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# Fundamental review of Social Housing Allocations An Equality Impact Assessment

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Draft Consultation Report  
September 2017



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# 1. Introduction

Under the statutory duties contained within Section 75 of the Northern Ireland Act 1998, the Department for Communities gave an undertaking to carry out an equality impact assessment (EQIA) when appropriate.

This draft report has been made available as part of the Formal Consultation stage of the EQIA relating to the Fundamental Review of Social Housing Allocations and we would welcome any comments which you may have in terms of this EQIA and our preliminary recommendations with regard to measures to mitigate adverse impact and alternative policies.

Further copies of this EQIA report are available on our website at [www.communities-ni.gov.uk/allocations-review](http://www.communities-ni.gov.uk/allocations-review)

If you have any queries about this document, and its availability in alternative formats (including large print, Braille, disk and audio cassette, and in minority languages to meet the needs of those who are not fluent in English) then please contact:

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Deadline for comments will be **Thursday 21 December 2017 at 17:00.**

Following consultation the Final Report will be made available on the Department's website.

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## Section 75 and the statutory duties

Section 75 of the Northern Ireland Act 1998 requires each public authority, when carrying out its functions in relation to Northern Ireland, to have due regard to the need to promote equality of opportunity between nine categories of persons, namely

- between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- between men and women generally;
- between persons with a disability and persons without; and
- between persons with dependants and persons without

Without prejudice to its obligations above, the public authority must also have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

The Department for Communities has in place an Interim Equality Scheme. The Scheme outlines how DfC proposes to fulfil its statutory duties under Section 75. Policies are screened to assess impact on the promotion of equality of opportunity and the duty to promote good relations using the following criteria:

- Is there any evidence of higher or lower participation or uptake by different groups?
- Is there any evidence that different groups have different needs, experiences, issues and priorities in relation to the particular policy issue?
- Is there an opportunity to promote equality of opportunity between the relevant different groups, either by altering the policy, or by working with others in government or in the larger community, in the context of the policy?
- Have consultations with relevant groups, organisations or individuals indicated that policies of that type create problems specific to any relevant group?

Copies of all screening exercises undertaken can be found at Policies Screened Section<sup>1</sup> on our website.

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<sup>1</sup> [www.communities-ni.gov.uk/dfc-equality](http://www.communities-ni.gov.uk/dfc-equality)

## **The Organisation**

The Department for Communities (DfC) was established on 9 May 2016. It comprises four main work areas:

- Strategic Planning & Resources
- Housing, Urban Regeneration & Local Government
- Engaged Communities
- Working & Inclusion

Our responsibility for housing includes:

- having overall control and responsibility for preparing and directing social housing policy in Northern Ireland;
- working closely with the Northern Ireland Housing Executive and Registered Housing Associations in implementing social housing policies;

- having regulatory powers over the Northern Ireland Housing Executive and Registered Housing Associations;
- having oversight of the Private Rented Sector, which is also controlled by the Rent (Northern Ireland) Order 1978;
- appointing the Board of the Northern Ireland Housing Executive and the Rent Assessment Panels;
- taking the lead in the Promoting Social Inclusion review of the difficulties faced by people who are homeless; and
- taking the lead in tackling fuel poverty, a major element of which is the Warm Homes Scheme

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## 2. The Policy

The policy relates to the Fundamental review of Social Housing Allocations.

NIHE developed the current Housing Selection Scheme and has responsibility for its daily operation and management.<sup>2</sup> Registered Housing Associations also use this scheme to make allocations to their accommodation.

As part of the Housing Strategy “Facing the Future” (2012–17) the Department for Communities committed to carry out a fundamental review of the allocation of social housing in Northern Ireland. The current Housing Selection Scheme (in place since 2000) sets out the rules for the allocation of social housing. Evidence from independent research, consultation with a range of stakeholders and two previous NIHE consultations (to make changes to the Scheme and to address the potential impacts of welfare reform) have led to a series of proposals which aim to provide for a fairer and more transparent system of assessing housing need.

Background information can be found in the Consultation document.

The policy aim is that the desired outcomes for the Selection Scheme are achieved as a result of the review. The outcomes are:

- A greater range of solutions to meet housing need;
- An improved system for the most vulnerable applicants;
- A more accurate waiting list that reflects current housing circumstances;
- Those in greatest housing need receive priority, with recognition of their time in need; and
- Better use of public resources by ensuring the list moves more smoothly.

To deliver these outcomes, the accompanying consultation document (available at: [www.communities-ni.gov.uk/allocations-review](http://www.communities-ni.gov.uk/allocations-review)) sets out the evidence to support the following proposals.

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<sup>2</sup> For further information on the existing Scheme go to: [www.nihe.gov.uk/housing\\_selection\\_scheme\\_rules.pdf](http://www.nihe.gov.uk/housing_selection_scheme_rules.pdf)

For information on the equality impacts of the current scheme, please see: [touch.nihe.gov.uk/final\\_report\\_-\\_equality\\_impact\\_assessment\\_of\\_the\\_housing\\_selection\\_scheme.pdf](http://touch.nihe.gov.uk/final_report_-_equality_impact_assessment_of_the_housing_selection_scheme.pdf)

**Table A**

1	An independent, tenure-neutral housing advice service for NI
2	An applicant who has been involved in unacceptable behaviour should not be eligible for social housing or Full Duty homelessness status unless there is reason to believe – at the time the application is considered – that the unacceptable behaviour is likely to cease
3	NIHE may treat a person as ineligible for Full Duty homelessness status on the basis of their unacceptable behaviour at any time before allocating that person a social home
4	NIHE can meet their duty to homeless applicants on a tenure-neutral basis, provided that the accommodation meets certain conditions
5	A greater choice of areas for all applicants for a social home
6	Greater use of a mutual exchange service
7	The removal of intimidation points from the Selection Scheme
8	Points should reflect current circumstances for all applicants
9	The removal of Interim Accommodation points from the Selection scheme
10	The Selection Scheme should place applicants into bands based on similar levels of need to meet longstanding housing need more effectively
11	The Selection Scheme should always align the number of bedrooms a household is assessed to need with the size criteria for eligible Housing Benefit customers
12	For difficult-to-let properties: Social landlords should be able to make multiple offers to as many applicants as they think necessary
13	For difficult-to-let properties: Social landlords should be able to use choice-based letting
14	For difficult-to-let properties: Social landlords should be able to go direct to multiple offers if they have evidence that a property will be difficult-to-let
15	An applicant may receive two reasonable offers of accommodation

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<b>16</b>	Social landlords may withdraw an offer of accommodation in specified circumstances
<b>17</b>	Social landlords may withhold consent for a policy succession or assignment to a general needs social home in limited circumstances where there is evidence an applicant needs it
<b>18</b>	Social landlords may withhold consent for a policy succession or assignment of adapted accommodation or purpose built wheelchair standard accommodation where there is evidence an applicant needs it
<b>19</b>	Updating the Selection Scheme to bring it in line with developments in Public Protection Arrangements Northern Ireland (PPANI)
<b>20</b>	Specialised properties should be allocated by a separate process outside the Selection Scheme

### 3. Consideration of available data and research and any pre-consultation / engagement

In order to carry out this Equality Impact Assessment, the following sources of information have been relied upon:

- DfC Equality Screening – Review of Social Housing Allocations Consultation (2017)

**[www.communities-ni.gov.uk/allocations-review](http://www.communities-ni.gov.uk/allocations-review)**

- NIHE’s EQIA on Housing Selection Scheme (2007)

**[touch.nihe.gov.uk/final\\_report\\_-\\_equality\\_impact\\_assessment\\_of\\_the\\_housing\\_selection\\_scheme.pdf](http://touch.nihe.gov.uk/final_report_-_equality_impact_assessment_of_the_housing_selection_scheme.pdf)**

This is the latest equality impact assessment which was carried out on the Housing Selection Scheme by the NIHE.

- NIHE’s EQIA on strategic guidelines for the Social Housing Development Programme (2011)

**[www.nihe.gov.uk/equality\\_impact\\_assessment\\_-\\_social\\_housing\\_development\\_programme\\_strategic\\_guidelines.pdf](http://www.nihe.gov.uk/equality_impact_assessment_-_social_housing_development_programme_strategic_guidelines.pdf)**

NIHE’s EQIA on the Strategic Guidelines look at the social housing development programme, not allocations per se, it provides background information on inequalities which are pertinent to allocations.

- DfC (ASU) Equality Analysis Report (2017)

**[www.communities-ni.gov.uk/allocations-review](http://www.communities-ni.gov.uk/allocations-review)**

The Department’s Analytical Services Unit provided analysis of waiting list data.

- Alison Wallace, Housing and Communities’ Inequalities in NI Report, (University of York, June 2015)

**[www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/HousingInequalities-FullReport.pdf](http://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/HousingInequalities-FullReport.pdf)**

This report provides analysis on equality issues pertaining to housing.

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- NIHE Homelessness Strategy 2017–22  
**[www.nihe.gov.uk/homelessness\\_strategy](http://www.nihe.gov.uk/homelessness_strategy)**  
This sets out NIHE’s strategic direction on how it will address homelessness over a five year period, and includes information on temporary accommodation.
  - NIHE Waiting List Administrative Data (2014–16)
    - NIHE provided the Department with waiting list statistics on intimidation cases and those in temporary accommodation.
    - NIHE has provided modelling to the Department on the impacts of proposals 7 and 10, (the removal of intimidation points from the scheme and placing applicants into bands based on similar levels of need).
    - NIHE included some questions in its Continuous Tenant Omnibus Survey, which have informed development of the proposals.
  - Census 2011  
**[www.nisra.gov.uk/statistics/census/2011-census](http://www.nisra.gov.uk/statistics/census/2011-census)**  
This primary source provides background data on the proportion of section 75 groups in the general population and data on the tenure in which people live.
  - Homelessness Monitor: Northern Ireland (2016)  
**[blog.crisis.org.uk/media/236838/the\\_homelessness\\_monitor\\_northern\\_ireland\\_2016.pdf](http://blog.crisis.org.uk/media/236838/the_homelessness_monitor_northern_ireland_2016.pdf)**  
This independent report is a longitudinal study analysing homelessness in Northern Ireland.
  - Sheffield Hallam University Report: Housing impacts of Welfare Reform in Private Rented Sector (2014)  
**[shura.shu.ac.uk/11306/](http://shura.shu.ac.uk/11306/)**  
This report concerns Housing Benefit reforms but it contains a qualitative element which sheds some light on the experience of ethnic minority communities in Northern Ireland.
  - House Condition Survey (2011)  
**[www.nihe.gov.uk/index/corporate/housing\\_research/house\\_condition\\_survey.htm](http://www.nihe.gov.uk/index/corporate/housing_research/house_condition_survey.htm)**  
This sampled primary source provides further equality data on tenure.
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- Office of National Statistics Integrated Household Survey (2009/10 & 2011/12)

**[www.ons.gov.uk/search?q=integrated%20household%20survey](http://www.ons.gov.uk/search?q=integrated%20household%20survey)**

This is the largest social survey undertaken by the Office of National Statistics. It provides estimates from approximately 325,000 individual respondents.

- The Rainbow Project / Council for the Homeless NI, 'Through Our Eyes' Report (2015)

**[www.nihe.gov.uk/through\\_our\\_eyes.pdf](http://www.nihe.gov.uk/through_our_eyes.pdf)**

The NIHE commissioned this research to provide an evidence base on the changing characteristics of homelessness in Northern Ireland, particularly with regard to NI's LGB&T communities.

Further sources have been used, such as media reports and voluntary and community sector publications.

Pre-consultation engagement has included:

- Ongoing consultation / liaison with NIHE;
- Meetings with NI Federation of Housing Associations, Housing Associations, Housing Rights Service, Chartered Institute of Housing, Equality Commission NI and other stakeholders
- Commissioning and publication of independent recommendations from the Universities of Ulster and Cambridge (at **[www.communities-ni.gov.uk/publications/fundamental-review-social-housing-allocations-policy](http://www.communities-ni.gov.uk/publications/fundamental-review-social-housing-allocations-policy)**)
- Public events and taking comments on the independent recommendations (compiled in a report at **[www.communities-ni.gov.uk/topics/housing/social-housing-allocations-research#toc-1](http://www.communities-ni.gov.uk/topics/housing/social-housing-allocations-research#toc-1)**)
- Monitoring of wider media and political interest in these issues, e.g. Private Members Motion Debate (12 September 2016) (at **[data.niassembly.gov.uk/HansardXml/plenary-12-09-2016.pdf](http://data.niassembly.gov.uk/HansardXml/plenary-12-09-2016.pdf)**)

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## 4. Assessment of Impact

The policy was examined in light of information obtained to assess whether or not there are actual or potential adverse impacts on any of the nine Section 75 categories and to ascertain if action could be taken to promote Equality of Opportunity and / or Good Relations.

Table B overleaf sets out each of the proposals within the policy and provides detail of actual or potential adverse impact where it has been identified, mitigation where appropriate and possible, and detail of further action required to determine level of impact i.e. monitor and review.

**Table B: Assessment of impact of each individual proposal within the fundamental review**

Proposal	Impact	Actual or potential adverse impact Mitigation Further Action required
<b>1. An independent tenure-neutral housing advice service for NI</b>	The proposed service should be open to all adults, including those whose immigration status or history of anti-social behaviour means they are ineligible for social housing. <b>This should be an addition to current provision, and therefore beneficial for all.</b>	Adverse impact: None Mitigation: N/A Further action required: N/A
<b>2 &amp; 3. Changes to eligibility where there has been serious anti-social behaviour</b>	The objective is to have a fair allocation process, reduce nuisance to tenants and strike a better balance between excluding people from the waiting list and prioritising vulnerable groups. The housing advice service and NIHE should assist excluded applicants in ways other than an allocation of a social home. <b>The proposed changes could result in more people being deemed ineligible for social housing because of their serious anti-social behaviour. This may impact young men in particular, as they are more likely to be both perpetrators and victims of anti-social behaviour.</b>	Potential adverse impact: possible adverse impact on young males who are perpetrators of serious anti-social behaviour.  Mitigation: A greater range of solutions to meet housing need, particularly the provision of a housing advice service as at proposal 1.  Further action required: None
<b>4. NIHE can meet their duty to homeless applicants on a tenure-neutral basis, provided that the accommodation meets certain conditions</b>	This should ensure that the NIHE has a greater range of ways to meet its duty to homeless applicants and that it can provide more options for those applicants to meet their housing needs. <b>This should be an addition to current provision, and therefore beneficial for all.</b>	Adverse impact: None Mitigation: N/A Further action required: N/A
<b>5. A greater choice of areas for all applicants</b>	Allows applicants to identify their geographical housing needs more precisely. <b>The proposal should be an addition to current provision, and therefore beneficial for all.</b>	Adverse impact: None Mitigation: N/A Further action required: N/A
<b>6. Greater use of a Mutual Exchange Service</b>	Increasing the proportion of transfer applicants who use Homeswapper may contribute to minimising the time that stock is empty. <b>The proposed service should be an addition to current provision, and therefore beneficial for all.</b>	Adverse impact: None Mitigation: N/A Further action required: N/A

Proposal	Impact	Actual or potential adverse impact Mitigation Further Action required
<p><b>7. The removal of intimidation points from the Selection Scheme</b></p>	<p>Removing intimidation points from the Selection Scheme would meet the objective of greater parity between applicants in similarly urgent housing need, including those at risk of violence in their own home and others in homes which it is not reasonable for them to occupy. This should ensure that no one type of emergency overrides another.</p> <p><b>The proposed change would result in victims of intimidation receiving fewer points for re-housing. This would impact on victims of paramilitary intimidation and anti-social behaviour in particular; and to a lesser extent, people intimidated because of sectarianism or on the basis of racial identity, sexual orientation or disability. Data shows that the latter three categories account for less than 15% of intimidated households.</b></p> <p><b>The Section 75 characteristics of households with intimidation points are examined at Annex A of the screening document (at: <a href="http://www.communities-ni.gov.uk/allocations-review">www.communities-ni.gov.uk/allocations-review</a>). The findings include that:</b></p> <ul style="list-style-type: none"> <li>• compared to all households on the waiting list and all allocated households, those with intimidation points were more likely to be single adults.</li> <li>• compared to the waiting list as a whole, applicants with intimidation points were more likely to be of unknown religion. Compared to all allocated households, those with intimidation points were less likely to be Catholic, and more likely to be of no, or unknown, religion.</li> <li>• <b>in respect of ethnic group</b>, applicants with intimidation points were slightly more likely to be white or of unknown ethnicity.</li> <li>• in respect of age, applicants with intimidation points were of working age, and more likely to be in the younger age groups.</li> </ul>	<p>Potential adverse impact: possible adverse impact on intimidated households, who are more likely to be single adults, in younger age groups and of white or unknown ethnicity. In terms of religion, such households are more likely to be of unknown religion, and those allocated are more likely to be of no or unknown religion.</p> <p>While intimidated households will no longer receive ‘over-riding’ priority for re-housing, they will still be entitled to removal from the threat of violence and full duty homeless applicant status and accompanying points for re-housing.</p> <p>There is expected to be a potential beneficial impact for households in high housing need across all Section 75 groups. Although numbers are small, it may be beneficial for people with dependants as shown in the NIHE modelling (Annex D of the consultation document).</p> <p>Mitigation: None at present</p> <p>Further action required: Monitor waiting times for key Section 75 groups to determine if any impact is as a result of removal of intimidation points from the Selection Scheme (particularly in respect of religious belief, age, disability, dependants and ethnic group. Gender and marital status are less informative on this issue as they only reflect the main applicant in a household. NIHE does not collect quantitative data on sexual orientation or political opinion, but qualitative research may provide a means to monitor change).</p> <p>If an impact is identified, it should be determined whether the impact does in fact reflect the desired outcomes of ensuring a more accurate waiting list that reflects current housing circumstances, and that those in greatest housing need receive priority, with recognition of their time in need.</p>
<p><b>8. Points should reflect current circumstances for all applicants</b></p>	<p>Should make the Selection Scheme fairer and more transparent to all applicants as they know they will be assessed on their current circumstances. <b>The proposed change should be fairer for all and result in a more accurate waiting list. Applicants whose points were historically protected will no longer receive this protection. The change will ensure that access to social housing reflects current housing need.</b></p>	<p>Adverse impact: None</p> <p>Mitigation: N/A</p> <p>Further action required: N/A</p>

Proposal	Impact	Actual or potential adverse impact Mitigation Further Action required
<p><b>9. The removal of Interim Accommodation points from the Selection Scheme</b></p>	<p>By removing Interim Accommodation Points, those homeless applicants who opt for other temporary accommodation (i.e. not arranged by the NIHE) would no longer be treated less favourably.</p> <p>The high level of need of people who are homeless should continue to be reflected in the 70 Full Duty Applicant points and points for individual housing circumstances.</p> <p>Our proposal for greater recognition of time waiting through banding, combined with points should deliver the outcome that those waiting longest in high levels of need will have a greater likelihood of receiving an offer of a social home.</p> <p><b>The proposed change should be fairer for all. Homeless households, who source their own accommodation, or share with family / friends, would indirectly benefit.</b></p> <p>The Section 75 characteristics of households with interim accommodation points are examined at Annex B of the screening document (at <a href="http://www.communities-ni.gov.uk/allocations-review">www.communities-ni.gov.uk/allocations-review</a>). The findings include that:</p> <ul style="list-style-type: none"> <li>• Compared to all households on the waiting list and all allocated households, those with interim accommodation points were less likely to be elderly and more likely to be families;</li> <li>• Compared to all households on the waiting list, those with interim accommodation points were more likely to be of Catholic or other religion and less likely to be of Protestant religion. Compared to all allocated households, those with interim accommodation points were more likely to be of Catholic religion and less likely to be of Protestant religion;</li> <li>• Compared to all households on the waiting list, those with interim accommodation points were less likely to be white and more likely to be of Black African, other or unknown ethnicity. Compared to all allocated households, those with interim accommodation points were slightly more likely to be white or of unknown ethnicity;</li> <li>• Compared to all households on the waiting list and all allocated households, those with interim accommodation points were more likely to be in the younger age groups.</li> </ul>	<p>Potential adverse impact: possible adverse impact for homeless households in NIHE-sourced temporary accommodation. However, proposal 10 will deliver benefits to all homeless applicants with longer waiting times, as greater recognition is given to time waiting.</p> <p>Mitigation: None at present</p> <p>Further action required:</p> <ul style="list-style-type: none"> <li>• Monitor waiting times for key Section 75 groups to determine if any impact is as a result of removal of interim accommodation points from the Selection Scheme (particularly in respect of religious belief, age, disability, dependants and ethnic group. Gender and marital status are less informative on this issue as they only reflect the main applicant in a household. NIHE does not collect quantitative data on sexual orientation or political opinion, but qualitative research may provide a means to monitor change).</li> <li>• If an impact is identified, it should be determined whether the impact does in fact reflect the desired outcome of a more accurate waiting list that reflects current housing circumstances. In particular, consideration should be given to whether average waiting times are falling for those in temporary accommodation or if further changes to the scheme are required.</li> </ul>

Proposal	Impact	Actual or potential adverse impact Mitigation Further Action required
<p><b>10. The Scheme should place applicants into bands based on similar levels of need</b></p>	<p>This measure should give greater priority to those applicants who have spent the longest time in a high degree of housing need. If this proposal is implemented, it should mean that over time, there should be a reduction in the number of applicants in high need who have been waiting a very long time.</p> <p>The screening document* provides information on waiting times across the Section 75 groups. It showed that the longest waiting times for those in housing stress are found among those:</p> <ul style="list-style-type: none"> <li>• whose religious background is 'undisclosed' (33 months)</li> <li>• aged 60–64 (30 months) and 65 or over (41 months)</li> <li>• Who are separated (31 months), married (39 months) and widowed (37 months)</li> </ul> <p>The Department commissioned analysis from its Analytical Services Unit (Social Housing Waiting List paper, 2017)*, which looked at waiting times by age, religion and dependants, but did not identify which are the determining variables. A policy analysis of the statistical report (Analysis of ASU research paper, 2017)* identified differences in waiting times between Protestant and Catholic households, where age and family status might be determining and compounding factors. The policy analysis cannot address the question of which of the three key variables has any influence, or the greatest influence, on waiting times. <b>The proposal to give greater recognition to time waiting, based on level of need, reflects the finding that some Section 75 groups are waiting for a very long time – in a high level of need – to access social housing. The proposal should therefore be beneficial for all those in high need, who are experiencing long waiting times.</b></p> <p><b>*These documents are available at:</b> <a href="http://www.communities-ni.gov.uk/allocations-review">www.communities-ni.gov.uk/allocations-review</a></p>	<p>Potential adverse impact: possible adverse impact for those with high housing need, who have not been waiting a long time.</p> <p>Mitigation: None at present</p> <p>Further action required:</p> <ul style="list-style-type: none"> <li>• Monitor waiting times for key Section 75 groups to determine if any impact is as a result of changes to the Selection Scheme (particularly in respect of religious belief, age, disability, dependants and ethnic group. NIHE does not collect quantitative data on sexual orientation or political opinion, but qualitative research may provide a means to monitor change. Gender and marital status are less informative on this issue as they only reflect the main applicant in a household.).</li> <li>• If an impact is identified, it should be determined whether the impact does in fact reflect the desired outcome of ensuring that those in greatest housing need receive priority, with recognition of their time in need. In particular, consideration should be given to whether average waiting times are falling for those in the highest need or if further changes to the scheme are required.</li> </ul>
<p><b>11. The Selection Scheme should always align the number of bedrooms a household is assessed to need with the size criteria for eligible Housing Benefit customers</b></p>	<p>Aligning the bedroom requirements and the overcrowding rules for the Selection Scheme with those of Housing Benefit should ensure a more consistent approach, avoid confusion for applicants and enable good housing management.</p>	<p>Adverse impact: None</p> <p>Mitigation: N/A</p> <p>Further action required: N/A</p>

Proposal	Impact	Actual or potential adverse impact Mitigation Further Action required
<b>12–14. More options for allocating difficult-to-let properties</b>	<p>The proposals aim to minimise the time that stock is empty by facilitating the allocation of all types of properties, including those that are difficult-to-let. These measures should ensure that difficult-to-let properties are let more quickly. They may increase the likelihood and speed of allocation for applicants in lower housing need.</p> <p>Those in greatest housing need must continue to receive priority, with recognition of their time in need, as properties let by multiple offer or choice-based letting should still go to the applicant (who has shown an interest in the property) in the highest band who has waited longest.</p>	<p>Adverse impact: None Mitigation: N/A Further action required: N/A</p>
<b>15. An applicant may receive two reasonable offers of accommodation</b>	<p>Combined with proposal 1 (Housing advice service), 5 (enabling applicants to choose areas that suit their needs), and proposals 12–14 (allocating difficult-to-let properties more effectively), this proposal should, over time, reduce the number of refusals of property and ensure the list moves more smoothly.</p> <p>The NIHE’s Continuous Tenants’ Omnibus Survey evidence (Annex A of the consultation document) shows that 82% of applicants took their first (72%) or second (10%) offer.</p>	<p>Adverse impact: None Mitigation: N/A Further action required: N/A</p>
<b>16. Social landlords may withdraw an offer of accommodation in specified circumstances</b>	<p>Clear provision setting out when an offer can be withdrawn will ensure that the Selection Scheme is fair and transparent, and enable the list to move more smoothly as homes will be available for those who are eligible and can occupy them without unreasonable delay.</p>	<p>Adverse impact: None Mitigation: N/A Further action required: N/A</p>
<b>17. Social landlords may withhold consent for a policy succession/ assignment to a general needs home in limited circumstances where there is evidence an applicant needs it</b>	<p>Greater discretion, particularly in areas of high demand, can ensure the best use is made of public resources.</p>	<p>Adverse impact: None Mitigation: N/A Further action required: N/A</p>

Proposal	Impact	Actual or potential adverse impact Mitigation Further Action required
<p><b>18. Social landlords may withhold consent for a policy succession/ assignment of adapted accommodation or purpose-built wheelchair standard accommodation where there is evidence an applicant needs it</b></p>	<p>Greater discretion to ensure best use is made of existing adapted stock should ensure the best use is made of public resources. Waiting times for applicants requiring adapted accommodation should reduce.</p> <p><b>The proposal reflects the additional cost of adapted stock and the current waiting times.</b></p>	<p>Potential adverse impact: households requesting a policy succession may be impacted. If so, they should be supported to move to more appropriate accommodation under the management transfer process.</p> <p>Mitigation: N/A</p> <p>Further action required: Monitor waiting times for those needing adapted stock and consider if further action is required.</p> <p>If an impact is identified, it should be determined whether the impact does in fact reflect the desired outcomes of ensuring an improved system for the most vulnerable applicants.</p>
<p><b>19. Updating the Scheme to bring it in line with Public Protection Arrangements NI</b></p>	<p>Applicants managed under PPANI should not be allocated a permanent home inappropriately in a way that brings risk to the applicant or others</p>	<p>Adverse impact: None</p> <p>Mitigation: N/A</p> <p>Further action required: N/A</p>
<p><b>20. Specialised properties should be allocated by a separate process outside the Scheme</b></p>	<p>Given that these households require specific rather than general needs housing, there should be a more bespoke, tenant-focused pathway for those applicants requiring specialised accommodation. To ensure they are housed appropriately, they should not have to 'compete' for specialised properties against those who require general needs housing.</p> <p><b>This proposal should be fairer for those requiring specialised properties compared to those requiring general needs housing.</b></p>	<p>Adverse impact: None</p> <p>Mitigation: N/A</p> <p>Further action required: Monitor waiting times for those requiring specialized properties and take forward a review to determine how specialized properties should be allocated.</p>

## 5. Measures to Mitigate / Alternative Policies

Having considered available data and research and considered any adverse impact which might arise out of the policy, it is proposed that the Department will take the following action in respect of the adverse impacts identified:

i. Provide a greater range of solutions to meet housing need, specifically the provision of a housing advice service as at proposal 1.

ii. Determine any impact as a result of changes to the Selection Scheme by monitoring waiting times for:

- key Section 75 groups to determine
  - if any impact is a result of removal of intimidation points from the Selection Scheme;
  - if any impact is a result of removal of interim accommodation points from the Selection Scheme; and
  - if any impact is a result of giving greater weight to time waiting
- those needing adapted stock
- those requiring specialised properties

Note that key Section 75 groups are those in respect of religious belief, age, disability, dependants and ethnic group. NIHE does not collect quantitative data on sexual orientation

or political opinion of households on the waiting list, but qualitative research may provide a means to monitor change. Gender and marital status are less informative in the context of waiting lists as they only record the main applicant in a household.

iii. Undertake reviews to determine:

- whether the impact of removing intimidation points reflects the desired outcome
- whether the impact of removing interim accommodation points reflects the desired outcome. In particular, consideration should be given to whether average waiting times are falling for those in temporary accommodation or if further changes to the scheme are required
- whether the impact of landlord discretion over policy succession / assignment reflects the desired outcome of an improved system for the most vulnerable applicants
- how specialised properties should be allocated

These measures, when implemented, should further Equality of Opportunity generally, in compliance with DfC's obligations in its interim Equality Scheme and with its obligations under Section 75 of the Northern Ireland Act 1998.

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## 6. Formal Consultation

DfC wishes to consult as widely as possible on the findings included in this equality impact assessment together with the preliminary recommendations offered above. With this in mind we propose to take the following actions:

- a press release will be prepared and submitted to various media outlets;
- prominent advertisements inviting the public to comment on this matter will be placed in the main newspapers in Northern Ireland, in accordance with normal practice;
- this report will be issued to all of the consultees listed in our Equality Scheme and to any member of the public on request;
- a copy of this report will be posted on the website;
- individual consultation meetings will be arranged with representatives of particular interest groups;
- consultation meetings for the general public will be arranged at suitable, accessible venues in the city;
- publicity material will be available at each operational location;
- the report will be made available, on request, in alternative formats including Braille, disk and audiocassette and in minority languages for those who are not fluent in English.

The arrangements for consultation are being co-ordinated by the Social Housing Policy Team, Department for Communities, to whom all enquiries should be made.

The closing date for responses is **Thursday 21 December 2017 at 17:00.**

## 7. Publication

The outcomes of this EQIA will be published in the form of a consultation report on the Department's website.

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# 8. Equality Impact Assessment Consultation Questions

## Have your say on the equality impact of proposed changes to the Housing Selection Scheme

Q1. Do you agree that the proposals contained within Table A (pages 8 and 9), will provide for a fairer and more transparent system of assessing housing need?

Agree       Don't know       Disagree

Any other comments?

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Q2. Do you agree with our assessment of impact outlined in Table B (pages 14–19)?

Agree       Don't know       Disagree

Any other comments?

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Q3. Are there any other pieces of information and evidence relevant to the Fundamental Review of Social Housing Allocations that you would like us to consider?

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Q4. Do you have any other comments/views on any aspect of our impact assessment?

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**Please return your responses to:**

Social Housing Policy Team  
Department for Communities  
Level 3, Causeway Exchange  
1-7 Bedford Street  
BT2 7EG  
**Tel:** 028 9051 5213  
**Email:** [allocations@communities-ni.gov.uk](mailto:allocations@communities-ni.gov.uk)

**by Thursday 21 December 2017 at 17:00**

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