



Equality Impact Assessment

Carrying out an Equality Impact Assessment (EIA) will help the Council to meet its Public Sector Equality Duties (Equality Act 2010).

The duties which need to be considered when making decisions are 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

Failure to assess the equality impact may increase the risk of making an unfair decision which could potentially be discriminatory. It also prevents us from identifying opportunities to promote equality and therefore leaves the Council open to potential legal challenge.

Using this EIA template will help to ensure that a decision is made in a fair way, based on evidence. It provides a clear and structured method to assess the potential impact on protected groups.

For more information how to complete this form please refer to the Guidance which can be found at [HERE](#)

Title of policy or proposal	Choice Based Lettings and Allocations Policy
Briefly describe the aims of the policy change, decision or proposal, the likely outcomes, and the rationale for it	The Council's Choice Based Lettings and Allocations Policy details how Rykneld Homes Limited allocate the Council's housing stock. The policy also covers the allocation of properties belonging to Registered Providers and Housing Associations and some private rented accommodation via the nominations process.

Consider the potential impact on any member of staff or member of the public with the following protected characteristics:

Age, Disability, Gender identity/Gender reassignment, Race, Religion or belief, Sex, Sexual orientation, Women who are pregnant or have recently had a baby.

Also, for issues affecting staff, consider employees who are married or in a civil partnership.

<p>What information is already held, or have you obtained through consultation or engagement activity? (For each protected characteristic: What do you know about our employees, service users or anyone else who potentially could be affected by the proposal? Who has been consulted? If you have gaps in your evidence or data, you may need to carry out targeted engagement activity and/or consider information from local or national research.)</p>	<p>A Choice Based Lettings and Allocations policy was first implemented due to the Localism Act 2011 and is reviewed on an annual basis. The current policy which has been implemented since 2018 has received annual updates in line with new legislation and identified key amendments. Therefore, the policy is being continuously monitored by the Council and Rykneld Homes to ensure its fit for purpose and does not discriminate against any of the protected characteristics.</p> <p>For the 2025 key amendments a full consultation exercise was carried out, which included:</p> <p>A full consultation was carried out with:</p> <ul style="list-style-type: none"> • Members (email/online survey) • Scrutiny committee • The public (online survey) • Waiting list applicants (letter and online survey) • Other housing providers and external organisations • Advertised on social media • The consultation survey was available on Rykneld Homes website with a link from the Council's website <p>The group the amendments will affect the most are applicants on the Housing Waiting list which made up 76.2% of the respondents. This includes applicants with the protected characteristics and the most vulnerable people who have a housing need in our district, for example, applicants with a disability, homeless, fleeing Domestic Violence or hate crime, care leavers and older people (the list is not exhaustive). From all respondents the majority agreed with all the proposed amendments by a large margin.</p> <p>Information is also obtained by the in-depth housing assessment for each application and their household, which has led to amendments being made to the policy to ensure those in most housing need are successful in securing settled accommodation whilst remaining in line with legislation.</p>
<p>After considering the information, which protected groups may potentially be affected? (Delete those not likely to be affected)</p>	<p>Age</p> <p>Disability</p> <ul style="list-style-type: none"> • Physical/mobility impairment • Sensory: hearing/visual or speech • Mental health • Learning disabilities • Non-visible conditions such as epilepsy/diabetes

	Sex
	Race including gypsies and travellers
	Sexual Orientation
	Religion/Belief
	Gender Reassignment
	Pregnancy & Maternity
<p>Using the information you have, give details of any potential positive and negative impacts on protected groups likely to be affected by the policy change, decision, or proposal</p> <p>(For each protected characteristic where there could be a potential impact, consider the following: Could people from any protected groups be positively or negatively affected? Could anyone's ability to take part in public life be affected? Could this policy change, decision or proposal affect public attitudes towards any protected group? Could any groups become more or less likely to be at risk of harassment or victimisation because of this policy change, decision, or proposal? Are there opportunities to create positive impacts?) <i>(remember that the law permits disabled people to be treated equally or better than other groups to enable reasonable adjustments to be made).</i></p>	<p>All the groups above can apply for housing and are not discriminated against due to their protected characteristic.</p> <p>Age Applicants must be 16 or over to register and will not normally be rehoused until they are 18. In some circumstances if applicants are 16 and 17 years support from DCC's Children and Young Adults Services will be given to enable them to live independently, sustain a tenancy and have an identified package of support available to them where necessary.</p> <p>Under the Domestic Abuse Act if children are abused/witness abuse housing priority can be given and are treated the same way an adult would be treated. This means priority banding will be awarded and a district/local connection is not required.</p> <p>Older people may require additional support to access the service, this may especially be the case where access to a computer is limited and computer literacy is low. Similarly, vulnerable older people who have difficulties leaving their home may remain unaware of what services and housing or support options are available to them. The Choice Move team can work with the applicant and bid on properties on their behalf. Support to complete Housing Application forms can be given by Rykneld Homes.</p> <p>There is a lack of affordable housing in the district which means applicants may be waiting a while on the housing register, therefore the Council and Rykneld Homes are continually looking to or working with developers to build new bungalows, extra care schemes or supported housing for older people or those with a disability to enable more housing choice to help independent living.</p> <p>Disability The policy gives priority to applicants with a medical condition, such as physical or mental disability. Emergency or urgent medical needs will be placed in band 1 or 2, and those with a general medical priority where housing which would be helped by a move to another property but not in urgent/emergency need will be placed in band 3, this ensures those in most need are</p>

able to secure housing first.

Where a property has adaptations, the policy gives priority to those people who require that adaptation, therefore the general rules are overridden to allow adapted properties to be offered to the applicant in most need.

People with sensory impairments may find accessing the website and bidding for properties difficult or impossible, the Choice Move team can bid for properties that match the applicants criteria in the area of their choice on their behalf.

Race

Under the policy, people who are experiencing hate crime, including that which is race related, can be awarded additional priority for housing under the policy.

The 'district connection' and 'community connection' element of the policy could be considered to disadvantage those from outside of the area, and potentially this may disadvantage those from an ethnic minority groups, especially newer immigrants, however if any person is fleeing Domestic Abuse/hate crime no local connection is necessary and the person would get priority banding.

Due to larger family sizes, larger properties may be required by the South Asian communities, which the district currently has a shortage of. However, due to small numbers and the demand for larger properties from across the community, the housing needs of those who require larger houses due to religious or cultural beliefs should be met in the same way as others. Applicants bid for properties in the area of their choice.

Normally Gypsies and Travellers do not wish to live in 'bricks and mortar' housing, however G&T's can apply to be on the housing register and can bid for housing in the same way as the settled community. Demonstrating a 'district connection' may however prove difficult, if not impossible, for this group meaning that they would not be eligible for bands 1 and 2, and also they would not be eligible for the additional 12 months waiting time due to no community connection.

Sex/ Sexual Orientation/Gender reassignment

Applicants or any members of their household will be treated by the sex they wish to be identified.

The policy does not disadvantage any applicant because of their sex/sexual orientation/gender reassignment. Domestic Abuse or hate crime applicants are given

	<p>priority with no local connection required. This applies to any person with any gender including transgender.</p> <p>The policy does not discriminate against applicants because of their sexual orientation. Same sex couples are treated the same as heterosexual couples and are able to secure a joint tenancy.</p> <p>Religion/Belief Choice based lettings allow individuals to bid for properties that meet their personal needs and requirements, including proximity to places of worship and religious beliefs.</p> <p>Pregnancy & Maternity An applicant who is pregnant will be banded in accordance with the assessed priority, for example, homeless, overcrowding, shared amenities, domestic abuse, etc. Applicants do not get priority simply because they are pregnant, assessments will take place regarding their housing need, support needs will be taken into consideration the same as all other applicants, for example if they need to move to receive support they priority will be given.</p> <p>Where the birth of the child/ren would cause serious overcrowding discretion by Rykneld Homes may be used to decide to grant priority equal to that after the child/ren is born.</p>
<p>Give details of any actions that can be taken to promote equality or to lessen any potential adverse impact on protected groups.</p>	<p>We are continually working with housing providers to address disability issues for younger people and transition into independent living, i.e. for those with a learning disability, sensory impairment, older people's extra care schemes.</p> <p>Continue to monitor customer satisfaction to identify any gaps or trends in provision.</p> <p>Getting the right support in place is essential to help with applications and to sustain tenancies, the Council and Rykneld Homes are continually looking at ways to promote, assess and implement support.</p>
<p>What plans are there to monitor and review the actual impact of the policy change, decision, or proposal on equality of opportunity?</p>	<p>The Council and Rykneld Homes will continue to monitor the policy to ensure its fit for purpose on an operational basis. The policy will then be reviewed after 1 year of implementation.</p> <p>The protected characteristics are monitored via the housing application form under section 35 Equal Opportunities.</p> <p>Before the amendments are implemented full training will be given to Rykneld Homes employees to ensure the</p>

	policy is being interpreted and implemented correctly.
When will follow up review be done?	<p>The policy is being implemented April 2026, therefore the review will be conducted April 2027.</p> <p>If it is found that the policy is not working correctly as intended then small amendments will occur before that date.</p> <p>03/11/2025</p>

Based on a consideration of all the potential impacts, mark one of the following as an overall summary of the outcome of this assessment:

X

The equality analysis has not identified any potential for discrimination or adverse impact and all opportunities to promote equality have been taken.

The equality analysis has identified risks or opportunities to promote better equality; the change, decision or proposal will be adjusted to avoid risks and ensure that opportunities are taken.

The equality analysis has identified risks to equality which will not be eliminated, and/or opportunities to promote better equality which will not be taken. Acceptance of these is reasonable and proportionate, given the objectives of the change, decision or proposal, and its overall financial and policy context.

The equality analysis shows that the change, decision, or proposal would lead to actual or potential unlawful discrimination or would conflict with the Council's positive duties to an extent which is disproportionate to its objectives. It should not be adopted in its current form.

Explain how the judgement above was reached and action plan what will be taken to reduce any negative or to enhance any positive impacts on equality

The policy is governed by legislation and government guidance and is based on housing need.

Embedded in the policy gives priority to vulnerable applicants, including those with the protected characteristics. These applicants receive the most priority for housing if they have a housing need.

Name(s) and job title(s) of person (people involved in) carrying out this assessment

Diane Parker – Housing Intelligence and Assurance Officer
Gary Smithurst – Housing Options Manager
Amar Bashir - Improvement Officer

Authorising Director or Assistant Director



Date authorised

5th November 2025

The completed equality impact assessment must be attached to the report that will be considered by the decision maker or decision makers to enable them to give due regard to the impact of the policy, decision, or proposal on protected groups. Also send a copy to Amar.Bashir@ne-derbyshire.gov.uk