

## Equality Impact Analysis (EIA) Resident/Service User

Please refer to the guidance and initial Equality Impact Analysis before completing this form.

<b>1. Details of function, policy, procedure or service:</b>	
Title of what is being assessed: Housing Allocations Scheme	
Is it a new or revised function, policy, procedure or service? Revised policy	
Department and Section: Commissioning Group – Growth & Development	
Date assessment completed: March 2018	
<b>2. Names and roles of people completing this assessment:</b>	
Lead officer	Faisal Butt
Stakeholder groups	LBB (Commissioning), HP Public Law, Barnet Homes (Housing Options), Registered Providers, Residents, Community and Voluntary Sector Groups, North London Sub-region
Representative from internal stakeholders	Cath Shaw
Representative from external stakeholders	Elliott Sweetman
Delivery Unit Equalities Network rep	Lesley Holland
Performance Management rep	N/A
HR rep (for employment related issues)	N/A
<b>3. Full description of function, policy, procedure or service:</b>	
<p>Barnet Council’s Housing Allocations Scheme has been designed to deliver a fair and transparent system by which housing is allocated by. An extensive Equality Impact Assessment was undertaken on the Scheme in July 2017 that considered the impact that it had on the 9 protected characteristics (age, disability, gender assignment, pregnancy and maternity, race (and ethnicity), religion or belief, sex, sexual orientation and marital status) and other groups under Barnet’s Fairness Agenda who may be considered disadvantaged and/or vulnerable (carers, people with mental health issues, some families and lone parents, people with a low income and unemployed people, young people not in employment, education or training). It found that the Housing Allocations Scheme had an overall minimal negative impact but the benefits are consistent and the criteria for increased priority (Community Contribution and Residential Connection) are based on need.</p> <p>As an extensive EIA has recently been completed on the Scheme, this EIA will look specifically at the proposed changes to it in light of the Homelessness Reduction Act (HRA) coming into</p>	

force on 3 April 2018. Some changes to the Housing Allocations Scheme have been identified as necessary following legal advice. These changes should make no difference to the outcomes being achieved by the scheme. Changes have had to be made for several reasons;

- The statutory definition of threatened with homelessness has increased from 28 days to 56 days
- The HRA amendments have introduced new prevention and relief duties imposing additional obligations on the Council to attempt to assist all eligible homeless applicants and to attempt to prevent homelessness
- The HRA amends the conception of “local connection” for care leavers.
- The Government has published a new Statutory Homelessness Code of Guidance on 22 February 2018 which explains how Councils should implement the HRA
- New regulations have also been published governing the statutory review procedure.

These changes will be applied consistency regardless of age, disability, gender reassignment, pregnancy and maternity, race (and ethnicity), religion or belief, sex, sexual orientation or marital status.

<b>How are the equality strands affected?</b> <i>Please detail the effects on each equality strand, and any mitigating action you have taken so far. Please include any relevant data. If you do not have relevant data please explain why.</i>			
Equality Strand	Affected?	Please explain how affected	What action has been taken already to mitigate this? What further action is planned to mitigate this?
1. Age	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	It is likely that there will be a positive impact for all age groups as the changes under the HRA increase assistance available to those who before would have only been able to access minimal assistance because they did not have a priority need. All ages now have access to new homelessness prevention and relief duties	N/A
2. Disability	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	People with mental health issues are proportionally overrepresented within the rough sleeper community and therefore there will a positive impact from the new relief duties under the HRA as currently they can only access minimal advice and assistance	N/A
3. Gender reassignment	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	An increase in meaningful homelessness advice and assistance will benefit all groups, including those who have undertaken gender reassignment	N/A
4. Pregnancy and maternity	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	Similarly this group will benefit from more meaningful advice and assistance at an earlier stage – 56 days for being threatened with homelessness compared	N/A

		to the current 28 days	
<b>5. Race / Ethnicity</b>	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	An increase in meaningful homelessness advice and assistance will benefit all groups and this will be consistently applied regardless to a person's race/ethnicity	N/A
<b>6. Religion or belief</b>	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	An increase in meaningful homelessness advice and assistance will benefit all groups and this will be consistently applied to those regardless to a person's religion or belief	N/A
<b>7. Gender / sex</b>	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	An increase in meaningful homelessness advice and assistance will benefit all groups and this will consistently benefit all groups including those of different genders/sex	N/A
<b>8. Sexual orientation</b>	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	An increase in meaningful homelessness advice and assistance will benefit all groups and this will be consistently applied regardless to a person's sexual orientation	N/A
<b>9. Marital Status</b>	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	An increase in meaningful homelessness advice and assistance will benefit all groups and this will be consistently applied to groups of differing marital status	N/A
<b>10. Other key groups?</b>	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>		N/A
Carers	Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/>	Carers will benefit from more meaningful advice and assistance at an earlier stage – 56 days from being threatened	

<p>People with mental health issues</p>	<p>Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/></p>	<p>with homelessness compared to the current 28 days</p> <p>People with mental health problems are proportionally overrepresented within the rough sleeper community and therefore will benefit from the new relief duties under the HRA as currently they only have access minimal advice and assistance</p>	
<p>Some families and lone parents</p>	<p>Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/></p>	<p>Some families and lone parents will benefit from more meaningful advice and assistance at an earlier stage – 56 days from being threatened with homelessness compared to the current 28 days</p>	
<p>People with a low income</p>	<p>Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/></p>	<p>An increase in meaningful homelessness advice and assistance will benefit all groups and this will be consistently applied including people with a low income</p>	
<p>Unemployed people</p>	<p>Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/></p>	<p>An increase in meaningful homelessness advice and assistance will benefit all groups and this will be consistently applied including those who are unemployed</p>	
<p>Young people not in employment education or training</p>	<p>Yes <input checked="" type="checkbox"/> / No <input type="checkbox"/></p>	<p>An increase in meaningful homelessness advice and assistance will benefit all groups and this will be consistently applied including young people not in employment, education or training</p>	

**4. What will be the impact of delivery of any proposals on satisfaction ratings amongst different groups of residents?**

Satisfaction amongst different groups of residents will increase because all eligible households will be able to access meaningful advice and assistance, and new homelessness prevention and relief duties will be available to all. Currently only minimal advice and assistance is available to those who are not considered to have a priority need for assistance. In addition, the timeframe by which a household is threatened with homelessness will increase from 28 days to 56 days. This will improve outcomes as it will give more time for specialist officers to prevent homelessness improving satisfaction amongst all groups of residents.

**5. How does the proposal enhance Barnet's reputation as a good place to work and live?**

Barnet is a popular place in which to live and work and there is a high demand for housing. The HRA placed new duties on local authorities with a focus on preventing homelessness for all eligible households. This should result in more households being able to remain in their current homes enhancing Barnet's reputation as a good place to live as fewer people will have to leave their home and community.

**6. How will members of Barnet's diverse communities feel more confident about the council and the manner in which it conducts its business?**

The HRA is a new piece of legislation and therefore it has been identified that minor amendments to the Housing Allocations Scheme need to be made. It is not expected that these changes will make a difference to the outcomes being achieved by the Scheme and are being made in a fair and transparent way. This in turn will increase confidence in the Council and how it conducts its business. In 2011 and 2014, members from Barnet's diverse communities were consulted on the then changes and the current proposed changes are within the scope of these consultations.

**7. Please outline what measures and methods have been designed to monitor the application of the policy or service, the achievement of intended outcomes and the identification of any unintended or adverse impact? *Include information about the groups of people affected by this proposal. Include how frequently the monitoring will be conducted and who will be made aware of the analysis and outcomes? This should include key decision makers. Include these measures in the Equality Improvement Plan (section 16)***

The HRA requires extensive data collection called H-CLIC from each Local Authority on an individual case level basis. Barnet Homes have procured a new IT case management system called Jigsaw to allow for H-CLIC collection. Jigsaw will allow to monitor the application of the proposed changes and will improve data integrity including on applicants with one or more protected characteristic:

- Annual equalities monitoring will be conducted by Barnet Homes' Housing options Service
- Additional ad-hoc analysis may be conducted when required to check for unintended or adverse impacts

**8. How will the new proposals enable the council to promote good relations between different communities?** *Include whether proposals bring different groups of people together, does the proposal have the potential to lead to resentment between different groups of people and how might you be able to compensate for perceptions of differential treatment or whether implications are explained.*

The proposed changes are in light of legislative changes under the HRA. These changes will be consistently applied across difference groups and will provide benefits to all groups by increasing meaningful advice and assistance and at an earlier stage. This should promote good relations between different communities.

**9. How have employees and residents with different needs been consulted on the anticipated impact of this proposal? How have any comments influenced the final proposal?** *Please include information about any prior consultation on the proposal been undertaken, and any dissatisfaction with it from a particular section of the community. Please refer to Table 2*

Extensive consultation was undertaken previously in 2011 and 2014. The findings from these consultation periods are included in the 2011 and 2014 EIAs.

As the proposed changes are minor and within the scope of the previous consultations, it is not necessary or proportionate to send the proposed changes out for further consultation. In addition the proposed changes to the Housing Allocations Scheme are in light of legislative changes under the HRA and will benefit all groups protected under the Equality Act 2010

## Overall Assessment

10. Overall impact		
Positive Impact	Negative Impact or Impact Not Known <sup>1</sup>	No Impact
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

11. Scale of Impact		
Positive impact:	Negative Impact or Impact Not Known	
Minimal <input checked="" type="checkbox"/> Significant <input type="checkbox"/>	Minimal <input type="checkbox"/> Significant <input type="checkbox"/>	

12. Outcome			
No change to decision	Adjustment needed to decision	Continue with decision <i>(despite adverse impact / missed opportunity)</i>	If significant negative impact - Stop / rethink
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>1</sup> 'Impact Not Known' – tick this box if there is no up-to-date data or information to show the effects or outcomes of the function, policy, procedure or service on all of the equality strands.



**13. Please give full explanation for how the overall assessment and outcome was decided.**

The overall assessment of the proposed amendments to the Housing Allocations Scheme is that they will have an overall minimal positive impact and these benefits are consistent across all of the groups protected under the Equality Act 2010 and Barnet's Fairness Agenda.

The proposed amendments to the Housing Allocations Scheme are in light of legislative changes under the HRA. The HRA places new duties on local authorities to providing meaningful advice and assistance to a wider group of people at an earlier stage of their homelessness. Under current legislation, groups that are not considered a "priority need" for assistance (predominantly households without children or those who do not have a considerable mental and/or physical disability) can only access general minimal advice and not the specialist provision that they will be able to access under the HRA. This can only provide a positive impact across all groups as these changes will be consistently applied to benefit all.

**14. Equality Improvement Plan**

Please list all the equality objectives, actions and targets that result from the Equality Analysis (continue on separate sheets as necessary). These now need to be included in the relevant service plan for mainstreaming and performance management purposes.

Equality Objective	Action	Target	Officer responsible	By when

<b>1<sup>st</sup> Authorised signature (Lead Officer/Project Sponsor)</b>	<b>2<sup>nd</sup> Authorised Signature (Service lead/Project Manager)</b>
<b>Date:</b>	<b>Date:</b>