellers). The Council has sought to strike the right balance between disadvantage to some groups of a residency requirement and the policy aims of the residence requirement, which is to prioritise applicants who can demonstrate a positive commitment to Cheshire West and Chester and are settled in the area as defined by 2 years residence.</p> <p>It is likely that for residents who have not resided in Cheshire West and Chester for more than 2 years the 2-year residency rule will impact to some extent on BME residents, former asylum seekers and Irish travellers who will not be able to access the Housing Register for 2 years. It should be noted that the levels of inward migration into Cheshire</p>
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			<p>West and Chester is relatively low compared to other local authorities in the North West of England.</p> <p>The Statutory Guidance expressly highlights the need for local authorities to take proper account of special circumstances and the Policy changes on residence allows for this. The new Policy in Cheshire West and Chester will follow this guidance by protecting people who are moving into the district to escape violence and would also include homeless families whom the local authority may have placed outside of their district.</p> <p>Applicants on the housing register will be equally disadvantaged through the 2-year residency rule and there is no significant difference in the</p>
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			<p>proportions of people from white, BAME or mixed heritage on the register compared to the Cheshire West and Chester population as a whole.</p> <p>Although it can be argued that by requiring residents to have resided in Cheshire West and Chester for 2 years to obtain the banding for their housing need the Council is indirectly discriminating against some applicants who come under a protected characteristic under the Equality Act. The impact however, is not considered to be substantial and the Council has been careful to reduce the impact through the following actions:</p> <p>1 - The residency criteria is set at 2 years which is the number of years suggested in the</p>
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			<p>Government's own guidance. The Council has been careful not to adopt a '3 years or more' residency rule which would have a greater negative impact.</p> <p>2 - The proposed allocations policy recommends that exceptions to the 2-year local connection requirement be made in appropriate cases, such as applicants who have been subjected to domestic violence. An exception may also be granted where an applicant can demonstrate that they would suffer hardship if they were not considered for housing.</p> <p>3 - By permitting exemptions to avoid hardship, the circumstances of all applicants can be fully considered and the possibility of an</p> <p>The Council is satisfied</p>
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			<p>that it has brought in changes that achieve an appropriate balance and namely any indirect discrimination of the local connection rules on applicants from a protected group has been minimised through the actions analysed below and is proportionate.</p> <p>Importantly, the new Policy builds in safeguards and exemptions. The safeguards include the fact that an applicant will retain their local connection where they have left the area due to:</p> <ol style="list-style-type: none">1) Being in hospital.2) Having to move out of the area for care.3) Being accommodated in supported accommodation outside the district.4) Having been placed into temporary accommodation outside of the area by the
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			<p>Council.</p> <p>5) Applicants who are leaving an institution such as a prison or secure unit or a hospital, rehabilitation centre, refuge, hostel or supported accommodation scheme and were resident in settled accommodation within Cheshire West and Chester for the two years immediately before they moved into their current accommodation will be allowed to qualify as an exception to the two continuous years rule.</p> <p>Exemptions from the local connection rules for exceptional circumstances will also be considered for:</p> <p>4) Any application from a Gypsy or Traveller household that does not meet the continuous period of residence rule, as the period may have</p>
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			<p>been broken by periods of travelling.</p> <p>5) Care leavers below the age of 21 years who are owed a duty under Section 23C of the Children Act 1989 by any local authority Children Services Department and have been accommodated within Cheshire West and Chester for a continuous period of at least two years</p> <p>6) Reasons of safety; i.e. when an applicant is fleeing domestic abuse or hate crime from another area, or c) Is on a witness protection program, or d) Where by not moving to the area this would be detrimental to their wellbeing or cause significant hardship.</p>
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			<p>The Council is committed moving forward to monitor and analyse the equality profile of households who will potentially be affected by the local connection rules and in particular the 2 year residency rule using the data available.</p> <p>A residency requirement of more than 2 years will impact on, refugees and non-UK nationals, Irish Travellers (though safeguards have been built in for travellers). The Council has sought to strike the right balance between disadvantage to some groups of a residency requirement and the policy aims of the residence requirement, which is to prioritise applicants who can demonstrate a positive commitment to Cheshire West and Chester and are settled in the area as defined by 2 years residence.</p>
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			<p>It is likely that for residents who have not resided in Cheshire West and Chester for more than 2 years the 2-year residency rule will impact to some extent on BME residents, former asylum seekers and Irish travellers who will not be able to access the Housing Register for 2 years. It should be noted that the levels of inward migration into Cheshire West and Chester is relatively low compared to other local authorities in the North West of England.</p> <p>The Statutory Guidance expressly highlights the need for local authorities to take proper account of special circumstances and the Policy changes on residence allows for this. The new Policy in Cheshire West and Chester will follow this guidance by protecting people who are moving</p>
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			<p>into the district to escape violence and would also include homeless families whom the local authority may have placed outside of their district.</p> <p>Applicants on the housing register will be equally disadvantaged through the 2-year residency rule and there is no significant difference in the proportions of people from white, BAME or mixed heritage on the register compared to the Cheshire West and Chester population as a whole.</p> <p>Although it can be argued that by requiring residents to have resided in Cheshire West and Chester for 2 years to obtain the banding for their housing need the Council is indirectly discriminating against some applicants who</p>
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			<p>come under a protected characteristic under the Equality Act. The impact however, is not considered to be substantial and the Council has been careful to reduce the impact through the following actions:</p> <p>1 - The residency criteria is set at 2 years which is the number of years suggested in the Government's own guidance. The Council has been careful not to adopt a '3 years or more' residency rule which would have a greater negative impact.</p> <p>2 - The proposed allocations policy recommends that exceptions to the 2-year local connection requirement be made in appropriate cases, such as applicants who have been subjected to domestic violence. An exception may also be</p>
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			<p>granted where an applicant can demonstrate that they would suffer hardship if they were not considered for housing.</p> <p>3 - By permitting exemptions to avoid hardship, the circumstances of all applicants can be fully considered and the possibility of an applicant suffering any disadvantage avoided.</p> <p>4 - There is an exemption for applicants where there are additional health, welfare or care/support needs that is reliant on the relative being within the area</p> <p>5 - All applicants have a statutory right to seek a review of their housing application if they are dissatisfied with the Council's decision re the Band they have been awarded. This provides an applicant with the opportunity to submit</p>
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			<p>reasons why they believe their case should be considered under the exceptional circumstances part of the Policy.</p> <p>6 - The Policy includes are other ways an applicant can obtain the banding for their housing need other than being resident for 2 years. The alternatives are where an applicant is employed in Cheshire West and Chester for as little as 16 hours a week, or has close relatives living in Cheshire West and Chester for 5 years that provide essential support</p> <p>7- Any disadvantage is only for a relatively short time period of 2 years after which an applicant will be allocated the band that fully reflects their housing need.</p> <p>Medium Impact - The specific change to include the ability to qualify for households</p>
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			<p>who are employed in the area.</p> <p>The policy aim is to reduce inequality and poverty over the long term by encouraging employment through the local connection rule</p> <p>A key aim of this policy change is to encourage those who work in Cheshire West and Chester to both be able to work and be able to live and settle in the borough, if they are unable to afford to rent or buy and have a statutory housing need based on their current housing position.</p> <p>The criteria has been deliberately set as paid employment for 16 hours or more per week for a period of one year, or self-employment where an applicant can demonstrate that the self-employed work they</p>
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			<p>perform is in the Cheshire West and Chester area and is on average 16 hours a week or more. This recognizes that many women with childcare challenges may only be able to work part time.</p> <p>The Policy aim is also to make a contribution to rebalancing communities on social housing estates seeking a balance of households that are dependent on benefits and are economically active.</p> <p>There will be little impact on other households who don't work and live in Cheshire West and Chester and have a protected characteristic, as most of these applicants will qualify for their priority band under the 2-year rule.</p> <p>Unlike many other local authorities Cheshire</p>
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			<p>West and Chester has been careful not to build into the priority selection banding rules that work as a determining factor for prioritising applicants for housing as this could have a disproportionate impact on applicant's who are not able to work and come under the definition of one or more of the protected characteristics.</p> <p>Many of the mitigating actions and considerations set out in the 2 year residency apply equally here.</p> <p>Medium Impact - The specific change to include the ability to qualify for households who are employed in the area.</p> <p>The policy aim is to reduce inequality and poverty over the long term by encouraging employment through the</p>
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			<p>local connection rule</p> <p>A key aim of this policy change is to encourage those who work in Cheshire West and Chester to both be able to work and be able to live and settle in the borough, if they are unable to afford to rent or buy and have a statutory housing need based on their current housing position.</p> <p>The criteria has been deliberately set as paid employment for 16 hours or more per week for a period of one year, or self-employment where an applicant can demonstrate that the self-employed work they perform is in the Cheshire West and Chester area and is on average 16 hours a week or more. This recognizes that many women with childcare challenges may only be able to work part</p>
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			<p>time.</p> <p>The Policy aim is also to make a contribution to rebalancing communities on social housing estates seeking a balance of households that are dependent on benefits and are economically active.</p> <p>There will be little impact on other households who don't work and live in Cheshire West and Chester and have a protected characteristic, as most of these applicants will qualify for their priority band under the 2-year rule.</p> <p>Unlike many other local authorities Cheshire West and Chester has been careful not to build into the priority selection banding rules that work as a determining factor for prioritising applicants for housing as this could have a disproportionate</p>
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			<p>impact on applicant's who are not able to work and come under the definition of one or more of the protected characteristics.</p> <p>Medium Impact - Failure to accept 3 properties.</p> <p>Applicants who refuse 3 offers following a successful bid or direct allocation including if they fail to attend the viewing appointment will be placed into the new Housing Options Band C for a period of 12 months.</p> <p>The Council will implement clear operational procedures for the assessing officers to take into account people with mental health or support needs where their condition may impact on their behaviour and their ability to keep appointments in the normal way. Officers will</p>
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			<p>look at the individual circumstances of any applicant.</p> <p>An additional safeguard is that the new Policy clearly defines what a reasonable offer is. This will ensure consistency in the application of the refusal policy.</p> <p>The view taken by the Council is the ability to refuse 3 reasonable offers before being placed into Band C is a reasonable compromise. It is not expected that many applicants will have the rule applied, as having the rule in place will focus applicants on seriously considering any property they bid for.</p> <p>It is also likely to be positive in that some applicants in a high band who are in a protected group refuse offers of accommodation waiting for what they perceive to</p>
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			<p>be the 'perfect' offer. This leaves them in unsuitable housing for a longer period of time. This policy will help tackle this problem.</p> <p>Medium Impact - Applicants with former/current rent arrears or serious unacceptable behaviour who are in housing need will be assessed as either non qualifying or allowed to qualify or allowed to qualify but not allowed to bid until the issue has been resolved.</p> <p>Applicants with former/current rent arrears or serious unacceptable behaviour who are in housing need will be assessed as either non qualifying or allowed to qualify or allowed to qualify but not allowed to bid until the issue has been resolved.</p> <p>This isn't a change to the</p>
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			<p>Policy. Under the previous policy section 2.4 an applicant could be disqualified for former rent arrears or unacceptable serious behaviour. The previous policy lacked clarity resulting in some applicants being 'stuck' for previous arrears and unable to access social housing and inconsistency in the application of the Policy. Many applicants where the policy was applied would be in a protected group.</p> <p>Changes have been made that will benefit applicants. These are:</p> <ul style="list-style-type: none">a) Much clearer criteria for when an applicant will or will not qualifyb) Exemptions and exceptional circumstances consideration built into the Policy.c) Agreement with the Registered Providers
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			<p>on the approach to take for when an applicant should be allowed to be considered for an offer accommodation for resolving the arrears or behaviour issue. This will mean fewer applicants are 'stuck' with no solution.</p> <p>d) Where applicants qualify but are unable to bid until the matter has been resolved they will be allocated the correct band for their housing need and will continue to accrue 'time in band' priority which will be an advantage to them when they have resolved the issue to the Council's satisfaction.</p> <p>Although the housing related debt and unacceptable behaviour rules will impact negatively on some</p>
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			<p>applicants from a protected group the Council is satisfied that the rules are a proportionate means of achieving a legitimate aim which is to ensure that new tenants pay the rent and resolve previous housing debt owed to a social landlord, and the Council is satisfied that it has brought in changes that achieve an appropriate balance with safeguards and exemptions so that any indirect discrimination on applicants from a protected group has been minimised through the safeguards introduced in the new Policy and are proportionate.</p>
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General comments on impact and safeguards

The Council is satisfied that the changes to the Policy are positive to many of the protected groups under the Equality Act and achieve an appropriate balance and if there is any negative impact on any group this is minimal.

Although it can always be argued that any change that positively impacts on the chances of social housing for one or more protected group may have a negative impact on other protected groups seeking social housing the impact is not considered to be substantial.

All applicants have a statutory right to seek a review of their housing application if they are dissatisfied with the Council's decision re how they have been assessed and the Band they have been awarded. The Policy also provides all applicants with the opportunity to submit reasons why they believe their case should be considered under the exceptional circumstances part of the Policy.

Evidence (see guidance note for details of what to include here):

The age profile for applicants on the Housing Register as of December 2019

Age	Total
Under 25	1352
Between 25 and 29	1463
Between 30 and 39	2432
Between 40 and 49	1345
Between 50 and 54	618
Between 55 and 59	559
Between 60 and 64	503
65 and over	1091
Overall total	9363

The Housing Register broken down by disability

Disability – do you consider yourself to have a disability?	Total
Yes	1858
No	6564
Prefer not to say	428
Blank – not completed	513
Overall total	9363

The Housing Register by transgender/gender reassignment

Gender reassignment - Is this the gender that you were born into?	Total
Yes	116
No	8624
Blank – not completed	623
Overall total	9363

The Housing Register by religion and belief

Religion and belief	Total
Buddhist	29
Christian	3472
Hindu	2
Jewish	4
Muslim	96
None	4155
Other	300
Prefer not to say	779
Sikh	2
Blank – not completed	524
Overall total	9363

The Housing Register by sexual orientation

Sexual orientation	Total
Bisexual	30
Gay	16
Heterosexual	2207
Lesbian	41
Other	39
Prefer not to say	150
Blank - not completed	6880
Overall total	9363

The Housing Register broken down by sex

Sex	Total
Male	3326
Female	5513
Prefer not to say	524
Overall total	9363

The Housing Register broken down by nationality

Nationality	Total
Austrian	5
Belgium	3
British	8453
Bulgarian	14
Czech	2
Dutch	4
French	1
German	3
Hungarian	10
Irish	30
Italian	10
Latvian	2
Lithuanian	19
Norwegian	2
Other Nationality	81
Polish	187
Portuguese	17

Romanian	26
Slovakian	11
Spanish	8
Blank – not completed	475
Overall total	9363

The Housing Register broken down by ethnicity

Ethnicity	Total
White English	8286
White Irish	60
Any other white background	332
Black	71
Asian	82
Mixed	15
Travelling Community	11
Other ethnic group	71
Not stated	794
Total	9722

The Housing Register broken down by levels of applicant's income.

Total household income per annum	Number of live applications
Up to £10,000	3812
£10,001 – £20,000	3430
£20,001 - £30,000	1352
£30,001 - £40,000	389
£40,001 - £50,000	117
£50,001 - £60,000	38
£60,001+	17

Action plan:

Actions required	Key activity	Priority	Outcomes required	Officer responsible	Review date
Age	The Website FAQs section will be amended to inform applicants that help is available if they are having difficulty in using any of the online application and bidding processes.	High	FAQs updated to include information about help that is available to those applicants having difficulty in using any of the online application and bidding processes.	Howard Hillier/Allan Batty	October 2020
Disability	The intention is to review the website to ensure that it is fully compliant with all accessibility requirements.	High	Actions include: a) To ensure that the website is W3C 1.0 compliant b) Information is available on how to adjust type, font size, colour contrast and how to make the applicant's computer speak text aloud. c) There is currently a drop down menu for people who need to read information in a language other than English. d) The ability to	Howard Hillier/Allan Batty	October 2020

			<p>receive a letter in audio.</p> <p>e) To include a link from the Housing Options home page on the West Cheshire Homes website to the Home Assistance page on the CWAC website.</p> <p>The Council will seek in the future, where the IT allows, to monitor data on the frequency of applicants accessing their account to check whether some applicants are being disadvantaged.</p>		
Gender	Potential gender bias in the proposals as females make up an estimated 54% of the housing register.	High	The Council going forward will collect and monitor bidding data to check that it is in proportion to those on the Housing Register to confirm whether or not there is any gender bias.	Howard Hillier	October 2020
Religion and belief	It can be difficult to distinguish what are factors to do with a person's religion as	Medium	Cheshire West and Chester will introduce a mechanism for collecting more	Howard Hillier	October 2020

	opposed to their ethnic or cultural origins.		accurate information in order to be able to assess any impact as the policy and the EQIA is reviewed.		
Sexual orientation	Reported numbers for the housing register are small.	Medium	More effort will be made on collecting the information in order to be able to assess any impact as the policy and the EQIA is reviewed.	Howard Hillier	October 2021
	Provide educational Equality and Diversity training to private landlords	Medium	<p>Actions include:</p> <ul style="list-style-type: none"> a) Deliver Equality and Diversity presentation at the Landlord Forum. b) Devise equality and diversity article for inclusion in Landlord Newsletter. c) Devise specific equality and diversity page to be included on the Private Landlords/Agents webpage of the CWAC website. d) Provide regular equality and diversity updates to landlords and letting agents. 	Allan Batty	Nov 2020

Local Connection	Amending the local connection rules for the priority band to be awarded.	Medium	The Council will analyse the equality profile of households who will potentially be affected by the proposed changes to local connection for a period of 2 years continuous residency, employment.	Howard Hillier	July 2020
Local Letting Policies	The new Policy includes the ability to apply local lettings policies.	Medium	The Council will fully consider the equalities impact of any local letting policy in deciding whether to approve any LLP and will then monitor the on-going impact.	Howard Hillier	July 2020
Failure to accept 3 properties.	Applicants who refuse 3 offers following a successful bid or direct allocation including if they fail to attend the viewing appointment will be placed into the new Housing Options Band C for a period of 12 months.	Medium	Regular analysis of the applicants placed into Band C because they refused 3 reasonable offers will be needed to ensure that specific groups are not being adversely affected.	Howard Hillier	July 2020
Former Rent arrears	Applicants with former/current rent arrears or serious unacceptable	Medium	The number of households impacted by Policy will be carefully monitored.	Howard Hillier	July 2021

	behaviour who are in housing need will be assessed as either non qualifying or allowed to qualify or allowed to qualify but not allowed to bid until the issue has been resolved.		Applicants with rent arrears over £1000 and subsequently unable to come onto the Housing Register will be referred to support agencies who can assist the applicant in reducing their housing debt.		
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Sign off	
Lead officer:	Allan Batty
Approved by Tier 4 Manager:	Alison Amesbury
Moderation and/or Scrutiny	
Date:	
Date analysis to be reviewed based on rating (high impact – review in one year, medium impact - review in two years, low impact in three years)	

Please forward the completed Equality Analysis to the Equality and Diversity Managers for publishing on the Council's website