



## Stage 2 – Full Equality Impact Assessment Form

**Title of the Equality Impact Assessment report:**

**REVISION OF HOMECHOICE POLICY FOR THE ALLOCATION OF SOCIAL HOUSING**

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

- Service area – Housing Services (Regeneration, Housing and Place)
- Lead officers – Duncan Hall, Nikki Patton, Andy King
- The current policy can be found on the [HomeChoice website](#).

This assessment was completed with support from members of the Corporate Equalities Working Group (referred to as 'the group' in this document).



The change is to amend the existing policy in several ways as follows. A full rationale behind each change is outlined in 1.3 of the report

| Current policy  | Revised policy  |
|---|---|
| 1. There are currently four allocation bands: low, medium, high and emergency   | A fifth band – no priority – will be added to the existing four bands   |
| 2. Every 10th family-type vacancy is advertised with preference given to applicants in the High and Medium housing need bands that are working      | This preference will be removed.  |
| 3. Homeless prevention cases to be placed in low band   | These cases will remain in low band but will be above those who are adequately housed   |
| 4. Welfare and medical needs are assessed separately.   | Welfare and medical needs will be considered together (so that a combination of welfare and medical needs could result in a higher band)  |
| 5. Applicants with children lacking a bedroom or in a first floor flat with a child under 12 or a flat with no garden are all given medium priority | Applicants with children lacking a bedroom will remain in medium priority. Applicants in a first floor flat with a child under 12 or a flat with no garden will be given low priority |
| 6. Applicants in supported hostel accommodation are automatically given high band when ready to move on   | The high band will be retained if supported accommodation residents can demonstrate their only move-on option is through social housing. Otherwise, they will be banded medium        |
| 7. Current serving members and veterans of the regular armed forces are considered to have local connection for 5 years after leaving the military  | The time limit will be removed  |

Additionally, the new policy formalises arrangements to support care leavers, awarding them a high band, subject to conditions.

The changes are because of:

- Changes in legislation
- Changes in demand for social and affordable accommodation
- Changes in the borough's overall approach to homelessness
- Feedback from staff, customers and internal/external partners

The changes will result in a decision by Members – the draft policy will be taken through Cabinet and full Council.



### **3. How will this change help the Council achieve its Corporate Strategy priorities (and therefore your Directorate/service objectives)?**

The changes help support the following Corporate Priorities:

#### **Support our communities**

- To support the health and wellbeing of our communities, help prevent homelessness, assist people with access to benefits advice and ensure there is equal access to opportunities.
- improve access to affordable homes

The changes also support the borough's homelessness and rough sleeping strategy, adopted by members in November 2024

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

The changes are because of:

- Changes in the [Allocation of accommodation: guidance for local housing authorities in England](#)
- Feedback identified during the [Homelessness Review](#) and the creation of the council's [Homelessness and Rough Sleeping Strategy](#)
- Strategic direction driven by the Strategy, which was adopted by councillors in November 2024.

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

The changes will achieve improved value for money by:

- Strengthening the council's ability to prevent homelessness.
- Encouraging appropriate use of good-quality private sector accommodation (in partnership with commissioned services) whilst retaining social housing as an option for people who need it the most.
- Improving the level of flexibility officers have when determining applicants' need.
- Improving housing outcomes for vulnerable groups such as care leavers, homeless households, people with disabilities and those in overcrowded situations.

This will result in the following potential savings:

- Reduction in numbers of families in temporary accommodation
- Improved 'flow' of people through supported hostel accommodation
- Reduced level of MPs' and member enquiries due to a fairer process
- Reduced risk of legal challenges to decisions



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

The policy is borough-wide but has a particular impact on areas with higher concentrations of social and affordable housing.

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

As outlined above, the proposals reduce risk to the council and its customers by creating an allocation policy that is:

- **Fairer:** reducing the risk of complaints and reputational damage (as well as reducing the cost arising from MPs' and members' enquiries)
- **More strategic:** improving the prospects of achieving the aims of the borough's Homelessness and Rough Sleeping Strategy, Ending Homelessness, Person by Person
- **In line with legislation and guidance:** reducing the risk of legal challenge to the decisions made by officers:

The proposals aim to contribute towards the overall aim of **supporting our communities** by improving access to housing, which is a key determinant of health outcomes.

The proposals therefore fall in line with the council's work towards establishing West Norfolk as a Marmot Place.

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

It is difficult to quantify the impact of the proposal; however, the Housing Needs Service and the council's Communications team has carried out extensive consultation work to gauge public and partner opinion, to ensure that any 'unintended consequences' are mitigated.



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

As laid out in section 1.2 of the report to Cabinet, the service worked alongside members of the council's Communications Team, other departments and partners to ensure that the needs and wishes of stakeholders were considered. A total of 261 people were involved in the development of the policy, including 212 survey respondents and at least 99 people with current or former lived experience of homelessness.

Methods included drop-in sessions, Teams briefings, Homelessness Strategy partnership meetings and a public survey:

- The survey was successful in canvassing the opinions of people with lived experience of homelessness (43% of respondents) and people with long-term physical and mental health conditions and disabilities (33%).
- The survey also covered a wide spread of ages, though responses were skewed towards female respondents (73%).
- The changes were supported by most respondents for six out of the seven changes.
- For change 6 (move-on from hostel accommodation), there was some concern expressed by partners and by people with lived experience of homelessness relating to the impact on their ability to access social housing. The service will mitigate this by designing the application process in partnership with local partners and people with lived experience of homelessness. We will also ensure that eligible hostel residents will still be put into a high priority unless there is a clear indication that they do not need social housing.

For the change 2 ("Remove priority for people in employment"), 103 respondents voted to keep things as they are now, with 80 respondents voting to make the change and 29 being unsure. Members of the Corporate Equalities Working Group discussed this change in greater depth. Key points of discussion were as follows:

- **Government guidance:** Para 4.7 of the [Allocation of Accommodation Guidance for Local Authorities](#) states: "Local authorities are urged to consider how they can use their allocation policies to support those households who want to work." However, the current scheme only benefits those who are in work, at the expense of those who (for example) are unable to work due to disabilities, or who may have recently been made redundant through no fault of their own.
- **Caselaw:** In the case of [R\(H\) v Southwark LBC \[2017\] EHC 736](#) a judicial review held that, whilst the policy [of incentivising employment] had legitimate aim, the effect of the scheme was "indirectly to discriminate against those with disabilities and against women"
- **Lived experience:** although the change was not supported by a public survey, the change was strongly supported by a group of people with lived experience of homelessness, during a consultation meeting (Sanctuary Supported Living, 15<sup>th</sup> May). This added weight to the argument for removing the restriction.
- **Partners:** the change was unopposed or supported by members of the Homelessness Strategy Implementation Group – a group of senior staff members from organisations with a key role in preventing and relieving homelessness in King's Lynn and West Norfolk. This also added weight to the argument for removing the restriction.
- **Disincentivising work:** the group considered whether the change might disincentivise work and therefore have a knock-on effect on wellbeing. However, the group felt that the change simply opened the register up so that there was no differentiation between those in work and those who (through no fault of their own) may be unable to do so.

Whilst the decision was not taken lightly, the group's assessment is that the change is justified due to its overall positive impact on different groups of the population, as laid out in section 11 of this assessment.



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

There are no direct implications – though the change may generate additional calls to the council's customer information centre from people on the housing register.

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

The group considered the impact on the following protected characteristics:

- **Age:** a slight positive impact on older households who may be less able to work (change 2) (change from neutral on pre-screening)
- **Disability:** a significant positive impact on people with disabilities – who are more likely to have combined welfare and medical grounds for moving (change 4). Also a slight positive impact on those who are unable to work because of their disability (change 2)
- **Gender reassignment:** no significant impact
- **Marriage and civil partnership:** no significant impact
- **Pregnancy and maternity (also, caring responsibilities):** The group considered this and assessed as an overall positive impact (changed from unsure). The reclassification from medium to low band for households with children living in a first floor flat or above (change 5) may have a negative impact on some households with children. However, the group expects the overall impact to be positive – accounting for the impact on people who are in overcrowded conditions or who have significant welfare or medical needs for accessing social housing. Also, a slight positive impact on those who may be less likely to work because of maternity and caring responsibilities (change 2)
- **Race:** no significant impact
- **Religion or belief:** no significant impact
- **Sex:** no significant impact
- **Sexual Orientation:** no significant impact
- **Other:**
  - **Armed Forces Community:** a positive impact for those whose local connection eligibility has been extended (change 7). This also falls in line with the council's commitment to the Armed Forces Covenant.
  - **Health Inequalities:** a positive impact - particularly those who are more likely to have combined welfare and medical grounds for moving (change 2). But also: providing fairer access to social housing, which is a key determinant of health.
  - **Care Leavers:** a positive impact - confirming interim arrangements to prioritise care leavers for social housing



**12. Other staff involved in Assessment (including Corporate Equality Group Representatives), and comments from Equality Working Group reps**

Ashley Easter – Policy Assistant

Laura Randall – Information Governance Officer

Alison Demonty – Senior Community Safety and Neighbourhood Nuisance Officer



## Full EIA Action Plan

| <b>Risk/adverse impact identified (Q11)</b>  | <b>Action to be taken to mitigate</b>   | <b>By who</b><br><i>Include a lead officer for implementing the actions</i> | <b>By when</b><br><i>Deadlines/timescales for implementing the actions</i> | <b>Monitoring mechanism</b><br><i>What indicators will you use to track the impact of the change when implemented?</i><br><br><i>How will you review its implementation?</i><br><br><i>How do you intend to monitor service take-up?</i> |
|--|---|---|--|--|
| Some changes may be perceived as having a negative impact (e.g. on working households) | Strong communications including: press release; use of existing Homelessness Strategy network; HomeChoice partner network | Comms – Phil Sillis<br><br>Partners – Andy King                             | Early July<br><br>Mid July to end September                                | Feedback through:<br><br>Homelessness Strategy Implementation Partnership inc. co-production group<br><br>HomeChoice partnership network<br><br>Homelessness and Housing Delivery Task Group   |
| Some changes may be misunderstood by members of the public                             |   |   |  |  |
| Changes may cause concern to those on the housing register or looking to apply         | Clear guidance provided to people on the register and Homelessness / HomeChoice partners                                  | Andy King   | September 2025   |  |
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**Assessment Completed By: Andy King**

**Job Title: Senior Housing Manager**

**Date: 26 June 2025**