

## EQUALITY ANALYSIS QUALITY ASSURANCE CHECKLIST

<p><b>Name of 'proposal' and how has it been implemented</b>          (proposal can be a policy, service, function, strategy, project, procedure, restructure/savings proposal)</p>	<p><b>Proposals to amend the Allocation Scheme as follows: -</b></p> <ol style="list-style-type: none"> <li><b>1. Introduce National Right to Move scheme as required by new government regulations</b></li> <li><b>2. Amendments to the Allocations scheme to respond to the risk of legal challenges to the 3 year residential criteria to be eligible to go onto the Housing Register.</b></li> <li><b>3. Amendment to the Allocations Scheme to place an age restriction for children sharing when bidding for smaller properties than assessed need</b></li> <li><b>4. Reduction to the quota of lettings to applicants in Band 3 who are not in housing need, in order to increase resources available for higher priority applicants in Bands 1 &amp; 2.</b></li> <li><b>5. To seek authority to use a limited amount of lettings each year to provide cost effective and suitable temporary accommodation for homeless households in the borough</b></li> <li><b>6. Agree the annual Lettings Plan and to expand criteria to qualify for key worker status</b></li> </ol>
<p><b>Directorate / Service</b></p>	<p><b>Development and Renewal</b></p>
<p><b>Lead Officer</b></p>	<p><b>Rafiqul Hoque Service Manager – Lettings</b></p>
<p><b>Signed Off By (inc date)</b></p>	<p><b>Jackie Odunoye</b></p>
<p><b>Summary –</b></p>	<p>As a result of performing the QA checklist, the policy, project</p>

or function does not appear to have any adverse effects on people who share *Protected Characteristics* and no further actions are recommended at this stage.

**Proceed with implementation**



Stage	Checklist Area / Question	Yes / No / Unsure	Comment (If the answer is no/unsure, please ask the question to the SPP Service Manager or nominated equality lead to clarify)
<b>1</b>	<b>Overview of Proposal</b>		
a	Are the outcomes of the proposals clear?	Yes	The proposals are: - to introduce changes required by new government regulation; to give access to the scheme to some applicants hitherto excluded by the residential qualification; to introduce some limitation on bidding for smaller property than assessed need which will reduce the risk of overcrowding; to seek authority for alternative use of a limited amount of housing supply for temporary accommodation to meet the need for such provision in the borough; to set out annual targets for special needs groups; to expand the criteria for professions eligible for key worker status to include social workers ; a reduction in the quota for the lowest priority band to divert resources to higher bands on the Housing Register.
b	Is it clear who will be or is likely to be affected by what is being proposed (inc service users and staff)? Is there information about the equality profile of those affected?	Yes	The equality profile of service users have been examined from existing data where appropriate for example in relation to a proposal to make changes to existing use of resources.
<b>2</b>	<b>Monitoring / Collecting Evidence / Data and Consultation</b>		
a	Is there reliable qualitative and quantitative data to support claims made about impacts?	Yes	Data required is available from existing data collection sources and housing applicant records
	Is there sufficient evidence of local/regional/national research that can inform the analysis?	Yes	Local data as above


b	Has a reasonable attempt been made to ensure relevant knowledge and expertise (people, teams and partners) have been involved in the analysis?	Yes	Data has been gathered and shared with specialist housing and managerial staff.
c	Is there clear evidence of consultation with stakeholders and users from groups affected by the proposal?	Yes	The proposals have been discussed between service areas and there has been consultation with service users.
<b>3 Assessing Impact and Analysis</b>			
a	Are there clear links between the sources of evidence (information, data etc) and the interpretation of impact amongst the nine protected characteristics?	Yes	Care has been taken to evaluate the impact of these changes on the many applicants on the Housing Register competing for scarce housing resources. It is believed that there will not be any disproportionate impact on any particular group.
b	Is there a clear understanding of the way in which proposals applied in the same way can have unequal impact on different groups?	Yes	<p>Work has been undertaken to assess and evaluate any potential disproportionate impact where appropriate. As properties are let through choice based lettings, which is a competitive bidding process with preference given by date order of registration, it is difficult to predict the outcome of the pattern of lettings throughout the year. However the composition of any of the three bands on the Housing Register could affect the balance of lettings outcomes if the band contained a disproportionate number of any particular group.</p> <p>The proposal to reduce the annual quota of lettings to the lowest priority band (Band 3) in the Allocations Scheme in order to increase the housing resources available to the higher priority bands (Bands 1 &amp; 2) was examined to ascertain whether any disproportionate effect might occur by this transfer of resources.</p> <p>Analysis of the applicants in Band 3 by ethnicity compared with the composition of the whole Housing Register by ethnicity shows that the proportions in Band 3 are broadly in line with the proportions on the register as a whole.</p> <p>Closer analysis of the 3 bands by ethnicity and separated out by bedsize need shows more variation between the groups.</p>

			<p>This is to be expected as this will reflect local population characteristics and some difference in housing need profile in the borough.</p> <p>For example, an analysis of 3 bed need by ethnicity shows that the proportion of each ethnic group is broadly the same in each of the 3 bands. However in relation to 1 bed need Asian households are over represented in Band 2 compared with their overall proportion on the Housing Register. This reflects a higher level of overcrowding amongst Asian households in the borough than other groups. By contrast in relation to one bed need White households are over represented in Band 1 compared with their proportion on the Housing Register. This is largely due to a higher proportion of older white applicants in larger property that have applied for an under occupation transfer. This category is given high priority in the Allocations Scheme in Band 1 as it frees up family sized property which is in high demand. This benefits all applicants by making better use of the available supply of housing.</p> <p>Analysis of the impact of the proposal to move a modest amount of annual housing resources away from Band 3 to higher priority applicants in Band 1 &amp; 2 indicates it is unlikely for there to be any disproportionate impact on any particular group.</p> <p>There are no indications that any of the other proposals will have a disproportionate impact on any particular group.</p>
<b>4</b>	<b>Mitigation and Improvement Action Plan</b>		
a	Is there an agreed action plan?	No	But the outcome of these changes if implemented will along with other significant factors relating to housing supply and

			demand, be routinely monitored and reported upon in annual Lettings Plan report.
b	Have alternative options been explored	Yes	<p>Regarding the new government regulations on the Right to Move, the Council is obliged to implement these changes. In relation to ameliorating the risk of legal challenge to the 3 year residential requirement to apply to go on the Housing Register, the proposed solution in the report was chosen following legal advice on the options and assessment of the implications of those options.</p> <p>The remaining proposals in the report were developed to make the best use of limited resources in response to pressures of demand for housing in the borough following consideration of alternatives and consultation with partners.</p>
<b>5</b>	<b>Quality Assurance and Monitoring</b>		
a	Are there arrangements in place to review or audit the implementation of the proposal?	Yes	All the above proposals will be monitored and analysed to ensure the right outcomes are achieved as part of the routine monitoring and management of supply and demand for housing in the borough and the reporting on performance against annual targets in the Lettings Plan.
b	Is it clear how the progress will be monitored to track impact across the protected characteristics??	Yes	The data is available to monitor the impact and is reported on regularly and shared with Common Housing Register Partners.
<b>6</b>	<b>Reporting Outcomes and Action Plan</b>		
a	Does the executive summary contain sufficient information on the key findings arising from the assessment?	Yes	

## Appendix A

### (Sample) Equality Assessment Criteria

Decision	Action	Risk
<p>As a result of performing the QA checklist, it is evident that due regard is not evidenced in the proposal and / or a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i>. It is recommended that the proposal be suspended until further work or analysis is performed – via a the Full Equality Analysis template</p>	<p><b>Suspend – Further Work Required</b></p>	<p><b>Red</b></p> 
<p>As a result of performing the QA checklist, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>	<p><b>Proceed with implementation</b></p>	<p><b>Green:</b></p> 