

Cherwell District Council
Equality and Climate Impact Assessment
Cherwell District Council Housing Allocations Scheme

Appendix 3

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Section 1: Summary details

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| Directorate and Service Area | Wellbeing and Housing – Housing Services |
| What is being assessed (e.g. name of policy, procedure, project, service or proposed service change). | Cherwell District Council Housing Allocation Scheme (2025) |
| Is this a new or existing function or policy? | Revised policy to cover existing service function |
| 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 Cherwell District Council will process and prioritise 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.</p> <p>Revisions are proposed to the Housing Allocation Scheme to take account of statutory guidance, best practice and evolving local housing needs in the District. It is best practice to keep the scheme under regular review and respond to local housing needs and pressures.</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 who 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> |

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| Completed By | Paul France |
| Authorised By | Richard Smith |
| Date of Assessment | May 2024 |

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 December 2021 with the changes being approved by the Executive. It is important to review the Scheme regularly to help ensure that it aligns with current housing needs in the District and to respond to changing patterns of need.</p> <p>The Domestic Abuse Act 2021 contained provisions to ensure the appropriate prioritisation of applicants fleeing abuse and to ensure they have secure accommodation. As such, we have proposed revisions to our Housing Allocation Scheme to help make our response to domestic abuse clear, streamlined and promote better choice and outcomes for those who have experienced abuse or are at risk of harm.</p> <p>We have also reviewed and reaffirmed our commitment to assist members of the armed forces and propose to make clear how we will give additional preference for housing to this group as required by Housing Act 1996. A new section to outline our approach is proposed.</p> <p>In terms of responding to changing needs, the housing service has seen an increase in homeless presentations and households occupying temporary accommodation since the last review. The number of homes available to let through the housing register have not been as high in recent years and as such we propose increasing the level of priority given to those households who are homeless and in Priority Need to help ensure those households can secure settled housing as early as possible.</p> <p>The longest waiting times to secure housing since the scheme was last reviewed is for larger homes and the main reason for applicants applying to join our housing register is a need for larger accommodation. Those who are overcrowded in their current home make up the largest portion of applicants on the housing register. To help ensure</p> |
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| | <p>that those who are more severely overcrowded secure a suitable home more quickly, we propose to split the large number of overcrowded households; giving those who are lacking two bedrooms a greater level of priority over those who are lacking only one bedroom. We also propose to introduce measures to help encourage under-occupiers to downsize and free up larger homes for households who need them.</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, communities or groups and our ability to deliver our climate commitments.</p> | <p>A 4-week public consultation to gather feedback on the proposed revised Housing Allocation Scheme will be carried out. Housing organisations including registered providers of social housing will also be consulted on the proposals. Stakeholders will have the opportunity to contribute to this consultation.</p> <p>Consultation responses will be considered and further revisions to the Housing Allocation Scheme may be made in accordance with the response received.</p> <p>As of 1 April 2024 there were 1,944 household on the Cherwell District Council housing register and 1,127 of these had an identified housing need in accordance with the Housing Allocation Scheme. Just under half of all households in housing need were affected by some level of overcrowding.</p> |

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| <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: Not bring forward a new Allocations Scheme. This is rejected as it is important that the Council has Policies that are up to date with legislation and can respond to current challenges.</p> |
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Section 3: Impact Assessment - Protected Characteristics

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| 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 type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | The proposal to allow under-occupiers of social housing to downsize to a property which would be larger than they would normally be eligible for (e.g. a single person household downsizing to a 2-bedroom home) is likely to impact older households. This is because under-occupiers of social housing are often older households. | | Strategic Housing Team Leader | Annual monitoring |
| Disability | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | The scheme reflects an applicant's vulnerabilities and disabilities in its banding system and prioritises according to their impact on housing need. Suitable accommodation offers according to their individual needs. | | Strategic Housing Team Leader | Annual monitoring |

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| 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"/> | The risk of domestic abuse is known to increase for those who are pregnant or have recently given birth. As such, this group will be positively affected by the changes proposed to improve outcomes for those who are at risk or who have experienced domestic abuse. | N/A | Strategic Housing Team Leader | Annual monitoring |

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| <p>Race</p> | <p><input checked="" type="checkbox"/></p> | <p><input type="checkbox"/></p> | <p><input type="checkbox"/></p> | <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 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.</p> | <p>Annual monitoring and comparisons of housing register ethnicity data to monitor potential impacts.</p> | <p>Strategic Housing Team Leader</p> | <p>Annual monitoring</p> |
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| <p>Sex</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>As stated in the previous section, the proposed revisions to our Housing Allocation Scheme will help make our response to domestic abuse clear, streamlined and promote better choice and outcomes for those who have experienced abuse or are at risk of harm. Women are far more likely to experience domestic abuse than men and as such are more likely to be positively affected by these proposals.</p> | <p>N/A</p> | <p>Strategic Housing Team Leader</p> | <p>Annual monitoring</p> |
| <p>Sexual Orientation</p> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <p>Research by the Albert Kennedy Trust 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.</p> | | <p>Strategic Housing Team Leader</p> | <p>Annual monitoring</p> |

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| 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 type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | The future housing development sites in Cherwell allocated to meet Oxford City's unmet housing needs are located in the more rural southern area of the Cherwell District. The proposed changes to the Housing Allocation Scheme allows CDC greater control over the allocation of housing on those sites to applicants who qualify to join the CDC housing register. This gives CDC greater control and influence over the future letting of these homes. | N/A | Strategic Housing Team Leader | N/A |
| Armed Forces | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | The proposal is to make clear how CDC gives additional preference for housing to those armed forces or ex-armed forces members who have urgent housing needs, as required by s.166A(3) | None | Strategic Housing Team Leader | Annual Monitoring |

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| 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 |
|------------------------------|-------------------------------------|-------------------------------------|--------------------------|--|--|---|---------------------------------------|
| | | | | Housing Act 1996. As such, those Armed Forces members will be positively affected. | | | |
| Carers | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | None | N/A | N/A |
| Areas of deprivation | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | The proposals include giving greater priority to those who are more severely overcrowded in their current home than others. This is likely to affect areas of deprivation more where overcrowding is more likely to occur. The proposals are also intended to better facilitate under-occupiers of social housing to downsize. Some of the larger social housing homes where under-occupation is likely to occur are within areas of deprivation such as the Brighter Futures area where there are some higher concentrations of social housing. | 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 |
|----------------------------------|-------------------------------------|-------------------------------------|--------------------------|---|--|---|--|
| 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"/> | The proposed wording changes will positively affect social housing providers as they are designed to help enable those tenants who are more severely overcrowded to move to a more suitable home more quickly. The provisions to facilitate under-occupiers to downsize will also positively affect social housing providers. | Annual monitoring | Strategic Housing Team Leader | N/A |
| Social Value ¹ | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Overall the proposed changes to the housing allocation scheme will have a positive impact as the allocation scheme should be more easily understood by residents and | Annual monitoring of the housing allocation scheme and number successfully securing housing, or not, following an application. Housing Options and | 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

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| 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 |
|--------------------------|-----------|----------|----------|---|--|--|---------------------------------------|
| | | | | <p>seeks to prioritise those applicants who need or warrant social housing most, such as homeless households. However, 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 due to the finite number of homes available.</p> | <p>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.</p> | | |

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 |

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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 | Annual |
| Person Responsible for Review | Strategic Housing Team Leader |
| Authorised By | Head of Housing |