

Equality Impact Assessment – Bromsgrove Home Choice Allocations Policy

Title of Policy

Bromsgrove Home Choice Housing Allocations Policy (Version 1, 2026)

Service Area

Community and Housing Services

Officer Completing Assessment

Amanda Delahunty, Housing Development and Strategy Manager

Date Assessment Started

2nd June 2026

Decision Maker

Cabinet

Date Decision Made

TBC

Overview

The Bromsgrove Home Choice Allocations Policy sets out how the Council allocates social and affordable housing through a banding system based on housing need, local connection, and statutory requirements.

The policy aims to:

- Ensure a **fair, transparent and accessible system** for allocating housing
- Prioritise households in **greatest housing need**, in line with “reasonable preference”
- Support **sustainable communities** and efficient use of housing stock
- Meet legal duties under the **Housing Act 1996, Homelessness Reduction Act 2017, and Equality Act 2010** The policy introduces structured eligibility criteria (including local connection), a **banding system**, and provisions for additional preference (e.g., homelessness, disability, domestic abuse, armed forces).

Current service users' needs will continue to be met through:

- Prioritisation of high-need groups
- Reasonable adjustments
- Assisted access and advocacy

The proposal is designed to ensure compliance with the **Public Sector Equality Duty (PSED)** and ensure equitable access to housing.

Who is the proposal likely to affect?

Group	Yes	No
All residents	☒	☐
Specific groups	☒	☐
All Council employees	☐	☒
Specific employee groups	☐	☒
Other	☒	☐

Details – Who could be affected and how

The policy affects:

- Individuals applying for **social housing**
- Households experiencing **homelessness or housing need**
- Vulnerable groups including:
 - Disabled people
 - Older people
 - Young people (including care leavers)
 - Victims of domestic abuse
 - Ethnic minority groups
 - Low-income households

Impact occurs through:

- Eligibility rules (e.g., **local connection requirement**)
- Priority banding determining access to housing
- Restrictions or demotions (e.g., Band 4 for behaviour or financial thresholds)

- Access to the **bidding-based choice system**

Some groups may experience **positive impacts** through targeted prioritisation (e.g., homelessness, disability), while others may face **barriers** (e.g., those without local connection or digital access).

Evidence and Data Used

- Housing demand and register data (local authority records)
- National legislation:
 - Housing Act 1996
 - Homelessness Reduction Act 2017
 - Equality Act 2010
- Internal performance and lettings data
- Demographic data for Bromsgrove
- Policy provisions include:
 - Prioritisation for homelessness, medical need, overcrowding
 - Exemptions (e.g., care leavers, domestic abuse victims)

Data gaps:

- Limited equality monitoring data on outcomes
- Limited evidence on digital exclusion impact
- Ongoing need to assess cumulative impacts across policies

Engagement and Consultation

Engagement includes:

- Consultation with housing partners / registered providers
- Input from homelessness services
- Feedback from applicants and service users
- Ongoing case management and reviews

Key findings:

- Applicants value fairness, transparency, and clarity
- Vulnerable groups require support to access and bid
- Barriers identified:
 - Digital access
 - Understanding the system
 - Local connection restrictions

The policy includes mitigations such as:

- Assisted applications and advocacy
- Translation and interpretation services
- Partner support (e.g., voluntary agencies)

Public Sector Equality Duty

1. Eliminate discrimination

- Policy explicitly states no less favourable treatment based on protected characteristics
- Reasonable adjustments provided (e.g., assisted applications, interpreters)
- Exemptions for vulnerable groups (e.g., domestic abuse, care leavers)

2. Advance equality of opportunity

- Priority given to:
 - Homeless households
 - Disabled applicants
 - Those in overcrowded or unsuitable housing
- Additional preference for vulnerable and disadvantaged groups
- Banding structure aligns need with access

3. Foster good relations

- Promotes balanced communities via Local Lettings Plans
- Transparent system reduces perceptions of unfairness
- Encourages community contribution incentives

Impact Assessment by Protected Characteristic

Protected Group	Impact	Justification	Mitigation
Age	Young people may struggle (16–18); older people prioritised in some cases	Legal tenancy limits; specialist housing	Advocacy support; tailored housing
Disability	Positive – priority for medical need;	Necessary to meet need	Ongoing assessment;

	reasonable adjustments		adaptations
Gender Reassignment	Neutral (no direct targeting)	Inclusive policy wording	Monitoring outcomes
Marriage/Civil Partnership	Neutral	Joint applications allowed	None required
Pregnancy/Maternity	Positive – pregnancy recognised for housing need	Reflects housing demand	Continued prioritisation
Race	Potential barrier via local connection or immigration status	Legal requirement	Translation; exceptions; monitoring
Religion/Belief	Neutral	No direct impact	Monitor access
Sex	Neutral	Equal treatment	Monitor outcomes
Sexual Orientation	Neutral positive – inclusive definitions	Same-sex couples recognised	Monitor outcomes

Other Groups (Non-protected)

- **Low-income households** – positively prioritised
- **Homeless households** – highest priority (Band 1)
- **People without local connection** – potential disadvantage
- **Digitally excluded applicants** – barriers to access
- **Armed Forces Personnel** – positively prioritised by legislation

Monitoring

The Council will:

- Monitor allocations by protected characteristics
- Track banding outcomes and refusals
- Review equality impacts regularly
- Use feedback to inform policy revisions

Action Plan

Action	By Whom	By When	Completion
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Strengthen equality monitoring data	Strategic Housing Team	Ongoing	
Review impact of local connection criteria	Strategic Housing Team	Annual review	
Improve accessibility / digital inclusion support	Housing Options Service	Ongoing	
Enhance consultation with vulnerable groups	Strategic Housing Team	Ongoing	
Update EIA following policy changes	Strategic Housing Team	At review	

Sign Off

Role	Name	Signature	Date
Lead Officer	Amanda Delahunty	AD	2.6.26
Equality Officer	Emily Payne	EP	2.6.26