

Equality Impact Assessment (EqIA)

Deciding what needs to be assessed

In theory all policies, decisions, services, projects and programmes should be impact assessed. The most practical approach is to assess as the proposal is being developed or as processes, services and policies come up for review making the EQIA part of the development process. Do not be put off by the list below, it does not mean that long and detailed assessments are required every time you are engaged in one of the activities. However, it does mean that you should always consider the equalities implications of your proposals.

Policy

- New policy development
- Substantial revision of an existing policy or process
- Any change which may have a disproportionate impact on a particular group

Decision

- Key decision
- Decision for management board/cabinet
- Budget change decision

Service

- New service
- Service review, including the decommissioning of services
- Any service change which may have a disproportionate impact on a particular group

Projects and programmes

- All, at planning stage

Further information: [Equality Impact Assessments - a user's guide](#)

Section One

	Question	Response
1.1	Name of policy/decision/service/project/programme being assessed	Housing Allocations Policy Housing Commissioning & Strategy
1.2	Summary of aims and objectives of the policy/decision/service/project/programme	The Council is required by section 166A(1) of the Housing Act 1996 to have an Allocation Policy for determining priorities and for defining the procedures to be followed in allocating housing accommodation. This Allocation Policy meets the legal requirement for the

		<p>Council to provide a statement on choice and it adheres to the “Allocation of Accommodation: Guidance for Local Authorities in England” (CLG, June 2012).</p> <p>The policy outlines who can apply for social housing (Council housing and Housing Association properties) in the Swindon Borough Council area, and how the Council sets priorities for who is housed.</p> <p>The Allocation Policy meets the requirements set out in Part 6 Housing Act 1996 (as amended by the Homelessness Act 2002). It also contains flexibilities introduced under the Localism Act 2011. In developing the Allocation Policy, the Council has included necessary flexibility that will help the Council to consider all household circumstances, giving reasonable and additional preference to applicants in the greatest need, and be able to respond appropriately.</p> <p>The changes approved in October 2022 to the existing allocations policy were produced through consultation, both internally and with partner organisations and the wider public this ran from 13th May 2022 to 27th June 2022. Through a task group, direct consultation with Tenants ran from November 2021 to May 2022. The main aims of the Allocations review were to:</p> <ul style="list-style-type: none">• Provide homes to local people• Recognise the contribution volunteers make to the community• Make the allocations Scheme fairer and easier to understand• Ensure Homeseekers were able to access, interpret and understand the scheme’s bidding system.• Ensure homes go to Homeseekers who are in a priority housing need and homeless households• Make best use of the housing stock to address the demand for housing.• Ensure staff are safe and discourage violence and abuse to staff. <p>All the aims above were strongly supported by the public consultation with % of strongly agree and agree ranging from 50.8% to 83%.</p> <p>This proposal and amendments are in light of a policy refresh putting the policy into a new policy template and taking into account updated legislation and best practice since October 2022.</p>
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		The full revised version of the Allocations Policy (Approved October 2022 as outlined above) has now been updated into a new policy template. In addition, content has been added around property types, special guardians, seriously hazardous properties, decants, size entitlement, and wording in relation to divorced or separated spouses or civil Partners of current regular Forces Service personnel.
1.3	Who is affected by the policy/decision/service/project/programme? (e.g. employees/service users/supplier/contractor)	It will affect all Homeseekers applying from inside or outside the Borough regardless of their background.
1.4	What involvement and consultation has been done in relation to this proposal? (e.g. with relevant groups and stakeholders)	The policy, has been subject to public, staff, partner and stakeholder engagement in 2022 and approved at Cabinet October 2022. This EQIA reviews the amendments made in line with updated legislation and best practice.
1.5	What are the arrangements for monitoring and reviewing the actual impact of the policy/funding activity/event?	Swindon Borough Council will continue to regularly review the EqIA, in line with legislative changes or good practice, or if the policy impacts any group directly.

Section Two - Protected Characteristics

Protected Characteristic Group	Is there a potential for positive or negative impact? Is the impact neutral?	Please explain and give examples of any evidence/data used	Action to address negative impact (e.g. adjustment to the proposal)
Disability	Positive	Making best use of housing stock by ensuring eligibility for a two bedroom house is allocated to those with the greatest need for a house based on a medical or welfare need. Houses are being allocated to those with the greatest need for that type of accommodation based on medical/welfare assessments and supporting evidence of requiring a house. This has been achieved through a review of	To ensure fairness and appropriate qualification, each case approved on a medical/welfare assessment requiring supporting evidence. Panel in place for any medical/welfare reviews. Audits carried out to ensure consistency.

	<p>Neutral impact</p>	<p>eligibility for certain property types and through choice based lettings and direct offers.</p> <p>Different approaches and mechanisms may be required for engaging with and representing, people with a range of disabilities depending on their individual needs. Consider:</p> <ul style="list-style-type: none"> • Communication methods. • Accessibility – venue, location, transport. • Range of support needed to participate. • Hearing Loops and Interpreters. • Disability awareness training for employees. 	<ul style="list-style-type: none"> • Offer a range of appointments, e.g. at home, at the office, at a library and ensuring suitable access for a wheelchair user. • Assist vulnerable applicants with bidding process either to enable them to access the portal themselves through training or demonstration at library or through an officer placing bids on behalf on the customer. Encourage third party or advocate to place bids. • Consider different support needs, e.g. liaise with support workers, make referrals to support agencies. Support worker/family to attend appointments for support. • Include interpretation services where needed. • All staff to receive disability awareness training. • Housing Register Reviews and reviews of active bids being placed will check service is being accessed and provide
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			remedies as outlined above if service is not being accessed or training or support required.
Gender Reassignment	Neutral impact	<p>Trans people should be able to disclose their gender identity without fear of prejudice.</p> <ul style="list-style-type: none"> • Making it clear you have a Trans policy and process. • Awareness training for employees. 	Mandatory Equalities & Diversity training for all staff.
Marriage or Civil Partnership	Neutral impact	All couples or partners, regardless of gender, should be able to access services.	Mandatory Equalities & Diversity training for all staff.
Pregnancy and Maternity	Neutral impact	<p>Consider:</p> <ul style="list-style-type: none"> • Flexible hours of the service. 	Be flexible with timings and appointments.
Race	Neutral impact	<p>Consider:</p> <ul style="list-style-type: none"> • The size of the BME communities that your service affects. • Language(s) spoken/understood. • Culture, such as hygiene, clothing, physical activities, mixed gender activities. • What access support can you offer? 	<p>Regular review of activities undertaken in respect of the policy to ensure this group is not being disadvantaged.</p> <p>Work with Community Support networks on individual cases where required.</p> <p>Include Interpretation services where needed.</p> <p>Mandatory Equalities & Diversity training for staff.</p> <p>Housing Register Reviews and reviews of active bids being placed will check service is being accessed and provide remedies as outlined above if service is not being accessed or training or support required.</p>

Religion or Belief	Neutral impact	<p>Consider:</p> <ul style="list-style-type: none"> The diversity within the communities that your service/project affect. Prayer times, meal times, food (some religions do not eat meat), cultural habit or belief, religious holidays such as Ramadan. Awareness training for employees. 	<p>Be flexible with appointments, e.g., home visits and viewings offered to suit the tenant.</p> <p>Mandatory Equalities & Diversity training for staff.</p>
Sexual Orientation	Neutral impact	<p>Consider:</p> <ul style="list-style-type: none"> LGB people should feel safe to disclose their sexual orientation without fear of prejudice. Make it clear you recognised civil marriage and partnerships. Awareness training for employees. 	<p>Provide ongoing awareness training for employees through mandatory Equalities & Diversity training.</p> <p>Swindon Borough Council Equality policy.</p>
Sex (gender)	Neutral impact	<p>Consider:</p> <ul style="list-style-type: none"> The impact on men and women. Child care/care of other dependants. Mixed/single gender groups/activities. Timing of services. 	<p>Be flexible with appointments for home visits and viewings. Offer home visit if not able to access office for interview. Consider virtual assessments if appropriate to do so.</p>
Age	Neutral impact	<p>Consider:</p> <ul style="list-style-type: none"> The way younger and older people access services may be different. Use of technology. Child care/care of another dependant. Timings/flexibility, such as work patterns. Transport arrangements. Venue location. 	<p>Accept correspondence in different formats, e.g. email, written, WhatsApp messages, telephone call.</p> <p>Offer a range of appointments, home visits, viewings and interviews. Flexibility on time, location or virtual offer.</p> <p>Use of technology: officers assisting clients with bidding where third party or advocate not available. Offer training/Support. We can support this demographic and are currently doing so.</p>

			Housing Register Reviews and reviews of active bids being placed will check service is being accessed and provide remedies as outlined above if service is not being accessed or training or support required.
Children in Care and Care Leavers	Neutral impact	<p>Consider:</p> <ul style="list-style-type: none"> • The way younger and older people access services may be different. • Use of technology. • Child care/care of another dependant. • Timings/flexibility, such as work patterns. • Transport arrangements. • Venue location. 	<p>Accept correspondence in different formats, e.g. email, written, WhatsApp messages, telephone call.</p> <p>Offer a range of appointments, home visits, viewings and interviews.</p> <p>Support or training available for bidding/accessing service. Housing officers liaise with Support workers/Care leavers team and Children's Services to ensure this group are able to access service.</p>

Section Three- Evaluation

3.1	<p>Is it possible the proposed policy or activity or change in policy or activity could discriminate or unfairly disadvantage people?</p>	<p>There have been potential barriers identified that could discriminate or unfairly disadvantage those with a protected characteristic group, These could be those of an older age or those with a disability who may require support to access the service. Officers placing bids and/or identifying advocates and providing options for interviews will continue to be used as mitigation. The Housing Register Reviews and reviews of active bids will also provide mitigation to ensure service is being accessed and circumstances updated/assessed accordingly in line with Allocations Policy.</p> <p>The policy does provide a transparent framework that SBC will follow to ensure decisions on allocation are followed in line with policy.</p>
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Final Decision:	Tick the relevant box	Include any explanation / justification required
1. No barriers identified, therefore activity will proceed.	✓	The policy provides a transparent framework that SBC will follow to assess and allocate social housing in line with the policy.
2. Stop at some point because the data shows bias towards one or more groups		
3. Adapt or change the event in a way which you think will eliminate the bias		
4. Barriers and impact have been identified, however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the policy or practice (e.g. in extreme cases or where positive action is taken). Therefore, proceed with caution with this knowing that it may favour some people less than others, providing justification for this decision.		

Section Four – Record Keeping

Will this EqIA be published* (*EqIA's should be published alongside relevant event paperwork including cabinet papers:	Yes/Not required
Date Completed	
Review date (if applicable)	

Change Log:

Name	Date	Version	Change Made

Responsibilities			
Name of person leading this EqIA	Janine Pike	Date Completed	28 August 2024
Names and roles of people involved in the consideration of impact	Janine Pike	Arlene Griffin	
Name of Director signing EqIA	Chris Stratford	Date Signed	
		30-08-2024	