Housing Register and Allocations Policy Changes
Full Equality Impact Assessment

1. Introduction

1.1 This Full Equality Impact Assessment looks at the Council's proposals for changing the residency criteria for joining the Housing Register and elements of the Allocations Policy. The assessment is based on the results of consultation which has been carried out via the Council's consultation portal.

1.2 An equalities impact screening was completed at the start of the consultation, and in view of the impact that some of the proposed changes may have on households, it was recognised that there was a need to undertake a full equality impact assessment. A copy of the screening is included at the end of this impact assessment. Full copies of all responses to the consultation can be provided upon request.

2. Background

2.1 The purpose of the Allocations Policy is to ensure social rented housing in the borough is let to those in greatest need, to ensure best use is made of the social rented stock in the borough, to encourage sustainable communities, and to make sure the housing needs of vulnerable applicants and those in priority need are given reasonable preference.

2.1 The Localism Act 2011 includes the Homelessness (Suitability of Accommodation) (England) Order which gives an authority the power to arrange an offer of private rented sector accommodation as a suitable offer to discharge its homelessness duty. The Council should include the implementation of this power in its Allocations Policy.

2.3 In April 2015, the Government introduced the Allocation of Housing (Qualification Criteria for Right to Move) (England) Regulations 2015. The purpose of this regulation is to enable social tenants to move to another authority to take up a job or live closer to employment or training.

2.4 Recent case law has highlighted the need for an Authority's allocations policy to allow for exceptional circumstances to be taken into account when applying any policy restriction.

2.5 The Council works with and supports a number of families who may have children taken into the care of the local authority. Where the Council considers that a child's best interests is to return to the care of a family member, the accommodation that is currently occupied by that family member may be inadequate for the child to return to. In these cases, it is proposed that the family is given a "head start" by enabling the housing need of the family to be assessed as if the child were resident in the property.

2.6 The following changes to the Housing register and Allocations Policy are proposed:

- Changing the eligibility to join the housing register from 12 months to 4 years residency in Bracknell Forest

- Making offers of private rented accommodation to homeless households for whom the Council has a statutory duty to house as a discharge of duty.
- Introducing the "Right to Move" which will allow social housing tenants living outside Bracknell Forest to move to a housing association property in Bracknell Forest to enable them to take up employment of keep employment in the Borough.
- Introducing the opportunity for exceptional circumstances to be taken into account when considering applicants from outside the borough
- Where families have children in care and Children Services are working with the family to enable the children to return home, these families will be prioritised as if the children are living with them so that they do not have to wait until the children are returned to come on to the housing register.

3. Consultation Responses

3.1 There were 295 responses to the consultation, although not all respondents answered every question or completed the equalities questions. The following tables summarise the responses that have been received across the Bracknell Forest community.

3.2 Changing the eligibility to join the housing register from 12 months to 4 years.

There were 291 responses to this question

Gender

	Strongly agree/agree	Strongly disagree/disagree	Neither
Male	62	16	11
Female	118	34	17
No response	26	7	0
Total	**206 (71%)**	**57 (20%)**	**28 (10%)**

The same percentage of males and females agreed or strongly agreed to the proposal to increase the residency eligibility for the housing register.

Age

	Strongly agree/agree	Strongly disagree/disagree	Neither
18-34 yrs	87	18	14
35-49 yrs	64	27	9
50-64 yrs	22	3	5
65+ yrs	8	2	0
No response	25	7	0
Total	**206 (71%)**	**57 (19%)**	**28 (10%)**

A higher proportion of all age groups agreed with the proposal to increase the residency criteria for joining the housing register from 12 months to 4 years.

Ethnicity

	Strongly agree/agree	Strongly disagree/disagree	Neither
English/Welsh/Scottish/Northern Irish/British	153	30	15
Gypsy/Irish Traveller	1	0	0
Show people/Circus	0	0	0
Any other white background	8	6	3
White & Black Caribbean	0	1	1
White & Black African	3	1	0
White & Asian	1	1	0
Any other mixed background	2	1	0
Indian	0	0	1
Pakistani	1	0	0
Nepali	0	0	0
Bangladeshi	0	0	0
Chinese	0	0	0
Filipino	2	2	2
African	4	9	3
Caribbean	1	0	1
Any other black background	0	1	0
Arab	2	0	1
Other ethnic group	0	0	1
No response	26	7	0
Total	**204 (70%)**	**59 (20%)**	**28 (10%)**

The proposal to increase the residency criteria from 12 months to 4 years is supported across all ethnic groups, with the exception of African respondents. As mitigation, the proposal to take into account exceptional circumstances could also be applied to cases where a household wishing to join the housing register does not meet the 4 year criteria.

Religion/Belief

	Strongly agree/agree	Strongly disagree/disagree	Neither
None	103	16	11
Christian	66	30	14
Buddist	0	0	1
Jewish	0	0	0
Hindu	0	0	0
Muslim	3	2	0
Sikh	0	1	0
Other	6	1	2
No response	28	7	0
Total	**206 (71%)**	**57 (19%)**	**28 (10%)**

The proposal to increase the residency criteria from 12 months to 4 years is supported by the majority faith groups.

Health Problem or Disability

	Strongly agree/agree	Strongly disagree/disagree	Neither
Yes	48	12	8
No	128	38	19
No Response	30	7	1
Total	**206 (71%)**	**57 (19%)**	**28 (10%)**

A higher proportion of disabled and non disabled respondents agreed with the proposal to increase the residency criteria from 12 months to 4 years.

Sexual orientation

	Strongly agree/agree	Strongly disagree/disagree	Neither
Heterosexual/straight	166	45	27
Gay man	0	0	0
Lesbian/gay woman	0	1	0
Bi sexual	0	1	0
Prefer not to say	11	3	0
No response	29	7	1
Total	**206 (71%)**	**57 (19%)**	**28 (10%)**

3.3 Making offers of private rented accommodation to homeless households as a discharge of duty

There were 288 responses to this question. Overall, the majority of respondents agreed with the proposal to make offers of private rented accommodation to homeless households as a discharge of duty, although a third of respondents did not express a view on the proposal.

Gender

	Strongly agree/agree	Strongly disagree/disagree	Neither
Male	53	10	25
Female	71	37	60
No response	15	6	11
Total	**139 (48%)**	**53 (18%)**	**96 (33%)**

A higher proportion of males and females support the proposal to discharge the Council's main homelessness duty by making offers of private rented accommodation.

Age

	Strongly agree/agree	Strongly disagree/disagree	Neither
18-34 yrs	52	27	40
35-49 yrs	54	17	28
50-64 yrs	13	3	13
65+ yrs	7	0	3
No response	13	6	12
Total	**139 (48%)**	**53 (18%)**	**96 (33%)**

Ethnicity

	Strongly agree/agree	Strongly disagree/disagree	Neither
English/Welsh/Scottish/Northern Irish/British	91	37	70
Gypsy/Irish Traveller	0	0	1
Show people/Circus	0	0	0
Any other white background	11	0	6
White & Black Caribbean	1	1	0
White & Black African	1	1	2
White & Asian	0	2	0
Any other mixed background	2	0	1
Indian	1	0	0
Pakistani	1	0	0
Nepali	0	0	0
Bangladeshi	0	0	0
Chinese	0	0	0
Filipino	5	0	0
African	7	4	4
Caribbean	2	0	0
Any other black background	0	0	1
Arab	2	1	0
Other ethnic group	1	0	1
No response	14	6	11
Total	**139 (48%)**	**52 (18%)**	**97 (33%)**

Religion/Belief

	Strongly agree/agree	Strongly disagree/disagree	Neither
None	69	26	36
Christian	46	18	44
Buddist	1	0	0
Jewish	0	0	0
Hindu	0	0	0
Muslim	4	0	1
Sikh	0	1	0
Other	5	2	2
No response	14	6	13
Total	**139 (48%)**	**53 (18%)**	**96 (33%)**

Health Problem or Disability

	Strongly agree/agree	Strongly disagree/disagree	Neither
Yes	30	21	17
No	96	26	62
No response	13	6	17
Total	**139 (48%)**	**53 (18%)**	**96 (33%)**

Sexuality

	Strongly	Strongly	Neither

	agree/agree	disagree/disagree	
Heterosexual/straight	119	40	77
Gay man	0	0	0
Lesbian/gay woman	0	1	0
Bisexual	1	0	0
Prefer not to say	4	6	4
No response	15	6	15
Total	**139 (48%)**	**53 (18%)**	**96 (33%)**

3.4 Banding families with children in care as if the children were living with them

There were 285 responses to this question. The responses to this proposal were more mixed, although this may reflect the fact that this proposal relates to a small population of families with whom Children Services will be working. However, the majority of responders did agree with the proposal overall.

Gender

	Strongly agree/agree	Strongly disagree/disagree	Neither
Male	41	16	30
Female	60	65	42
No response	9	12	10
Total	**110 (38%)**	**93 (33%)**	**82 (29%)**

Age

	Strongly agree/agree	Strongly disagree/disagree	Neither
18-34 yrs	38	57	24
35-49 yrs	51	15	34
50-64 yrs	10	7	9
65+ yrs	2	2	6
No response	9	12	9
Total	**110 (38%)**	**93 (33%)**	**82 (29%)**

The populations least supportive of this proposal are females, and households aged 18 – 34 years. It is expected that the number of families assisted via this policy will be very small (an estimated 2/3 a year). It is proposed that the impact of this policy is kept under review to ensure that other families on the housing register are not disadvantaged.

Ethnicity

	Strongly agree/agree	Strongly disagree/disagree	Neither
English/Welsh/Scottish/Northern Irish/British	69	72	55
Gypsy/Irish Traveller	0	0	1
Show people/Circus	0	0	0
Any other white background	12	0	5
White & Black Caribbean	0	2	0
White & Black African	1	0	3
White & Asian	0	0	2
Any other mixed background	2	1	0

Indian	0	0	1
Pakistani	1	0	0
Nepali	0	0	0
Bangladeshi	0	0	0
Chinese	0	0	0
Filipino	2	0	3
African	10	4	1
Caribbean	1	0	1
Any other black background	1	0	0
Arab	1	1	1
Other ethnic group	1	0	1
No response	9	11	10
Total	**110 (38%)**	**91 (33%)**	**84 (29%)**

Religion/Belief

	Strongly agree/agree	Strongly disagree/disagree	Neither
None	51	48	31
Christian	40	29	39
Buddist	1	0	0
Jewish	0	0	0
Hindu	0	0	0
Muslim	4	1	0
Sikh	1	0	0
Other	4	2	2
No response	9	13	10
Total	**110 (38%)**	**93 (33%)**	**82 (29%)**

Health Problem or Disability

	Strongly agree/agree	Strongly disagree/disagree	Neither
Yes	23	17	26
No	78	63	43
No response	9	13	13
Total	**110 (38%)**	**93 (33%)**	**82 (29%)**

	Strongly agree/agree	Strongly disagree/disagree	Neither
Heterosexual/straight	93	73	68
Gay man	0	0	0
Lesbian/gay woman	0	1	0
Bisexual	1	0	0
Prefer not to say	5	6	3
No response	11	13	11
Total	**110 (38%)**	**93 (33%)**	**82 (29%)**

3.5 Introducing the “Right to Move” to enable social housing tenants to move into Bracknell Forest to take up employment.

There were 287 responses to this question. More females and respondents between the ages of 35 -49 years agreed with the proposal to allow social housing tenants to move into the borough to take up employment.

Gender

	Yes	No
Male	49	40
Female	94	73
No response	20	11
Total	**163 (57%)**	**124 (43%)**

Age

	Yes	No
18-34 yrs	58	60
35-49 yrs	60	39
50-64 yrs	19	10
65+ yrs	6	4
No response	20	11
Total	**163 (57%)**	**124 (43%)**

Ethnicity

	Yes	No
English/Welsh/Scottish/Northern Irish/British	97	99
Gypsy/Irish Traveller	1	0
Show people/Circus	0	0
Any other white background	14	3
White & Black Caribbean	2	0
White & Black African	4	0
White & Asian	2	0
Any other mixed background	2	1
Indian	1	0
Pakistani	1	0
Nepali	0	0
Bangladeshi	0	0
Chinese	0	0
Filipino	2	3
African	10	6
Caribbean	2	0
Any other black background	1	0
Arab	2	1
Other ethnic group	2	0
No response	20	11
Total	**163 (57%)**	**124 (43%)**

Religion/Belief

	Yes	No
None	66	63
Christian	66	43
Buddist	0	1
Jewish	0	0

Hindu	0	0
Muslim	5	0
Sikh	1	0
Other	6	3
No response	19	14
Total	**163 (57%)**	**124 (43%)**

Health Problem or Disability

	Yes	No
Yes	42	26
No	100	83
No Response	21	15
Total	**163 (57%)**	**124 (43%)**

Sexual Orientation

	Yes	No
Heterosexual/straight	134	101
Gay man	0	0
Lesbian/gay woman	0	1
Bisexual	1	0
Prefer not to say	6	8
No response	22	14
Total	**163 (57%)**	**124 (43%)**

3.6 Enabling exceptional circumstances to be taken into account when considering applicants from outside the borough

There 288 responses to this question. The majority of respondents across all populations supported this proposal.

Gender

	Yes	No
Male	55	33
Female	93	75
No response	16	16
Total	**164 (57%)**	**124 (43%)**

Age

	Yes	No
18-34 yrs	66	53
35-49 yrs	58	41
50-64 yrs	20	10
65+ yrs	5	4
No response	15	16
Total	**164 (57%)**	**124 (43%)**

Ethnicity

	Yes	No
English/Welsh/Scottish/Northern Irish/British	105	91
Gypsy/Irish Traveller	1	0
Show people/Circus	0	0

Any other white background	12	5
White & Black Caribbean	2	0
White & Black African	3	1
White & Asian	2	0
Any other mixed background	3	0
Indian	1	0
Pakistani	1	0
Nepali	0	0
Bangladeshi	0	0
Chinese	0	0
Filipino	4	1
African	9	7
Caribbean	1	1
Any other black background	1	0
Arab	2	1
Other ethnic group	1	1
No response	16	16
Total	**164 (57%)**	**124 (43%)**

Religion/Belief

	Yes	No
None	68	61
Christian	70	39
Buddist	1	0
Jewish	0	0
Hindu	0	0
Muslim	3	2
Sikh	1	0
Other	3	6
No response	18	16
Total	**164 (57%)**	**124 (43%)**

Health Problem or Disability

	Yes	No
Yes	38	28
No	104	81
No Response	22	15
Total	**164 (57%)**	**124 (43%)**

	Yes	No
Heterosexual/straight	136	100
Gay man	0	0
Lesbian/gay woman	0	1
Bisexual	1	0
Prefer not to say	8	6
No response	19	17
Total	**164 (57%)**	**124 (43%)**

4. Conclusions

4.1 The proposed changes to the housing register eligibility and Allocations Policy changes have received support across all parts of the Bracknell Forest community. Where policy changes relate issues which affect a specific population, such as discharging the Council's main homelessness duty for homeless families into the private rented sector and allowing families with children in care to be banded in advance of their children being returned to them, there was a higher lever of no response given.

4.2 It is proposed to apply the opportunity to take exceptional circumstances into account when considering requests to join the housing register from households who have not been resident in the borough for 4 years. This will mitigate an adverse impact on any minority group.

4.3 The policy to allow families with children in care to be banded in advance of their children being returned to them will be kept under review to ensure that other high priority households on the housing register are not disadvantaged.