

Appendix 2 - Equality Impact Assessment

Directorate:	
Service: Housing Allocations	
Name of Officer/s completing assessment: Rachel Khan, Senior Associate Consultant, Campbell Tickell Ltd	
Date of Assessment: 28.5.2026	
Name of service/function or policy being assessed: Housing Allocations Scheme	
1.	What are the aims, objectives, outcomes, purpose of the policy, service change, function that you are assessing? The Housing Allocations Scheme outlines who is eligible and will qualify to join the housing register under part VI of the housing legislation to be considered for permanent social housing in Slough. These statutory policies should be reviewed every 5 years, sooner if there is a legislation or regulatory change. Slough last did this in 2018 and the policy is now overdue for a review. With social housing scarce in the borough and demand outweighing supply, it is incumbent on the Council to target the document to those in housing need who cannot afford to rent privately or purchase their own home. The new policy is geared towards these challenges and seeks to create movement on the register by having a fair and transparent policy in order to make the best possible use of the social housing available in the borough.
2.	Who implements or delivers the policy, service or function? State if this is undertaken by more than one team, service, and department including any external partners. The Housing Register Team primarily delivers the service, working closely with the homeless service, neighbourhoods, void management, adult social care, children services and occupational health. Externally it works with a number of community based groups acting as advocacy services and other social housing landlords.
3.	Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc. Please consider all of the Protected Characteristics listed (more information is available in the background information). The policy is aimed at applicants on the current housing register and future applicants who wish to be considered for social housing. The full set of proposed changes are:

1. A new section outlining all the options for housing in Slough has been inserted in recognition of the short supply and the need to prioritise it for those most in housing need.
2. The household income threshold has been reduced from £55,00 per annum to an average annual income of £39.059 where the applicant and a joint applicant can only join the register if their joint income is below the threshold.
3. Similarly the savings, assets and capital threshold has been reduced from £20,000 to £16,000 in line with welfare benefits.
4. Applicants with NO housing need are deemed adequately housed and will not be permitted to join the register.
5. Currently there is no penalty for refusing an offer, this will change and provided the single offer was suitable and the refusal deemed unreasonable, the applicant will be removed from the register.
6. If an applicant or someone in their household is serving in the reserve/regular forces or who has served, they can join the register regardless of how long ago they were discharged.
7. Many full-time carers are young and living as part of the household of the person needing care. Often, they have siblings and have to share a bedroom. They may struggle to keep up with their studies and get adequate sleep and downtime when they are full time carers. Adult carers who live in, are awarded their own bedroom. In the interest of fairness, we are proposing to award a young carer their own bedroom for the duration of the time that they are providing the care.
8. Currently children of the same sex share up to the age of 16. We are proposing to raise this to 18. The wait for large properties is considerable as we have very few of them. By raising the age, it will allow the Council to manage the demand for these larger units to those who are severely overcrowded.
9. As a rule we do not allow social housing to become over occupied. Properties are allocated based on bedroom entitlement. The shortage of large family sized accommodation is particularly acute and waiting times are therefore substantially longer than for smaller sized accommodation. In some circumstances where households are waiting for large properties, we may consider allocating them to a slightly smaller property provided it would alleviate severe overcrowding and provided everyone in the household has an adequate bedspace.
10. We are proposing to reduce three medical priority awards to two awards, emergency (Band A) and Urgent (Band B).
11. The banding and priority has been simplified. Band A is the emergency band in line with industry practice. Band B become urgent priority and Band C moderate priority.
12. The current community contribution award was to change from a housing need category in band B to a 2% lettings target. But following consultation and on the recommendation of industry professionals it has been removed entirely as the practice of allocation a property to someone who is working over someone who is not is deemed prejudicial. Adoption and

fostering will be retained as a housing need category in band B.

13. Adult children in overcrowded council properties will be given the option to be housed into a bedsit to reduce or remove the overcrowding of the main household.
14. We already make direct offers, going forward we will have a choice based lettings system allowing applicants to bid for a property suited to their need.
15. The current homeless households in temporary accommodation lettings target of 65% will be increased to 70% annually and reviewed quarterly.
16. Affordability checks will be mandatory for offers of social housing with an aim to maximising the income of the household.
17. Band A applications will be reviewed every 3 months and bands B and C every 12 months. Those failing to renew will be removed from the register.
18. We are introducing a new section on affordability checks. Being able to pay rent and service charges is key to a tenant being able to sustain their tenancy. How much a resident can afford to pay for their housing costs will vary depending on the type of accommodation they live in and their financial circumstances. Carrying out affordability checks when allocating a home gives confidence to incoming tenants that they will be able to afford the home and assists them with maximising their income.

Bear in mind that people affected by the proposals may well have more than one protected characteristic.

Age: positive for young carers and young adults in overcrowded households.

Disability: clear guidelines around emergency and urgent medical awards.

Gender Reassignment: no impact

Marriage and Civil Partnership: no impact

Pregnancy and maternity: no impact

Race: no impact

Religion and Belief: no impact

Sex: negative for same sex sharing

Sexual orientation: no impact

Other: former members of the armed forces may join the register at any time after their discharge, there is no 5 year threshold.

4.	What are any likely positive impacts for the group/s identified in (3) above? You may wish to refer to the Equalities Duties detailed in the background information. The positive impacts are for age. Young carers are to have their own bedroom. Adult children in overcrowded council tenancies will be given the option to be housed separately if it will alleviate the overcrowding. There is also a positive impact to former members of the armed forces who will no longer be prevented from joining the register if they left the forces over 5 years ago.
5.	What are the likely negative impacts for the group/s identified in (3) above? If so then are any particular groups affected more than others and why? Same sex sharing it to raise from 16 to 18 to make best use of stock. Large units have long waiting times. This is in line with industry practice.
6.	Have the impacts identified in (4) and (5) above been assessed using up to date and reliable evidence and data? Please state evidence sources and conclusions drawn (e.g. survey results, customer complaints, monitoring data etc). The data available on the current register is limited we have created a demographic profile with the data available. This is attached and embedded below. The data need further interrogation around the 214 cases deemed ineligible. If this because they do not qualify they will be dealt with under the re-registration process. Slough - Demographic Profile / We have also undertaken a Housing Register Impact Assessment based on the data available. This is attached and embedded below. We have struggled with the data in places and the recommendations on page 2 identify the need for a further breakdown of this data for categories which state “other” or “blank”. As the aim to have everyone re-register rather than migrate the data, it is unlikely this breakdown will be available before the policy goes live. The overall size of the register has reduced in size but this is attached to housing need groups rather than a protected characteristic. It is possible that a further reduction might be seen if Slough reassessed these cases before the policy went live.



Band Comparisons
(HR Impact Assessment)

7. Have you engaged or consulted with any identified groups or individuals if necessary and what were the results, e.g. have the staff forums/unions/ community groups been involved?

The production of a revised Housing Allocations Scheme required Slough to undertake a statutory (formal) consultation process. This took place over 9 weeks between the 10 March 2026 and the 11 May 2026. It took the form of an online survey with key stakeholders contacted either directly or via the Council's social media platforms. The stakeholders were:

- Applicants on the housing register
- Homeless households in temporary accommodation
- Residents of the borough
- Gypsies and Travellers
- Councillors
- Staff
- Registered providers
- Community groups
- We also attended care leaver forums and the resident board.

Early engagement took place with key sections of the Council to ensure a joined-up approach around vulnerable adults, occupational health, domestic abuse, carers and care leavers.

The results are captured in the consultation report which accompanies the final draft of the policy and this EIA.

8.	Have you considered the impact the policy might have on local community relations? Yes we consulted community groups and local residents as part of the formal consultation.
9.	What plans do you have in place, or are developing, that will mitigate any likely identified negative impacts? For example what plans, if any, will be put in place to reduce the impact? There are no immediate plans to mitigate the negative impact around same sex sharing and the age rise. This is because the Council recognises the long waits for larger properties. The policy mitigates for overcrowded council properties. This will be monitored as part of the policy implementation. There are plans to improve the ICT system and the data available to the Council when making these sorts of key policy changes. The new banding does not allow for ambiguity and each applicant will have to be placed in a housing need group by band and the application form will have to collect the information needed to monitor the 9 protected characteristics as well as for the armed forces.
10.	What plans do you have in place to monitor the impact of the proposals once they have been implemented? (The full impact of the decision may only be known after the proposals have been implemented). Please see action plan below. The annual lettings target for homeless households will be monitored every 3 months and adjusted as necessary. The whole policy will be allowed to bed in for the first 12 months and then reviewed annually as part of an annual lettings plan.

What course of action does this EIA suggest you take? More than one of the following may apply	✓
Outcome 1: No major change required. The EIA has not identified any potential for discrimination or adverse impact and all opportunities to promote equality have been taken	✓
Outcome 2: Adjust the policy to remove barriers identified by the EIA or better promote equality. Are you satisfied that the proposed adjustments would remove the barriers identified? (Complete action plan).	n/a
Outcome 3: Continue the policy despite potential for adverse impact or missed opportunities to promote equality identified. You will need to ensure that the EIA clearly sets out the justifications for continuing with it. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact (see questions below). (Complete action plan).	n/a
Outcome 4: Stop and rethink the policy when the EIA shows actual or potential unlawful discrimination. (Complete action plan).	n/a

Action Plan and Timetable for Implementation

At this stage a timetabled Action Plan should be developed to address any concerns/issues related to equality in the existing or proposed policy/service or function. This plan will need to be integrated into the appropriate Service/Business Plan.

Action	Target Groups	Lead Responsibility	Outcomes/Success Criteria	Monitoring & Evaluation	Target Date	Progress to Date
Set an annual lettings plan						
Review the homeless lettings target quarterly						
Review application for to ensure it syncs with the new housing needs groups and qualification						

rules.						
Create demographic profile reports in the ICT system.						
Activate renewals in the ICT system						
Introduce CBL						
Name: Rachel Khan, Senior Associate Consultant, Campbell Tickell Ltd Signed: Rachel Khan (Person completing the EIA) Name: Roberto Brunei, Head of Housing Options Signed:(Policy Lead if not same as above) Date: 28.5.2026						