

# Dacorum BC Community Impact Assessment (CIA) Template

Policy / service / decision

Policy: Housing Allocations Policy

## Description of what is being impact assessed

*What are the aims of the service, proposal, and project? What outcomes do you want to achieve? What are the reasons for the proposal or change? Do you need to reference/consider any related projects?*

*Stakeholders; Who will be affected? Which protected characteristics is it most relevant to? Consider the public, service users, partners, staff, Members, etc.*

*It is advisable to involve at least one colleague in the preparation of the assessment, dependent on likely level of impact*

- **What is the aim**

In accordance with the Localism Act 2011, each local authority has the right to determine their own Housing Allocations Policy. This allows local authorities to give “reasonable preference” to certain categories of applicants, ensure that properties are allocated in a fair and reasonable manner as well as being able to better manage our stock. The Allocations Policy sets out the rules that Dacorum Borough Council must follow when letting our properties. This also allows us to manage the unrealistic expectations of those applicants who have little or no prospect of being allocated a property. It is a legal requirement that this policy should be reviewed every 4 years to take ensure the current policy evolves with the ever changing climate.

- **Outcomes**

To make best use of our housing stock to house applicants most in need and ensure that access to Dacorum’s social housing is fair, transparent and flexible.

- **What are the reasons for proposal or change**

Changes to Housing Allocations Policy – recent significant change to address demand. Good practice to review policy every four years. Changes has been proposed to help and support applicants most in demand and to increase the uptake of Supported Housing stock.

- **Consider any related projects**

Not applicable.

- **Who will be affected?**

All residents wishing to apply for social housing in Dacorum.

### **Evidence**

#### **What data/information have you used to assess how this policy/service/decision might impact on protected groups?**

*(Include relevant national/local data, research, monitoring information, service user feedback, complaints, audits, consultations, CIAs from other projects or other local authorities, etc.). You should include such information in a proportionate manner to reflect the level of impact of the policy/service/decision.*

The Strategic Housing team have used the following evidence to help support the proposed changes to the policy and assess the impact of the protected groups: complaints and service review requests, public consultations, KPI keys to key targets, village demand data, Microsoft Teams engagement sessions and benchmarking against other local authorities and housing associations. The policy will impact all protected groups and it is vital that the policy can support certain protected group and also ensure that it does not discriminate against them. The opinion of Counsel has been sought, and acted upon, in order to ensure that the changes are fair and comply with the law and is fair and non-discriminatory.

At engagement sessions, one was focused on Age of applicants at the Supported Housing Tenants Forum. Certain proposed changes in the policy could have a positive impact of the demand of Supported Housing and to make it more accessible for applicants over 60. However, this will not prevent applicants under 60 accessing this accommodation if their needs require.

**Who have you consulted with to assess possible impact on protected groups?** *If you have not consulted other people, please explain why? You should include such information in a proportionate manner to reflect the level of impact of the policy/service/decision.*

We have consulted with the general public (via Dacorum’s social media), Tenants & Leaseholders, staff, stakeholders and partners. This aligns with the government’s ‘Charter for Social Housing Residents’ [social housing white paper](#)

**Analysis of impact on protected groups (and others)**

The Public Sector Equality Duty requires Dacorum BC to eliminate discrimination, advance equality of opportunity and foster good relations with protected groups. Consider how this policy/service/decision will achieve these aims. Using the table below, detail what considerations and potential impacts against each of these using the evidence that you have collated and your own understanding. Based on this information, make an assessment of the likely outcome, **before** you have implemented any mitigation.

- *The PCs of Marriage and Civil Partnership and Pregnancy and Maternity should be added if their inclusion is relevant for impact assessment.*
- *Use “insert below” menu layout option to insert extra rows where relevant (e.g. extra rows for different impairments within Disability).*

Summary of impact		Negative impact / outcome	Neutral impact / outcome	Positive impact / outcome
Protected group	<i>What do you know? What do people tell you? Summary of data and feedback about service users and the wider community/ public. Who uses / will use the service? Who doesn't / can't and why? Feedback/complaints?</i>			
Age	<p>Internet access – older people less likely to be able to apply online.</p> <p>Older people – more likely to be physically disabled (as per AGEUK)</p> <p>Younger people cannot be tenants until they are 18 years old.</p> <p>Older people may be isolated in terms of information as they may not have access to IT or the internet.</p>	☒	☐	☐

	<p>Older people may have vision issues which means they cannot read and write.</p> <p>16 year olds are able to apply for the Housing Register, however, a tenancy cannot be awarded until 18.</p> <p>Supported Housing is designed for 60+, limits the number of applicants that can apply for this type of housing.</p> <p>Applicants under 60 that have over £16k may not be eligible for Supported Housing.</p>			
<p><b>Disability (physical, intellectual, mental)</b></p> <p><i>Refer to CIA Guidance Notes and Mental Illness &amp; Learning Disability Guide</i></p>	<p>Applicants might be partially sighted or blind so cannot read paperwork or websites.</p> <p>Deaf people may have difficulty communicating with officers and find the process daunting.</p> <p>Disability may impact on timescales for being rehoused due to lack of suitable property.</p> <p>Some people with a disability or mental health issues may not have been diagnosed, or may need extra support.</p> <p>Some applicants with mental health issues may not have the support worker in place to apply.</p>	<p>⊗</p>	<p>□</p>	<p>□</p>

	<p>People with intellectual impairment may not understand the application/allocation process.</p> <p>People that require major adaptations to their homes will receive a direct offer rather than being active and being able to bid.</p> <p>Blind applicants may want the Housing Register bidding process to be accessible via screen reader.</p>			
<b>Gender reassignment</b>	<p>We should refer to people as you/they, gender neutral</p> <p>We could ask people for their preferred pronoun on the application</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Race and ethnicity</b>	<p>Some applicants may have English as a second language</p> <p>Some applicants may wish to live in an area where there are more likely to be other residents of the same ethnicity</p> <p>In some circumstances we may need to discriminate positively in favour of applicants from certain countries.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Religion or belief</b>	<p>Some applicants may wish to live close to a place of worship, or in an area where there are more likely to be other residents who follow the same faith</p> <p>In some circumstances we may need to discriminate positively in favour of applicants from certain countries, who may also be more likely to follow a particular religion.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sex</b>	<p>Females are more likely to be a single parent than males and therefore more likely to have a housing need for properties with more than one bedroom.</p> <p>For this reason, single males are also less likely to be allocated social housing than females.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	<p>According to Age UK, older women are more likely to be physically disabled than older men, partly because they live longer.</p> <p>Age and sex of children may impact how many bedrooms they are entitled to.</p> <p>Custody orders to determine their primary address.</p> <p>Social normality that children reside with Mother rather than their Father.</p>			
<p><b>Sexual orientation</b></p>	<p>Applicants may have concerns about homophobia from staff or other residents.</p> <p>Gender/sexual orientation etc is not a factor.</p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>
<p><b>Not protected characteristics but consider other factors, e.g. carers, veterans, homeless, low income, loneliness, rurality etc.</b></p>	<p>Lack of data on our applicants and existing tenants means we cannot always identify protected groups.</p> <p>Language should always meet plain English standards and be gender neutral – e.g. ‘parent’ rather than mother/father.</p> <p>Some applicants may not wish to live in an area where there are more likely to be incidents of hate crime/asb or there is a perception that this is the case.</p> <p>Victims of domestic abuse may have cases reviewed and be allowed to apply for housing when they would not otherwise qualify.</p> <p>Low income families, affected by high rents either in private rent or affordable rents. They would be deemed adequately housed, they would not be eligible for the Housing Register.</p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>

## Negative impacts / outcomes action plan

Where you have ascertained that there will potentially be negative impacts / outcomes, you are required to mitigate the impact of these. Please detail below the actions that you intend to take.

<b>Action taken/to be taken</b> <i>(copy &amp; paste the negative impact / outcome then detail action)</i>	<b>Date</b>	<b>Person responsible</b>	<b>Action complete</b>
<p>Age-</p> <p><b>Internet access-</b> paper copies of the application can be provided, applicants can be given direct offers, able to bid by phone or text. Applicants can request a home visit if they struggle with completing paperwork online.</p> <p><b>Older people might be more physically disabled-</b> If applicants have issues with applying or providing information, staff from DBC can help and assist with this. DBC have an adaptations team to ensure that properties offered are suitable for applicant's needs.</p> <p><b>Younger people cannot be tenants until they are 18 years old-</b> DBC can signpost applicants under 18 to suitable supported accommodation provided by HCC or RPS. Also known as move on accommodation. When applicant is 18, the landlord will work with DBC to house applicant long term.</p> <p><b>Older people may have vision issues which means they cannot read and write-</b> We will provide paper versions of forms, in alternative language, in Braille, or as voice recording</p>	26.09.21	Paul Hunt	<input type="checkbox"/>

<p><b>Disability (physical, intellectual, mental)</b></p> <p><b>Applicants might be partially sighted or blind so cannot read paperwork or websites</b> - We will provide paper versions of forms, in alternative language, in Braille, or as voice recording, staff can complete home visits or applicants can enter council offices. Supported Housing newsletters can be send out in braille.</p> <p><b>Deaf people may have difficulty communicating with officers and find the process daunting-</b> staff will treat all applicants with the same help and advice. Emails, letters can be composed. If needed an interpreter can assist.</p> <p><b>Disability may impact on timescales for being rehoused due to lack of suitable property-</b> OT reports are required for applicants that require adaptations, not all properties can be adapted, therefore can wait longer is likely. When properties become void, they are assessed to determine what adaptations are feasible.</p> <p><b>Some people with a disability or mental health issues may not have been diagnosed, or may need extra support-</b> DBC has a tenancy sustainment team to help support applicants with complex needs &amp; can make referrals to external agencies such as CMHT &amp; ACS.</p> <p><b>People with intellectual impairment may not understand the application/allocation process-</b> Applicants can have support with the allocation process, this can be provided by assisted bidding, direct offers or requesting staff to place bids for them.</p>	26.9.21	Paul Hunt	<input type="checkbox"/>



<p><b>People that require major adaptations to their homes will receive a direct offer rather than being active and being able to bid-</b> as much personal information and preferences are taken and the Housing Needs team try to meet these preferences when allocating a property.</p>			
<p><b>Gender reassignment</b></p> <p><b>Applicants who are or who have children that identify as non binary may or may not be entitled to own bedroom-</b> guidance required from counsel to fairly determine how applications are assessed fairly and in line with legislation.</p>	26.09.21	Paul Hunt	<input checked="" type="checkbox"/>
<p><b>Race and ethnicity</b></p> <p><b>Some applicants may have English as a second language-</b> application or communication can be provided in different languages or an interpreter can be used.</p> <p><b>Some applicants may wish to live in an area where there are more likely to be other residents of the same ethnicity</b></p> <p><b>In some circumstances we may need to discriminate positively in favour of applicants from certain countries.-</b> applicants who are active on the housing register have a choice to bid for properties in certain areas. Applicants that are on the direct offers list, information and area</p>	26.9.21	Paul Hunt	<input type="checkbox"/>

<p>preferences are taken into account when offering a property. Where area preference cannot be given, the Housing Needs team will make every effort to ensure that it is in the same town.</p>			
<p><b>Non protected characteristics-</b></p> <p><b>Veterans-</b> are given additional priority on the Housing Register in line with legislation.</p> <p><b>Homeless-</b> applicants that are homeless or at risk of homelessness can be awarded additional points. Homeless applications are taken from the Homeless Prevention team and are assessed in line with legislation and the homeless code of guidance. If a main housing duty is accepted, applicants are placed on the direct offers list.</p>			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
<p><b>If negative impacts / outcomes remain, please provide an explanation below.</b></p>			

<b>Completed by (all involved in CIA)</b>	<b>Paul Hunt, Sue Prowse, Cybele Fernandes</b>
<b>Date</b>	
<b>Signed off by</b> <i>(AD from different Directorate if being presented to CMT / Cabinet)</i>	
<b>Date</b>	
<b>Entered onto CIA database - date</b>	
<b>To be reviewed by</b> (officer name)	
<b>Review date</b>	