

Equality impact assessment (EIA) form: evidencing paying due regard to protected characteristics

(Form updated October 2023)

Housing Allocations Policy

Equality Impact Assessments (EIAs) are public documents. EIAs accompanying reports going to County Councillors for decisions are published with the committee papers on our website and are available in hard copy at the relevant meeting. To help people to find completed EIAs we also publish them in the Equality and Diversity section of our website. This will help people to see for themselves how we have paid due regard in order to meet statutory requirements.

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Lead Officer and contact details	Carl Doolan Carl.doolan@northyorks.gov.uk
Names and roles of other people involved in carrying out the EIA	Dominic Richardson & Vicky Young
How will you pay due regard? e.g. working group, individual officer	Allocations Policy Working Group
When did the due regard process start?	April 2023

Section 1. Please describe briefly what this EIA is about.

This EIA seeks to assess the proposed allocations policy for North Yorkshire Council, which was developed as part of the preparations for Local Government Re-Organisation (LGR). The policy is drawn from the existing allocation policies of the predecessor councils which have been the subject of EIAs previously and approved through a democratic process.

In addition, the EIA will assess the impact of the proposal for North Yorkshire Council to adopt the North Yorkshire Home Choice allocation scheme across all locality areas which is a partnership scheme with Beyond Housing, Broadacres Housing Association and Yorkshire Housing.

The EIA has been created to reflect the difference in impact on the existing North Yorkshire Home Choice partnership area, which incorporates all former district and borough councils except Harrogate, and that of the former Harrogate Borough Council area, where a completely different allocations policy and vehicle for delivery is in place.

Section 2. Why is this being proposed? What are the aims? What does the authority hope to achieve by it? (e.g. to save money, meet increased demand, do things in a better way.)

Local housing authorities are required by law to have a scheme for determining priorities and procedures when allocating social housing, including council housing stock and housing association properties to rent. At present The Council (North Yorkshire) operates two allocation schemes, North Yorkshire Home Choice which covers all localities except for Harrogate and a standalone allocation scheme covering the former Harrogate BC area.

Local Government (Structural Changes) (General) (Amendment) Regulations 2018 provide a period of two years for the housing allocation schemes inherited from predecessor councils to be revised and harmonised across the new unitary authority.

The North Yorkshire Home Choice (NYHC) allocation scheme sets out how this is achieved via a Choice Based Lettings (CBL) scheme, the model that will be used to allocate homes. The scheme applies to households seeking social housing within North Yorkshire and existing social tenants wishing to transfer.

Section 3. What will change? What will be different for customers and/or staff?

Although the policy itself, which sets out criteria around qualification, eligibility and how applicants will be prioritised, will not be significantly different for customers of Harrogate or North Yorkshire Home Choice (the partnership that covers all of the North Yorkshire Council geographical area with the exception of Harrogate), the delivery vehicle of Choice Based Lettings will be a significant change for Harrogate customers.

For current customers who are familiar with the NYHC CBL scheme, the key differences will be some proposed changes to the existing NYHC common allocation policy. For staff, applicants and partner agencies operating within the Harrogate locality there will be more significant change, particular in the way they apply and are allocated accommodation, which will be reflected within the involvement and consultation processes.

The key changes are:

1. INCOME, SAVINGS AND CAPITAL

Applicants who are deemed to have sufficient income, savings, capital and/or assets more than £60000 will not normally qualify to join the housing register.

This is a change for Harrogate applicants, who currently have a threshold of £120,000, but is already North Yorkshire Home Choice policy so will not affect those applicants.

2. LOCAL CONNECTION

Local connection will be required to the North Yorkshire partnership area through family, employment, or residency. For the purposes of residency, applicants must either reside in the partnership area and have done for at least 6 out of the last 12 months or have previous residence in the partnership for at least 3 out of the last 5 years.

This is a change for Harrogate applicants, where applicants must reside in the area and have done so for at least two years but is already North Yorkshire Home Choice policy so will not affect those applicants.

For the purposes of employment, applicants must be employed in the North Yorkshire partnership area on either a full or part time basis for a minimum of six months. Casual, seasonal, and voluntary work is not included. An employment contract must remain valid at the point of offer.

This differs slightly from the current Harrogate allocations policy, where employment must be in the district, for a minimum period of 12 months, and at least 16 hours a week, and the North Yorkshire Home Choice policy where an applicant must be employed in the partnership area, and is defined as meaningful, permanent full or part time, not casual, seasonal or voluntary.

3. EXEMPTIONS FOR LOCAL CONNECTION

In line with statutory guidance, we propose to exempt divorced or separated spouses or civil partners of Service personnel who need to move out of accommodation provided by the Ministry of Defence from any local connection requirements.

This is not included in either the current North Yorkshire Home Choice or Harrogate Allocations Policies

We are proposing that care leavers (those aged between 16 and 20) who are owed a duty by North Yorkshire Council, or who are owed a duty by another Council but live in North Yorkshire are exempt from any local connection requirement.

This is a change for Harrogate applicants, and is not currently within policy, but is already within the North Yorkshire Home Choice policy so will not affect those applicants.

To comply with our duties under the Domestic Abuse Act 2021, we are proposing that those who have escaped domestic abuse in another local authority area and are living in a refuge or other form of safe temporary accommodation in the partnership area will be exempt from the requirement to have a local connection.

This is a change for Harrogate applicants, whose policy had not been updated to reflect the changes, but is already North Yorkshire Home Choice policy so will not affect those applicants.

4. **RURAL INITIATIVES**

In order to support rural communities, (settlements of less than 3000 population), properties in those areas may be restricted to those with a local connection to a specific parish. If there are no successful applicants, the property will be advertised to the wider partnership area.

This is currently included in the North Yorkshire Home Choice policy but there is no similar provision within Harrogate's policy.

5. **FREE MOVEMENT ACROSS THE PARTNERSHIP AREA**

Applicants will be able to bid on any property and will not be restricted to their locality area. This will apply to all applicants including those that are homeless.

This is currently included in the North Yorkshire Home Choice policy.

6. **REFUSALS**

An application will be cancelled if an applicant refuses two suitable offers of accommodation made in writing within a 12-month period, or a single direct offer of accommodation.

This differs slightly from the current North Yorkshire Home Choice, where applicants are entitled to three suitable offers of accommodation within no defined timescale, and Harrogate's Allocations Policy, where they are entitled to two offers within no defined timescale.

7. **ASSESSED HOUSING NEED**

Applications will be placed in either Emergency, Gold, Silver or Bronze band based on their assessed housing need. The definitions of each banding can be found in the draft North Yorkshire Home Choice allocations policy.

The bandings reflect the current North Yorkshire Home Choice policy so will not affect those applicants. For Harrogate, the way applicants are prioritised will be fundamentally similar but there will be a change as applicants will be placed in bandings rather than awarded points as they are currently.

8. **ASSESSED BEDROOM NEED**

The size of property that an applicant is eligible for is assessed by the family composition, taking into account the number of children and their ages. A table can be found in the draft North Yorkshire Home Choice policy.

This is a change for North Yorkshire Home Choice applicants, as it will reduce the age at which point someone requires their own bedroom from 21 to 17, but is already Harrogate policy so will

not affect those applicants. For Harrogate, the way applicants are prioritised will be fundamentally similar but there will be a change as applicants will be placed in bandings rather than awarded points.

9. **UNBORN CHILDREN.**

Generally, an unborn child is not counted as a member of the household until proof has been received that the child has been born, the only exception to this is where the applicant is within 12 weeks of their due date, and it is determined that they would be overcrowded in their current accommodation upon the birth of the child.

This is a change for Harrogate applicants, where an unborn child is not counted as a member of a household until they are born, but is already North Yorkshire Home Choice policy, albeit this is discretionary, so will not affect those applicants.

At present applicants who wish to join the respective allocations scheme can do so in a variety of ways, predominantly online but alternative options are also available to ensure fair and equal access to the housing register. Thereafter there is a marked divergence in the process applicants will then experience.

In Harrogate Officers will draw up shortlists of applicants for council housing and for nominations for Housing Association properties whereas under the NYHC CBL scheme, properties are advertised, and applicants express their interest through a weekly bidding process (*some applicants may receive a direct let in certain circumstances).

Choice Based Lettings schemes require more active engagement on the part of applicants and we acknowledge that, without the correct support mechanisms in place, some people could potentially be disadvantaged by the proactive nature of the system due to age, disability, ethnicity (where English is not a first language or where literacy levels are low) and other vulnerabilities, potentially linked to low income and rurality (access to technology, skills, broadband).

The North Yorkshire Home Choice partnership, excepting Harrogate, has been in operation since 2011, and has been mindful to mitigate any exclusion from its inception. The majority of partners at this time moved from points to choice-based lettings system in the same way Harrogate will be, and through equalities and operational groups has ensured this has remained on the agenda.

General evaluations of Choice Based Lettings, and a comprehensive study by Birmingham University in relation to North Yorkshire HomeChoice (2012), which considered vulnerability as one of its key themes, confirmed that issues around exclusion can be overcome so long as appropriate support and assistance is provided.

Within North Yorkshire Home Choice, and the proposed new allocations policy, vulnerable applicants can be identified through a series of questions within the application process and, as a result, they can:

- Nominate someone to act on their behalf.
- Be added to an assisted list and sent weekly newsletters.
- Be activated for auto-bid, meaning the system will place bids on properties for them.
- Make contact and place bids on properties via a variety of methods – phone, text, online, direct messaging on the system.

Alongside this, applicants can upload their own documents on to the system, meaning they do not have to attend an office or put items in the post.

Local partners and support services are also familiar with the system and have supported their customers for many years within the partnership area.

The table below shows the current number of active applicants on the respective housing registers.

Area	Number of active applicants
NYHC	6166
Harrogate	2084
TOTAL	8250

Section 4. Involvement and consultation

The draft Allocations Policy has been subject to a sixteen-week public consultation.

The consultation was undertaken by SNAP survey and open to all residents, stakeholders and interested organisations. The consultation was accessible to those who wish to provide feedback via other methods, such as telephone, post, and email and available in other formats and languages upon request.

The following consultation and promotional methods were utilised:

Communication to all applicants and prospective applicants via the NYHC and NYC websites with links to the online survey.

Direct contact with all existing Harrogate applicants.

Direct communication with involved tenants from the Harrogate, through face-to-face discussions, and other relevant forums.

Promotion on North Yorkshire Council's social media platforms.

Internal staff communications via email, team meetings etc.

Direct contact with all housing association partners.

The consultation summary report is available here

The consultation response indicated broad support for the policy proposals.

Section 5. What impact will this proposal have on council budgets? Will it be cost neutral, have increased cost or reduce costs?

In the short term there will be a budgetary impact in harmonising the two existing allocation schemes which cannot be avoided however once operational CBL has potential cost benefits, reducing void time etc.

Section 6. How will this proposal affect people with protected characteristics?

AGE	NYHC			Harrogate		
	No impact	Make things better	Make things worse	No impact	Make things better	Make things worse
	X			X		

Why will it have this effect? Provide evidence from engagement, consultation and/or service user data or demographic information etc.

NYHC:

Age of main applicant	Number	Percentage
	NYHC	NYHC
16-17	4	0.1%
18-24	586	9.5%
25-31	1077	17.5%
32-38	1082	17.5%
39-45	753	12.2%
46-52	599	9.7%
53-59	675	10.9%
60-64	376	6.1%
65-69	360	5.8%
70-74	275	4.5%
75-79	215	3.5%
80+	164	2.7%
TOTAL	6166	

Table 1 North Yorkshire HomeChoice Applicants March 2023

23% of applicants (1226) are aged 60 or above.

10% of applicants (590) are aged under 25.

Applicants already registered on the NYHC allocation scheme will not be affected by any of the proposed policy changes, as a result of their age.

Harrogate :

Applicants age	Number	%
Under 30	396	19
30-59	1270	61
Over 60	312	15
Sheltered Only	104	5
Total	2082	100

Table 2 Harrogate Applicants based on March 2023 percentages

It is not possible to compare the same data due to reporting restrictions from the allocations system.

20% of applicants are aged 60 or above.

19% of applicants are under 30.

The new policy will not affect how properties are allocated to those over 60, or under 25.

Moving to Choice Based Lettings has a potential to disadvantage due to age, specifically the elderly who might face particular challenges in engaging with choice-based lettings, given the system's requirement for active participation.

Potential barriers to elderly residents accessing the scheme are:

- visibility of the service and ease of registration
- lack of access to information about vacant properties
- lack of access to mechanisms for bidding

However, as per information in section 3, based on the experience of existing partners of North Yorkshire HomeChoice, any potential negative impact will be mitigated by the following measures:

	<p>Whilst the majority of applicants will be expected to register online, they can also be provided with a paper copy of the application form or can nominate someone to act on their behalf.</p> <p>Newsletters can also be sent to customers weekly with a list of vacant properties, and there are a variety of ways that applicants can place bids – including text, auto-bid (which, once activated, will place bids automatically on behalf of an applicant), telephone.</p> <p>We will also seek approval from the NYHC Partnership Board to re-establish an Equalities Monitoring operational group for a period of up to 12 months post the planned go-live date of 01 April 2025.</p> <p>The benefits, to all groups, of CBL includes greater customer choice (as Harrogate applicants will be able bid across the North Yorkshire area), more transparency, increased engagement and interaction between customers and housing providers, better acceptance rates and more sustainable neighbourhoods.</p>
Consultation:	<p>There were responses from all age groups to the consultation, which means feedback had representation from all age demographics. However, there was a significantly lower proportion of responders from younger age groups when compared to the NYHC list, particularly in the demographics 18-24 and 25-31.</p> <p>It is felt that most of the issues raised within the consultation can be addressed through the existing policy itself, by being flexible on a case by case basis, or surrounding working procedures (for example, in relation to support for young people and succession rights).</p> <p>No changes required to the EIA.</p>

DISABILITY	NYHC			Harrogate		
	No impact	Make things better	Make things worse	No impact	Make things better	Make things worse
	X			X		
Why will it have this effect? Provide evidence from engagement, consultation and/or service user data or demographic information etc.						
NYHC:	Disability	Number	% (of those with disabilities)			
	Autistic	87	2.9%			
	Not disclosed	167	5.5%			
	Hearing impairment	75	2.5%			
	Learning disability	114	3.8%			
	Mental Health	1053	34.6%			
	Mobility	677	22.3%			
	Other	267	8.8%			
	Progressive disability / chronic illness	547	18%			
	Visual Impairment	53	1.7%			
	TOTAL	3040				
<i>Table 3 NYHC Active Applications with identified disability</i>						

	<p>49% of main applicants (3040) have identified that they consider themselves to have a disability.</p> <p>Applicants already registered on the NYHC allocation scheme will not be affected by any of the proposed policy changes as a result of their disability.</p>
<p>Harrogate :</p>	<p>The level of breakdown for NYHC is not available on the Harrogate system but:</p> <p>23% (496) of waiting list applicants answered yes to “Does anyone have an illness, medical condition, or disability”.</p> <p>13% (269) require adaptations.</p> <p>Although the Allocations Policy will not have a negative impact on Harrogate applicants, moving to a Choice Based Lettings model for allocating social housing has a potential to disadvantage due to disability, both physical and cognitive – including hidden disabilities.</p> <p>Barriers which may prevent disabled residents actively participating in the process are:</p> <ul style="list-style-type: none"> • visibility of the service and ease of registration • lack of access to information about vacant properties • lack of access to mechanisms for bidding • the inability to understand written material (either through language or literacy difficulties) • the inability to comprehend the basic requirements of the scheme and to exercise informed choice • the inability to make or articulate choices and adopt an appropriate bidding strategy • the inability to participate actively in choice-based lettings over a sustained period as a result of ongoing health problems or debilitating illnesses, particularly mental ill health. <p>However, as per information in section 3, based on the experience of existing partner landlords, any potential negative impact will be mitigated by the following measures.</p> <p>Whilst the majority of applicants will be expected to register online, they can also be provided with a paper copy of the application form or can nominate someone to act on their behalf.</p> <p>Translation services can be utilised to assist and documentation can be translated on request.</p> <p>Newsletters can also be sent to customers weekly with a list of vacant properties, and there are a variety of ways that applicants can place bids – including text, auto-bid (which, once activated, will place bids automatically on behalf of an applicant), telephone.</p> <p>We will also seek approval from the NYHC Partnership Board to re-establish an Equalities Monitoring operational group for a period of up to 12 months post the planned go-live date of 01 April 2025.</p> <p>Adapted homes will be advertised as part of the scheme to ensure that applicants assessed as needing this type of accommodation are given the widest possible choice.</p>

	<p>This is consistent with the duty to promote disability equality.</p> <p>Applicants with disabilities who wish to bid for an un-adapted home are free to do so, although the landlord reserves the right to overlook any successful bid if it is not practical to adapt the property for the applicant or there is no funding to enable them to do so.</p> <p>Direct offers may also be utilised for cases who have an urgent need for housing and require an adapted property.</p> <p>The benefits, to all groups, of CBL includes greater customer choice (as Harrogate applicants will be able bid across the North Yorkshire area), more transparency, increased engagement and interaction between customers and housing providers, better acceptance rates and more sustainable neighbourhoods.</p>
Consultation:	<p>39% of responders identified as having a disability, compared to 49% of applicants on North Yorkshire HomeChoice. Harrogate did not have any corresponding data but 23% identified as having an illness, medical condition or disability. The consultation figure is therefore reasonably representative of both registers.</p> <p>The policy is flexible enough to take account of most of the feedback received with regards to individual circumstances in relation to the protected characteristic of disability, including offers not being reasonable following OT assessment, being unable to meet housing need as a result of income restrictions, increased banding due to health and wellbeing, and additional rooms where there is supporting evidence.</p> <p>No changes required to the EIA.</p>

SEX	NYHC			Harrogate		
	No impact	Make things better	Make things worse	No impact	Make things better	Make things worse
	X			X		

Why will it have this effect? Provide evidence from engagement, consultation and/or service user data or demographic information etc.

NYHC:	Sex	Number		Percentage	
		NYHC	Harrogate	NYHC	Harrogate
	Female	4002	1345	65	64.5
	Male	2164	735	35	35.3
	Other	0	2	0	0.1
	Prefer not to say	0	2	0	0.1
	TOTAL	6166	2084	100	100

Table 4 Sex by lead applicant for NYHC and Harrogate applicants

On North Yorkshire HomeChoice, 65% (4002) of lead applicants are female, and 35% (2164) are male

Social housing via North Yorkshire HomeChoice is allocated according to an applicant's eligibility, qualification status and housing need. This is irrespective of their sex.

Harrogate :	<p>In Harrogate, 65% (1345) waiting list applicants (lead applicants) are female, and 35% (735) male.</p> <p>Social housing in Harrogate is allocated according to an applicant's eligibility, qualification status and housing need. This is irrespective of their sex.</p>
Consultation:	<p>There was a slightly lower percentage of male respondents to the consultation when compared to both the Harrogate and North Yorkshire HomeChoice housing registers, however it was not a huge variance and other numbers were broadly similar.</p> <p>Limited feedback in terms of implications based on sex.</p> <p>No changes required to the EIA.</p>

RACE	NYHC			Harrogate		
	No impact	Make things better	Make things worse	No impact	Make things better	Make things worse
	X			X		

Why will it have this effect? Provide evidence from engagement, consultation and/or service user data or demographic information etc.

NYHC:	Ethnicity	Number		Percentage		Census 2021
		NYHC	Harrogate	NYHC	Harrogate	North Yorkshire
	Asian / Asian British – Indian	5	6	0.1%	0.3%	
Asian / Asian British – Pakistani	7	3	0.1%	0.1%		
Asian / Asian British – Bangladeshi	6	1	0.1%	0%		
Asian / Asian British – Chinese	1	0	0%	0%		
Asian / Asian British – Any other	16	13	0.3%	0.6%		
Asian Total	35	23	0.5%	1.1%	1.4%	
Black - African	9	18	0.1%	0.4%		
Black - Caribbean	8	3	0.1%	0.1%		
Black – Any other	10	1	0.2%	0%		
Black Total	27	22	0.4%	1%	0.4%	
Mixed – White and Black Caribbean	17	9	0.3%	0.4%		

Mixed – White and Black African	4	2	0.1%	0.3%	
Mixed – White and Asian	9	2	0.1%	0.09%	
Mixed – Any other	18	7	0.3%	0.3%	
Mixed Total	48	20	0.8%	1%	1.1%
White - British	5492	1396	89.1%	67%	
White - Irish	21	4	0.3%	0.2%	
White – Gypsy or Irish Traveller	10	1	0.2%	0%	
White – Any other	403	145	6.5%	7%	
White Total	5916	1546	96.1%	95%	96.7%
Other – any other ethnic group	43	18	0.7%	0.9%	
Other Total	43	18	0.7%	0.9%	0.5%
Not Stated/Refused	87	454	1.4%	21.8%	
TOTAL	6166	2084			

Table 5 Ethnicity of NYHC and Harrogate Applicants

All ethnic groups are slightly under- represented when compared to the North Yorkshire population figures on the latest 2021 census, with the exception of black and other ethnic groups.

The overwhelming majority of those on the list were from White backgrounds, accounting for 96.1% of the housing register, which reflects figures for the overall population in North Yorkshire.

Social housing via North Yorkshire HomeChoice is allocated according to an applicant's eligibility, qualification status and housing need. This is irrespective of race/ethnicity.

Harrogate :

In Harrogate currently 95% of applicants identify as white, white British or any other white background.

Although the Allocations Policy will not have a negative impact on Harrogate applicants, moving to a Choice Based Lettings model for allocating social housing has a potential to disadvantage due to ethnicity, where English is not a first language and/or where culturally levels of literacy are low.

However, as per information in section 3, based on the experience of existing partner landlords, any potential negative impact will be mitigated by the following measures.

Translation services can be utilised to assist the bidding process and documentation can be translated on request.

	<p>Whilst the majority of applicants will be expected to register online, they can also be provided with a paper copy of the application form or can nominate someone to act on their behalf.</p> <p>Newsletters can also be sent to customers weekly with a list of vacant properties, and there are a variety of ways that applicants can place bids – including text, auto-bid (which, once activated, will place bids automatically on behalf of an applicant), telephone.</p> <p>We will also seek approval from the NYHC Partnership Board to re-establish an Equalities Monitoring operational group for a period of up to 12 months post the planned go-live date of 01 April 2025.</p> <p>The local authority works closely with the refugee council and their support workers for families who arrive through the resettlement scheme.</p> <p>The benefits, to all groups, of CBL includes greater customer choice (as Harrogate applicants will be able bid across the North Yorkshire area), more transparency, increased engagement and interaction between customers and housing providers, better acceptance rates and more sustainable neighbourhoods.</p>
<p>Consultation :</p>	<p>There was a higher percentage of Asian respondents to the consultation when compared to Harrogate and NYHC registers, and a lower percentage of white respondents, although 11% did not state or refused to provide their ethnicity. All others were represented in broadly similar percentages.</p> <p>No feedback specifically in relation to ethnicity.</p> <p>No changes required to the EIA.</p>

GENDER REASSIGNMENT	NYHC			Harrogate		
	No impact	Make things better	Make things worse	No impact	Make things better	Make things worse
	X			X		

Why will it have this effect? Provide evidence from engagement, consultation and/or service user data or demographic information etc.	
<p>NYHC:</p>	<p><i>No user data currently available</i> Social housing is allocated according to an applicant’s eligibility, qualification status and housing need. This is irrespective of whether they identify as the same gender they were assigned at birth.</p>
<p>Harrogate :</p>	<p><i>No user data currently available</i> Harrogate currently allocate according to an applicant’s eligibility, qualification status and housing need. This is irrespective of whether they identify as the same gender they were assigned at birth.</p>
<p>Consultation:</p>	<p>Limited feedback in terms of implications on gender reassignment. No changes required to the EIA.</p>

	<p>NYHC</p>	<p>Harrogate</p>
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SEXUAL ORIENTATION	No impact	Make things better	Make things worse	No impact	Make things better	Make things worse
		X			X	
Why will it have this effect? Provide evidence from engagement, consultation and/or service user data or demographic information etc.						
NYHC:	<i>No user data currently available</i> Social housing is allocated according to an applicant's eligibility, qualification status and housing need. This is irrespective of their sexual orientation.					
Harrogate :	<i>No user data currently available</i> Social housing is allocated according to an applicant's eligibility, qualification status and housing need. This is irrespective of their sexual orientation.					
Consultation:	No responses were made to the consultation where sexual orientation was mentioned. No changes required to the EIA.					

RELIGION OR BELIEF	NYHC			Harrogate		
	No impact	Make things better	Make things worse	No impact	Make things better	Make things worse
Why will it have this effect? Provide evidence from engagement, consultation and/or service user data or demographic information etc.						
NYHC:	<i>No user data currently available</i> Social housing is allocated according to an applicant's eligibility, qualification status and housing need. This is irrespective of their religion or faith.					
Harrogate :	<i>No user data currently available</i> Social housing is allocated according to an applicant's eligibility, qualification status and housing need. This is irrespective of their religion or faith. Applicants may need to know the location of places of worship when considering bids under CBL.					
Consultation:	No relevant responses were made to the consultation where religion or belief was mentioned. No changes required to the EIA.					

PREGNANCY OR MATERNITY	NYHC			Harrogate		
	No impact	Make things better	Make things worse	No impact	Make things better	Make things worse
		X			X	
Why will it have this effect? Provide evidence from engagement, consultation and/or service user data or demographic information etc.						
NYHC:	<i>No user data held</i>					

	<p>Social housing is allocated according to an applicant's eligibility, qualification status and housing need.</p> <p>In the draft Allocations Policy, an unborn child will not be counted as a member of the household until proof has been received that the child has been born. The only exception to this is where the applicant is within 12 weeks of their due date, and it is determined that they would be overcrowded in their current accommodation upon the birth of the child.</p> <p>In the present Allocations Policy, there is discretion for staff to award additional bedrooms within 12 weeks of the due date but the new policy makes this a mandatory requirement and, as a result, will make things better for those who are pregnant.</p>
Harrogate :	<p>In Harrogate currently 4.75% (99) of applicants were pregnant when they last updated their profile.</p> <p>This will have a positive impact for Harrogate applicants, as currently unborn children are not counted until proof has been received that the child has been born.</p>
Consultation:	<p>The vast majority agreed, or were neutral, on the proposal in Q9 (397 of 471 respondents). Based on the comments received, it is felt the policy is balanced between the mixed views and feedback on this subject, and the mandatory requirement to update within 12 weeks of the due date offers more protection than the existing policies of NYHC and Harrogate. No changes required to the EIA.</p>

MARRIAGE OR CIVIL PARTNERSHIP	NYHC			Harrogate		
	No impact	Make things better	Make things worse	No impact	Make things better	Make things worse
	X			X		
Why will it have this effect? Provide evidence from engagement, consultation and/or service user data or demographic information etc.						
NYHC:	<i>No user data available</i> Social housing is allocated according to an applicant's eligibility, qualification status and housing need. This is irrespective of marital status.					
Harrogate :	<i>No user data available</i> Social housing is allocated according to an applicant's eligibility, qualification status and housing need. This is irrespective of marital status					
Consultation:	Limited feedback in terms of impact on Marriage or Civil Partnership. No changes required to the EIA.					

Section 7. How will this proposal affect people who...

LIVE IN A RURAL AREA	NYHC			Harrogate		
	No impact	Make things better	Make things worse	No impact	Make things better	Make things worse
	X				X	

<p>Why will it have this effect? Provide evidence from engagement, consultation and/or service user data or demographic information etc.</p> <p>The policy recognises the issues in terms of rural communities not having access to affordable and social housing. To support rural communities a partner landlord may allocate properties to those with a local connection to a specific parish.</p> <p>Rural communities may be defined as parish settlements of less than 3000 in population. If there are no successful applicants, the property will be advertised to the wider partnership area.</p>	
NYHC:	The proposed policy contains the same criteria as the existing NYHC policy.
Harrogate :	<p>The rural parish connection will have a positive impact for Harrogate applicants as there is no provision with the existing allocations policy.</p> <p>However, moving to choice-based lettings has a potential to disadvantage due to rurality.</p> <p>Potential barriers are the visibility of the scheme, access to information about available properties and access to the mechanisms used for bidding linked to available broadband, technology, and phone signal.</p> <p>However, as per information in section 3, any potential negative impact will be mitigated by the following measures.</p> <p>Whilst the majority of applicants will be expected to register online, they can also be provided with a paper copy of the application form or can nominate someone to act on their behalf.</p> <p>Newsletters can also be sent to customers weekly with a list of vacant properties, and there are a variety of ways that applicants can place bids – including text, auto-bid (which, once activated, will place bids automatically on behalf of an applicant), telephone.</p> <p>We will also seek approval from the NYHC Partnership Board to re-establish an Equalities Monitoring operational group for a period of up to 12 months post the planned go-live date of 01 April 2025.</p> <p>The benefits, to all groups, of CBL includes greater customer choice (as Harrogate applicants will be able bid across the North Yorkshire area), more transparency, increased engagement and interaction between customers and housing providers, better acceptance rates and more sustainable neighbourhoods.</p>
Consultation:	<p>Most feedback was received for question 4, in relation to rural initiatives. The majority of the feedback was positive or neutral for this proposal (404 of 470 respondents). Valid points were raised around residents of neighbouring areas possibly missing on bids for properties nearby, however most were in support for the proposal as written. Other comments received can be addressed by wider housing management procedures or multi agency working, such as support for addiction etc.</p> <p>No changes required to the EIA.</p>

HAVE A LOW INCOME	NYHC			Harrogate		
	No impact	Make things better	Make things worse	No impact	Make things better	Make things worse
	X				X	
<p>Why will it have this effect? Provide evidence from engagement, consultation and/or service user data or demographic information etc.</p> <p>The draft policy states that applicants may not qualify to join the register if they have a combined household income and/or savings and/or capital of £60,000 or above which would enable them to meet their own housing need.</p>						
NYHC:	The NYC policy contains the same criteria as the existing North Yorkshire Home Choice policy.					
Harrogate :	<p>The current Harrogate policy allows applicants to have up to £120k in income, savings, and equity before they do not qualify. As a result, fewer applicants will qualify to join the housing register under the new Allocations Policy due to this figure being reduced to £60k giving those on a lower income more opportunity to be re-housed.</p> <p>The policy change will affect 4 applicants.3 of whom are protected by age (over 65) and one by disability. Mitigating actions will be put in place, to offer those affected applicants a face to face meeting and one to one support to access alternative tenures.</p> <p>However, moving to Choice Based Lettings has a potential to disadvantage those on a low income. Potential barriers include the access to technology, literacy levels, skills and ability to engage with the bidding mechanism.</p> <p>Whilst the majority of applicants will be expected to register online, they can also be provided with a paper copy of the application form or can nominate someone to act on their behalf.</p> <p>Newsletters can also be sent to customers weekly with a list of vacant properties, and there are a variety of ways that applicants can place bids – including text, auto-bid, telephone.</p> <p>We will also seek approval from the NYHC Partnership Board to re-establish an Equalities Monitoring operational group for a period of up to 12 months post the planned go-live date of 01 April 2025, who will actively monitor the impact of the policy on those with protected characteristics.</p> <p>The benefits, to all groups, of CBL includes greater customer choice (as Harrogate applicants will be able bid across the North Yorkshire area), more transparency, increased engagement and interaction between customers and housing providers, better acceptance rates and more sustainable neighbourhoods.</p>					
Consultation:	<p>There is sufficient flexibility in the policy to address concerns raised and individual cases to be considered.</p> <p>No changes required to the EIA.</p>					

ARE CARERS (UNPAID FAMILY OR FRIEND)	NYHC			Harrogate		
	No impact	Make things better	Make things worse	No impact	Make things better	Make things worse
	X			X		
<p>Why will it have this effect? Provide evidence from engagement, consultation and/or service user data or demographic information etc.</p> <p>The new allocations policy contains provision for carers to be awarded an additional bedroom in certain, defined circumstances:</p> <p>They must be in receipt of PIP or DLA; it must be for a minimum of 2/3 nights per week on average; care must be provided during the night; care must be provided by someone who does not normally live with the applicant (as they would be considered part of their household for the purposes of assessment in this case), the overnight bedroom must be used by the carer and only one extra bedroom will be allowed.</p>						
NYHC:	<p><i>No user data available</i></p> <p>In the present Allocations Policy, there is discretion for staff to award an additional bedroom for a carer or to facilitate specialist medical treatment.</p> <p>The new policy is better defined in terms of what is expected but ultimately achieves the same so there will be no impact.</p>					
Harrogate :	<p><i>No user data available</i></p> <p>The current Harrogate policy allows for carers in much the same way as the new policy so there would be no change.</p>					
Consultation:	<p>There is flexibility within the policy to take account of individual circumstances.</p> <p>No changes required to the EIA.</p>					

ARE FROM THE ARMED FORCES COMMUNITY	NYHC			Harrogate		
	No impact	Make things better	Make things worse	No impact	Make things better	Make things worse
		X			X	
<p>Why will it have this effect? Provide evidence from engagement, consultation and/or service user data or demographic information etc.</p>						
NYHC:	<p><i>No user data available</i></p> <p>NYHC applied an exception to the local connection criteria for members of the Armed Forces.</p> <p>Members of the Armed Forces are also exempt from the "Sufficient Financial Resources" qualifying criteria if this as a result of compensation for an injury or disability sustained whilst on active duty. This is the same as existing policy.</p> <p>The new policy is compliant with the Armed Forces Act and pays due regard to the Armed Forces Covenant duty.</p>					

	<p>The new policy will extend the local connection exception following the “armed forces community” definition which includes former partners and their first re-location after the end of the relationship.</p> <p>Current NYHC application includes questions on current and former armed forces personnel. Date of discharge and bereavement.</p> <p>New policy questions will be improved to reflect the armed forces community definition. Dedicated web page signposting support available to armed forces to be introduced.</p>
Harrogate :	<p><i>No user data available</i></p> <p>The new policy is an improvement for Harrogate. Armed Forces were previously given exception to local connection, additional points for need etc but the new policy opens it up to ‘the community’ of spouses/ family etc which will have a positive impact for those who are defined within the armed forces community.</p> <p>The new policy is compliant with the Armed Forces Act and pays due regard to the Armed Forces Covenant duty.</p>
Consultation:	<p>6.1% of responses came from Armed Forces personnel or those with a connection to the Armed Forces.</p> <p>No changes required to the EIA.</p>

Section 8. Geographic impact – Please detail where the impact will be (please tick all that apply)

North Yorkshire wide	<p>The policy and allocation scheme will operate across the full council area. Smaller rural locations may have Local Lettings Initiatives, or rural lettings, in place to try and provide much needed affordable and social housing for those who live and work locally. This has a knock-on effect in terms of the amount of overall accommodation the list that everybody can bid on. However, LLIs have been in operation across the North Yorkshire Home Choice partnership area for a considerable amount of time, and Harrogate has had restricted bidding within the former borough area, so it is not expected that this will cause any issues.</p>
Harrogate	<p>The chosen method of allocation, Choice Based Letting, will impact Harrogate specifically as it has not previously been used here. Applicants within Harrogate will also now be in competition for properties in the former borough with those who have a local connection to the wider NY partnership area. However, this will be balanced by their ability to bid beyond their previous boundaries for properties in other areas of North Yorkshire.</p>

If you have ticked one or more areas, will specific town(s)/village(s) be particularly impacted? If so, please specify below.

As above, areas with LLIs or rural lettings criteria in place, which are currently all across the partnership area.

Applicants in the Harrogate locality will be required to ‘reregister’ on the CBL system and familiarise themselves with the new process, as will staff and partners operating here.

Section 9. Will the proposal affect anyone more because of a combination of protected characteristics? (e.g. older women or young gay men) State what you think the effect may be and why, providing evidence from engagement, consultation and/or service user data or demographic information etc.

There is no reason to suggest that the policy and allocations scheme would have any adverse impact on combinations of characteristics.

Section 10. Next steps to address the anticipated impact. Select one of the following options and explain why this has been chosen. (Remember: we have an anticipatory duty to make reasonable adjustments so that disabled people can access services and work for us)	Tick option chosen
1. No adverse impact - no major change needed to the proposal. There is no potential for discrimination or adverse impact identified.	x
2. Adverse impact - adjust the proposal - The EIA identifies potential problems or missed opportunities. We will change our proposal to reduce or remove these adverse impacts, or we will achieve our aim in another way which will not make things worse for people.	
3. Adverse impact - continue the proposal - The EIA identifies potential problems or missed opportunities. We cannot change our proposal to reduce or remove these adverse impacts, nor can we achieve our aim in another way which will not make things worse for people. (There must be compelling reasons for continuing with proposals which will have the most adverse impacts. Get advice from Legal Services)	
4. Actual or potential unlawful discrimination - stop and remove the proposal – The EIA identifies actual or potential unlawful discrimination. It must be stopped.	
<p>Explanation of why option has been chosen. (Include any advice given by Legal Services.)</p> <p>Both legacy allocation schemes had already been subject to EIA's and broader impact assessments in the case of NYHC and were fully compliant with the relevant legislation at the time, which has not changed recently.</p> <p>Consultation feedback does not highlight any adverse impact.</p> <p>The revised policy has been reviewed by Legal and their proposed amendments have been fully incorporated.</p>	

Section 11. If the proposal is to be implemented how will you find out how it is really affecting people? (How will you monitor and review the changes?)

As part of the procurement of the new CBL system, equalities monitoring will be refreshed to reflect protected characteristics.

We will seek approval from the NYHC partnership board to re-establish an Equalities Monitoring operational group for a period of up to 12 months post the planned go-live date of 01 April 2025 as noted above.

We may also undertake other activities if it is appropriate such as customer journey mapping and tenant scrutiny once new housing structures are in place.

Rolling reviews will take place on an annual basis to make contact with those who are not bidding and engaging with the process.

Section 12. Action plan. List any actions you need to take which have been identified in this EIA, including post implementation review to find out how the outcomes have been achieved in practice and what impacts there have actually been on people with protected characteristics.				
Action	Lead	By when	Progress	Monitoring arrangements
Update CBL system with equalities monitoring questions	Carl Doolan	1 st April 2025		
Set up Equalities Working Group	Carl Doolan	1 st April 2025		
Provide additional support to those applicants identified as no longer meeting qualification criteria	Carl Doolan	1 st April 2025		
Undertake Customer Journey Mapping	Carl Doolan	Post April 2025		
Establish annual rolling reviews of non-engagement.	Carl Doolan	Post April 2025		

Section 13. Summary

This EIA confirms the statement made within the draft Allocations Policy, that scheme will be accessible and sensitive to the diverse needs of individuals and will take measures to ensure that people with disabilities have equal access to housing opportunities. Whilst there is clearly much more potential impact on those who will join the scheme from Harrogate, this is mitigated through the processes that are in place and the benefit of development that has taken place over many years by the NY Home Choice Partnership.

The scheme is committed to ensuring equal access in its allocation of housing. No one will be treated any less favourably than anyone else because of age, disability, gender reassignment, marital status and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation.

The creation of an equalities monitoring group will help to continue to monitor impact of policy beyond its commencement.

Section 14. Sign off section

This full EIA was completed by:

Name: Vicky Young and Dominic Richardson

Job title: Housing Policy and Strategy Officer and Housing Tenant Services Team Leader

Directorate: Community Development

Completion date: 8/1/2024

Authorised by relevant Assistant Director (signature): Andrew Rowe

Date: 9/1/2024