



Equality Impact Assessments

Full Impact Assessment Form

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

Service Area – Strategic Housing
Lead Officer – Nikki Patton
Assisted by – Karl Patterson

2. What change are you proposing?

The acceptance of capital grant funding offered to BCKLWN through the Local Authority Housing Fund for the acquisition of 16 new affordable homes. These homes would be to 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.

It is envisaged that the homes will be acquired by the council's wholly owned Registered Provider of Social Housing, West Norfolk Housing Company Ltd.

The decision regarding acceptance of the funding will be made by Cabinet on 8th February and a Memorandum of Understanding with DLUHC must be signed prior to 15th March.

A policy regarding allocation of the homes will be brought forward at a later date and a further EIA will be produced regarding this.

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

The funding and will enable new affordable housing to be delivered which 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 funding is available to provide additional capacity to Local Authorities who have welcomed substantial numbers of Ukrainian refugees to assist with alleviating pressures on housing and homelessness systems.
- 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?

- The properties will enable sustainable accommodation to be offered to 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 options under consideration will not have a negative financial impact on the council's capital programme.

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

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, GP's, transport links etc
- Funding has been allocated by the Department for Levelling Up, Housing and Communities to local authorities and supports the Government's commitment to supporting those who have fled conflict and the need to ensure the effective resettlement and integration of refugees into local communities. The funding available is specifically to address this need - which has been identified nationally
- There are no cross-boundary implications
- The acceptance of the funding is discretionary but comes with specific terms including the use of the homes to accommodate eligible households from Ukraine and Afghanistan. The new homes will respond to increasing pressures on the council's Housing Services resulting from recent arrivals of these households through government resettlement schemes.
- In the last year, 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 Add UK numbers. The majority of these households remain with sponsors/hosts with many nearing the end of a 12-month host period and will therefore require alternative 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

7. What is the impact of your proposal?

- An additional 16 affordable homes will be acquired
- 16 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
- Wider housing needs will be met by the homes in the longer term

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?

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 Homes for Ukraine Scheme. Intelligence from the Persons from Abroad Team suggest the number of sponsorships at risk of breaking down or coming to the end of the term is increasing

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?

Persons from Abroad team at NCC will be consulted in relation to the type and location of homes to be acquired.

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

Wider consultation with relevant parties will be undertaken when formulating policies for allocation of the homes.

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.
- Allocation of homes to Ukrainian/Afghan households may increase perception that 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
- Property Services will assist with the acquisition of homes for the scheme
- Some properties may be acquired via the Council's own developments which would have implications for the Corporate

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.

Existing Ukrainian community

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

- Offers accepted, including bedroom size and whether these are part of the “main” or “bridging” element of the funding.
- Number of properties where contracts exchanged, including bedroom size; •
- Number of properties occupied, including bedroom size; •
- Number of families housed, including which resettlement programme they belong to; •
- Number of individuals housed, including which resettlement programme they belong to.
- Total expenditure (including grant and other funding).
- Total committed spend (including grant and other funding); #
- Government grant used

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

Consultation with and input from the Equalities Working Group have been incorporated into the assessment.

Assessment Completed By: Karl Patterson

Job Title: Senior Housing Development Officer

Date: 8th Feb 23