



Cherwell
DISTRICT COUNCIL
NORTH OXFORDSHIRE



**OXFORDSHIRE
COUNTY COUNCIL**

Appendix 3

Cherwell District Council Equality and Climate Impact Assessment

May 2021

Revised Housing Allocation Scheme

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Section 1: Summary details

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| Directorate and Service Area | Housing Services – Cherwell District Council Directorate: Adults and Housing Services |
| What is being assessed (e.g. name of policy, procedure, project, service or proposed service change). | Cherwell District Council Housing Allocation Scheme (2021) |
| Is this a new or existing function or policy? | New (replacing the existing Housing Allocation Scheme) |
| Summary of assessment Briefly summarise the policy or proposed service change. Summarise possible impacts. Does the proposal bias, discriminate or unfairly disadvantage individuals or groups within the community? (following completion of the assessment). | <p>The Housing Allocation Scheme sets out how the council processes and prioritises applications for social housing. It sets out the criteria for determining whether a household is eligible for social housing and what level of priority the household will be given based on housing need.</p> <p>The allocation of social rented housing is the responsibility of the District Council as the housing authority. Applications for other affordable housing options (e.g. shared ownership) go through the help to buy agent, not the local authority.</p> <p>Revisions are proposed to the Housing Allocation Scheme in order to take account of updated statutory guidance, regulatory changes and evolving local housing needs in the District.</p> <p>The proposed revisions have both direct and indirect impacts on groups within the community but the proposals do not bias, discriminate or unfairly disadvantage these groups or individuals.</p> <p>The proposed revisions will have several positive impacts on those individuals or groups that are directly affected as set out in this impact assessment. However, due to the finite number of homes available to be allocated, each individual or group that may have an increased chance of securing housing through the housing register will have a knock-on effect for others.</p> |
| Completed By | Paul France, Senior Housing Officer |

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| Authorised By | Vicki Jessop (Interim Assistant Director Housing and Social Care Commissioning) |
| Date of Assessment | Updated 23/08/2021 |

Section 2: Detail of proposal

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| <p>Context / Background</p> <p>Briefly summarise the background to the policy or proposed service change, including reasons for any changes from previous versions.</p> | <p>CDC's Housing Allocation Scheme was last amended in November 2018 with the changes being approved by the Executive. It is important to review the Scheme regularly in order to make sure that it aligns with current housing needs in the District and that the council can respond to changing patterns of need.</p> <p>A feasibility study conducted by Crisis in Oxfordshire and published in November 2020 recommended that Oxfordshire councils review their allocation schemes in order to improve access to social housing for single homeless people including rough sleepers. Data reviewed by Crisis showed that on average only 13% of people in the Adult Homeless Pathway move on from their supported accommodation in any given year. People in the pathway with a connection to Cherwell should be able to join the housing register and receive a band 2 priority as per other homeless households. However, people can be excluded from the register as a result of past rent arrears or anti-social behaviour. We therefore intend to relax these barriers and will need to work with registered providers of social housing to avoid nominations being rejected. This will involve putting in place tenancy sustainment support so that individuals are 'tenancy supported' rather than having to be 'tenancy ready' before being offered a home. This is essential to moving towards a housing-led approach to preventing and resolving homelessness.</p> |
| <p>Proposals</p> <p>Explain the detail of the proposals, including why this has been decided as the best course of action.</p> | <p>A summary table outlining the proposed changes to the Housing Allocation Scheme and the rationale for those changes is contained in Appendix 1.</p> |
| <p>Evidence / Intelligence</p> <p>List and explain any data, consultation outcomes, research findings, feedback from service users and stakeholders etc, that supports your proposals and can help to inform the judgements you make about potential impact on different individuals,</p> | <p>A 4-week public consultation was carried out during June/July 2021 to gather feedback on the proposed revised Housing Allocation Scheme. This process was supported by the corporate Consultation Team.</p> <p>In order to help ensure the consultation was appropriately worded and relevant to respondents, two separate surveys were carried out; one for completion by members of the general public and another for housing organisations including registered providers of social housing.</p> <p>16 responses were received from housing organisations and housing providers with the vast majority of feedback on the proposed changes being positive. This includes feedback from homelessness organisations</p> |

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| <p>communities or groups and our ability to deliver our climate commitments.</p> | <p>such as Crisis who were positive about the proposed changes likely positive effects on individuals that have experienced homelessness.</p> <p>46 responses were received from members of the general public. Responses were also mostly in support of the proposed changes although some responses were more neutral.</p> |
| <p>Alternatives considered / rejected</p> <p>Summarise any other approaches that have been considered in developing the policy or proposed service change, and the reasons why these were not adopted. This could include reasons why doing nothing is not an option.</p> | <p>The following alternative options have been identified and rejected for the reasons as set out below.</p> <p>Option 1: Do nothing. Rejected on the basis that the current scheme does need to change in response to customer and staff feedback, developments in statutory guidance and to support the shift to a housing led approach.</p> |

Section 3: Impact Assessment - Protected Characteristics

| Protected Characteristic | No Impact | Positive | Negative | Description of Impact | Any actions or mitigation to reduce negative impacts | Action owner* (*Job Title, Organisation) | Timescale and monitoring arrangements |
|--------------------------|-------------------------------------|--------------------------|--------------------------|---|--|--|---------------------------------------|
| Age | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The changes to the qualification criteria in relation to financial resources (section 3.6.2.5) mean that under-occupiers of social housing (often older households) will be qualify to downsize, whether or not they have sufficient financial resources to obtain housing in the private sector. | | CDC Housing Options and Allocations Team | Annual monitoring |

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|---|-------------------------------------|-------------------------------------|--------------------------|--|-----|--|-----|
| Disability | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>The changes to the qualification criteria in relation to financial resources (section 3.6.2.5) make clear that special consideration can be given where appropriate to those applicants that require larger accommodation or more specialist accommodation, such as disabled adapted accommodation, which may be more difficult to secure in the private sector.</p> <p>A Band 3 reason has been introduced under the Mental Health section so that applicants receiving short-term, time-limited secondary care intervention may have a Band 3 applied in cases where housing is the cause or a significant aggravating factor in the mental health issue.</p> | | CDC Housing Options and Allocations Team | |
| Gender Reassignment | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | N/A | N/A | N/A | N/A |
| Marriage & Civil Partnership | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | N/A | N/A | N/A | N/A |

| | | | | | | | |
|----------------------------------|--------------------------|-------------------------------------|--------------------------|---|--|--|-------------------|
| Pregnancy & Maternity | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>The proposed changes include the introduction of a space standard that determines adequacy of bedroom sizes. This is in addition to the existing bedroom standard that determines the number of bedrooms a household requires.</p> <p>This means that households expecting a further baby may be given additional priority if the baby will need to share a bedroom with another child and that bedroom is determined to be too small.</p> <p>A Band 1 reason is proposed to be introduced for families that are approved to foster or adopt but do not have sufficient bedrooms to commence or continue with the arrangement.</p> | | CDC Housing Options and Allocations Team | Annual monitoring |
|----------------------------------|--------------------------|-------------------------------------|--------------------------|---|--|--|-------------------|

| | | | | | | | |
|-------------|-------------------------------------|-------------------------------------|-------------------------------------|--|---|--|-------------------|
| Race | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <p>The data on ethnicity of those on the housing register appears to show that the proportion of white applicants is lower than the proportion of the Cherwell and Oxfordshire population. The proportion of Black/African/Caribbean/Black British also appears to be higher. This is when compared to 2011 Census data.</p> <p>Any changes to the housing allocation scheme may therefore affect those in ethnic minority groups, both positively and negatively, more so than a change affecting the whole of the population of Cherwell or Oxfordshire.</p> | Annual monitoring and comparisons of housing register ethnicity data to monitor impacts | CDC Housing Options and Allocations Team | Annual monitoring |
| Sex | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | N/A | N/A | N/A |

| | | | | | | | |
|---------------------------|-------------------------------------|-------------------------------------|--------------------------|---|-----|--|-------------------|
| Sexual Orientation | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Research by the Albert Kennedy Trust has found that LGBT young people are more likely to find themselves homeless than their non-LGBT peers, comprising up to 24% of the youth homeless population. There should therefore be some positive impacts on the LGBT community by the increased priority given to homeless households. | N/A | CDC Housing Options and Allocations Team | Annual monitoring |
| Religion or Belief | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | N/A | N/A | N/A | N/A |

Section 3: Impact Assessment - Additional Community Impacts

| Additional community impacts | No Impact | Positive | Negative | Description of impact | Any actions or mitigation to reduce negative impacts | Action owner (*Job Title, Organisation) | Timescale and monitoring arrangements |
|------------------------------|-------------------------------------|-------------------------------------|--------------------------|---|--|--|---------------------------------------|
| Rural communities | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | N/A | N/A | N/A | N/A |
| Armed Forces | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>The requirements and recommendations contained within the statutory guidance – <i>“Improving Access to Social Housing for Members of the Armed Forces”</i> MHCLG, July 2020 are proposed to be adopted in full.</p> <p>This includes exempting from any local connection criteria current or former members of the regular armed forces who served at any time in the 5 years preceding their application; and bereaved spouses or civil partners; divorced or separated spouses or civil partners and members of the reserved armed forces who are suffering from injury attributable to their service.</p> | Rather than reference to statutory guidance, the new wording clearly outlines the categories of Armed Forces personnel and their family members that will qualify to join the housing register, whether or not they meet another measure of local connection as per the housing allocation scheme. | CDC Housing Options and Allocations Team | Annual monitoring |

| Additional community impacts | No Impact | Positive | Negative | Description of impact | Any actions or mitigation to reduce negative impacts | Action owner (*Job Title, Organisation) | Timescale and monitoring arrangements |
|------------------------------|--------------------------|-------------------------------------|--------------------------|--|--|--|---------------------------------------|
| Carers | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | A Band 1 reason is proposed to be introduced for families that are approved to foster or adopt but do not have sufficient bedrooms to commence or continue with the arrangement. | | CDC Housing Options and Allocations Team | Annual monitoring |
| Areas of deprivation | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A | N/A | N/A | N/A |

Section 3: Impact Assessment - Additional Wider Impacts

| Additional Wider Impacts | No Impact | Positive | Negative | Description of Impact | Any actions or mitigation to reduce negative impacts | Action owner* (*Job Title, Organisation) | Timescale and monitoring arrangements |
|-------------------------------|-------------------------------------|-------------------------------------|--------------------------|--|--|--|---------------------------------------|
| Staff | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Some of the proposed wording changes, such as to the disqualification criteria, will make the allocation scheme easier to understand for staff, and help improve clarity and consistency of decision making | Annual monitoring | CDC Housing Options and Allocations Team | Annual monitoring |
| Other Council Services | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | N/A | N/A | N/A | N/A |
| Providers | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Some of the proposed wording changes, notably to the disqualification criteria, will positively affect social housing providers as it is easier for them to understand what factors may result in an applicant being disqualified from the housing register and therefore qualifying for an offer of housing with the social | Annual monitoring | CDC Housing Options and Allocations Team | Annual monitoring |

| Additional Wider Impacts | No Impact | Positive | Negative | Description of Impact | Any actions or mitigation to reduce negative impacts | Action owner* (*Job Title, Organisation) | Timescale and monitoring arrangements |
|----------------------------------|--------------------------|-------------------------------------|-------------------------------------|---|--|--|---------------------------------------|
| | | | | housing provider, or not. | | | |
| Social Value ¹ | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Overall the proposed changes to the housing allocation scheme have a positive impact as the allocation scheme should be more easily understood by residents and seeks to prioritise those applicants that need or warrant social housing most. With each individual or group given additional priority or eligibility to join the housing register there will be another that is negatively affected as a result. | Annual monitoring of the housing allocation scheme and number successfully securing housing, or not, following an application. Housing Options and Allocations Teams will continue to promote alternative housing options such as private rented and low cost home ownership and deliver initiative and incentives such as those currently delivered through the Cherwell Bond Scheme. | CDC Housing Options and Allocations Team | Annual monitoring |

¹ If the Public Services (Social Value) Act 2012 applies to this proposal, please summarise here how you have considered how the contract might improve the economic, social, and environmental well-being of the relevant area

Section 3: Impact Assessment - Climate Change Impacts

OCC and CDC aim to be carbon neutral by 2030. How will your proposal affect our ability to reduce carbon emissions related to

| Climate change impacts | No Impact | Positive | Negative | Description of impact | Any actions or mitigation to reduce negative impacts | Action owner (*Job Title, Organisation) | Timescale and monitoring arrangements |
|--|-------------------------------------|--------------------------|--------------------------|-----------------------|--|---|---------------------------------------|
| Energy use in our buildings or highways | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | N/A | N/A | N/A | N/A |
| Our fleet | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | N/A | N/A | N/A | N/A |
| Staff travel | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | N/A | N/A | N/A | N/A |
| Purchased services and products (including construction) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | N/A | N/A | N/A | N/A |
| Maintained schools | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | N/A | N/A | N/A | N/A |

We are also committed to enable Cherwell to become carbon neutral by 2030 and Oxfordshire by 2050. How will your proposal affect our ability to:

| Climate change impacts | No Impact | Positive | Negative | Description of impact | Any actions or mitigation to reduce negative impacts | Action owner (*Job Title, Organisation) | Timescale and monitoring arrangements |
|---|-------------------------------------|--------------------------|--------------------------|-----------------------|--|---|---------------------------------------|
| Enable carbon emissions reduction at district/county level? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | N/A | N/A | N/A | N/A |

Section 4: Review

Where bias, negative impact or disadvantage is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

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|--------------------------------------|--|
| Review Date | On or around the anniversary of adoption of the revised scheme from November 2021. |
| Person Responsible for Review | Senior Housing Officer (Allocations Team) (Cherwell DC) |
| Authorised By | Interim Assistant Director, Housing and Social Care Commissioning. Oxfordshire County Council and Cherwell District Council. |