

General Equality Impact Assessment (EIA) Form

Support:

An [EIA toolkit](#), [workshop content](#), and guidance for completing an [Equality Impact Assessment \(EIA\) form](#) are available on the [EIA page](#) of the [EDI Internal Hub](#). Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact your Equality, Diversity, and Inclusion (EDI) Business Partner as follows:

- Economy, Environment and Culture (EEC) – [Chris Brown](#),
- Families, Children, and Learning (FCL) – [Jamarl Billy](#),
- Governance, People, and Resources (GPR) – [Eric Page](#).
- Health and Adult Social Care (HASC) – [Zofia Danin](#),
- Housing, Neighbourhoods, and Communities (HNC) – [Jamarl Billy](#)

Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Business Partner. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the 'activity' you are assessing.

Process:

- Once fully completed, submit your EIA to your EDI Business Partner, copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), Equalities inbox, and any other relevant service colleagues to enable EIA communication, tracking and saving.
- When your EIA is reviewed, discussed, and then approved, the EDI Business Partner will assign a reference to it and send the approved EIA form back to you with the EDI Manager or Head of Communities, Equality, and Third Sector (CETS) Service's approval as appropriate.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the [EIA toolkit](#) for more information.

Name of activity or proposal being assessed:	Underbidding change to the Housing Allocations Policy
Directorate:	Housing & Health
Service:	Homelessness & Housing Options
Team:	Housing Allocations
Is this a new or existing activity?	New activity
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	No

2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Luke Harris, Housing Options Manager
Accountable Manager:	Harry Williams, Head of Homelessness & Housing Options
Additional stakeholders collaborating or contributing to this assessment:	N/A

3. About the activity

To make a change to the council's Housing Allocations Policy which will alter the priorities, and the procedure to be followed, in allocating housing accommodation.

The proposed change is to allow households with a need for 4+ bedrooms to bid for and accept an allocation of a 3-bed property - which is smaller than their assessed housing need. For ease of reference, I refer to this as "underbidding".

What are the desired outcomes of the activity?

To alleviate the level of crowding experienced by households in the city with a need for 4+ bedrooms by allocating them a property with fewer bedrooms than meets their needs, because waiting times for social housing for households with a need for 4+ bedrooms are long. For example, in 2023/24, the average waiting time to be rehoused for a household with a 4-bed need on the council's housing register in priority band A was 8.7 years.

The following table shows the numbers of households on the council's Housing Register by household type and bedroom need:

Applicant Household Type	Eligible Number of Bedrooms						
	1	2	3	4	5	6	Total
Family3childcanshare	2	8	601	18			629
Family3childcantshare		1	40	26			67
largerfamily4	2	2	124	77	71		276
largerfamily5	1		2	78	13	1	95
family6plus			1	4	1		6
Total households	5	11	768	203	85	1	1,073

Which key groups of people do you think are likely to be affected by the activity?

All potential and current applicants for social housing, those in queue for social housing. Households with a need for 4+ bedrooms are likely to be positively affected by being allowed to be allocated accommodation with fewer bedrooms than their housing need. Households with a need for 3 bedrooms are likely to be negatively affected because they have longer waiting times for rehousing via the housing register as a result of 4-bed need households competing with them for the same scarce social housing properties.

4. Consultation and engagement

Summary of consultation and engagement

To comply with the consultation duty in s.166A(13) of the Housing Act 1996, we consulted with social landlords holding nomination agreements with the council to gauge their views about whether they would be willing to accept households to bid for and accept an allocation of accommodation which is smaller than their assessed housing need.

On 29 May 2024 we sent the following:

'We propose to change the Housing Allocations Policy to allow housing register applicants to bid for and accept an allocation of accommodation which is smaller than their assessed housing need.

This proposed change would allow, for example, a household with a need for 4 bedrooms to bid for and accept a 3-bed socially-rented home.

The exception to this proposed change is that bidding and allocation will not be permitted if it results in a breach of the space standard or room standard in Part X of the Housing Act 1985.

Under the proposed change, the council may accept that the household remains overcrowded, but their priority will likely decrease (for example, from Band A or B to Band B or C depending on the severity of the situation) and they will be given a new priority date, so their relative priority for an adequately sized home under the Housing Allocations Policy will decrease.

Equipped with that information, it would for applicants to express their informed preference for a smaller home by actively placing bids via the choice-based lettings scheme.'

We sent the above to the following social landlords with nomination agreements with the council:

- Anchor
- Brighton Housing Trust
- Brighton Lions Housing
- Brighton YMCA
- Clarion
- The Guinness Partnership
- Hyde Housing

- JLiving
- Moat
- Optivo
- Orbit
- Places For People
- Sanctuary Housing
- Saxon Weald
- Stonewater
- Southern Housing Group
- Worthing Homes

We received replies from the following landlords, all of whom said they would not accept nominations of households who had bid for and accepted an allocation of accommodation which is smaller than their assessed housing need:

- Clarion
- The Guinness Partnership
- Stonewater

Two of these landlords gave a reason for not accepting nominations of these households is that it would likely cause leaks, condensation, damp and mould, in that moving a family into a property that is too small for them, will likely contribute to the formation of health hazards for the tenants, including condensation/humidity and so damp, from the property being crowded. Two landlords gave the reason that underbidding would breach their internal lettings policy.

5. Current data and impact monitoring

Age		YES						
Census Data								
Age Group	% of Brighton & Hove Population							
0-15	15							
16-19	5.4							
20-24	10.1							
25-34	15							
35-49	21.3							
50-64	19.1							
65-74	7.6							
75-84	4.4							
85+	2							
<i>Table: Office for National Statistics 2021 Census Data on Age of Brighton & Hove Population</i>								
Households on the Housing Register: Breakdown by age group of main applicant (5 year bands)								
Eligible number of bedrooms:								
Age column	1	2	3	4	5	6	Grand Total	
Household type: Family of 3 child can share	2	8	601	18			629	

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20-24			4			4
25-29		1	36	1		38
30-34	2	1	87	1		91
35-39		2	150	1		153
40-44		1	149	9		159
45-49			80	2		82
50-54		2	45	1		48
55-59		1	27	2		30
60-64			15			15
65-69			5			5
70-74			1	1		2
85-89			1			1
95-99			1			1
Family of 3 child can't share		1	40	26		67
25-29			6			6
30-34			7	2		9
35-39			6	8		14
40-44			9	6		15
45-49		1	5	1		7
50-54			2	3		5
55-59			2	2		4
60-64			1	2		3
65-69			2			2
70-74				2		2
Larger family of 4	2	2	124	77	71	276
20-24					1	1
25-29			6	1	3	10

30-34		1	15	8	7		31
35-39	1		29	21	19		70
40-44	1		30	20	17		68
45-49		1	24	14	10		49
50-54			6	7	5		18
55-59			8	4	5		17
60-64			4	1	2		7
65-69			2	1	1		4
70-74					1		1
Larger family of 5	1		2	78	13	1	95
15-19	1						1
30-34			1	5	2		8
35-39			1	20	4		25
40-44				20	4	1	25
45-49				18	2		20
50-54				9			9
55-59				5	1		6
60-64				1			1
Family of 6 plus			1	4	1		6
30-34				1			1
35-39			1	1			2
40-44				1	1		2
55-59				1			1
Grand Total	5	11	768	203	85	1	1073

Disability and inclusive adjustments, coverage under equality act and not	YES
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Our computerised record system records whether applicants on the Housing Register have a 'mobility category'. Applicants are awarded a mobility category when a housing officer is satisfied that they are unable to traverse more than 3 stairs due to a long-term impairment. Any applicant with a mobility code would, by the above definition, also be disabled according to the definition set out in the Equality Act 2010. The mobility code group data is used a proxy for disability in this case. However, it is acknowledged that this approach would be unlikely to include those applicants who are disabled because of a mental impairment and will exclude those applicants who can traverse the stairs but who are nonetheless disabled by a physical impairment.

The proportion of applicants with a mobility category in each priority queue tends to be lower than the average number of households in Brighton & Hove who are disabled. This is evidence that using the mobility category as a proxy for disability is lacking as, we believe, disabled households are disproportionately more likely to be in housing need than non-disabled households. For example, the 2021 Census showed that 44.1% of people identified as homeless were disabled¹⁴.

8.8% of applicants on the Housing Register have a mobility code.

Census Data

Disability status	% of Brighton & Hove Population
Disabled under the Equality Act: Day-to-day activities limited a lot	8.0
Disabled under the Equality Act: Day-to-day activities limited a little	11.5
Not disabled under the Equality Act	80.5

Table: Office for National Statistics 2021 Census Data on Disability status of Brighton & Hove Population

Mobility code column	Bedroom need:						Total
	1	2	3	4	5	6	
Household type:							
Family of 3 child can share	2	8	601	18			629
1			4				4
2			2				2
3		1	15	2			18
None			1				1
None	2	7	579	16			604
Family of 3 child can't share		1	40	26			67
1			2				2
2			1	2			3
3			1	3			4
None		1	36	21			58
Family of 6plus			1	4	1		6
None			1	4	1		6
Larger family of 4	2	2	124	77	71		276
1			1				1
2			1	1			2
3			6	3	1		10
None	2	2	116	73	70		263
Larger family of 5	1		2	78	13	1	95
1				1			1
2	1						1
3				3			3
None			2	74	13	1	90
Grand Total	5	11	768	203	85	1	1073

Table: Households on the Housing Register: Breakdown by mobility code

Ethnicity, Race, ethnic heritage (including Gypsy, Roma, Travellers) YES

Census Data

Ethnic group	% of Brighton & Hove Population
Asian, Asian British or Asian Welsh	4.8
Black, Black British, Black Welsh, Caribbean or African	2.0
Mixed or multiple ethnic groups	4.8
White	85.4
Other ethnic group	3.1

Table: Office for National Statistics 2021 Census Data on Household composition of Brighton & Hove Population

Race/Ethnicity of Main Applicant Column	Bedroom Need						Grand Total
	1	2	3	4	5	6	
Household type:							
Family of 3 child can share	2	8	601	18			629
Arabic			9				9
Asian or Asian British - Bangladeshi			12	2			14
Asian or Asian British - Other			8	1			9
Asian or Asian British - Pakistani			2				2
Black or Black British - African			26				26
Black or Black British - Caribbean			3				3
Black or Black British - other			2				2
Chinese			4				4
Gypsy or Traveller			1				1

Mixed - other			5		5
Mixed - White and Asian			1		1
Mixed - White and Black African			8		8
Mixed - White and Black Carribbean			2		2
Not Known	1	1	174	4	180
Other		1	18	2	21
White - British	1	6	293	9	309
White - Irish			2		2
White - other			22		22
(blank)			9		9
Family of 3 child can't share		1	40	26	67
Asian or Asian British - Bangladeshi			2	1	3
Asian or Asian British - Other			1	1	2
Asian or Asian British - Pakistani				1	1
Black or Black British - African			1		1
Mixed - White and Asian				1	1
Mixed - White and Black Carribbean			1		1
Not Known			8	5	13
Other			1		1
White - British			23	12	35
White - other		1	3	4	8
(blank)				1	1
Family of 6 plus			1	4	6
Black or Black British - Caribbean				1	1

Not Known			1			1
White - British				2	1	3
White - other				1		1
Larger family of 4	2	2	124	77	71	276
Arabic			1			1
Asian or Asian British - Bangladeshi			4		2	6
Asian or Asian British - Other			1		1	2
Asian or Asian British - Pakistani				1		1
Black or Black British - African			5	2	2	9
Black or Black British - other			2			2
Gypsy or Traveller					1	1
Mixed - other			2			2
Mixed - White and Black African			3			3
Mixed - White and Black Carribbean			1			1
Not Known			45	24	13	82
Other			5	3	2	10
White - British	2	1	47	42	44	136
White - Irish					1	1
White - other		1	5	4	5	15
(blank)			3	1		4
Larger family of 5	1		2	78	13	95
Asian or Asian British - Bangladeshi				4		4
Asian or Asian British - Other				2		2
Black or Black British - African				3		3
Mixed - other				1		1

Mixed - White and Asian				1			1
Mixed - White and Black African				2			2
Not Known	1		30	5			36
Other			3				3
White - British	1		29	7	1		38
White - other (blank)	1		2	1			4
			1				1
Grand Total	5	11	768	203	85	1	1073

Table: Households on the Housing Register: Breakdown by Ethnicity/Race of main applicant

Religion, Belief, Spirituality, Faith, or Atheism	YES
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Census Data

Religion	% of Brighton & Hove Population
No religion	55.2
Christian	30.9
Buddhist	0.9
Hindu	0.8
Jewish	0.9
Muslim	3.1
Sikh	0.1
Other religion	1.0
Not answered	7.1

Table: Office for National Statistics 2021 Census Data on Religion of Brighton & Hove Population

Religion of main applicant column	Bedroom Need
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Household Type:	1	2	3	4	5	6	Grand Total
Family of 3 child can share	2	8	601	18			629
Blank			56	2			58
Buddhist			2				2
Christian		1	72	2			75
Jewish			2				2
Muslim			23	2			25
No Religion		4	178	3			185
NOT CAPTURED	1	2	131	6			140
OTHER			3				3
Prefer not to say	1	1	134	3			139
Family of 3 child can't share		1	40	26			67
Blank			6	5			11
Christian		1	4	7			12
Muslim			3	3			6
No Religion			18	6			24
NOT CAPTURED			6	2			8
OTHER				1			1
Prefer not to say			3	2			5
Family of 6 plus			1	4	1		6
Blank				1			1
Christian					1		1
No Religion				2			2
OTHER				1			1
Prefer not to say			1				1
Larger family of 4	2	2	124	77	71		276
Blank			19	3			22
Christian		1	12	6	15		34

Muslim			8	5	4		17
No Religion	2	1	24	27	34		88
NOT CAPTURED			28	21	5		54
OTHER			3		1		4
Prefer not to say			30	15	12		57
Larger family of 5	1		2	78	13	1	95
				9			9
Christian				5			5
Jewish	1						1
Muslim				3			3
No Religion			1	17	7	1	26
NOT CAPTURED				17	3		20
OTHER				1			1
Prefer not to say			1	26	3		30
Grand Total	5	11	768	203	85	1	1073

Table: Households on the Housing Register: Breakdown by Religion/Belief of main applicant

Gender Identity and Sex (including non-binary and Intersex people) YES

Our computerised record system was not able to produce a report on the sex/gender of the applicants on the Housing Register. While far from ideal, data on the title of main applicants on the Housing Register has been used as a proxy for sex/gender and is set out below.

Title of main applicant	Bedroom Need						Grand Total
	1	2	3	4	5	6	
Household type:							
Family 3 child can share	2	8	601	18			629
Miss		1	217	7			225
Mr	1	1	113	6			121

Mrs	1		93	1		95	
Ms		1	67	3		71	
Other			1			1	
(blank)		5	110	1		116	
Family 3 child can't share		1	40	26		67	
Miss			22	8		30	
Mr			5	5		10	
Mrs		1	6	9		16	
Ms			2	3		5	
(blank)			5	1		6	
Family 6 plus			1	4	1	6	
Miss				1	1	2	
Mrs				1		1	
Ms				2		2	
(blank)			1			1	
Larger family 4	2	2	124	77	71	276	
Miss	1	1	44	20	29	95	
Mr			20	12	11	43	
Mrs			25	21	19	65	
Ms		1	13	8	4	26	
Other				1		1	
(blank)	1		22	15	8	46	
Larger family 5	1		2	78	13	95	
Miss				22	4	27	
Mr	1			19	1	21	
Mrs			1	14	5	20	
Ms				5	1	6	
(blank)			1	18	2	21	
Grand Total	5	11	768	203	85	1	1073

Table: Households on the Housing Register: Breakdown by title of main applicant

Census Data

Sex	% of Brighton & Hove Population
Female	51.1
Male	48.9

Table: Office for National Statistics 2021 Census Data on sex of the Brighton & Hove resident completing the census

Gender Reassignment YES

Our computerised record system does not hold data on whether applicants on the Housing Register have undergone, or proposed to undergo, gender reassignment.

Census Data

Gender identity	% of Brighton & Hove Population
Gender identity the same as sex registered at birth	92.97
Gender identity different from sex registered at birth	0.99
Not answered	6.21

Table: Office for National Statistics 2021 Census Data on Gender identity of Brighton & Hove Population

Sexual Orientation YES

Sexual orientation of main applicant **Bedroom Need**

290

Household type	1	2	3	4	5	6	Grand Total
Family 3 child can share	2	8	601	18			629
Blank	1	1	136	3			141
Bisexual			25				25
Gay			1				1
Heterosexual		4	263	10			277
Lesbian			4				4
Not Declared		2	130	4			136
Other			2				2
Prefer not to say	1	1	40	1			43
Family 3 child can't share		1	40	26			67
Blank			3	3			6
Bisexual			3	1			4
Heterosexual		1	23	13			37
Not Declared			7	5			12
Other			1				1
Prefer not to say			3	4			7
Family 6 plus			1	4	1		6
Heterosexual				4			4
Prefer not to say			1		1		2
Larger family 4	2	2	124	77	71		276
Blank			32	16	12		60
Bisexual			2	1	3		6
Heterosexual	2	2	51	31	45		131
Lesbian			1	1			2
Not Declared			34	21	1		56
Prefer not to say			4	7	10		21
Larger family 5	1		2	78	13	1	95

Blank		1	26	2		29
Bisexual			1			1
Heterosexual		1	29	6		36
Not Declared	1		19	4		24
Prefer not to say			3	1	1	5
Grand Total	5	11	768	203	85	1073

Table: Sexual orientation of main applicant on the Council's Housing Register, by household type

Census Data

Sexual orientation	% of Brighton & Hove Population
Heterosexual	80.62
Lesbian, Gay, Bisexual, or Other (LGB+)	10.73
Not answered	8.66

Table: Office for National Statistics 2021 Census Data on sexual orientation of the Brighton & Hove resident completing the census

Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	YES
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Our computerised record system does not record whether applicants on the Housing Register are pregnant. Applicants are typically on the Housing Register for years while waiting to bid successfully for accommodation. Pregnancy status will be very unlikely to remain constant between when an applicant first registers on the Housing Register and the point they are offered a property. Maternity/paternity is therefore the more pertinent characteristic. All households used in the data which will be affected by this policy proposal will contain children.

Applicant Household Type	Eligible Number of Bedrooms						
	1	2	3	4	5	6	Total
Family3childcanshare	2	8	601	18			629
Family3childcantshare		1	40	26			67
largerfamily4	2	2	124	77	71		276
largerfamily5	1		2	78	13	1	95
family6plus			1	4	1		6
Total households	5	11	768	203	85	1	1,073

Table: Households on the Council's Housing Register which contain children, by household type

Household composition	% of Brighton & Hove Population
Single family household	53.0
One-person household	34.7
Other household types	12.3

Table: Office for National Statistics 2021 Census Data on Household composition of Brighton & Hove Population

Armed Forces Personnel, their families, and Veterans	YES
<p>There are currently only 3 households on the Council's Housing Register with an armed forces band reason. One of these households have a 3-bed need. None of these households have a 4-bed need.</p>	
UK Armed Forces veteran indicator	Number of Brighton & Hove Population

Previously served in the UK regular armed forces	3949
Previously served in UK reserve armed forces	1423
Previously served in both regular and reserve UK armed forces	246
Has not previously served in any UK armed forces	229749

Table: Office for National Statistics 2021 Census Data on armed forces service of Brighton & Hove Population

Expatriates, Migrants, Asylum Seekers, and Refugees	YES
In the quarter April – June 2024, the Council received 49 applications for homelessness assistance where the main applicant had been granted refugee status.	
Carers	NO

Provision of unpaid care

Brighton and Hove | (England)

Provides no unpaid care **92.2%** (91.2%)



Provides 19 hours or less unpaid care a week **4.3%** (4.3%)



Provides 20 to 49 hours unpaid care a week **1.5%** (1.8%)



Provides 50 or more hours unpaid care a week

2.0% (2.6%)



% of people aged five years and over

Table: Office for National Statistics 2021 Census Data on percentage of Brighton & Hove Population who are unpaid carers

Looked after children, Care Leavers, Care and fostering experienced people

YES

There are currently 44 households on the Council's Housing Register with the care leaver priority band reason. None of these households have a need for 3-bed or 4-bed accommodation and they will therefore be unaffected by this proposed policy.

Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)

YES

In the quarter April – June 2024, the Council received 18 applications for homelessness assistance where the main applicant was vacating accommodation due to domestic abuse.

Socio-economic Disadvantage

YES

All applicants on the Council's Housing Register are likely to be subject to socio-economic disadvantage.

The Council's Housing Allocations policy currently disqualifies applicants who have an annual income of more than the following:

One Bedroom need: £22,000

Two Bedroom need: £32,000

Three Bedroom or above need: £36,000

[Source: <https://www.brighton-hove.gov.uk/sites/default/files/2023-11/Allocations%20policy%20Nov%202023.pdf> page 13]

Therefore, applicants are only permitted to be on the Housing Register if they earn less than the above amounts.

By how many bedrooms there are in a property, average monthly rents as of June 2024 in Brighton and Hove were:

One bedroom: £1,118

Two bedrooms: £1,444

Three bedrooms: £1,713

[Source: https://www.ons.gov.uk/visualisations/housingpriceslocal/E06000043/#rent_price]

A common measure of rent affordability is that a household income is 30 times the monthly rent. Accordingly, to afford an average rent in Brighton & Hove, households should earn the following per year:

- One bedroom need: £33,540
- Two bedroom need: £43,320
- Three bedroom need: £51,390

As every household who qualifies for the Housing Register must earn substantially less than the amount to afford the average rent in Brighton & Hove, every household on the Housing Register is likely to be in socio-economic disadvantage.

Homelessness and associated risk and vulnerability

YES

There are 1536 households in the homeless queue on the Council's Housing Register.
 768 households on the housing register have a 3-bed need.
 4 of these 3-bed need families are currently statutorily overcrowded in their homes.
 289 households on the housing register have a 4+bed need.
 10 of these 4-bed need families are currently statutorily overcrowded in their homes.
 Households who are affected by this proposed policy who are statutorily overcrowded are likely to be considered to be homeless in law because it is uncommon for local housing authorities to conclude that circumstances of statutory overcrowding are reasonable to continue to occupy.

6. Impacts

Advisory Note:

- **Impact:**

- Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
- These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean:** Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment: If there is impact on all groups equally, complete **only** the cumulative assessment section.**
- **Data analysis and Insights:**
 - In each protected characteristic or group, in answer to the question ‘If “YES”, what are the positive and negative disproportionate impacts?’, describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
 - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.
 - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
 - **Consider a wide range (including but not limited to):**
 - [Census](#) and [local intelligence data](#)
 - Service specific data
 - Community consultations
 - Insights from customer feedback including complaints and survey results
 - Lived experiences and qualitative data
 - [Joint Strategic Needs Assessment \(JSNA\) data](#)
 - [Health Inequalities data](#)
 - Good practice research
 - National data and reports relevant to the service
 - Workforce, leaver, and recruitment data, surveys, insights
 - Feedback from internal ‘staff as residents’ consultations
 - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
 - Insights, gaps, and data analyses on ‘who’ the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#).

6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: those under 16, young adults, with other intersections.	NO
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More information below

N/A

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability , considering our anticipatory duty ?	NO
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More information

N/A

6.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	NO
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6.4 Religion, Belief, Spirituality, Faith, or Atheism:

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	NO
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6.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to Gender Identity and Sex (including non-binary and intersex people)?	NO
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6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment ?	NO
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6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation ?	NO – See below
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More information

Some households on the Housing Register with a 3-bed need feature main applicants with bisexual, gay and lesbian sexual orientation. No households on the Housing Register with a 4-bed need share these characteristics.

If this policy proposal is implemented, households with a 3-bed need will experience the negative impact of greater waiting times for rehousing, while households with a 4-bed need will experience the positive impact of a larger pool of properties to bid on.

The proposed policy change will achieve the legitimate aim of alleviating the level of crowding experienced by households in the city with a need for 4+ bedrooms by allocating them a property with fewer bedrooms than meets their needs. This policy is necessary because waiting times for social housing for households with a need for 4+ bedrooms are long. For example, in 2023/24, the average waiting time to be rehoused for a household with a 4-bed need on the council's housing register in priority band A was 8.7 years.

The positive impact of this policy for households with need for 4+ bedrooms will outweigh the negative impact on households with a need for 3 bedrooms, who will experience longer waiting times as a result. There are currently 768 households with a 3-bed need on the

Housing Register, while there are only 289 households with a need for 4+ bedrooms. Not every household with a need for 4+ bedrooms will bid on a smaller property. Based on the figures, this proposed policy will likely increase waiting times for rehousing for households with a 3-bed need by a relatively small amount.

In 2023/24, the average waiting time to be rehoused for a household with a 4-bed need on the council's housing register in priority band A was 8.7 years, whereas the average waiting time for households of all bands with a 3-bed need was only 5.3 years. Households with a need for 4+ bedrooms stand to benefit greatly from this policy, whereas households with an need for 3-bedrooms stand to be negatively impact in a way which is likely to be relatively small.

An alternative to this policy would be to increase the financial payment under the Allocations Policy to incentivise households under occupying a 4-bed property to downsize to free up 4-bed homes which could be allocated to a household on the housing register with a need for 4+ bedrooms. However, this alternative measure would be extremely unlikely to achieve the legitimate aim of alleviating the housing need experienced the 289 households on the city's housing register with a need for 4+ bedrooms.

The proposed policy change is no more than is necessary to achieve the legitimate aim. Accordingly, the proposed policy change is the proportionate means of meeting a legitimate aim.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO
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6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	NO
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6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO
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6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

<p>Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)</p>	<p>NO</p>
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6.12 [Carers](#):

<p>Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).</p>	<p>NO</p>
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6.13 Looked after children, Care Leavers, Care and fostering experienced people:

<p>Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections). Also consider our Corporate Parenting Responsibility in connection to your activity.</p>	<p>NO</p>
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6.14 Homelessness:

<p>Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)</p>	<p>NO</p>
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6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	NO
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6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)	NO
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6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	NO
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6.18 Cumulative, multiple [intersectional](#), and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

None identified.

7. Action planning

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate

FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

<ul style="list-style-type: none"> ○ N/A

Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

N/A

8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	
Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.	X

If your decision is to “Proceed with caution”, please provide a reasoning for this:

See section 6.7 above.

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

The proposed policy change will achieve the legitimate aim of alleviating the level of crowding experienced by households in the city with a need for 4+ bedrooms by allocating them a property with fewer bedrooms than meets their needs. This policy is necessary because waiting times for social housing for households with a need for 4+ bedrooms are long. For example, in 2023/24, the average waiting time to be rehoused for a household with a 4-bed need on the council’s housing register in priority band A was 8.7 years.

The positive impact of this policy for households with need for 4+ bedrooms will outweigh the negative impact on households with a need for 3 bedrooms, who will experience longer waiting times as a result. There are currently 768 households with a 3-bed need on the Housing Register, while there are only 289 households with a need for 4+ bedrooms. Not every household with a need for 4+ bedrooms will bid on a smaller property. Based on the figures, this proposed policy will likely increase waiting times for rehousing for households with a 3-bed need by a relatively small amount.

The proposed policy change is no more than is necessary to achieve the legitimate aim. Accordingly, the proposed policy change is the proportionate means of meeting a legitimate aim.

9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

N/A

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Luke Harris	08-AUG-24
Accountable Manager:	Harry Williams	21-AUGUST-24