

## **Equality Impact Assessment**

### **Concerning the Local Lettings Policy for New B&NES housing development, Flats 1-8 Great Hayes Court, Bath.**

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<b>Date of assessment</b>	05/09/2025

The Equality Act 2010 public sector equality duty requires public authorities to demonstrate that they have paid 'due regard' to the need to:

- eliminate unlawful discrimination, harassment and victimisation
- advance equality of opportunity
- foster good relations between people

# Introduction

## **Flats 1-8 Great Hayes Court, Bath**

This EIA is to consider the implications of the Local Lettings Policy for new Social Housing Flats 1-8, Great Hayes, Bath. The accommodation is owned by Bath & North East Somerset Council and will be classed as Council Housing.

Local lettings policies are additional policies made under the allocation scheme, "Homesearch Policy", to address housing management issues and public policy concerns that may relate to specific locations and developments in Bath & North East Somerset.

This assessment has been made using data from 2011 census, information from the Office of National Statistics, Stonewall, Rightmove, National Health Service/Royal United Hospital and the Homesearch database. Details of the information are provided in the appendix at the end of the document.

Equalities Profile	How the LLP meets any particular needs or helps to promote equality in some way	How the LLP could have a negative or adverse impact	Comments
<b>Age</b>	<p>Priority will be given to those who meet the criteria dependent on their housing need, regardless of their age.</p> <p>The 3x ground floor flats will be exclusively nominated via Childrens Services for care experienced individuals under age 25. The group usually faces considerable challenges accessing stable, long term independent housing and there is also a local lack of suitable availability.</p>	<p>Expressing a preference within the LLP for applicants where there is no significant criminal and/or anti-social behaviour for the last 5 years may have more of a more marked negative impact on younger applicants for all properties.</p>	<p>Housing Services will monitor ongoing lettings to ensure that there is no under/over representation of particular age groups within the general needs properties, with a view to making changes to the LLP as needed.</p> <p>Younger/older applicants are more likely to have lower incomes (see <i>Economic Inclusion</i>)</p>
<b>Disability</b> - physical, sensory and mental impairments/mental health	<p>The LLP allows applications from adult households requiring two bedrooms for the general needs properties. This may include individuals who require a second bedroom for a carer.</p> <p>The LLP looks to highlight applicants with histories of significant criminal/anti-social behaviour (which would include any incidents classed as hate crime). This supports an allocations process that is better able to ensure that other tenants with additional vulnerabilities are able to live peacefully and safely in their homes.</p> <p>The general needs properties will be allocated to Homeseach applicants across the banding, reflecting the profile of need of the wider B&amp;NES community.</p>	<p>Disabled individuals can face challenges in navigating the housing allocations process and the LLP adds a further element of complexity to this</p> <p>Information around the allocations criteria needs to be made available in accessible formats and further support to understand these may need to be given.</p> <p>The LLP specifies that applicants with recognised higher needs should have a support plan in place identifying how these needs will be managed at least initially once in the tenancy. This may impact negatively on individuals where existing support cannot be transferred over, eg applicants moving from supported housing and/or where there are long wait lists to access</p>	<p>The current Equalities Act prohibits discrimination against disable people and requires housing providers to make reasonable adjustments to accommodate their needs. However the LLP is constrained by the physical layout of the building (eg there is no lift access to the first and second floors).</p> <p>Housing Services will monitor this on a periodic basis to review the need to make any changes around the LLP.</p>

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		community based services .	
<b>Economic Inclusion</b>	<p>The general needs properties will be allocated to Homesearch applicants across the banding and this could include a wide range of economic circumstances, eg individuals on long term sickness and disability benefits, those out of work but actively seeking employment, etc.</p> <p>The stated allocations preference for three applicants who are working does explicitly include volunteering and part time employment and this could again include individuals with varying economic circumstances, eg those unable to work full time due to family/care commitments or individuals looking to gain experience in order to obtain work, etc.</p> <p>The overall aim of the allocations process is to house a mix of tenants with varying economic circumstances in order to create a balanced, resilient and sustainable community.</p>	<p>The LLP states that for the initial allocation of flats within this scheme, preference will be given to working applicants for three of the properties. This may negatively impact individuals with high housing need who are unable to meet this criteria.</p>	<p>Housing Services will monitor this on a periodic basis to review the need to make any changes around the LLP.</p> <p>Additional housing related charges that will not be covered by HB need to be set at an affordable rate in order not to disadvantage those more likely to be on lower incomes, eg younger people with limited benefit entitlement, those on disability benefits, women, pensioners, etc.</p>
<b>Gender</b>	<p>Priority will be given to those who meet the criteria dependent on their housing need, regardless of their gender. However women are more likely to be statutory homeless and this should be reflected in both the numbers and banding of women applicants.</p>	<p>The aim of the allocations process is to create a mixed community from applicants across the Homesearch banding and this may include people with higher complex needs. However women meeting this description may have their housing and other needs better met by being in women</p>	<p>Housing Services will monitor this on a periodic basis to review the need to make any changes around the LLP.</p>

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	The 2 bed general needs flats will support the housing of small family households and these are disproportionately headed by females.	only housing environments.	
<b>Gender Reassignment</b>	The LLP looks to highlight applicants with histories of significant criminal/anti-social behaviour (which would include any incidents classed as hate crime). This supports an allocations process that is better able to ensure that all tenants are able to live peacefully and safely in their homes.	Nothing identified.	Housing Services will monitor this on a periodic basis to review the need to make any changes around the LLP.  B&NES have robust policies in place around any form of discrimination.
<b>Marriage and civil partnership</b>	Couples in civil partnerships will be treated the same as married couples and cohabitees in relationships.	Nothing identified.	Single, widowed or divorced persons– or those who were formerly in a same-sex civil partnership or who have survived their spouse/civil partner – will be treated equally.
<b>Pregnancy and maternity</b>	Applicants who are pregnant/on maternity leave and who otherwise meet the criteria will not have their allocation priority affected.	Potential issues around affordability need to be explored pre tenancy.	Housing Services will monitor this on a periodic basis to review the need to make any changes around the LLP.
<b>Race and ethnicity- BAME Groups</b>	Priority will be given to those who meet the criteria dependent on their housing need, regardless of their race/ethnicity.  The LLP looks to highlight applicants with histories of significant criminal/anti-social behaviour (which would include racially motivated incidents). This supports an allocations process that is better able to ensure that other tenants are able to live peacefully and safely in their homes.	Potential issues around understanding and navigating the housing allocation system need to be identified and addressed (eg any language barrier, availability of information, etc).	Homeseach monitors lettings to ensure that there is no under or over representation of different ethnic groups.  B&NES have robust policies in place around any form of discrimination.

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<b>Religion/belief</b>	Priority will be given to those who meet the criteria dependent on their housing need, regardless of their religion/belief.	None identified	Homesearch monitors stated religion/belief.  Within Homesearch, any discrimination, bullying or harassment based upon religion or belief should be identified and addressed.
<b>Sexual orientation</b> - lesbian, gay, bisexual, heterosexual and others.	Priority will be given to those who meet the criteria dependent on their housing need, regardless of their sexual orientation.  The LLP looks to highlight applicants with histories of significant criminal/anti-social behaviour (which would include incidents involving any forms of hate crime). This supports an allocations process that is better able to ensure that other tenants are able to live peacefully and safely in their homes.	None identified	Homesearch monitors this information to identify and address positive or negative trends.  B&NES have robust policies in place around any form of discrimination.
<b>All</b>	The LLP looks to support the housing of individuals across a broad range of need and this should reflect the profile of need of the wider BaNES community.  Where families are applying for properties within the scheme, the LLP aims to achieve a balanced mix of children's ages within the development to help foster a safe, inclusive and sustainable community for all residents.	Although the LLP supports allocations across the Homesearch banding, showing preference for applicants without previous more serious criminal/housing management issues may impact on the accessibility of housing for individuals with higher needs who otherwise have protected characteristics.	This is the initial LLP for a new build development and it will need to be reviewed on a regular basis to ensure that it continues to support the housing of a wide range of individuals but does not discriminate against or prejudice the housing opportunities of individuals with protected characteristics.

## Conclusion

The Local Lettings Policy for Great Hayes Court has been designed to support a housing allocations process that establishes a balanced, cohesive, resilient and sustainable community. This includes purposefully looking to house individuals with a range of needs and circumstances in the same development, including care experienced individuals under 25, families with children and some individuals with higher/more complex needs.

This is an opportunity to provide housing that meets demand and reflects the broader needs of the wider BaNES community and specifically by including the three properties allocated to care experienced younger people, to actively house a group that are chronically underserved in terms of suitable longer term independent accommodation.

The purpose of this LLP is to allow some flexibility within the allocations process in order to balance the various needs and vulnerabilities of both new and existing applicants, with the aim of reducing potential housing management issues and supporting all tenants to live safely and peacefully in their homes. In order to achieve this aim there is a possibility that some applications from individuals with higher housing needs may be declined where it is assessed that any risks or unwanted behaviour cannot be managed within general needs housing. However this process will be monitored and reviewed regularly by Housing Services and the LLP can be amended as needed.

Overall the LLP does not disadvantage any groups and the Great Hayes Court development though comparatively limited in size should have a positive impact on the demand for housing in the B&NES area.



## **Appendix: Bath & NE Somerset Information**

This document can be made available in a range of languages, large print, Braille, on tape, electronic and accessible formats. Please contact Housing Services. Telephone 01225 396 444 or email [housing@bathnes.gov.uk](mailto:housing@bathnes.gov.uk)