

Equality Impact Assessment

Stage 1: The proposed change that is being assessed and responsibility for the EQIA.

Name of the proposed change	Allocation Scheme
Purpose of proposed change	<p>Under the 1996 Housing Act, the Council is required to periodically review its Allocation Scheme. An Allocation Scheme sets out how a housing applicant can qualify for the housing register and the categories by which approved cases are accorded priority. It also describes the processes by which applicants can apply to the scheme.</p> <p>Article 14 of the Human Rights Act 1998 requires that there must be no unjustified discrimination within the scope of human rights on any grounds, such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth, or other status. The purpose of this EIA is to carry out a self-assessment to ensure the Council's Allocation Scheme meets this requirement.</p>
Is this a change to a policy, practice or service?	No
Who has senior level responsibility for the proposed change?	<i>Beatrice Cingtho-Taylor</i>
Who is completing this assessment?	<i>Simon James</i>
Indicate where your EQIA will be submitted to including date where known:	<i>[The EQIA will be submitted to Cabinet alongside the Draft strategy for Members' consideration and if appropriate, approval.]</i>

Stage 2: Deciding what relevance, the proposed change has for equality.

<p>Is the proposed change likely to impact on any of the following? <i>If there is no equality relevance for either go to Stage 7 and get sign off</i></p>	<p><input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Employees</p>
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Is the impact on equality low, medium or high?

The purpose of the Allocation Scheme policy is to ensure that those who are both applying and qualified for rehousing are treated fairly and equitably when decisions are made as to whether they qualify for rehousing. In addition, it sets out how priority is awarded for different types of housing need.

The proposed changes are below with an assessment of impact:

- Residency criteria- all applicants except those with a reasonable preference will need to have six years residency from the date these changes are approved. However, those in reasonable preference groups (listed below) will be excluded to ensure that those in severe need are not negatively impacted

REASONABLE PREFERENCE GROUPS

- a) People who need to move on welfare or medical grounds (including grounds relating to a disability),
- b) People living in unsanitary, unsatisfactory, or overcrowded housing,
- c) People who are homeless within the meaning of the Housing Act 1996
- d) People who are owed a particular statutory duty by any local housing authority under section 190(2), 193(2) or 195(2) (or under section 65(2) or 68(2) of the Housing Act 1985.
- e) People who need to move to a particular locality within the district to avoid hardship to themselves or others
- f) Current or previous members of the armed forces.
- g) Asylum seekers who do not have six years residency and are fleeing violence

Travellers or gypsy living a traditional travelling lifestyle will also be exempt from the 6-year residency criteria.

- Care Experienced young adults will receive a greater priority under the new scheme linking in with the commitments made in the Children and Families and Housing Protocol
- Care Experienced young adults agreed by the Children and Families and Housing Protocol will have their approval date backdated to the date of their 18th birthday

- To qualify for Sheltered Accommodation, a resident will need to be at State Pension Age or under that age with circumstances agreed by the Director of Housing- allowing residents between 50 to 60 years into sheltered has led to management and anti-social behaviour issues and negatively impacted upon the lifestyles of elderly people
- Annual or Local Lettings Schemes will be used to target particular areas of housing need such as homelessness, move on accommodation and those on estates under regeneration. If applied, this will have a positive benefit on those in temporary or supported accommodation
- Moving up and down bands- this clarifies the process when a resident attains a higher or lower priority because of a change in their housing need. This change is applied to all, is not retrospective and is consistent with processes used in other boroughs with band schemes
- Reciprocal schemes- this allows the Council capacity to reach agreements with other Councils and Local Authorities to carry out an exchange of a property. This may have a positive benefit on those who are in urgent need of a move on grounds of fleeing violence and domestic abuse.
- Annual review of all cases- All cases will be evaluated every 12 months- care will be taken in making contact with those who may have difficulty responding, this will allow the Council to better monitor those in urgent need.
- Response times- have been extended to 6 weeks from 10 days in line with policies of many London Boroughs. The previous target of 10 days has proven to be an unrealistic target. This will have no impact as in reality the existing response time is similar to the to be applied target
- Changes to the document to ensure they are easier for residents to follow- this will be a 30-page document reduced from 90 days and will have a positive benefit in terms of providing clearer information
- Bidding down-under circumstances those in housing need facing a wait for rehousing will be able to bid down for a smaller property.
- A one offer policy will be introduced for all applicants other than under occupation and those leaving adapted properties
- Those who have not bid for 12 months may be suspended from the scheme or if homeless placed on auto bid

	<ul style="list-style-type: none"> • Additional wording defining domestic abuse and coercive control as unacceptable behaviour
Summary of EQIA outcome:	<p>The updated policy provides a positive benefit to Care leavers, and residents of Croydon who will achieve a better chance of rehousing with 6 years residency.</p> <p>Those who are new to the Borough will be negatively affected and will have to wait longer before they can apply for housing those this will not affect by residents in the protected groups. Additions to the unacceptable behaviour definition underline the Council's commitment to tackling all forms of abuse.</p> <p>Otherwise, the impact to protected groups is low.</p>

Stage 3: Describe how the proposed change might impact on the council's ability to undertake the Public Sector Equality Duty and commitment to anti-racism (N.B. this can be both positive or negative):

Eliminating discrimination, harassment, victimisation	The proposed changes to the Allocation Scheme are set out in Stage 2 of this document and below.
Advancing equality of opportunity	<p>The Council is committed to producing a policy which ensures that decisions around rehousing are made fairly and equitably. Set out below are figures showing the current percentage of those in protected groups who are qualified for rehousing against lettings over the last three years as well as an assessment of the proposed changes on each group</p> <p>Disability.</p> <p>The Census 2021 data shows that 15.8% of residents in Croydon identify themselves as disabled under the Equality Act 2010).</p> <p>The policy ensures the Council maintains its legal commitment in giving 'reasonable preference' for disabled applicants.</p>

An assessment of 14,750 applicants owed support need across London between October and December 2022 involving those who had been owed a preventative or relief duty by London Councils found the following.

- 14.4% of applicants had a history of mental health difficulties.
- 13.9% suffered physical ill health or disability.
- 5.4% had Alcohol or drug dependency.
- 2.8% had a Learning disability.

An assessment of disabled applicants on the housing register against those receiving offers in the last three years shows the following

	Learning disability	Mental health	Physical health	Combined
% Applicants	1	5.6	11	4.5
% Offers*	1	9	25	9

*Lettings 2021-24

- These figures reflect the higher priority given to those who are disabled in the scheme
- The changes in the scheme will not affect the preserved rights of this group
- Carers with a medical need will receive a higher priority as a result of these changes

Age

In terms of age groups who have qualified for housing the current information shows the following in terms of rehousing

	18-29	30-49	50-69	70 plus
Applicants %	26	52	18.5	3.5
Re-housed %*	14	42	31	13

*Lettings 2021-24

These figures show

- Younger age groups are likely to be more affected by waiting times hence receive a lower proportion of offers
- Older age groups are more likely to receive preference due to health or disability reasons.

In terms of the impact of these changes these are likely to be minor to qualifying groups and positive to some -ie care leavers.

Those who have not applied however will have to wait an additional three years before qualifying unless they are specified as exempt and is more likely to effect newer residents to the borough . Those in this position will still have the right to receive advice on how to address their housing need from Housing services

Race

The table below sets out the ethnic mix in Croydon in the 2011 and 2021 census.

	White	Black	Asian	Mixed	Other	TOTAL
Croydon 2011	55.1%	20.2%	16.4%	6.6%	1.8%	100.0%
Croydon 2021	48.4%	22.6%	17.5%	7.6%	3.9%	100.0%

The table sets out summary ethnicity data for four key dates for those who are

- a) are qualified on the register
- b) and for those who have been offered a property in the last three years

%	% White	% Black	% Asian	% Mixed
Housing Register	29%	44%	11%	8%
Lettings to each group	37%	42%	2%	7%

This shows the following: -

- Black and Mixed communities' lettings are consistent with the profile qualified on the register

- White groups have a slightly higher percentage of offers against the profile- on average this group has an older profile and the likelihood of being rehoused for illness, disability or sheltered accommodation or under occupation is greater.
- Asian groups are underrepresented in lettings -as they are in homelessness applications

The impact of the changes will have a low effect to those already on the housing register. The proposal to lengthen the residency criteria to 6 years will have an impact on all protected groups although this excludes those with reasonable preference

Gender

Sex	Housing register approved%	Proportion of lettings 2021-24%
Male	32%	37%
Female	68%	63%
<i>Excludes prefer not to say</i>		
Total	8187	1958

- A higher proportion of males receiving more offers than their percentage representation on the register is explained by greater proportion of single homeless males rehoused through supported accommodation and rough sleeping pathways into one-bedroom properties
- These measures will have low impact for those on the housing register already
- For those who have not applied to the housing register and have not lived in the borough for five years the residency requirement will impact all but excludes reasonable preference groups.

	Total of all households	Female single parent	Male single parent
London	30,240	6,460 (21%)	650 (2%)
Croydon	1,500	85 (6%)	15 (1%)

In terms of the above figure, existing agreed housing applicants will be unaffected by the proposals.

The Council gives a higher priority (Band 2) for those who partake in employment or training –see definitions in Allocation Scheme. Those who would be unable to take up this scheme because of medical or ill health reasons

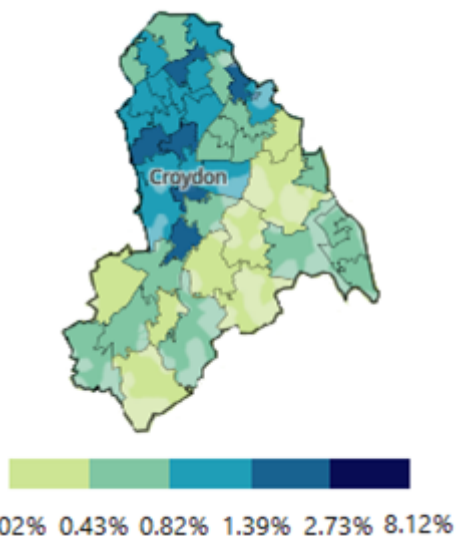
would be likely to be in a higher banding and thus experience no impact. However, the Council will carry out a review of this criteria between now and October 2025 to ensure that it has no negative impact on protected groups

Gender identity - From census data 0.89% of Croydon residents identify as a gender different from sex registered at birth.

With higher populations in Central Croydon and North Croydon where there is a greater propensity of social housing, areas to note are Broad Green & Waddon (1.86%), Purley North (1.56%), Selhurst South & West Croydon (1.49%) and Thornton Heath North West (1.48%).

This can be seen from the map shown below.

Gender Identity Different from Birth



From our information, there were no applicant's self-identifying as having a gender identity different from Birth who were agreed for housing although a small number (preferred not to say). The Council is aware of the difficulty that some may have in self-identifying and will ensure it listens to responses received about any impacts the changes to the scheme may have on an individual.

Sexuality

Based on the results from ONS Census 2021, we can estimate that around 3% identify as being LGBT. A comparison of all categories who have qualified for housing (as of August 24) compared with those who have been allocated a property show the following

- That 34% of applicant do not disclose their sexuality whilst at the letting stage 44% of those who receive an offer are not declared
- 63% of those on the register state they are heterosexual against 55% who have been let a property
- 1% of applicants state they are Gay man and Women against 1.2% who have been allocated a property

In conclusion, the proposed changes will have a low impact on these groups.

Pregnancy and Maternity -The policy will have little impact on these groups. If an applicant is homeless because of pregnancy, they hold reasonable preference under the Housing Act.

Faith

Total:	Croydon	London
Christian	48.9%	40.7%
No religion	25.9%	27.1%
Muslim	10.4%	15.0%
Sikh	0.4%	1.6%
Jewish	0.2%	1.7%
Buddhist	0.6%	0.9%
Other religion	0.8%	1.0%
Not answered	6.9%	7.0%
Hindu	5.9%	5.1%

In terms of the Housing register

- Of those approved for rehousing 48% do not declare their religion against 48% of those at the lettings stage
- 38% of applicants identify themselves as Christian- against 35% who receive offers
- 11% of applicants identify themselves as Muslims with 7% receiving offers.

Fostering good relations	The Council recognises that its Housing Needs Service needs to be improved, and it is committed to working with the Community, Voluntary and Statutory Sector as well as residents to achieve this. A full consultation process involving residents, local voluntary and resident groups will take place between October 24 and February 25.
Embedding anti-racism	The Council is committed to carry out annual audits to ensure allocations are delivered fairly and consistently in terms of ethnicity and the other protected groups.

Stage 4: What evidence has been considered and what consultation has been carried out?

Data collection	<p>This Allocations Policy primarily uses</p> <ul style="list-style-type: none"> a) Data collected by Croydon in respect of the lettings of council properties over the last three years with regards to those allocated properties between 2021 and 2024 b) Information from the 2021 census c) data collected by Croydon regarding the breakdown of 8187 approved cases on the housing register in terms of those on the Housing Register. This provides information on all housing register applications on 6th August 2024.
Consultation	The Allocation Scheme will involve a consultation with applicants-see above.

Stage 5: Identify any adverse or positive impact and mitigation steps that can be or have been taken.

Guidance on Impact Scores: Consider the impact of your proposal by giving a numerical score to both the likelihood of an impact and the severity of an impact against each characteristic. This should draw upon the evidence you cited at Stage 3.

Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.	<p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>
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Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.	1 = Low 2 = Medium 3 = High
The score for likelihood and severity are then multiplied.	e.g. Unlikely to impact =1, Low impact =1, total score =1

Characteristics		Likelihood of impact	Severity of impact	Impact score	Summary of impact (positive, negative, no impact or unknown)*	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines.**
Protected Characteristics (Equality Act 2010)	Age	2	1	2	<p>Positive- As set out above, the policy will monitor allocations by age group to ensure there is no discrimination. The policy will also ensure that young adult care leavers will receive a higher priority for housing.</p> <p>Negative- For those not on the register, a younger age group applying for housing is more likely not to meet the residency criteria of 6 years.</p>	In terms of the negative impact, the change applies to all and will reduce the rise in housing register numbers meaning that those in greatest need can be prioritised.
	Disability	2	1	2	Positive- The Allocations Schemes will ensure that reasonable preference is given to those who are disabled.	.
	Gender Reassignment	1	1	1	No specific impact- other than longer residency criteria	Data collected within this group may not be representative.

Characteristics		Likelihood of impact	Severity of impact	Impact score	Summary of impact (positive, negative, no impact or unknown)*	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines.**
					requirement of 6 years affecting all groups.	
	Marriage or Civil Partnership	1	1	1	No specific impact other than longer residency criteria requirement of 6 years.	
	Pregnancy and Maternity	2	1	2	Positive- The Allocation Scheme maintains reasonable preference for those who are in housing need-see above.	
	Race	2	1	2	Positive -The changes to the allocation scheme will be monitored to ensure consistency of allocations by race.	An assessment of the reasons for the lower rate of allocations to those categorised as Asian will be carried out when data management systems capability is enhanced.
	Religion or Belief	2	1	2	No specific impact	
	Sex	2	2	4	Positive The Allocation Scheme maintains priority for key issues such as domestic violence. Families with children who are homeless are recognised as having reasonable preference.	The Council will review its Employment and Training criteria to ensure it is fully accessible by October 2025
	Sexual Orientation	1	1	1	Lack of data on this protected group make the impact difficult to predict	


** Unknown impact may only be used where there is no data or evidence available and must be accompanied by an action plan for how to collect this.*

*** Mitigations must be referenced in the Equalities comments of the substantive report and in its recommendations.*

Stage 6: What is the outcome of your assessment? Select one of these four options:

Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the proposed change is robust. The evidence shows no potential for discrimination, and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.	X This changes to the Allocation Scheme have a positive impact to housing applicants and no negative impact on any specific group.
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, ensure you have completed Section 5 above.	
Continue the proposed change despite potential for adverse impact	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, there are justifiable reasons to continue as planned. If you reach this conclusion, ensure you have completed Section 4 above, clearly setting out your justifications.	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	

Stage 7: EQIA Monitoring and Sign Off

How will the EQIA be reviewed and monitored, including timescales?	<i>[EQIAs must be reviewed every 2 years or sooner if new data or impact is identified.]</i>		
Equalities advice received from:	Ken Orlukwu (Senior Equalities Officer)	Date:	26/09/2024
EQIA approved by:	Beatrice Cingtho-Taylor (Director of Housing – Homelessness Prevention & Accommodation) 	Date:	24/09/24

