In line with the principles of decision making outlined in the City Council Constitution, the Council will ensure that its decision making is open and transparent, and that due regard is given to the Council's obligations and desire to promote equality of opportunity and equal treatment.

Form 1

This part must be completed and before formal consultation is undertaken and must be available during the consultation stage.

Author of this document: Gemma Tate

Name of ECA and Service: Coventry Homefinder Policy – Housing and Homelessness Service

Head of Service: Jim Crawshaw

Date of completion: October 2019

Background to the planned changes

1. What is the background to the planned changes? Why is this change being considered? If further information is available on the different scenarios that have been considered as part of this work, provide a link to the public document which contains this information.

Coventry City Council no longer owns or manages council housing stock, following the large-scale voluntary transfer (LSVT) of all council housing to Citizen Housing (formally Whitefriars Housing Group) in 2000. However, the Council still has a duty to produce a policy on how social housing is allocated in the City which sets out how applicants are prioritised and how allocations are made, and which complies with Part 6 of the Housing Act 1996 (as amended by the Housing Act 2004 and the Localism Act 2011). The Policy must have regard to the guidance document ‘Allocation of Accommodation: guidance for local housing authorities in England’ (DCLG 2012).

As the Council no longer holds its own housing stock, allocations under the policy are carried out through nominations from the Council to Registered Providers of social housing. The Coventry Homefinder Choice Based Lettings Policy sets out the policies and processes by which applicants will be prioritised for an allocation of social housing, and how available social housing vacancies are advertised and let.

The last wholesale review of the Coventry Homefinder Policy was in 2014, although the Policy was slightly amended in 2018 to reflect legislative changes required by the Homelessness Reduction Act 2018.

The housing and homelessness landscape has changed significantly since 2014. The Homelessness Reduction Act 2017 (HRA) came into force in April 2018 and placed new statutory duties on Councils in England to provide enhanced advice and assistance to people who are homeless or threatened with homelessness. The first year of HRA resulted in a notable increase in demand on the Housing
and Homelessness Service, including an increase in the number of homeless households living in temporary accommodation.

There are currently 13,824 households registered on Coventry Homefinder (as at 27 September 2019). The table below shows the number of households in each current band.

<table>
<thead>
<tr>
<th>Band</th>
<th>Number of households</th>
</tr>
</thead>
<tbody>
<tr>
<td>1a</td>
<td>602</td>
</tr>
<tr>
<td>1b</td>
<td>127</td>
</tr>
<tr>
<td>2a</td>
<td>1682</td>
</tr>
<tr>
<td>2b</td>
<td>402</td>
</tr>
<tr>
<td>2c</td>
<td>122</td>
</tr>
<tr>
<td>3a</td>
<td>10,576</td>
</tr>
<tr>
<td>3b</td>
<td>310</td>
</tr>
<tr>
<td>Blank</td>
<td>2</td>
</tr>
<tr>
<td>Total</td>
<td>13,824</td>
</tr>
</tbody>
</table>

In 2018/19 only 1446 households were housed via Coventry Homefinder across all accommodation types. This means that demand for social housing greatly outweights the number of properties that become available in any given year.

The review of the Coventry Homefinder Policy provides the opportunity to review how the allocation of social housing is prioritised within Coventry. This review is also one of the key actions within the city’s Housing and Homelessness Strategy 2019-2024.

The proposals for change are wide-ranging and include:

- Who can register on Coventry Homefinder.
- Who will receive priority within the ‘banding system’ in the future – including a reduction in the number of bands and the introduction of a reduced preference band.
- How to apply and what supporting information will be needed.
- Changing the number of times people can refuse an offer of housing.
- Ensuring that those registered are actively using Coventry Homefinder.
- Changing how adapted properties are advertised/allocated.

One of the proposals relates changing the qualification criteria for accessing the Housing Register. The proposed changes mean that only applicants with an assessed housing need will be able to register. The current policy has Housing Need ‘Priority bands’ 1a to 2c and no priority bands (including no housing need) in 3a and 3b.

For applicants with a housing need but no local connection (3a) they will still be able to apply in certain circumstances. Applicants with no housing need and no local connection (3b) will no longer be able to apply.

These changes would mean that the register is focussed on supporting those applicants (households) in the greatest need of housing. In addition, an asset/income cap would be introduced which means
that those applicants who have the financial means to afford other types of housing will no longer be able to register for social housing.

If the qualification criteria and/or the banding system is changed following consultation and approval by Elected Members, there would need to be a comprehensive review of all Housing Register applications to reassess them. Currently applicants need to apply for a priority banding, and we believe there will be many households in the non-priority bands (3a and 3b) who have a housing need, but it is not possible to quantify how many until reassessments have taken place.

The proposals will impact all people currently registered on Coventry Homefinder and potentially those people who may wish to register for social housing in the future.

2. Who do you need to consider as part of this ECA? *stakeholder analysis*
- Applicants for social housing in Coventry (this may include applicants who currently live outside of Coventry)
- Potential applicants for social housing in Coventry (this may include applicants who currently live outside of Coventry)
- Current or future applicants for social housing who require an adapted property (also known as disabled persons accommodation)
- Registered Providers of social housing in Coventry

Pre-Consultation Engagement

*This section refers to any activities that took place (such as briefings, meetings, workshops, scoping exercises etc) with stakeholders before the formal consultation period.*

3. What engagement activities took place prior to formal consultation and what feedback (if any) was received in relation to equality issues?

The review of the Coventry Homefinder Policy began in June 2019 and between June and October 2019 there has been significant engagement activity with Registered Providers in the City. There was overwhelming agreement that the review needed to be undertaken. A Steering Group was set up with Council Officers, nominated Registered Providers and an advice agency representative representing the City’s Welfare Forum Working Together Group.

All 9 Registered Providers were invited to an initial workshop. In total there have been 4 workshops with 6 Registered Providers involved, including the biggest three Registered Providers in the City (Citizen Housing, Orbit and Midland Heart). The other Registered Providers involved were Stonewater, Accord and Clarion.

Since July 2019, there has been a page on the Council’s ‘Let’s Talk’ Engagement Platform seeking feedback on the current policy and for people to share their ideas for change via quick polls and a question and answer tool. As at 29th October 2019 there were 621 visits to the page by 502 people.

In addition, the review has sought feedback and ideas from the City’s Homelessness Forum and Frontline Network throughout the review process.

The legislative guidance relating to social housing allocations specifies that any scheme must give reasonable preference to certain categories of people and there is a link between some these categories and the protected characteristics under the Equality Act, for example the need to move on
Coventry City Council
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medical or welfare grounds which could encompass people with a disability as some people may require an adapted property.

Analysis of Impact

In this section please ensure that you consider the three aims of the general duty as they affect protected groups. These groups are:

Age
Disability
Gender reassignment
Marriage/Civil Partnership
Pregnancy/Maternity
Race
Religion/Belief
Sex
Sexual Orientation

The three aims of the general duty require that a public authority, in the exercise of its functions, must have due regard to the need to:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

4. Outline below how this proposal/review could impact on protected groups positively or negatively, and what steps/mitigations (if any) could be taken to reduce any negative impact that has been identified.

Note – when identifying potential impacts below, please only include impacts that may exist over and above general impacts that may affect the wider community/population. (For example, a reduction in grant to Coventry Citizens Advice would affect all service users through a reduced level of first line advice being available to all – but it would affect the following groups more: age, disability, gender and race as they represent a larger proportion of the clients who use the advice service.)

Age

To register for Social Housing, you normally have to be aged 18+ in order to sign a tenancy agreement with a Registered Provider. Most applicants on Coventry Homefinder are aged between 20 and 54 years (82%) There are currently 1702 (12%) of applicants who are aged 55 and over and of those 317 (19%) of applicants are registered in a priority need band. Some properties that become available on Coventry Homefinder are age restricted properties, these are normally advertised for people aged
over 55. 13% of the 1400 properties advertised on Coventry Homefinder in 2018/19 were age restricted properties.

Disability
When applicants currently register on Coventry Homefinder they are not asked to declare whether they or a member of their household have any disabilities. Disability is only recorded on the Homefinder Register when an applicant requires a property with specialist adaptations. A disability or medical condition of an applicant may also be declared by an applicant when they apply for a priority banding, such as medical priority. This information is held on the applicant's individual case record. This information is not collated centrally by the current IT system.

There are currently 54 applicants registered for purpose build wheelchair housing, 58 applicants registered for partly adapted houses and 99 applicants registered for partly adapted flats. 52% of applicants registered for purpose build wheelchair housing are aged 45 year and over.

Adapted properties are currently allocated outside of the main policy and are not currently advertised on the Coventry Homefinder Website. The current allocation process is resulting in adaptations being removed from properties because Registered Providers have been unable to match an applicant to the property. One of the proposals within the review is for all adapted properties to be advertised via the Coventry Homefinder website so that people needing an adapted property can see which properties become available and then decide whether to bid. It is hoped that this change will result in more people with disabilities finding social housing to meet their housing needs.

Pregnancy/Maternity
568 applicants currently registered on Coventry Homefinder have declared a pregnancy either at point or application to the register or by subsequently updating their application. This represents 4% of applicants on the overall register.

Sex
8236 (60%) applicants on Coventry Homefinder are female.

Race (Ethnicity)
There are a total of 13,824 applicants/households on the Housing Register, of which 3863 applicants (28%) are from an ethnic minority background. The biggest minority ethnic group (13%) are people from Black/Black British – African backgrounds. These is reflected across all bands 7 bands (1a, 1b, 2a, 2b, 2c, 3a, 3b) within the current Coventry Homefinder Policy. This minority ethnic group are overrepresented on the Housing Register when compared to the overall Coventry population whereby 5.6% of people identify as Black/African/Caribbean/Black British ethnicity.

Under the current policy the ‘priority bands’ are (1a to 2c) of which there is 909 (31%) out of 2959 applicants identifying as an ethnic minority group.

215 applicants (35%) in band 1a are from an ethnic minority background. Of which 18% are people from Black/Black British – African backgrounds. When compared to the Housing Register as a whole this shows that people from minority ethnic groups are overrepresented in the top band. One of the reasons for this is that households from BME backgrounds, including Black/Black British African are overrepresented within households who are accepted as homeless, which is another reasonable preference category in band 1a.
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There is only one change within the proposed banding system which specifically affects 1a and 1b applicants. Currently applicants who have priority for severe over-crowding 2+ bedrooms are placed in band 1a (top priority). It is proposed they would be placed in band 2 (the 2nd highest priority). Data analysis was recently undertaken (July 2019) on the households who currently had overcrowding priority in band 1a. There were 96 households, less than 1% of people on the Housing Register. 53 of these applicants (55%) were from ethnic minority backgrounds. Applicants from ethnic minority backgrounds are culturally more likely to live in larger family groups (e.g. having larger families and have multiple generations living in the same property when compared to other ethnic groups). Data from the British Social Attitudes Survey (2017) showed that of those people answering the survey, 13% of the respondents from a Black origin lived in a household with 5 or more people compared to 5% of the respondents of White origin.

The new banding system still gives highest banding priority to those applicants who are under occupying by 2 or more bedrooms to encourage people to release larger family homes for other families in housing need such as those living in overcrowded conditions. Another potential mitigation is that within the proposed Coventry Homefinder Policy, in properties have two living rooms, one of these rooms could be used as a downstairs bedroom with the agreement of the Registered Provider which would support those living in overcrowded accommodation to move to larger accommodation. This provision is not included in the current policy.

In band 3b, applicants with no housing need and no local connection, 44.5% of applicants are from an ethnic minority background. In the proposed new banding system band 3b would no longer exist. Applicants would only be able to remain on the register if they could demonstrate their housing need (like all applicants on the register) and their exceptional circumstances. As at 27th September 2019 only 132 bids for housing have been placed by applicants in band 3b out of a total of 9217, less than 1% of the total bids received. This could indicate that a number of applicants in this band are not actively seeking housing in Coventry.

No data is currently held for the protected characteristics of Marriage/Civil Partnership, Religion/Belief and, Gender Reassignment and Sexual Orientation. A question is asked during the application process about gender reassignment, but it has not been possible to obtain this data from the reporting module.

5. **Are there any other vulnerable groups that could be affected?** i.e. deprivation, looked after children, carers.
   Also include any information about the health inequalities/Marmot implications of this proposal. Contact Caroline Ryder (caroline.ryder@coventry.gov.uk) or Hannah Watts (hannah.watts@coventry.gov.uk) in Public Health for more information.

**Looked After Children / Children’s Social Care**

The current Coventry Homefinder Policy gives priority to housing needs as a result of being a ‘looked after child’ in Coventry, they are currently placed in band 2a (3 band out of 7 bands). The proposed changes to the banding system would benefit looked after children from Coventry, as once they are ‘tenancy ready’ they would receive band 1 (top band) priority.

In addition, the proposed revised policy gives a new priority for families who are being reunited following children being returned from care of the Local Authority within the Urgent Housing Need due to Social and Welfare issues. These families will be eligible for band 1 (top band) priority where this
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is dependent on a change of accommodation and this has been confirmed by the Children's Social Care Department. Similarly, approved fosters and adopters who require more appropriate accommodation would be eligible for band 1 (top band) if this need is confirmed by the Children's Social Care Department.

Deprivation

The proposed revised policy includes a new qualification criterion linked to an applicant's income and/or assets. It is proposed that applicants with assets and/or income above £50,000 per year will no longer be able to register on Coventry Homefinder, unless they wish to register for age restricted properties, sheltered housing or shared ownership. This proposed change is to ensure that the Housing Register is for those in greatest need of affordable housing.

The proposed 'low housing need' definition includes applicants who are or could potentially experience financial difficulty if they remained in their current accommodation and therefore need to move to more affordable accommodation in the medium to long term. This ensures that people can still register for social housing if their main housing need is linked to requiring affordable housing.

The proposed change to include a qualification criterion based on housing need will also support those applicants who face multiple layers of deprivation to access the Housing Register and have their housing need assessed at point of application, rather than having to currently apply for priority banding.

Whilst access to the Housing Register does not guarantee applicants being housed, it is felt the revised application process, qualification criteria and banding system will provide those with the greatest housing need a greater chance of being housed.

6. What are the gaps in evidence? Can this be addressed during the consultation stage?

In this section, re-state those protected characteristics for which there is no data available. In addition, outline if there are any plans to collect further data during the consultation stage (through surveys, on-site sampling etc). If it is unlikely that additional data will be available to inform this ECA, then include a commitment statement in this section along the lines of “following on from this ECA, once the new service is implemented/commissioning process undertaken*, a specific requirement to collect and analyse relevant equalities data will be included in management information processes / service specifications***. *delete as appropriate

No data is currently held for the protected characteristics of Marriage/Civil Partnership, Religion/Belief and Sexual Orientation. A question is asked during the application process about gender reassignment, but it has not been possible to obtain this data from the reporting module. We will attempt to collect further data during the consultation.

The Housing and Homelessness Services will be re-tendering for its IT system later this year. This means that the service will be able to improve its data collection of equalities data.

7. What are the likely impacts of this project/review on staff from protected groups?

Council Staff who work in the Housing and Homelessness Service are not affected by the review of the Coventry Homefinder Policy.
Form 2

This section should be completed AFTER any consultation has been concluded.

Author of this document: Gemma Tate

Date of completion: January 2020

Potential Impacts – further information

8. Referring to the information detailed in question 4 of ECA Form 1, state if the potential impacts have been confirmed. Also detail below any additional information about potential impacts that has been highlighted during any consultation.

As part of the consultation survey respondents were asked to say what impact they thought the proposals would have for different groups of people. The responses were themed two ways. Firstly, in respect of impacts for any groups with protected characteristics and secondly themed by the proposals or topic their comment related to (more detail on these proposals related themes is contained in the accompanying consultation statement).

<table>
<thead>
<tr>
<th>What impact do you think these proposals could have for different groups of people?</th>
</tr>
</thead>
<tbody>
<tr>
<td>ECA - Religion and Belief</td>
</tr>
<tr>
<td>ECA - Domestic Violence</td>
</tr>
<tr>
<td>ECA - Gender</td>
</tr>
<tr>
<td>ECA - Pregnancy and Maternity</td>
</tr>
<tr>
<td>ECA - Ethnicity</td>
</tr>
<tr>
<td>ECA - Young People</td>
</tr>
<tr>
<td>ECA - Older People</td>
</tr>
<tr>
<td>ECA - No impact</td>
</tr>
<tr>
<td>ECA - Disability</td>
</tr>
<tr>
<td>ECA - Negative Impact</td>
</tr>
<tr>
<td>ECA - Positive Impact</td>
</tr>
</tbody>
</table>

Respondents to the consultation felt there were both positive and negative impacts of the proposals with some people stating they felt the proposals would have no particular impact on certain groups as they affected everyone equally.

In summary – the negative impacts identified during consultation were:
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Equality and Consultation Analysis (ECA) Form

- For households currently on the register with no local connection to Coventry
- Households on low incomes who cannot afford housing in the private rented sector
- Concern that proposals would increase homelessness and/or overcrowded households where affordability of housing is their primary housing need
- Negative impact on those vulnerable groups (elder people and people with disabilities who need support to apply and bid for properties)

In summary – the positive impacts identified during consultation were:

- That a households housing need would be assessed at application and support those in greatest housing need to find social housing
- Applicants felt the applicant process would be simpler
- Support people to get housed quicker
- Support the City to relieve homelessness

In terms of protected characteristics specific impacts (negative and positive) were identified for:

<table>
<thead>
<tr>
<th>Protected Characteristic</th>
<th>Positive Impact</th>
<th>Negative Impact</th>
<th>Potential Mitigation</th>
</tr>
</thead>
</table>
| Disability              | • Changes to how adapted properties are let  
                          • One application process will make it simpler for people with disabilities | • People with disabilities may require more time and help to register, bid for properties and renew application  
                          • Need to consider impact of all types of disabilities (physical disabilities, mental health and hidden disability such as autism)  
                          • The change to the bidding cycle will make it very difficult to continue to send the weekly property list to c16 people | • Revised timescale for renewing housing application will be longer following consultation feedback (56 days instead of 28 days)  
                          • Application form / change of circumstances form will ask for information and/or supporting evidence of all types of disability when assessing housing need  
                          • Revised IT system and potential opportunities for auto/assistive bidding to support those with limited IT access and/or support networks or those who receive the weekly property list (will be dependent on IT supplier) |
| Age – Older People      | Changes to how adapted properties are let | • Older people may require additional support to register, bid for properties and renew application | • Revised IT system and potential opportunities for auto/assistive bidding  
                          • Revised timescale for renewing housing application |
| Age – Young People      | Positive impacts for care leavers who are tenancy ready | • Young people would be offered less properties (those living with family or friends or | • Care leavers and those in supported accommodation will have access to support to |

9
| Ethnicity | No specific positive impacts identified | For people who want to move to Coventry to access certain community/cultural groups  
- People who have English as 2nd language may need extra support to register, bid for properties and renew application. | People with no local connection but an identified housing will still be able to register in exceptional circumstances  
- Revised IT system and potential opportunities for language translation (will be dependent on IT supplier)  
- Revised timescale for renewing housing application  
- Revised IT system and potential opportunities for auto/assistive bidding (will be dependent on IT supplier) |
| --- | --- | --- | --- |
| Pregnancy and Maternity | No specific positive impacts identified | Suitability of current accommodation for growing families or those who are expecting | Pregnancy is taken into consideration for the criteria for bedroom size from 26 weeks of pregnancy  
- Using rooms flexibly in larger homes (e.g. those with two living rooms) will support more larger families to find suitable accommodation |
<p>| Sex/Gender | No specific positive impacts identified | Need to ensure women and children would be adversely affected by the changes | The housing need of all household members would be taken into consideration as part of the assessment process – 60% of applicants on Coventry Homefinder are female as it is not expected this proportion would |</p>
<table>
<thead>
<tr>
<th>Religion and Belief</th>
<th>No specific positive impacts identified</th>
<th>No specific negative impacts identified in consultation responses</th>
<th>change as part of the proposals.</th>
</tr>
</thead>
</table>
| Deprivation and/or income | • Reassessment process of current applicants will help identify people those current housing needs are not accurately reflected in their current band  
• Bidding cycle changes will help people on low incomes with gaining IT access | There was general concern about introduction of the asset and income cap within the qualification criteria and that this should not penalise low income households | • The asset and income cap of £50k for assets and income cap reflects the average salary in the city and takes into consideration average rent levels in the city.  
• The qualification criterion will be assessed on a case by case basis and where exceptional circumstances are identified in relation to the asset and income cap a household will be able to register as long as they meet the other qualification criterion.  
• Applicants who are beginning to experience financial difficulty which is impacting on their current housing circumstances are able to register. If affordability is the only identified housing need the applicant would be placed in Band 4 – Housing need band. |

Prior to consultation, the Part 1 of this Equality and Consultation Analysis identified a potential negative impact for people from BME backgrounds particularly those who identify as Black African from changing the banding system. Currently applicants who have priority for severe overcrowding 2+ bedrooms are placed in band 1a (top priority). It is proposed they would be placed in band 2 (the 2nd highest priority). People from BME backgrounds are over represented within households who are currently awarded priority for being overcrowded by 2+ bedrooms. Post consultation this impact remains unchanged.

As part of the consultation survey respondents were asked a number of equality questions related to the protected characteristics under the Equality Act 2010.
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- **Sex** – 72% (331 people) were female, 23% male, 0.1% identified in a different way and 2.7% preferred not to say – More females than males are registered on Homefinder as the lead applicant – the consultation response reflects this.
- **Age** – 87% of people were aged 25-64
- **Ethnicity** – 65.5% (295 people) were White British or White Irish Background with 30% from BME backgrounds with 5% preferring not to say – 28% of those households registered on Coventry Homefinder are from BME backgrounds – 30% of respondents to the survey indicated they were from BME groups, so the response is representative.
- **Disability** – 20% of people considered themselves disabled (with a range of physical and mental disabilities indicated) – Disability data is not currently captured within the Coventry Homefinder system – as part of the consultation we were proposing changes to the adapted property register and sent paper copies of the survey to this group alongside people we assistive bid for and those who receive the weekly property list by post.
- **Gender reassignment** – 3.7% (16 people) of respondents stated yes with 5.3% (23 people) preferred not to say
- **Marriage and Civil Partnership** – this information is not currently collected by Coventry Homefinder but as part of the consultation a broad range of relationship statuses declared by 444 respondents who completed this question.
- **Religion and Belief** – this information is not currently collected by Coventry Homefinder but 65% of people who answered this question (449 responses) stated they had religious belief
- **Sexual Orientation** – this information is not currently collected by Coventry Homefinder but 10% of respondents indicated their sexual orientation to be a gay man, a gay woman/lesbian, asexual, bisexual, queer or other.
- **Care Leavers** – 5% (22 people) stated they were care leavers or soon to be leaving care. Care Leavers were a specific group who would be impacted by changing the banding system. – Care Leaver views are similar to other respondents.
- **Armed Forces** – 7% of people stated they had or currently served in the armed forces with 5% preferring not to say – Armed Forces and former Armed Forces personal are a specific group who have ‘additional preference’ in terms awarding priority under within a housing allocation scheme. – This group were less enthusiastic about the changes to the qualification criterion – even though they would be exempt from the local connection rules.

The consultation responses for people from BME backgrounds has been analysed to understand their specific views on the proposed changes and whether there are any specific differences compared to other respondents on changing the banding system. The views of Black African respondents are not dissimilar to other groups. People from Asian backgrounds are slightly less enthusiastic about changing the banding system but only a small number of respondents from these communities responded to the survey.

**No specific impacts have been identified during consultation for – Gender reassignment, Marriage and civil partnership or sexual orientation.**

**Outcome of equality impact**

9. Indicate which of the following best describes the equality impact of this project/review:
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There will be no equality impact if the proposed option is implemented  □

There will be positive equality impact if the proposed option is implemented  □

There will be negative equality impact if the proposed option is implemented but this can be objectively justified  □

There will be both positive and negative impacts if the proposed option is implemented  ☒

Summary of ECA

Write a paragraph below which summarises the key aspects of this ECA.

This paragraph should be included in the Equalities/EIA section of any Cabinet/Cabinet Member Report.

The equalities analysis pre and post consultation has clearly indicated both potential positive and negative equality implications of the proposed changes to Coventry Homefinder (Social Housing Allocations Scheme). The potential positive equality implications could apply across all protected characteristics, particularly in respect of the changes supporting those in greatest housing need to be offered a suitable property. Assessing housing need at point of application is also seen as a positive change for all applicants including those with protected characteristics.

The specific changes to the way adapted properties are advertised and allocated is considered to be a very positive change for older people and people with disabilities who require an adapted property. People with disabilities are particularly supportive of this change. The changes to the banding system are positive for young people who are leaving care but there is concern that younger people living with friends and family or in shared accommodation are less likely to be offered housing.

The changes to the banding system will potentially negatively affect people from BME backgrounds who are:

a) currently living in overcrowded conditions or
b) who are currently registered in band 3b (no housing need and no local connection to Coventry) who no longer be able to register under the proposed qualification criteria.

Mitigations identified for overcrowded households include the revised policy providing flexibility as to how properties with two living rooms could provide additional bedroom provision with the agreement of the registered provider. As part of the implementation process all current applicants will need to re-apply and as part of this process the housing need of the household will be assessed. This will give applicants the opportunity to have their housing need assessed as where exceptional circumstances are identified they will still be able to re-register (as long as they need the other qualification criterion – applied to all applications).

As part of the implementation process equality impacts will be assessed. This will be supported by a new IT system currently being procured for the Housing and Homelessness Service which will improve the collection and analysis of equalities data. A review of the revised policy will be undertaken one year after implementation which will include a review of actual ECA impact.
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Equality and Consultation Analysis (ECA) Form

Approvals from Director and Cabinet Member

Name of ECA Author Gemma Tate  Date 27.01.2020

Director: David Ashmore – Director of Housing and Transformation

Cabinet Member: Cllr T Khan

Please detail below any committees, boards or panels that have considered this analysis.

<table>
<thead>
<tr>
<th>Name</th>
<th>Date</th>
<th>Chair</th>
<th>Decision taken</th>
</tr>
</thead>
</table>

Next steps

Please send this completed ECA to the Insight Team as follows:

Wendy Ohandjianian (wendy.ohandjianian@coventry.gov.uk tel. 7697 7076)

Jaspal Mann (jaspal.mann@coventry.gov.uk tel. 7697 7109)