



# Equality Impact Assessments

## Full Impact Assessment Form

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

Service Area – Strategic Housing  
Assistant Director – Duncan Hall  
Lead Officer – Nikki Patton & Karl Patterson

### 2. What change are you proposing?

The acceptance of capital grant funding offered to BCKLWN through the Local Authority Housing Fund Round 3 for the acquisition of 12 new affordable homes. Four of these homes would be to provide longer-term sustainable accommodation for households from Afghanistan who have arrived or are soon to arrive in the UK via resettlement schemes and are now at risk of homelessness or are currently housed in unsuitable accommodation. The remaining 8 will be provided as temporary accommodation for homelessness households.

The 4 homes will assist the council to respond to increased pressures from these arrivals on the existing housing and homelessness systems, particularly as accommodation arrangements provided by the Home Office 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 17<sup>th</sup> September and a Memorandum of Understanding with MHCLG must be signed in September 2024.

On 27<sup>th</sup> June 2023 Cabinet endorsed a Local Lettings Plan to be used to allocate homes acquired through LAHF Round 1, including 2 homes for Afghan families.

It is proposed to extend this letting plan to cover the 4 homes for Afghans funded through LAHF Round 3. In accordance with the Council's Social Housing Allocations Policy, this will need to be approved by the West Norfolk Homechoice panel. The remaining 8 temporary accommodation properties will be used to accommodate homelessness households in accordance with Homelessness legislation.

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

The funding will enable new affordable housing to be delivered which will help to achieve the following Corporate Business Plan Objectives.

**Promote growth and prosperity to benefit West Norfolk. To create job opportunities, support economic growth, develop skills needed locally, encourage housing development and infrastructure that meets local need and promote West Norfolk as a destination,**

- The homes will be new build affordable housing therefore increasing affordable housing stock in the borough .

**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.**

- The homes will enable those from Afghanistan arriving in the UK having fled war torn countries to access longer-term sustainable and appropriate accommodation.
- The homes will provide good quality temporary accommodation for any households facing homelessness and therefore reducing the Borough Council's use of inappropriate and expensive B&B as temporary accommodation. This is a key objective of the Council emerging Homelessness & Rough Sleeping Strategy 2024-2029 and existing Homelessness & Rough Sleeping Strategy 2029 (I think this date is wrong?)-2024

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

- Funding has been allocated by MHCLG 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. The funding has also been made available to reduce local housing pressures and use of expensive and unsuitable accommodation, by providing better quality temporary accommodation to those owed homelessness duties by local authorities and increase and support local housing markets by assisting the delivery of new housing stock or new developments to grow overall housing supply.
- The acceptance of the funding is discretionary but comes with specific terms including the use of the homes to accommodate 4 eligible households from Afghanistan. The new homes will respond to increasing pressures on the council's Housing Services
- Many of these households will face barriers to entering the private rental 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. 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.

**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 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 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.

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

- Homes are expected to be acquired within King's Lynn in order to provide access to services such as schools, GPs, transport links etc
- There is an expectation that the homes will be acquired on the Florence Fields Development, a Borough Council development currently under construction but this will depend on property availability and price
- There are no cross-boundary implications

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

- An additional 12 affordable homes will be acquired
- 12 households at risk of homelessness or housed in unsuitable accommodation, who will require housing assistance from the council, will be housed in either long term accommodation or good quality temporary 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?**

We are aware that nationally there are Afghan households residing in Home Office Accommodation and require longer term sustainable housing. None of these are currently in the borough.

There are currently 68 households in total in temporary accommodation, 35 of which are in B&B accommodation. A key objective of the emerging homelessness & Rough Sleeping Strategy is to have no need for B&B accommodation.

**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 Norfolk County Council will be consulted in relation to the type and location of the 4 homes to be acquired for Afghan households.

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

## 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 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 may assist with the acquisition of homes for the scheme
- The properties are likely to be acquired via the Council's own developments which would have implications for the Corporate Projects team



**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 4 new homes will increase access to sustainable housing for eligible Afghan households at risk of homelessness. The remaining 8 homes will increase access to sustainable for housing for any eligible household requiring temporary accommodation regardless of race or nationality.
- The Afghan 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 there are perceptions that Afghan 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 Afghan households.
- The allocation of the new homes to eligible households from 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 the numbers are small ie 4 households and will be supported by the Persons From Abroad Team to support community integration.

**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 MHCLG. 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 Afghan element or temporary accommodation element.
- 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: Nikki Patton**

**Job Title: Housing Services Manager**

**Date: 27<sup>th</sup> August 2024**

Comments:

Supporting this application for Local Authority Housing Fund Round 3 will enable the Borough Council to deliver quality affordable housing for those Afghan households displaced from their homes without impacting on the existing housing offer to those already on the homelessness list. It also adds provision for all those who are not from Afghanistan and contributes towards the reduction in reliance on Bed and Breakfast accommodation. The overall impact will be positive for all members of our communities.

L Gayton