



## Home-Link Equality Impact Assessment

This Equality Impact Assessment has been written on behalf of the Home-Link LA partners to assess the impact of the change to the lettings policy linked to the Home-Link service on people that live in, work in or visit their areas, as well as their staff.

The Home-Link LA partners are:

Cambridge City Council  
East Cambridgeshire District Council  
Fenland District Council  
Forest Heath District Council  
Huntingdonshire District Council  
South Cambridgeshire District Council  
St. Edmundsbury Borough Council

The partners have an Equality and Diversity statement for the whole scheme, and this document is in addition to that.

### 1. Title of strategy, policy, plan, project, contract or major change to your service:

Lettings Policy amendments

### 2. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?

Lettings Policy  
To determine how housing is allocated to those applying for it across the 7 LA areas who are partners in the Home-Link sub-regional CBL scheme.

### 3. Who will be affected by this strategy, policy, plan, project, contract or major change to your service? (Please tick those that apply)

- Residents
- Visitors
- Staff

A specific client group or groups (please state):

**4. What type of strategy, policy, plan, project, contract or major change to your service is this? (Please tick)**

- New  
 Revised  
 Existing

**5. Are other partners involved in delivering this strategy, policy, plan, project, contract or major change to your service?**

- No  
 Yes (please give details):

All 7 local authority partners & 32 registered providers who form the Home-Link partnership

**6. Potential impact**

Please list and explain how this strategy, policy, plan, project, contract or major change to your service could **positively** or **negatively** affect individuals from the following equalities groups.

**(a) Age** (any group of people of a particular age, including younger and older people – in particular, please consider any safeguarding issues for children and vulnerable adults)

- 1) **POSITIVE:** Older people may benefit disproportionately from the proposal to offer emergency housing status to those who are terminally ill and in band A. This assumes, without any evidence, that older people are more likely to have a terminal illness diagnosed than people below the age of 60

**(b) Disability** (including people with a physical impairment, sensory impairment, learning disability, mental health problem or other condition which has an impact on their daily life)

- 2) **NEGATIVE:** People with disabilities may be affected by new proposals around suspending applications in band A if they have received 3 reasonable offers of accommodation. As at December 2015 applicants categorised as having an urgent medical need number 64 across the Home-Link scheme. This represents 0.64% of all live applications on the combined housing registers.
- 3) **POSITIVE:** Terminal illness may disproportionately affect people who have a disability and these applicants will benefit from the new 'emergency status' provision for people who are terminally ill and already hold a band A status.

**(c) Gender**

- 4) POSITIVE: The policy makes an explicit requirement that officers consider those fleeing domestic violence or abuse in determining whether a local connection should be awarded on a discretionary basis. This is a positive development for women who find themselves in this situation in larger numbers than men.

**(d) Pregnancy and maternity**

No obvious positive or negative impact regarding pregnant applicants

**(e) Transgender (including gender re-assignment)**

No obvious positive or negative impact regarding transgender applicants

**(f) Marriage and Civil Partnership**

No obvious positive or negative impact regarding applicants who are married or are in a Civil Partnership

**(g) Race or Ethnicity**

- 5) NEGATIVE: The proposals to not allow those 'subject to immigration control' as part of an applicant's household, even if they are part of the family, will, by definition, adversely affect racial and ethnic groups that feature prominently in the immigration figures for the UK. In the Home-Link area this will predominantly be Eastern European migrants. 13.5% of the combined registers as at December 2015 are categorised as white other. Reliable data on the ethnic breakdown of those applying for housing and deemed to be 'ineligible for assistance' or 'subject to immigration control' is not available but, anecdotally, Eastern European migrants are disproportionately affected. The justification for the policy change is to bring the approach in line with homelessness legislation, which rules out consideration for ineligible applicants or household members for housing. It is also a necessary measure given the low supply, relative to demand, of social housing in the Home-Link area.

**(h) Religion or Belief**

No obvious positive or negative impact regarding applicants on the basis of religion or belief

**(i) Sexual Orientation**

No obvious positive or negative impact regarding applicants on the basis of sexual orientation

**(j) Other factors that may lead to inequality – in particular – please consider the impact of any changes on low income groups or those experiencing the impacts of poverty (please state):**

- Families and those with parenting or caring responsibilities – no obvious impacts.
- Individuals on low income – no obvious impacts.
- Those suffering rural isolation – no obvious impacts.
- Those who do not have English as a first language – no obvious impacts.

### **7. If you have any additional comments please add them here**

N/A

### **8. Conclusions and Next Steps**

Two possible negative impacts on the basis of disability & ethnicity have been identified. Actions to mitigate these issues are listed in the Action Plan below

### **9. Sign off**

Name and job title of assessment lead officer: Marianne Upton – Sub-regional Home-Link Manager

Date of completion: December 2015

Date of next review of the assessment: A review would only be needed should any more changes to the lettings policy become necessary

## Action Plan

**Equality Impact Assessment title:** Lettings Policy 2015-16

**Date of completion:** December 2015

Equality Group	Age
Details of possible disadvantage or negative impact	N/A
Action to be taken to address the disadvantage or negative impact	N/A
Officer responsible for progressing the action	N/A
Date action to be completed by	N/A

Equality Group	Disability
Details of possible disadvantage or negative impact	People with disabilities may be affected by new proposals around suspending applications in band A if they have received 3 reasonable offers of accommodation
Action to be taken to address the disadvantage or negative impact	Partners will have a clear procedure around suspending band A applicants who have refused 3 reasonable offers. It will provide a clear definition of 'reasonable' and ensure that officers making these decisions have carefully considered if a person with a disability has: <ul style="list-style-type: none"> <li>a) received adequate support in understanding what they are bidding for, or</li> <li>b) is not a person with a mental health impairment who does not have a clear understanding of the implications of the refusals, and</li> <li>c) if relevant, also take account of relevant occupational therapist reports and opinions before arriving at a decision to suspend.</li> </ul> Generally, if a refusal is based on correct information that was clearly available on the property advert, it will be considered 'unreasonable'
Officer responsible for progressing the action	Managers at LAs (& where relevant register holding organisations)
Date action to be completed by	31 <sup>st</sup> March 2016

<b>Equality Group</b>	<b>Gender</b>
Details of possible disadvantage or negative impact	N/A
Action to be taken to address the disadvantage or negative impact	N/A
Officer responsible for progressing the action	N/A
Date action to be completed by	N/A

<b>Equality Group</b>	<b>Pregnancy and Maternity</b>
Details of possible disadvantage or negative impact	N/A
Action to be taken to address the disadvantage or negative impact	N/A
Officer responsible for progressing the action	N/A
Date action to be completed by	N/A

<b>Equality Group</b>	<b>Transgender</b>
Details of possible disadvantage or negative impact	N/A
Action to be taken to address the disadvantage or negative impact	N/A
Officer responsible for progressing the action	N/A
Date action to be completed by	N/A

<b>Equality Group</b>	<b>Marriage and Civil Partnership</b>
Details of possible disadvantage or negative impact	N/A
Action to be taken to address the disadvantage or negative impact	N/A
Officer responsible for progressing the action	N/A
Date action to be completed by	N/A

<b>Equality Group</b>	<b>Race or Ethnicity</b>
Details of possible disadvantage or negative impact	The proposals to not allow those 'subject to immigration control' as part of an applicant's household, even if they are part of the family, will, by definition, adversely affect racial and ethnic groups that feature prominently in the immigration figures for the UK
Action to be taken to address the disadvantage or negative impact	The justification for this policy approach is outlined above. Reviews of decisions on bedroom entitlement resulting from a decision to exclude household members should be dealt with by the appropriate person (or panel) as outlined in the policy. Where the applicant wants to request a review of the decision that one of his/her household members is ineligible the route of appeal is via statutory review as cited in 6.2.1 (a and c) Additionally, a short procedure should be written outlining these two routes for review and linking it to the relevant part of the policy (3.1.3)
Officer responsible for progressing the action	Managers at LAs (& where relevant register holding organisations)
Date action to be completed by	31 <sup>st</sup> March 2016

<b>Equality Group</b>	<b>Religion or Belief</b>
Details of possible disadvantage or negative impact	N/A
Action to be taken to address the disadvantage or negative impact	N/A
Officer responsible for progressing the action	N/A
Date action to be completed by	N/A

<b>Equality Group</b>	<b>Sexual Orientation</b>
Details of possible disadvantage or negative impact	N/A
Action to be taken to address the disadvantage or negative impact	N/A
Officer responsible for progressing the action	N/A
Date action to be completed by	N/A

<b>Other factors that may lead to inequality</b>	
Details of possible disadvantage or negative impact	N/A
Action to be taken to address the disadvantage or negative impact	N/A
Officer responsible for progressing the action	N/A
Date action to be completed by	N/A