

Customer Access Review – Full Assessment

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| Assessment details | |
| Assessment area | Housing Allocations Policy |
| Date of assessment | May 2025 |
| Directorate and Service | Housing and Public Protection, Housing Services |
| Manager | Housing Solutions and Private Sector Manager / Housing Policy & Development Manager |
| Officer conducting assessment | Senior Housing Policy & Performance Officer |
| Step 1: Scoping the assessment | |
| 1. What are the aims and objectives of the activity or proposal? | <p>The Housing Allocations Policy sets out the criteria and procedures that Dartford Borough Council uses to prioritise applicants for housing owned by the Council and a proportion of homes owned by housing association partners in the borough. It details how applicants can apply for, and access, social housing and sets out how applicants are prioritised on the Council's housing register. It also sets out other assistance that is provided to housing applicants, including advice and access to housing in the private rented sector.</p> <p>The key objectives of the Housing Allocations Policy are to:</p> <ul style="list-style-type: none"> • Provide a fair and transparent system by which people are prioritised for housing. • Help those most in need of housing. • Promote the development of sustainable mixed communities. • Make the best use of affordable housing in the Dartford borough. • Make efficient use of our resources and those of our partner housing associations. <p>This assessment has been undertaken in conjunction with a review of the Housing Allocations Policy.</p> |
| 2. Who will be affected by the activity or proposal? | <p>The Housing Allocations Policy affects any person seeking Council and housing association accommodation in the borough of Dartford, housing associations operating in the borough, and other partner agencies working to support people in housing need (e.g. under the Kent Agency Assessment).</p> |
| 3. How does the activity or proposal contribute to: a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council? | <p>a) The Housing Allocations Policy relates to the following key performance indicators:</p> <ul style="list-style-type: none"> • HPI-27 – Number of applicants on the housing register • HPI-41 – Percentage of lettings made to households already registered in the borough <p>The Housing Allocations Policy contributes to the Corporate Plan 2024-2027 key action to maintain a housing register of those in housing need to enable them to access good quality affordable homes when it becomes available.</p> |

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| <p>4. Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?</p> | <p><u>Legislative and regulatory context</u></p> <p>The Housing Allocations Policy and its delivery is intended to be compatible with the following relevant legislation, statutory guidance and regulation:</p> <ul style="list-style-type: none"> • Housing Act 1996 (as amended) • Localism Act 2011 • Allocation of Accommodation Code of Guidance 2012 (updated 2023) • The Homelessness Reduction Act 2017 • Immigration Act 2016 • Providing social housing for local people 2013 • Improving access to social housing for victims of domestic abuse 2022 • Improving access to social housing for members of the Armed Forces 2020 • Domestic Abuse Act 2021 • Allocation of Housing (Procedure) Regulations 1997, SI 1997/483 • Allocation of Housing (England) Regulations 2002, SI 2002/3264 • Allocation of Housing and Homelessness (Eligibility) (England) Regulations 2006, SI 2006/1294 • Allocation of Housing (Qualification Criteria for Armed Forces) (England) Regulations 2012, SI 2012/1869 • Housing Act 1996 (Additional Preference for Armed Forces) (England) Regulations 2012, SI 2012/2989 • The Homelessness (Suitability of Accommodation) Order 2012 (as amended by the Homelessness Reduction Act 2017) • The Allocation of Housing (Qualification Criteria for Right to Move) (England) Regulations 2015 • The Homeless (Review Procedure etc.) Regulations 2018 <p><u>Equality duties</u></p> <p>The Housing Allocations' Policy is subject to the provisions of the Equality Act 2010 and the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 (SI 2017/353); and specifically, s.149 which states that the Council has a duty to eliminate unlawful discrimination, advance equality of opportunity, and to foster good relations between persons who share a relevant protected characteristic and those who do not.</p> |

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| | <p><u>Allocation schemes</u></p> <p>Local housing authorities have a statutory requirement to have an allocation scheme for determining priorities, and for defining the procedures to be followed in allocating housing accommodation; and they must allocate in accordance with that scheme. A summary of the allocations scheme must be published and made available free of charge to any person who asks for a copy. The Council’s Housing Allocations Policy is published at https://www.dartford.gov.uk/housingstrategy.</p> <p>Local housing authorities have a statutory requirement to state within their housing allocations policies what its position is on offering applicants a choice of housing accommodation, or offering them the opportunity to express preference about the housing accommodation to be allocated to them. The Council operates a choice-based letting scheme. The Council currently operates a banding system (Bands A to D), which reflects the differing levels of housing needs or relative priorities within the allocation scheme.</p> <p>When framing or modifying the housing allocation scheme, local housing authorities must give regard to their Homelessness and Rough Sleeper Strategy and Tenancy Strategy.</p> <p>In the allocation of social housing, local housing authorities:</p> <ul style="list-style-type: none"> • Have statutory obligations as to who is eligible for an allocation of accommodation. The categories of ineligible persons include people subject to immigration control (with limited exceptions), and people from abroad as defined by the Secretary of State. • Have the power to decide who is a qualifying person under the allocation scheme. Subject to the requirement not to allocate to persons from abroad who are ineligible and exceptions for members of the Armed and Reserve Forces and for social tenants who need to move for work related reasons, local housing authorities may decide the classes of people who are, or are not, qualifying persons. • Have a statutory obligation to provide reasonable preference to certain categories of applicants. The reasonable preference categories are: <ul style="list-style-type: none"> - (a) people who are homeless within the meaning of Part 7 of the 1996 Act (including those who are intentionally homeless and those not in priority need) - (b) people who are owed a duty by any housing authority under section 190(2), 193(2) or 195(2) of the 1996 Act (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any housing authority under section 192(3) |

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| | <ul style="list-style-type: none"> - (c) people occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions - (d) people who need to move on medical or welfare grounds, including grounds relating to a disability, and - (e) people who need to move to a particular locality in the district of the housing authority, where failure to meet that need would cause hardship (to themselves or others) <ul style="list-style-type: none"> • Have discretion to determine priority between applicants with reasonable preference. • Have discretion to grant additional preference to particular descriptions of people who fall within the reasonable preference categories and have urgent housing needs. • Must give additional preference to the following categories of people who fall within one or more of the reasonable preference categories and who have urgent housing needs: <ul style="list-style-type: none"> - (a) Former members of the Armed Forces - (b) Serving members of the Armed Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service - (c) Bereaved spouse and civil partners of members of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner - (d) Serving or former members of the Reserve Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service. • Have discretion to include a residency requirement as part of the qualification criteria. There are statutory regulations for certain members of the Armed Forces community to be exempt from any residency requirements: <ul style="list-style-type: none"> - (a) Those who are currently serving in the Regular Armed Forces or who were serving in the Regular Forces at any time in the 5 years preceding their application for an allocation of social housing. - (b) Bereaved spouses or civil partners of those serving in the Regular Forces where (i) the bereaved spouse or civil partner has recently ceased, or will cease, to be entitled to reside in Ministry of Defence accommodation following the death of their Service spouse or civil partner, and (ii) the death was wholly or partly attributable to their service. - (c) Serving or former members of the Reserve Armed Forces who are suffering from a serious injury, illness or disability which is wholly or partly attributable to their service. |

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| | <p>There are also statutory regulations to prevent local housing authorities from applying a local connection test under the Right to Move. Specifically, local connection may not be applied to existing social tenants seeking to transfer from another local authority district who:</p> <ul style="list-style-type: none"> - (a) Have reasonable preference under section 166(3)(e) because of a need to move to the local authority's district to avoid hardship, and - (b) Need to move because the tenant works in the district, or - (c) Need to move to take up an offer of work <ul style="list-style-type: none"> • Statutory guidance encourages all local authorities to exempt from their residency requirements those who are living in a refuge or other form of safe temporary accommodation in their district having escaped domestic abuse in another local authority area. • Have discretion to make direct offers of accommodation outside of the allocations scheme to households waiting for re-housing in order to fulfil its housing management duties and responsibilities. |
| Step 2: Information collection | |
| <p>5. What do you know about the groups of people who will be affected? (i.e. demographic information in relation to the protected characteristic groups of age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment, marriage and civil partnership)</p> | <p><u>Dartford's population profile (Census 2021, Office for National Statistics)</u></p> <ul style="list-style-type: none"> • Sex – There are slightly more female residents than male residents in Dartford where 51% are female and 49% are male, which is the same as the overall England ratio of females and males • Age – The median age in Dartford is 37 years, which is slightly lower than the overall England mean age of 40 years. 21.1% of Dartford's population is aged 14 years or under. This is followed by residents aged 35 to 44 years (15.7%), 25 to 34 years (15.2%), 45 to 54 years (13.3%), 55 to 64 years (10.8%), 15 to 24 years (10.2%), 65 to 74 years (7.4%), and aged 75 years and over (6.4%). • Ethnicity – The largest ethnic group that people in Dartford identify with is White at 74.5%. This is followed by Black, Black British, Black Welsh, Caribbean or African (10.50%), Asian, Asian British or Asian Welsh (9.90%), Mixed or Multiple ethnic groups (3.10%), and Other ethnic groups (2.00%). In England and Wales overall, 81.7% identified their ethnic group as White. The next most common ethnic group was Asian, Asian British or Asian Welsh accounting for 9.3%. • Disability – 15.9% of Dartford's population are disabled. Of this, 6.6% of people's activities are limited a lot and 9.3% of people's activities are limited a little. |

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| Step 2: Information collection | |
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| | <ul style="list-style-type: none"> • Religion – 48.1% of Dartford’s population connect or identify with the Christian religion, followed by 3.8% Hindu, 3.5% Muslim, 1.7% Sikh, 0.6% Buddhist, 0.1% Jewish, 0.4% other religion. 36.5% of Dartford’s population did not connect or identify with any religion and 5.3% did not answer this question in the Census. • Sexual orientation – 91.2% of Dartford’s population aged 16 years and over identified as ‘straight or heterosexual’. 1.5% identified as ‘gay or lesbian’. 0.91% identified as ‘bisexual’. 0.14% identified as ‘pansexual’; 0.03% identified as ‘asexual’; 0.00% identified as ‘queer’. 0.01% identified as ‘other sexual orientation’. 6.54% did not answer this question in the Census. • Gender identity – 94.29% of Dartford’s population indicated that their gender identity is the same as their sex registered at birth and 0.24% indicated that their gender identity was different from their sex registered at birth. 5.20% did not answer this question in the Census. In terms of specific gender identities, 0.12% identify as a ‘Trans woman’, 0.09% identify as a ‘Trans man’, 0.04% identify as ‘Non-binary’, and 0.03% identified as ‘All other gender identities’. <p><u>Dartford’s housing register</u> There are currently 1,453 applicants on Dartford’s housing register. Of these applicants:</p> <ul style="list-style-type: none"> • 95 are in Band A (high priority) • 730 are in Band B (medium to high priority) • 177 are in Band C (medium priority) • 451 are in Band D (low to medium priority) <p>Latest published data for 2023-24, shows there were 377 dwellings let (223 local authority lets and 154 housing association lets). (Source: Local Authority Housing Statistics data returns, 2023-24, Department for Levelling Up, Housing and Communities)</p> <p>Characteristics of applicants on Dartford’s housing register The housing register application form asks for information regarding the applicants’ protected characteristics of age, sex, disability, ethnic origin, religion, sexual orientation and pregnancy. Equalities records are kept and monitored on a regular and systematic basis to ensure properties are being offered and allocated fairly and in line with the Equality Act 2010 and data protection provisions. Main applicants on the housing register have described they have the following protected characteristics:</p> <p>Age – The highest proportion of applicants on the housing register are aged 25-34 and 35-44.</p> |

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|--|---|----------|--------|----------|--------|---------------|--------|-------------|--------|----------|--------|----------|-------|----------|-------|-----|-------|
| | <table><tr><td>Under 18</td><td>0.07%</td></tr><tr><td>18 to 24</td><td>9.84%</td></tr><tr><td>25 to 34</td><td>30.08%</td></tr><tr><td>35 to 44</td><td>30.08%</td></tr><tr><td>45 to 54</td><td>15.49%</td></tr><tr><td>55 to 64</td><td>7.16%</td></tr><tr><td>65 to 74</td><td>4.40%</td></tr><tr><td>75+</td><td>2.89%</td></tr></table> | Under 18 | 0.07% | 18 to 24 | 9.84% | 25 to 34 | 30.08% | 35 to 44 | 30.08% | 45 to 54 | 15.49% | 55 to 64 | 7.16% | 65 to 74 | 4.40% | 75+ | 2.89% |
| | Under 18 | 0.07% | | | | | | | | | | | | | | | |
| | 18 to 24 | 9.84% | | | | | | | | | | | | | | | |
| | 25 to 34 | 30.08% | | | | | | | | | | | | | | | |
| | 35 to 44 | 30.08% | | | | | | | | | | | | | | | |
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| | 55 to 64 | 7.16% | | | | | | | | | | | | | | | |
| | 65 to 74 | 4.40% | | | | | | | | | | | | | | | |
| | 75+ | 2.89% | | | | | | | | | | | | | | | |
| | Sex – There is a higher proportion of female main applicants than male main applicants. | | | | | | | | | | | | | | | | |
| | <table><tr><td>Male</td><td>24.98%</td></tr><tr><td>Female</td><td>74.67%</td></tr><tr><td>Blank/Unknown</td><td>0.28%</td></tr><tr><td>Transgender</td><td>0.07%</td></tr></table> | Male | 24.98% | Female | 74.67% | Blank/Unknown | 0.28% | Transgender | 0.07% | | | | | | | | |
| | Male | 24.98% | | | | | | | | | | | | | | | |
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| 6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings | Internal consultation on the draft updated Housing Allocations Policy has been undertaken. | | | | | | | | | | | | | | | | |
| 7. Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account? | <p><u>Consultation</u></p> <p><u>Housing register applicants</u> - Consultation on the proposed revised Housing Allocations Policy will be undertaken with applicants on the housing register. The Council will also ensure that within a reasonable time that those likely to be affected by the change in policy have the effect brought to their attention in accordance with Section 168(3) of the Housing Act 1996.</p> <p><u>Housing associations</u> – Consultation on the proposed revised Housing Allocations Policy will be undertaken with housing associations operating in the borough in accordance with Section 166A of the Housing Act 1996.</p> | | | | | | | | | | | | | | | | |

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| | <p><u>Council tenants</u> - – The Council is committed to ensuring the voice of its tenants is heard on matters that affect them. The Regulator of Social Housing places a requirement on social housing landlords to comply with the Transparency, Influence and Accountability Standard 2024, by ensuring that residents are given a wide range of opportunities to influence and be involved in the formulation of their landlord's housing-related policies and strategies. Consultation with Council tenants will be undertaken, as follows:</p> <ol style="list-style-type: none"> 1. All Council tenants will be invited to comment on the proposed updated Housing Allocations Policy. 2. The Dartford Tenants' and Leaseholders' Forum (DTLF) will be invited to comment on the proposed updated Housing Allocations Policy. The DTLF aims to ensure that the services delivered by the Council are accessible to all. The Forum works as a group to ensure that the views and housing needs of residents are recognised and addressed by the Council, and that those needs and views are placed at the centre of housing services delivery. <p><u>Housing Advisory Board</u> – The Housing Advisory Board (HAB) will be invited to comment on the proposed revised Housing Allocations' Policy. The HAB considers reports on proposed policy, strategy and performance in relation to housing issues and makes recommendations to Cabinet as appropriate. The HAB includes representation from Council officers, elected Members and Dartford Tenants' and Leaseholders' Forum members.</p> |

| Step 3: Assessing the equality impact | |
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| <p>8. Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the Public Sector Equality Duty:</p> <p>a) tackling unlawful discrimination b) promoting equality of opportunity c) promoting good relations</p> <p><u>NOTES:</u></p> <ul style="list-style-type: none"> • The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration • For existing activities, consider how they are working in practice for each relevant protected group • For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group • If there is no identified equality impact, please tick the 'No Impact' box and explain why in question 9 • If the equality impact is unclear, please tick the 'Unknown' box and explain why in question 9 | |

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Step 3: Assessing the equality impact

| PROTECTED CHARACTERISTIC | POSITIVE IMPACTS | NEGATIVE IMPACTS | NO IMPACT | UNKNOWN |
|--------------------------|--|------------------|--------------------------|--------------------------|
| Age | <p>Housing schemes for older people Applicants who apply for Housing Scheme accommodation (for those aged 55 and over), will be subject to a needs and risk assessment whereby consideration will be given to the following:</p> <ul style="list-style-type: none"> • Whether the applicant has a need for this specific type of accommodation with enhanced housing management • Whether the applicant's needs can be met by the accommodation • That the applicant has an understanding of the support provided and will engage with the service • That they will not present a risk to the vulnerable group of individuals who are already living there. <p>The aim of the assessment is to ensure that applicants needs can be suitably matched with housing scheme accommodation and to identify any support needs. Applicants for Housing Scheme accommodation with a local connection to Dartford will be placed in Band C.</p> <p>Medical or welfare needs Health is closely related to the protected characteristic of 'age' since health generally declines as people get older. There is criteria in the Housing Allocations Policy to award medical or welfare priority where the current housing is adversely affecting the health or wellbeing of an</p> | | <input type="checkbox"/> | <input type="checkbox"/> |

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Step 3: Assessing the equality impact

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|--------------------------|---|------------------|-----------|---------|
| | <p>applicant, or member of their household, and whereby a move would positively improve their health or wellbeing. This is subject to the Council's medical and welfare needs assessment. Applicants with high medical or welfare needs are placed in Band A; applicants with medium medical or welfare needs are placed in Band B, and; applicants with low medical or welfare needs are placed in Band C.</p> <p>Applicants for 'Scheme Housing' that have been accepted onto the register under Band D, will not qualify to have their medical & welfare needs assessed in order to give them additional priority as they will be subject to a Needs and Risk Assessment. However, identified medical needs will be taken into account upon the allocation of a property, for example wheelchair accessibility.</p> <p>Where applicants may have a medical need that requires an additional bedroom, this will be considered under a medical and welfare needs assessment where there is significant supporting medical evidence.</p> <p>Kent Agency Assessment There is criteria in the Housing Allocations Policy to give additional preference where a medium or high priority referral has been accepted by the Council under the Kent Agency Assessment Procedure (Joint Stock referrals).</p> | | | |

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Step 3: Assessing the equality impact

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|--------------------------|--|------------------|-----------|---------|
| | <p>This assessment procedure is for people who need to move home due to a health or support related need that cannot be met, or is being impaired by, their current accommodation. High priority referrals are placed in Band A and medium priority referrals are placed in Band B.</p> <p>Care leavers Care leavers, looked after by Kent County Council, within the meaning of the Children (Leaving Care) Act 2000 will be entitled to apply to join any local authority Housing Register, at age 18, regardless of previous local connection to an area and where they have been identified as being ready for move on in their Pathway Plan with their Personal Advisor.</p> <p>Accessible properties/disabled adaptations Levels of disability are closely related to the protected characteristic of 'age' since older people are more likely to be disabled. The Council advertises accessible properties as part of the choice-based lettings scheme. A property is identified as accessible prior to letting as well as whether an applicant has a disability and requires an accessible property.</p> <p>For applicants with a physical disability and who need an adapted property, assessments are made by the Occupational Therapist Team and suitable properties can be offered direct with</p> | | | |

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|--------------------------|--|------------------|-----------|---------|
| | <p>support from the Occupational Therapist and a Housing Surveyor. There is a budget to fund adaptations available.</p> <p>Young people There is a nomination agreement in place with the YMCA for assisting homeless young people.</p> <p>Carers Carers qualify for additional priority and are identified as the following;</p> <ul style="list-style-type: none"> • Applicants who undertake formal care of dependents and are in receipt of carers allowance or care element of a current disability benefit. Or; • A carer who provides help and support to a partner, relative, friend or neighbour, who would not manage without their help. This could be due to age, physical or mental health, addiction, or disability. In all cases the carer must have been identified by the applicant as the person who is primarily responsible for providing them with care, and the need to live with them or near them. <p>Even if a carer is in receipt of Carer's Allowance this does not necessarily mean that it is necessary for them to reside with the person who is being cared for. An application to include a carer in a housing application will be</p> | | | |

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| | <p>considered if the carer has been assessed by Social Care and Health as needing to provide overnight support. In these circumstances the applicant must provide supporting evidence from other agencies e.g. Social Care or a Health professional.</p> <p>Targeted adverts Adverts for available properties may state if a property is targeted at certain applicants, e.g. over a certain age or at households with a specific medical need (for example, ground floor accommodation). Targeted adverts aim to ensure that applicants suited to a property are aware of and have the opportunity to submit a bid.</p> | | | |
| Disability | <p>Medical or welfare needs Health is closely related to the protected characteristic of 'disability'. There is criteria in the Housing Allocations Policy to award medical or welfare priority where the current housing is adversely affecting the health or wellbeing of an applicant, or member of their household, and whereby a move would positively improve their health or wellbeing. This is subject to the Council's medical and welfare needs assessment. Applicants with high medical or welfare needs are placed in Band A; applicants with medium medical or welfare needs are placed in Band B, and; applicants with low medical or welfare needs are placed in Band C.</p> | | <input type="checkbox"/> | <input type="checkbox"/> |

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| | <p>Accessible properties/disabled adaptations The Council advertises accessible properties as part of the choice-based lettings scheme. A property is identified as accessible prior to letting as well as whether an applicant has a disability and requires an accessible property.</p> <p>For applicants with a physical disability and who need an adapted property, assessments are made by the Occupational Therapist and suitable properties can be offered direct with support from the Occupational Therapist and a Housing Surveyor. There is a budget to fund adaptations available.</p> <p>Carers Carers qualify for additional priority and are identified as the following;</p> <ul style="list-style-type: none"> • Applicants who undertake formal care of dependents and are in receipt of carers allowance or care element of a current disability benefit. Or; • A carer who provides help and support to a partner, relative, friend or neighbour, who would not manage without their help. This could be due to age, physical or mental health, addiction, or disability. In all cases the carer must have been identified by the applicant as the person who is primarily responsible for providing them with care, and the need to live with them or near them. | | | |

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| | <p>Even if a carer is in receipt of Carer's Allowance this does not necessarily mean that it is necessary for them to reside with the person who is being cared for. An application to include a carer in a housing application will be considered if the carer has been assessed by Social Care and Health as needing to provide overnight support. In these circumstances the applicant must provide supporting evidence from other agencies e.g. Social Care or a Health professional.</p> <p>Targeted adverts Adverts for available properties may state if a property is targeted at certain applicants, e.g. over a certain age or at households with a specific medical need (for example, ground floor accommodation). Targeted adverts aim to ensure that applicants suited to a property are aware of and have the opportunity to submit a bid.</p> <p>Local connection In those cases where an applicant has spent time away from Dartford in an institution, e.g. mental health, drug and alcohol treatment centres, the Council will give regard to local connection prior to time spent away.</p> | | | |

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| | <p>Management transfers Management transfers or reciprocal arrangements of existing social housing tenants where the social landlord requires the tenant to move or the tenant needs to move due to domestic abuse, violence, harassment, intimidation, hate crime or threats of violence likely to be carried out, will be placed into Band A (high priority).</p> <p>People with learning disabilities An easy read leaflet on Kent Homechoice is available for people with learning disabilities.</p> <p>Accessible communication In accordance with the Council's Equality & Diversity Document Framework, information about the services provided regarding the Housing Allocations' Policy and the allocations scheme can be provided in alternative formats to people with sensory needs including:</p> <ul style="list-style-type: none"> • Braille, audio tape and large print versions of documents • British Sign Language interpreting <p>Calls can be received via Relay UK.</p> | | | |
| Sex | <p>Domestic abuse While domestic abuse can affect anyone regardless of their protected characteristics, domestic abuse is closely related to the protected characteristic of 'sex'. Statistically</p> | | <input type="checkbox"/> | <input type="checkbox"/> |

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| PROTECTED CHARACTERISTIC | POSITIVE IMPACTS | NEGATIVE IMPACTS | NO IMPACT | UNKNOWN |
|--------------------------|---|------------------|-----------|---------|
| | <p>more women are affected by domestic abuse than men.</p> <p>Local connection may be waived for applicants currently residing outside the borough but are fleeing domestic abuse.</p> <p>The Domestic Abuse Act 2021 imposes duties on local authorities to ensure all victims and their children can access the right support in safe accommodation. The Council works in partnership with Kent County Council to ensure the availability of specialist domestic abuse support services which includes the provision of safe accommodation in refuge. To support move on into stable accommodation, the Council will give additional priority to homeless applicants that are homeless as a result of fleeing domestic abuse.</p> <p>Priority may be given to applicants who are moving on from a domestic abuse refuge or safe accommodation as defined in the Domestic Abuse Act 2021.</p> <p>Homeless households owed the main housing duty as a result of losing their home due to domestic abuse will be placed in Band B (medium to high priority).</p> | | | |

Customer Access Review – Full Assessment

Step 3: Assessing the equality impact

| PROTECTED CHARACTERISTIC | POSITIVE IMPACTS | NEGATIVE IMPACTS | NO IMPACT | UNKNOWN |
|--------------------------|---|------------------|--------------------------|--------------------------|
| | Management transfers Management transfers or reciprocal arrangements of existing social housing tenants where the social landlord requires the tenant to move or the tenant needs to move due to domestic abuse, violence, harassment, intimidation, hate crime or threats of violence likely to be carried out, will be placed into Band A (high priority). | | | |
| Gender reassignment | Management transfers Management transfers or reciprocal arrangements of existing social housing tenants where the social landlord requires the tenant to move or the tenant needs to move due to domestic abuse, violence, harassment, intimidation, hate crime or threats of violence likely to be carried out, will be placed into Band A (high priority). | | <input type="checkbox"/> | <input type="checkbox"/> |
| Race | Eligibility The Housing Allocations Policy states that normally councils will not be able to allocate social housing to persons who are not already social housing tenants and who need leave to enter or remain in the UK. This applies to all persons except British citizens or persons with a right to reside in the UK under the Withdrawal Agreement entered into between the UK and the EU. The policy provides a summary of the eligibility rules to join the housing register for persons who need leave to enter or remain in the UK. | | <input type="checkbox"/> | <input type="checkbox"/> |

Customer Access Review – Full Assessment

Step 3: Assessing the equality impact

| PROTECTED CHARACTERISTIC | POSITIVE IMPACTS | NEGATIVE IMPACTS | NO IMPACT | UNKNOWN |
|--------------------------|--|------------------|--------------------------|--------------------------|
| | <p>Management transfers Management transfers or reciprocal arrangements of existing social housing tenants where the social landlord requires the tenant to move or the tenant needs to move due to domestic abuse, violence, harassment, intimidation, hate crime or threats of violence likely to be carried out, will be placed into Band A (high priority).</p> <p>Accessible communication In accordance with the Council's Equality & Diversity Document Framework, information about the services provided regarding Housing Allocations' Policy and the allocations scheme can be provided in alternative formats to people where English is not their first language including:</p> <ul style="list-style-type: none"> • Documents translated into other languages • Telephone and face-to-face language interpreting | | | |
| Religion/Belief | <p>Management transfers Management transfers or reciprocal arrangements of existing social housing tenants where the social landlord requires the tenant to move or the tenant needs to move due to domestic abuse, violence, harassment, intimidation, hate crime or threats of violence likely to be carried out, will be placed into Band A (high priority).</p> | | <input type="checkbox"/> | <input type="checkbox"/> |

Customer Access Review – Full Assessment

| Step 3: Assessing the equality impact | | | | |
|--|--|---|-------------------------------------|--------------------------|
| PROTECTED CHARACTERISTIC | POSITIVE IMPACTS | NEGATIVE IMPACTS | NO IMPACT | UNKNOWN |
| Sexual Orientation | Management transfers Management transfers or reciprocal arrangements of existing social housing tenants where the social landlord requires the tenant to move or the tenant needs to move due to domestic abuse, violence, harassment, intimidation, hate crime or threats of violence likely to be carried out, will be placed into Band A (high priority). | | <input type="checkbox"/> | <input type="checkbox"/> |
| Pregnancy/Maternity | | | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Marriage and Civil Partnership* | Not applicable as the Housing Allocations Policy does not apply in the context of employment. | Not applicable as the Housing Allocations Policy does not apply in the context of employment. | <input type="checkbox"/> | <input type="checkbox"/> |

* Regarding the protected characteristic of Marriage and Civil Partnership – public bodies need to comply with the first aim of the Public Sector Equality Duty and only in the context of employment.

| Step 3: Assessing the equality impact | |
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| 9. If 'no impact' or 'unknown' was selected, please explain | There are no known circumstances where the Housing Allocations Policy will have a disproportionate equality impact on the pregnancy and maternity protected characteristic group. |
| 10. If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups | <p>The Council is a member of Kent Homechoice partnership, which is the choice-based lettings scheme for all council and housing association homes in Kent. The scheme uses an online platform (Humme) to advertise all available council and housing association properties. Kent Homechoice has produced its own accessibility statement with regards to the website used for operating the scheme.</p> <p>The Council works with housing associations operating in the borough to nominate applicants to be tenants of the housing associations through nomination agreements. These agreements set out the proportion of lettings that will be made available; any</p> |

Customer Access Review – Full Assessment

| Step 3: Assessing the equality impact | |
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| | <p>criteria which the private registered provider has adopted for accepting or rejecting nominees; and how any disputes will be resolved.</p> <p>The Council works closely with Kent County Council's Occupational Therapy department to produce Housing Needs Assessments for applicants that may require an adapted property and that the correct adaptations can be identified.</p> <p>The Council works closely with statutory partner agencies and their agents under the Kent Agency Agreement. These can include:</p> <ul style="list-style-type: none"> • Community Mental Health Teams • Early Intervention Teams • General Practitioners (GPs) • Health Visitors • Hospitals (not Mental Health) • Substance Misuse support services • Kent Association for the Blind • Mental Health in Patient Services • Mental Health Older People Service • Occupational Therapists • Probation /Community Rehabilitation Company • Social Care Professionals <p>There are no known circumstances where these partnership working arrangements have a disproportionate equality impact. Partnership working enables housing applicants with particular identified needs, e.g. such as care and support needs, to access suitable social housing.</p> |
| 11. Any other comments | <p>Local connection</p> <p>Under the review of the Housing Allocations Policy, it is proposed that the local connection criteria is increased from two years to five years. Social housing is a scarce resource, and the Council believes that it is appropriate and proportionate to ensure that sufficient affordable housing is available for those who can demonstrate a reasonable period of residency and close association to the borough. The five-year local connection</p> |

Customer Access Review – Full Assessment

| Step 3: Assessing the equality impact | |
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| | <p>criteria will only affect new applicants after the policy is approved. There are some exceptions to the local connection criteria which are explained in the policy. The revised policy has also taken account of applicants from outside the borough who need to move to Dartford because of medical or welfare needs, where failure to do so would cause hardship to themselves or others or they need to move to Dartford for work, where failing to do so would cause hardship.</p> <p>Advice and assistance Statutory guidance states that if a person is likely to have difficulty making an application without assistance, the authority must secure that any necessary assistance is available free of charge. The Council makes reasonable adjustments for applicants who need assistance, including accessible information formats and interpreting services.</p> <p>The Council records whether a person applying for housing is vulnerable. Each year the Council reviews the bidding history of vulnerable people in order to offer support or advice if it is needed.</p> <p>An online application form must be completed to join the housing register. Paper applications are no longer accepted. If a person requires assistance to join, they may nominate a friend, relative or advocacy worker from an appropriate agency to apply on their behalf by completing an advocacy form. The Council also offers an advocacy service and will bid on behalf of an applicant if required.</p> <p>Where applicants are unable to bid for properties themselves, they can arrange to set up auto bidding, which allows bids to be placed automatically for applicants based on their predetermined preferences and needs. Auto bidding is implemented for a variety of customers including homeless applicants, tenants wishing to downsize and those have told the Council they are unable to bid for themselves and have no family or friends to assist.</p> |

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| Step 3: Assessing the equality impact | |
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| | <p>Appeals and reviews All housing applicants have the right to request a review of their banding decision within 21 days. Some applicants, for example those that will be made only one offer of accommodation, can request a review of the suitability of accommodation. This can be requested at viewing.</p> <p>Complaints If a housing applicant is dissatisfied with the way their housing application has been handled or feel they have been treated unfairly, they can use the Council's corporate complaints procedure. If the complaint is not resolved to the complainant's satisfaction at the end of the Council's complaints process, the complainant may refer the complaint to the Local Government Ombudsman.</p> |

| Step 4: Action plan | | | | | |
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| 12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address: a) any gaps in information and consultation b) how any negative impacts on equality will be mitigated or eradicated | | | | | |
| a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need? | | | | | |
| Information needs | Action | Intended outcome | Date for completion | How this will be monitored | Responsible officer |
| Views from housing register applicants on the proposed updated Housing Allocations Policy | Invite comments on the draft policy from housing register applicants | Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy | June 2025 | Details of the consultation and any amendments made to the draft policy as a result of the consultation will be included in the Cabinet report | Housing Solutions & Private Sector Manager / Housing Policy & Development Manager |

Customer Access Review – Full Assessment

| Information needs | Action | Intended outcome | Date for completion | How this will be monitored | Responsible officer |
|---|--|--|---------------------|--|---|
| Views from housing association partners operating in the borough on the proposed updated Housing Allocations Policy | Invite comments on the draft policy from housing associations | Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy | June 2025 | Details of the consultation and any amendments made to the draft policy as a result of the consultation will be included in the Cabinet report | Housing Solutions & Private Sector Manager / Housing Policy & Development Manager |
| Views from Council tenants and the Dartford Tenants and Leaseholders Forum on the proposed updated Housing Allocations Policy | Invite comments on the draft policy from Council tenants and the Dartford Tenants and Leaseholders Forum | Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy | June 2025 | Details of the consultation and any amendments made to the draft policy as a result of the consultation will be included in the Cabinet report | Housing Solutions & Private Sector Manager / Housing Policy & Development Manager |
| Views from the Housing Advisory Board on the proposed updated Housing Allocations Policy | Invite comments on the draft policy from the Housing Advisory Board | Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy | August 2025 | Details of the consultation and any amendments made to the draft policy as a result of the consultation will be included in the Cabinet report | Housing Solutions & Private Sector Manager / Housing Policy & Development Manager |

b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?

| Identified impacts (and who is affected) | Action | Intended outcome | Date for completion | How this will be monitored | Responsible officer |
|--|--------|------------------|---------------------|----------------------------|---------------------|
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Customer Access Review – Full Assessment

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| Step 5: Decision making and future monitoring | |
| 13. Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by? | Head of Legal Services and Director of Housing & Public Protection. |
| 14. Is the subject of the Customer Access Review going to committee? If yes, include your findings in the committee report and attach this assessment to the report | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 15. How will you continue to monitor the activity or proposal on protected characteristic groups? | <p>Equalities records are kept and monitored on a regular and systematic basis to ensure properties are being offered and allocated fairly and in line with The Equality Act 2010 and data protection provisions.</p> <p>Other sources of monitoring include where any issues are highlighted through appeals, reviews, and complaints.</p> |
| 16. When will you review this Customer Access Review? | New assessments will be undertaken as and when the Housing Allocations Policy is significantly reviewed and updated. |
| Step 6: Final steps | |
| 17. Once this Customer Access Review has been approved, send this assessment to the Policy & Projects Officer | |
| 18. Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded | |

Reviewed by Legal Services:

J.WENHAM

John Wenham. 06.06.2025.

Reviewed by Director of Housing & Public Protection:



Peter Dosad. 06.06.2025.