

Initial Equalities Screening Record Form

Date of Screening: 8 August 2023	Directorate: People	Section: Housing. Early Help and Communities
1. Activity to be assessed	Development of a new Housing Allocations Policy	
2. What is the activity?	X Policy/strategy <input type="checkbox"/> Function/procedure <input type="checkbox"/> Project <input type="checkbox"/> Review <input type="checkbox"/> Service <input type="checkbox"/> Organisational change	
3. Is it a new or existing activity?	X New <input type="checkbox"/> Existing	
4. Officer responsible for the screening	Ian Stone	
5. Who are the members of the screening team?	Ian Stone, Kathryn Hobman, Lisa Jones	
6. What is the purpose of the activity?	<p>Government Guidance states that all housing authorities must have a housing allocation scheme. Bracknell Forest's current allocations policy was introduced in 2016.</p> <p>The housing service is committed to the development of a new housing allocations policy which will provide a fair, transparent, and easily understood approach to meeting the housing needs of the local area, making best use of the stock available for allocation whilst prioritising those in the most pressing housing need.</p> <p>The new policy aims to bring the policy in line with legislative changes, support the Council's Homeless prevention agenda, address current housing supply and demand challenges facing the borough, and improve wording and policies that are unclear or difficult to apply. The proposed changes include:</p> <ul style="list-style-type: none"> Adoption of national bedroom standard in place of current entitlement to number of bedrooms Increasing priority for overcrowded households. Removal of non-dependent household members (aged over 21) from assessments of housing need. Increasing priority for under-occupying households Reducing priority for homeless households Reducing residency requirement from 4 to 2 years. New 5th band for 'reasonable preference' group with little or no need. Increasing priority for care leavers in housing need. Foster carers able to apply for larger family homes. Parents able to include children in care in applications. Increasing priority for ex-armed forces personnel that have been medically discharged and recognition for other armed forces personnel. Removal of priority given to working households. Removal of increased priority after six years. 	

<p>7. Who is the activity designed to benefit/target?</p>	<p>Those affected will be current and future applicants on the Council's housing register – generally local residents who are unable to meet their housing needs through the housing market.</p>		
<p>Protected Characteristics</p>	<p>Please tick yes or no</p>	<p>Is there an impact? What kind of equality impact may there be? Is the impact positive or adverse or is there a potential for both? If the impact is neutral please give a reason.</p>	<p>What evidence do you have to support this? E.g equality monitoring data, consultation results, customer satisfaction information etc Please add a narrative to justify your claims around impacts and describe the analysis and interpretation of evidence to support your conclusion as this will inform members decision making, include consultation results/satisfaction information/equality monitoring data</p>
<p>8. Disability Equality – this can include physical, mental health, learning or sensory disabilities and includes conditions such as dementia as well as hearing or sight impairment.</p>	<p>Y ✓</p>	<p>N</p> <p><u>Adoption of national bedroom standard</u> The proposal does not disproportionately impact on disabled households. However, analysis has identified that there are approximately 30 household with a disabled member that will potentially be impacted by the change. Recognising that in many cases the need for an additional bedroom for a disabled member is fully justified, the policy will include appropriate mitigations to ensure that disabled households are not negatively impacted by the proposal.</p> <p><u>Removal of non-dependent household members (aged over 21) from assessments of housing need.</u> As above, this policy will include appropriate mitigations/exceptions for disabled people living with people who care for them to ensure that the proposal does not have an adverse impact.</p> <p><u>Increasing priority for under-occupying households</u> Older households are more likely to be impacted by this policy and are more likely to include disabled people. The policy will offer appropriate rehousing options that will aim to improve the living situation for disabled under-occupiers.</p> <p><u>Reducing priority for homeless households</u> Disabled households are over-represented among homeless households and so may be impacted by this proposed change. Whilst it will result in longer average waits for rehousing, the majority of those impacted are adequately housed in temporary</p>	<p>Analysis of the Housing Register shows that disabled households accounted for 21% of applicants in 2021/22, increasing to 23% of all applicants in 2022/23.</p> <p>Disabled households are more like to be single and require a one-bedroom property. Analysis of the housing register shows that 72% of disabled applicants require a one bed property and 11% a two-bed property. 17% require a larger 3+ bed property. Some disabled people live with a carer, or may be adult or dependent members of a larger family households.</p> <p>In 2022/23, 24% of general needs properties were let to disabled households and over 50% of sheltered properties. In total, disabled households received 30% of all properties let.</p> <p>The 2021 Homelessness Strategy found that in 2019/20, 12.9% of homeless applicants reported physical ill health issues and disability and 14% of homeless applicants were claiming benefit on the basis of long term illness or disability.</p> <p>National research shows that disabled households are less likely to be in work.</p> <p>Some disabled households are living in specialist provision out of borough due to lack of appropriate provision in the borough and may in future seek rehousing in general needs accommodation, with support, in the borough.</p>

			<p>accommodation (compared to other households on the housing register, such as overcrowded households, who are often waiting in inadequate accommodation, and will benefit from the change).</p> <p><u>Reducing residency requirement from 4 to 2 years.</u> There will continue to be exceptions for disabled people that have been placed by Bracknell Forest in specialist accommodation out of area that want to be rehoused in the borough.</p> <p><u>Increasing priority to ex-armed forces personnel that have been medically discharged</u> The proposed policy will benefit those who have been medically discharged from the armed services due to a disability.</p> <p><u>Removal of priority given to working households.</u> Disabled households are less likely to be in work and so this change will have a positive impact by ensuring that they are not disadvantaged for rehousing compared to working households.</p> <p>The other proposed changes will not have a positive or negative impact on disability equality.</p>	
<p>9. Racial equality</p>	<p>Y ✓</p>	<p>N</p>	<p><u>Increasing priority for overcrowded households.</u> Increasing the priority for the most over-crowded households will benefit black and Asian households who are more likely to be overcrowded and increase their share of applications in band B.</p> <p><u>Removal of non-dependent household members (aged over 21) from assessments of housing need.</u> This policy may impact more on Asian and other ethnic groups where extended households are more common. In some cases, non-dependent household members may play a caring role within the household and so the policy will therefore include mitigations where care is being provided. In other cases, whilst it is recognised that the policy may have a negative impact on some ethnic communities that have traditionally lived as extended households, the policy is justified because of the overwhelming evidence of negative health, welfare and educational impacts on</p>	<p>2021 Census data showing ethnic breakdown of Bracknell Forest population: 86% white British or other, 7% Asian, 2.5% Black British, African or Caribbean, 3% mixed ethnicity, 1.5% other.</p> <p>Housing register. A breakdown of applicants by ethnicity shows: 83.4% white British or other, 2.6% Asian, 4.8% Black British, African or Caribbean, 3% mixed ethnicity, 2.2 other. Therefore, Black British, African or Caribbean households are slightly over-represented on the housing register and Asian households are under-represented.</p> <p>Analysis of the housing register shows that Black and Asian applicants are more likely to be overcrowded and are over-represented among those needing a larger home of three or more bedrooms. 6.2% of those needing a larger home are Black British, African or Caribbean households and 3.7% are Asian households</p>

		<p>overcrowded households with dependent children, which means that meeting the housing needs of this group is a higher priority. For those households negatively affected, non-dependent members over 21 will be able to apply to the housing register as single applicants and will receive priority where they are living in overcrowded households.</p> <p><u>Increasing priority for under-occupying households</u> The proposed policy is likely to benefit older white households as under-occupying households are mainly older people and ethnic minority groups make up a lower share of the older population. However, the policy will release larger family properties which will benefit over-crowded households, among whom black and Asian groups are more highly represented.</p> <p><u>Reduced priority for homeless households</u> Black households are over-represented among homeless households and so may be impacted by this proposed change. Whilst it will result in longer average waits for rehousing, the majority of those impacted are adequately housed in temporary accommodation (compared to other households on the housing register, such as overcrowded households, who are often waiting in inadequate accommodation, and will benefit from the change).</p> <p>The other proposed changes will not have a positive or negative impact on ethnic equality.</p>	<p>(compared to 4.8% and 2.6% of all applicants respectively).</p> <p>Black households, in particular, are over-represented among homeless households. The 2021 Homelessness Strategy found that 5.2% of homeless applicants were Black British, African or Caribbean households, 1.7% were Asian, 2.3% were mixed ethnicity and 3% were other ethnic groups.</p> <p>Black British, African or Caribbean households are slightly under-represented in Bands A and B of the housing register. White households and mixed race households are slightly over-represented. Asian households are represented in line with their share of overall applications.</p> <p>Black and Asian households received a higher share of lettings relative to their share of applications in 2022/23. Other groups (white, mixed and other ethnic groups) have received slightly less than their share of applications.</p>
<p>10. Gender equality</p>	<p>Y ✓</p>	<p>N</p> <p><u>Adoption of national bedroom standard</u> A majority of those affected by the proposal are female applicants. This is not surprising as female applicants account for two thirds of all applications and female headed households make up a large proportion of those applicants with dependent children. However, whilst some female applicants with children may be negatively impacted by the policy, others will potentially benefit through shorter waiting times for rehousing. Overall, the policy will have positive and negative impacts on female applicants according to their household circumstances.</p> <p><u>Increasing priority for overcrowded households.</u></p>	<p>A higher proportion of total applications on the housing register are from female applicants compared to male applicants. Female applicants make up 66% and males 34%.</p> <p>However, some caution needs to be applied in interpreting this as those recorded as female applicants include women that have made an application on behalf of a two adult households as well as lone female headed households.</p> <p>Women are over-represented in the homelessness statistics, with the Homelessness Strategy finding that women are at higher risk of homelessness.</p>

			<p>A significant proportion of overcrowded households are female headed households who will benefit from the change.</p> <p><u>Reducing priority for homeless households</u> Female applicants are over-represented among homeless households and so may be impacted by this proposed change. Whilst it will result in longer average waits for rehousing, the majority of female homeless applicants accepted in priority need are adequately housed in temporary accommodation (compared to other households on the housing register, such as overcrowded households, who are often waiting in inadequate accommodation, and will benefit from the change).</p> <p>The other proposed changes will not have a positive or negative impact on gender equality.</p>	<p>Female headed households (lone parent households) are highly represented among homeless applicants and those owed a duty.</p> <p>Older single people that are under-occupying are more likely to be female than male.</p> <p>Female headed households make up a large proportion of households fleeing domestic abuse who may be placed in refuge accommodation out of borough.</p>
11. Sexual orientation equality	Y	N ✓	<p>There is insufficient data or responses to identify any impact on sexual orientation equality as a result of the proposed changes.</p>	<p>Housing register analysis: 97% of applicants that responded to the question on sexual orientation identified themselves as heterosexual/straight. 2% of applicants described themselves as gay/lesbian and 0.7% as bisexual.</p> <p>There is some evidence nationally that young LGBT people have a higher rate of homelessness.</p>
12. Gender re-assignment	Y	N ✓	<p>There is insufficient data or responses to identify any impact on gender re-assignment due to the proposed changes.</p>	<p>There is no data available in relation to housing register applicants.</p> <p>National research suggests that Trans people may be particularly at risk of housing crisis and homelessness arising from transphobic reactions and harassment by family, neighbours and members of their local community.</p>
13. Age equality	Y ✓	N	<p><u>Adoption of national bedroom standard</u> The proposed policy will impact disproportionately on households aged 25-44 years as this age group is most likely to have two or more dependent children. However, whilst some applicants within this age cohort may be negatively impacted, others will potentially benefit through shorter waiting times for rehousing. Age does not determine which groups are</p>	<p>2021 Census data: Older people (65+) make up 15% of the local population (cf 19.4% in south east). This equates to 18% of the adult population (over 16). 14% of the population are young people aged 20-24. Working age people make up 68% of the local population (with those between 25-44 accounting for 36%) .</p>


	<p>likely to be positively or negatively impacted by the proposed policy.</p> <p><u>Increasing priority for overcrowded households</u> A high proportion of overcrowded households are households aged 25-44 years and these applicants are most likely to benefit from the change.</p> <p><u>Removal of non-dependent household members (aged over 21) from assessments of housing need.</u> Removal of non-dependents will ensure that overcrowded households with dependent children will benefit through reducing waiting times. These households are most likely to be aged between 25 and 44 years.</p> <p><u>Increasing priority for under-occupying households</u> The majority of these households are older aged 55-64 and 65+. Older people who want to move to a more suitable home will benefit through the increased priority. Among this group, some older people will be vulnerable, have medical and mobility issues and wheelchair or accessible accommodation or care and support needs. These older people will be prioritised for the limited specialist accommodation available.</p> <p><u>Reducing priority for homeless households</u> Young people are over-represented among homeless households and so may be impacted by this proposed change. Whilst it will result in longer average waits for rehousing, the majority of young people accepted in priority need are adequately housed in temporary accommodation (compared to other households on the housing register, such as overcrowded households, who are often waiting in inadequate accommodation, and will benefit from the change).</p> <p><u>Reducing residency requirement from 4 to 2 years.</u> There will continue to be exceptions for young people and care leavers who have been placed by Bracknell Forest in out of area specialist accommodation and older people who want to return to the borough for family support.</p> <p><u>Increasing priority for care leavers.</u></p>	<p>Housing Register: Age of applicants. The vast majority of applicants (80%) are of working age (25-64), with 60% aged between 25 and 44 years. Younger applicants (19-24) account for 12.7% and older applicants (65+) for 6.3%.</p> <p>This means that older people are under-represented on the housing register with working age households, especially those between 25-44, heavily over-represented. Young people are slightly below their share of the population.</p> <p>Homelessness Strategy 2021: 18–34 year olds are significantly over represented in the homelessness figures, with the 35 – 45 year old age group also over represented. Young people aged 18–24 are almost 3 times more likely to become homeless than those aged 45–54.</p> <p>Older households are highly represented among under-occupying households.</p> <p>Older households may be living outside of borough but need to return for family support or following breakdown of family support elsewhere.</p> <p>Older people more likely to be vulnerable, have medical and mobility issues needing wheelchair or accessible accommodation. Older people more likely to have dementia and other care needs requiring specialist accommodation with care and support.</p> <p>Young people may be vulnerable and require support to manage a tenancy.</p> <p>Some young people will be care leavers.</p>
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14. Religion and belief equality	Y ✓	N	<p><u>Adoption of national bedroom standard</u> Analysis of household affected by the proposed change does not show a disproportionate impact on any religious group.</p> <p><u>Increasing priority for overcrowded households.</u> Some religious groups live in larger households and may be more likely to experience overcrowding. And so will benefit from this proposal.</p> <p><u>Removal of non-dependent household members (aged over 21) from assessments of housing need.</u> This policy may impact more on some religious groups associated with larger extended households (Muslims and Hindus). However, there are mitigations as those non-dependent members over 21 can apply to the housing register as single applicants and would receive priority where they are living in overcrowded households.</p> <p>The other proposed changes will not have a positive or negative impact religion and belief equality.</p>	<p>2021 Census data: 48% Christian, 40% no religion; 6% no response, 1% Buddhist, 2% Hindu, 2% Muslim, 1% Sikh.</p> <p>There is research to suggest that some religious groups (Muslims and Hindus) are more likely to live in larger, extended households, which contain more non-dependent members, compared to others (e.g. Christians).</p> <p>Analysis of applicants affected by the proposed bedroom standard policy has looked at the religion of those affected: 0.7% Buddhist, 34% Christian, 9.3% Prefer not to say, 0.7% Hindu, 2% Muslim, 46.7% No religion, 6% Other.</p>
15. Pregnancy and maternity equality	Y ✓	N	<p><u>Adoption of national bedroom standard</u> The proposed change will not impact on pregnant women. The change will impact on women in maternity with young children, as it will mean that some applicants with two or more young children will no longer be entitled to separate rooms and have lower priority under the new standard. It is therefore more likely to impact on women in maternity, some of</p>	<p>Pregnant women without children are not counted separately from single/couples without dependent children in homelessness data.</p> <p>Homeless pregnant households are usually considered to be in priority need.</p>

			<p>whom will find themselves negatively impacted by the proposed change. However, the policy change is justified as it will ensure that those facing the worst impact of overcrowding (including some women in maternity with young children) will benefit through shorter waiting times.</p> <p><u>Increasing priority for overcrowded households.</u> The policy will ensure that the most overcrowded households are prioritised and rehoused more quickly including some women in maternity with young children.</p> <p><u>Reducing priority for homeless households</u> Pregnant women and those with young children are highly represented among homeless households and so may be impacted by this proposed change. Whilst it will result in longer average waits for rehousing, the majority of applicants accepted in priority need due to pregnancy or having young children are adequately housed in temporary accommodation (compared to other households on the housing register, such as overcrowded households, who are often waiting in inadequate accommodation, and will benefit from the change).</p> <p>The other proposed changes will not have a positive or negative impact on pregnancy and maternity equality.</p>	<p>Pregnant households will usually require an additional bedroom once their child is born.</p>
<p>16. Marriage and civil partnership equality</p>	<p>Y</p>	<p>N ✓</p>	<p><u>Adoption of national bedroom standard</u> The proposed change will impact on some households with children who will no longer be entitled to separate rooms and some of these will be households that are married or in a civil partnership. However, the proposed policy change does not impact disproportionately on households that are married or in a civil partnership compared to those that are not.</p> <p><u>Increasing priority for overcrowded households.</u> As above, the policy will ensure that the most overcrowded households are prioritised and rehoused more quickly which will include some households that</p>	<p>2021 Census: 48.3% of people are married or in a civil partnership in Bracknell Forest – slightly higher than SE and England averages. 35.4% have never been married, 2% are married but separated, 9.4% are divorced and 4.9% widowed. 63% are living in a couple and 37% not. Overall, nearly half of Bracknell Forest households are married or in a civil partnership</p> <p>Census 2021. 26.8% and 33.8% of people lived in single person or two person households. 17.8% and 14.4% lived in three and four person households. 6.3% of people lived in households with five or more people.</p>

	<p>are married or in a civil partnership – but the latter has no effect on which households benefit or not.</p> <p>There is no evidence to suggest that the other proposed changes will impact on marriage and civil partnership equality.</p>	<p>Marriage and civil partnership are not recorded for applicants on the housing register.</p>
<p>17. Please give details of any other potential impacts on any other group (e.g. those on lower incomes/carers/ex-offenders, armed forces communities) and on promoting good community relations.</p>	<p>Please explain</p> <p>Armed forces: The proposal gives additional priority to applicants who are serving or ex armed forces personnel, particularly those that have been medically discharged, and so this group will positively benefit.</p> <p>Households with higher incomes: The proposal places a cap on household income such that those earning above this cap will not be able to apply on the housing register; this is justified as such households are more easily able to meet their housing needs in the housing market, ensuring that the beneficiaries of the policy are low income households.</p> <p>Care-leavers: the proposed policy will ensure that those most in need of social housing for welfare or other reasons are awarded a higher priority.</p>	
<p>18. If an adverse/negative impact has been identified can it be justified on grounds of promoting equality of opportunity for one group or for any other reason?</p>	<p>Please explain</p> <p>1. <u>Proposed policy excluding non-dependent household members from housing applications</u>: potential negative impact on some ethnic or religious groups where extended households are more common. The policy is justified as it ensures that overcrowded households with dependent children are prioritised above those with non-dependent members because of the well-established negative welfare, health and educational impacts on children and their families in overcrowded households. Mitigations will be included in the policy to take account of the specific circumstances in some households with non-dependent members, such as caring responsibilities.</p> <p>2. <u>Proposed adoption of bedroom standard</u>. This policy will impact more on certain households such as working age households between 25 and 44 years, female headed households, and women in maternity as these groups are over-represented among households with two or more dependent children. As a result, households from these groups are more likely to be adversely impacted by the proposed change. The justification for the policy is that it responds to the huge demand for the limited supply of larger properties available, and growing waiting times for rehousing, by ensuring that those households with dependent children that are most likely to be negatively impacted by overcrowding are prioritised above other households. Generally, the proposed policy does not advantage or disadvantage households in the above identified groups – as some households will benefit through shorter waiting times whilst others will not. The policy is justified in terms of increasing the opportunity for rehousing of those households most negatively affected by overcrowding.</p>	
<p>19. If there is any difference in the impact of the activity when considered for each of the equality groups listed in 8 – 14 above; how significant is the difference in terms of its nature and the number of people likely to be affected?</p>	<p>Please explain</p> <p>Households with a disabled member are likely to be more negatively impacted than other households by the proposed policy excluding non-dependent household members from housing applications. It was identified that about 30 disabled</p>	

	households would be affected. In recognition of the different circumstances and needs of these households, the policy will include mitigations and exceptions for disabled households.		
20. Could the impact constitute unlawful discrimination in relation to any of the Equality Duties?	Y	N ✓	Please explain for each equality group
21. What further information or data is required to better understand the impact? Where and how can that information be obtained?	Consultation with applicants and a wide range of organisations and stakeholders will help in understanding the issues identified above, whether there are any additional equalities issues and impacts that need to be addressed and the particular mitigations that are needed.		
22. On the basis of sections 7 – 17 above is a full impact assessment required?	Y	N ✓	<p>Please explain your decision. If you are not proceeding to a full equality impact assessment make sure you have the evidence to justify this decision should you be challenged.</p> <p>A thorough analysis of the equalities impact has been undertaken based on the detailed data available from the housing register and other sources. In relation to some groups, there is no or limited data available or the numbers are too small to identify any significant effect. In these cases it has been assessed that no additional information is available to inform the analysis and that any potential negative impacts are likely to be very small.</p> <p>The initial equalities that has been undertaken has identified some potentially negative impacts on some groups, but in all cases, a justification for the proposed policy has been provided and certain mitigations and exceptions have been included.</p> <p>If you are proceeding to a full equality impact assessment, please contact Samantha.wood@bracknell-forest.gov.uk or Harjit.Hunjan@bracknell-forest.gov.uk</p>
23. If a full impact assessment is not required; what actions will you take to reduce or remove any potential differential/adverse impact, to further promote equality of opportunity through this activity or to obtain further information or data? Please complete the action plan in full, adding more rows as needed.			
Action	Timescale	Person Responsible	Milestone/Success Criteria
Development of appropriate mitigations and exceptions where necessary, to be included in public/stakeholder consultation.	Feb 2024	Ian Stone, Kathryn Hobman, Lisa Jones	Analysis of consultation responses and changes made to policies, mitigations and exceptions where appropriate
Continue to monitor impact of the policy following implementation	2024/25	Ian Stone, Kathryn Hobman, Lisa Jones	Equalities monitoring continues to show no significant negative impacts on any specific cohort, or where it does, the application of the policy is reviewed.

24. Which service, business or work plan will these actions be included in?	The first action will be included within the consultation plan for the housing allocations policy. The second action is included within the housing service plan as part of the ongoing monitoring of housing and homelessness.
25. Please list the current actions undertaken to advance equality or examples of good practice identified as part of the screening?	Please list: Detailed consultation on the policy proposals involving applicants, the wider public, voluntary and statutory organisations, Council Members, Town and Parish Councils, Registered Providers of Social Housing, etc. to inform potential need for changes in the wording or mitigations included in proposed policies.
26. Assistant Director/Director signature.	 Signature: Date: 5/10/23