



# Equality Impact Assessments

---

## Full Impact Assessment Form

### 1. What is the service area(s) and who is the lead officer?

Service Area – Strategic Housing/Housing Needs  
Assistant Director – Duncan Hall  
Lead Officer – Nikki Patton  
Assisted by – Karl Patterson

### 2. What change are you proposing?

**The creation of a Local Lettings Plan to enable the allocation of 16 new affordable homes, funded via the Local Authority Housing Fund to eligible households from Ukraine and Afghanistan is accordance with funding requirements.**

Cabinet previously approved the decision to accept the funding on 8<sup>th</sup> February 2023 and agreed to the principle of allocating the homes to eligible Ukrainian and Afghan households. The previous cabinet report was also accompanied by a full EIA

These homes will provide longer-term sustainable accommodation for households from Ukraine and Afghanistan who have arrived in the UK via resettlement schemes and are now at risk of homelessness or are currently housed in unsuitable accommodation.

The homes will assist the council to respond to increased pressures from these arrivals on the existing housing and homelessness systems particularly as sponsorship/family placements/bridging accommodation arrangements come to an end. The homes will also add to the borough's affordable housing stock and will be used to meet wider housing needs in the longer term.

The lettings plan will prioritise eligible Ukrainian households based on their banding and relevant date on the housing register in line with normal allocations.

Eligible Afghan households will be identified for 2 larger homes in partnership with Norfolk County Council's Person's From Abroad Team who will liaise directly with the Home Office to identify households in Bridging Accommodation. Prospective nominees will still be required to apply to the Housing Register and supply all relevant documentation.

**3. How will this change help the council achieve its corporate business plan objectives (and therefore your Directorate/service objectives)?**

The Lettings Plan is necessary to enable the Council to deliver new affordable housing in accordance with the funding criteria associated with the homes. The delivery of new affordable housing will help to achieve the following Corporate Business Plan Objectives.

**Continue to deliver all statutory services to an appropriate standard within available resources, whilst also responding to the priorities set out in the Corporate Business Plan.**

- The homes will accommodate those at risk of homelessness thereby assisting the Council to meet its statutory homelessness duties

**Assist our residents to maximise their opportunities by accessing the support and services they are entitled to**

- The homes will enable those who have already arrived in the UK having fled war torn countries to access longer-term sustainable and appropriate accommodation.
- The November 2022 Corporate Business Plan Monitoring Report highlighted the need to address future demand pressures arising from households from Ukraine seeking accommodation following an initial period with families or hosts and these homes will assist with this.

#### 4. What is your evidence of need for change?

- Following the decision by cabinet on 8<sup>th</sup> February 2023 to accept funding through the Local Authority Housing Fund, a Local Lettings Plan is necessary to enable allocation of the properties acquired in accordance with the funding requirements. Without a lettings plan, we are unable to fulfil the funding requirements and deliver the additional affordable homes.
- Since March 2022, over 135,000 Ukrainian refugees have arrived in the UK via the Homes for Ukraine and Family schemes. 193 Ukrainians have arrived in the borough through the Homes for Ukraine Scheme. Many of these households remain with sponsors/hosts and will require alternative more sustainable housing options. The expectation is that many of these households will have their housing needs met through the private rented sector. However, many of these households will face barriers to entering the private rented sector due to requirements for references, credit checks and guarantors that they may be unable to provide due to their recent arrival in the UK. Therefore, a proportion are likely to require housing assistance from the Council. This modest number of additional affordable homes will help to accommodate those in the highest need. The number of arrivals through the Family Scheme is unknown.
- Without the new affordable homes, the housing needs of these households would have to be met in other ways. This is likely to be through the existing affordable housing stock. This would increase pressures on the existing stock and disadvantage existing communities.
- There are around 9,200 people across the UK currently living in Home Office bridging accommodation who are being resettled via the Afghan Relocations and Assistance Policy and the Afghan Citizens Resettlement Scheme
- The accommodation delivered via the fund must increase the housing available to eligible households. In addition to the eligibility criteria above, the fund prospectus states that local authorities should make reasonable endeavours to prioritise households based on who is most in need when matching eligible households with properties.
- The provision of a Lettings Plan is contained within the Allocations Policy. Under the Housing Act 1996 (section 166A(6)(b)) a Lettings Policy allows homes to be allocated by local authorities, or nominated to housing associations, to eligible applicants of a particular description.

**5. How will this change deliver improved value for money and/or release efficiency savings?**

- The properties will enable sustainable accommodation to be offered to eligible households at risk of homelessness or currently in unsuitable accommodation. These needs would otherwise have to be met by the existing housing stock. Pressures on the existing housing stock may mean that without these homes, households would have to be placed in inappropriate and relatively expensive temporary accommodation such as bed and breakfast.
- The homes will add to the long-term stock of affordable housing in the borough
- The homes cannot be allocated in accordance with the funding requirements without a lettings plan being agreed

**6. What geographical area does this proposal cover?**

- Homes are expected to be acquired within the 3 towns, King's Lynn, Downham Market and Hunstanton in order to provide access to services such as schools, GPs, transport links etc
- The exact location of the homes is currently unknown. This will be informed by consultation with the Persons From Abroad team but will also depend on property availability and price
- There are no cross-boundary implications

## 7. What is the impact of your proposal?

- 16 new affordable homes funded through the Local Authority Housing Fund will be allocated in accordance with the funding requirements.
- 16 eligible households at risk of homelessness or housed in unsuitable accommodation, who will require housing assistance from the council, will be housed in longer-term sustainable accommodation
- The lettings plan will be reviewed after 2 years. The housing will remain affordable in perpetuity and becomes part of the wider social housing stock once no longer required by the eligible households.

In considering our proposals we have been mindful of our legal responsibilities, as set out in the Equality Act 2010, which seeks to protect the rights of individuals and advance equality of opportunity for all. This particular funding is targeted at specific potentially disadvantaged groups in our local community, and it has therefore been necessary to consider how we fulfil our role with regards equalities, as a community leader and as service provider in west Norfolk.

The Equality Act places a requirement on all Local Authorities to comply with the Public Sector Equality Duty (PSED) in the exercise of their functions, to have due regard for the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the act
- Advance equality of opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who share a protected characteristic and those who do not

Having 'due regard' means giving consideration to:

- Removing or minimising disadvantages suffered by people due to their protected characteristics
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low

There is a risk that this proposal could impact on the relationships between residents who share a protected characteristic and those who do not. However, the proposals have due regard to minimising disadvantage and taking steps to meet the needs of people from protected groups due to the specific circumstances of those who will benefit from them. The risk is greater if the specific purpose and limitations of the funding are not clearly explained and communicated. Therefore, steps to mitigate potential negative impacts are critical.

**8. What data have you used to support your assessment of the impact of your proposal?**

The Funding was allocated by central government to local authorities based on a formula taking into account the number of Ukrainian arrivals per 1000 population and the level of housing pressure.

Over 135,000 Ukrainians have arrived in the UK via the Homes for Ukraine and Family Schemes.

193 Ukrainians have arrived in the borough through the Homes for Ukraine Scheme.

Around 9,200 Afghans are currently in Home Office bridging accommodation such as hotels (Source – Local Authority Housing Fund Prospectus). None of these are currently in the borough.

**9. What consultation has been undertaken/will need to be undertaken with stakeholders/ groups directly or indirectly impacted by the proposals and how do you intend to use this information to inform the decision?**

The Local Lettings Plan has been informed by consultation with the Persons from Abroad team at NCC and Broadland Housing who will be the landlord for the properties in the main.

Ward members will be notified if homes are acquired in their areas via member briefings.

Wider services such as Police and other statutory services will be made aware of the scheme at a strategic level via the Persons From Abroad Strategic Meetings

As per the existing Allocations Policy any letting plan must receive approval from West Norfolk Homechoice Panel. The panel consists of representatives from the Borough Council and Housing Associations partners.

**10. Are there any implications for other service areas?**

Implications of the scheme on other services will be minimal except for the following teams

- New homes will help to relieve pressures on the Housing Needs service area.
- Under the proposed Lettings Plan, properties will be directly let rather than advertised via Homechoice, the Councils Choice Based Lettings (CBL) scheme. This may increase perception that the Council's Allocations Policy is unfair. This may impact on the Housing Needs team and CIC in terms of enquiries.
- Communications team are aware of the scheme and will be kept up to date with any developments to enable proactive communications
- Potential positive impact for Lily service due to increase in accommodation options for some of the Ukrainian households that they support.

**11. What impact (either positive or negative) will this change have on different groups of the population?**

It should be noted that the Council will have the responsibility for addressing these housing needs with or without the additional funding. Accessing the additional funding therefore enables existing funding to address other housing pressures within the wider community

- Positive impact based on Race/Nationality – The new homes will increase access to sustainable housing for eligible Ukrainian and Afghan households at risk of homelessness.
- These households are disadvantaged by barriers to accessing private rented accommodation due to requirements for references, credit checks and guarantors that they may be unable to provide due to their recent arrival in the UK.
- If perceptions that these households are gaining favourable treatment ahead of existing communities are allowed to develop, this may lead to increased community tensions. It is possible that this could result in hate crimes against Ukrainian and Afghan households.
- The allocation of the new homes to eligible households from Ukraine and Afghanistan is a requirement of the grant funding which will be used to acquire the homes.
- Without the new affordable homes, the housing needs of these households would have to be met in other ways. This is likely to be through the existing affordable housing stock. This would increase pressures on the existing stock and disadvantage existing communities.
- Longer term, the additional housing will become available to support the wider community, increasing the stock of affordable housing in the borough, supporting local families on low income.
- This policy will not impact significantly on the general local housing market
- The policy will not negatively impact on local services as these households are already within the community



**12. What actions could be taken to mitigate the adverse impacts identified in question 11? Please clearly state if any actions cannot be mitigated.**

Effective Communications regarding the scheme to highlight benefits to the wider population of additional affordable housing stock and dispel perceptions of negative effect on existing communities could help to minimise any increase in community tensions.

The communications team will play a key role and does this by supporting the dissemination of positive stories about how new communities are settling in. For example, how they are supporting themselves, getting jobs, contributing to society. Continuing to highlight the plight that these communities may face in the countries from which they have come can help to foster a sense of community spirit and duty towards new communities. In the case of the LAHF, the communications team is not seeking to publicise the scheme, only to be prepared to answer questions about it as they arise

The Communications team will also monitor social media to gather intelligence on public perceptions

**13. How will you monitor the impact of this change?**

The Strategic Housing Team will complete monitoring returns bimonthly for DLUHC. These can also be used to monitor the impact internally; this is likely to include

- Number of families housed, including which resettlement programme they belong to;
- Number of individuals housed, including which resettlement programme they belong to.

Where a property funded through the LAHF scheme becomes vacant during the duration of this lettings plan, allocations will be made in accordance with the lettings plan. If no eligible households are identified, the property will be let in accordance with the normal provisions of the Social Housing Allocations Policy to meet wider local general housing and homelessness needs and responsibilities. The outcome of any such re-lets will be monitored.

A full review of the Lettings Plan will be undertaken after 2 years.

**14. Other Staff Involved in Assessment (including Corporate Equality Group Representatives), and comments from Equality Work Group Reps**

Consultation has been undertaken with representatives from the Corporate Equality Working Group to support the development of this full impact assessment, as required by Council procedures. The views of group members are incorporated in this final version of the assessment.

Becky Box (on behalf of Equality Working Group)

**Assessment Completed By: Nikki Patton**

**Job Title: Housing Strategy Manager**

**Date: 8/6/2023**