

Equality and Rurality Impact Assessment Form

When completing this form you will need to provide evidence that you have considered how the ‘protected characteristics’ may be impacted upon by this decision. In line with the General Equality Duty the Council must, in the exercise of its functions, have due regard for the need to:

- a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

This form should be completed in conjunction with the guidance document available on the Intranet

Once completed a copy should be emailed to cheryl.sloan@publicagroup.uk to be signed off by an equalities officer before being published.

1. Persons responsible for this assessment:

Names: Thomas See/Caroline Clissold (for Publica, on behalf of the Homeseeker Plus Partnership); and Paul Tuckey, Housing Options Manager for Cheltenham Borough Council	
Date of assessment: 26 January 2026	Telephone: Email: Paul.Tuckey@cheltenham.gov.uk

2. Name of the policy, service, strategy, procedure or function:

HomeseekerPlus Common Allocations Policy Document
Is this a new or existing one? Existing

3. Briefly describe its aims and objectives

<p>The HomeseekerPlus Allocations Policy aims to:</p> <ul style="list-style-type: none"> • Ensure fairness, transparency, and equality of opportunity in the allocation of social housing. • Prioritise households with the greatest housing need, while supporting sustainable communities. • Provide applicants with informed choice and accessible processes, including support for less able applicants. • Make best use of available housing resources, including enabling mobility within social housing and giving priority to those with a local connection where appropriate. • Help local authorities meet their statutory duties under housing and homelessness legislation. • Contribute to tackling discrimination and promoting inclusion across Gloucestershire and West Oxfordshire.
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HomeseekerPlus is a sub-regional housing allocations scheme using choice-based lettings that operates across Gloucestershire and West Oxfordshire to oversee the allocation of social housing in the area.

4. Are there any external considerations? (e.g. Legislation/government directives)

The policy is regularly reviewed to make sure it reflects:

- national policy and legislation
- new case law,
- local policy changes, and
- local housing need/supply

Since the policy was last reviewed, amended and adopted in March 2022, there have been some external considerations that need to be taken into account. These include (not exhaustive):

- The Allocation of Accommodation: Guidance for Local Authorities in England (2020) has been revised in 2025. The updated version includes strengthened provisions for domestic abuse survivors, care leavers, and Armed Forces personnel.
- A new statutory instrument — The Allocation of Housing (Qualification Criteria for Victims of Domestic Abuse and Care Leavers) (England) Regulations 2025
- Cheltenham Borough Council – new Housing, homelessness and rough sleeping strategy 2023 – 2028
- Cotswold District Council - Preventing homelessness strategy 2025-2030
- Stroud – new Housing, homelessness & rough sleeping strategy 2024-2029
- Tewkesbury Borough Council housing and homelessness strategy 2022-26
- Forest of Dean District Council – new Preventing homelessness strategy 2025
- West Oxfordshire – new Preventing homelessness strategy 2025-2028

The proposed changes result from the latest review of the policy. The HomeseekerPlus partnership is governed by a HomeseekerPlus Management Board. The Board includes representatives from all of the partner Councils. All of the changes have been considered and agreed by HomeSeekerPlus Management Board.

5. What evidence has helped to inform this assessment?

Source	✓	If ticked please explain what
Demographic data and other statistics, including census findings	✓	<ul style="list-style-type: none"> Demographic data extracted from the Locata housing allocations software system Census 2021 data on: sex; age; religion; race; disability
Recent research findings including studies of deprivation	✓	<ul style="list-style-type: none"> 6 of the 7 participating councils within the HomeseekerPlus Scheme have published new housing and/or homelessness strategies over the last 3 years. There will be research and data underpinning and informing these, especially strategies covering homelessness. There is a legal requirement to complete a comprehensive review of homelessness in your area to inform your homelessness strategy. These strategies have informed and been a point of reference for the allocations policy development.
Results of recent consultations and surveys	✓	<ul style="list-style-type: none"> Where significant changes are proposed to a housing allocations scheme, the housing authority must ensure that affected customers and Registered Provider partners are informed within a reasonable timeframe and that appropriate consultation is undertaken. A 4-week consultation process as outlined above will be undertaken using Survey Monkey and links provided to all current applicants. Additional stakeholder engagement sessions will also be held during the consultation process.
Results of ethnic monitoring data and any equalities data	✓	<ul style="list-style-type: none"> Equalities monitoring data from the Locata housing allocations software system
Anecdotal information from groups and agencies within Gloucestershire	✓	<ul style="list-style-type: none"> The 4-week consultation will request feedback from: Registered Provider partners operating in the area; County Councils; NHS; Social Care; Internal colleagues.

Comparisons between similar functions / policies elsewhere	✓	<ul style="list-style-type: none"> • ARK Housing consultancy supported part of the process of reviewing the current HomeseekerPlus allocations scheme/policy. ARK support reviews of council housing allocations schemes across the country so bring knowledge of other policies and practice for comparison.
Analysis of audit reports and reviews	✓	<ul style="list-style-type: none"> • The allocation of social housing processes include a legal right to review decisions made in relation to processing housing applications and allocation of social housing. Representatives on the HomeseekerPlus Partnership Board have used data on review decisions to inform the proposed changes to the policy.
Other:	✓	<ul style="list-style-type: none"> • Trends and data relating to complaints and the Ombudsman has also been taken into account.

6. Please specify how intend to gather evidence to fill any gaps identified above:

No gaps – see above.

7. Will any consultation been carried out?

Yes -

Details of Consultation

Where significant changes are proposed to a housing allocations scheme, the housing authority must ensure that affected customers and Registered Provider partners are informed within a reasonable timeframe and that appropriate consultation is undertaken. A 4-week consultation process will be undertaken using Survey Monkey and and links provided to all current applicants. Additional stakeholder engagement sessions will also be held during the consultation process.

If NO please outline any planned activities

8. What level of impact either directly or indirectly will the proposal have upon the general public / staff? (Please quantify where possible)

Level of impact	Response
NO IMPACT – The proposal has no impact upon the general public/staff	<input type="checkbox"/>
LOW – Few members of the general public/staff will be affected by this proposal	<input checked="" type="checkbox"/>
MEDIUM – A large group of the general public/staff will be affected by this proposal	<input type="checkbox"/>
HIGH – The proposal will have an impact upon the whole community/all staff	<input type="checkbox"/>
<p>Comments: e.g. Who will this specifically impact? The policy changes include some amendments to ‘tidy’ the document up, provide procedural clarity and improved transparency. These changes are not considered material. These changes should help staff giving them more clarity regarding the policy and enabling them to apply it consistently.</p> <p>There are some more major changes proposed. The majority of these changes are NOT likely to impact a large number of applicants although limited data is available to quantify this. The changes are outlined below:</p> <ul style="list-style-type: none"> ● Who does not Qualify: We are considering a change to how we assess who may not qualify for social housing. We are considering whether all tenure types should be considered when assessing if applicants have sufficient financial resources to adequately resolve their own housing need. Previously, this was limited to whether an applicant had sufficient financial resources to resolve their housing needs by purchasing a property. This change is not likely to impact a specific group of applicants but will impact households across the scheme in a range of circumstances/with a range of characteristics if they have financial means to resolve their own housing needs. ● Deliberate worsening of circumstances: we are considering a change to how deliberate worsening of circumstances is treated. These applicants would be placed in the lowest priority band (Bronze) for six months. After that, they would only move to a higher band if they can show they have taken all reasonable steps to find alternative accommodation and actively tried to resolve their situation. This change is not likely to impact a specific group of applicants but will impact households across the scheme in a range of circumstances/with a range of characteristics if they have deliberately worsened their circumstances. ● Acting on professional advice: A new rule is being considered to ensure applicants follow reasonable steps before a higher banding is awarded. Applicants are sometimes given advice or recommendations by the Council or other professionals to help improve their housing situation. Under this proposal, if applicants choose not to follow reasonable steps, they may not be awarded a higher banding ● Employment & local Connection: HomeseekerPlus is reviewing how employment is used to establish local connection. At present, any household member included on an application who works in the district can help establish a local connection. Under the proposed change, only the main or joint applicant’s employment would count — unless there are exceptional circumstances. 	

- **Expanding Local Connection Options for members of the Armed Forces:** Recent legislation has come into effect regarding the exemption of all members and former members of the Armed Forces from the Local Connection test. This has been implemented and all applicants who meet the criteria are awarded a local connection to a Local Authority of their choosing. We are proposing to expand this further to allow members or former members of the Armed Forces the opportunity to apply for a local connection to all the HomeseekerPlus partners, or to choose some of the partners who they would like to be given a local connection to. This is not likely to apply to many applicants, however as this is being offered over and above legislation and to a specific demographic and not to all applicants generally, could disproportionately affect others.
- **Emergency banding for downsizing:** Emergency Banding is sometimes awarded to social housing tenants who agree to move to smaller housing. At present, social housing tenants in Gloucestershire and West Oxfordshire who are willing to move from family accommodation to non-family housing within the partnership area are automatically awarded Emergency Banding. The proposed change is that this banding would only be awarded if the move releases a property that is in high demand or limited supply.
- **Additional bedroom need:** To allow couples who cannot share a bedroom due to medical or disability reasons to be awarded an additional bedroom. In these cases, consideration may be given to whether separate single beds could resolve the issue without needing an extra bedroom.
- **Demotion Period & Reassessment:** Some categories of housing need are time limited to recognise urgency. Applicants in these categories are expected to bid for all suitable properties each week and across a wide range of locations. If, at the end of the time limited period, it appears that an applicant is waiting for a particular property and not treating their circumstances as urgent, they may be demoted to a lower banding. At present, demotion periods vary case by case. The proposed change is to set a fixed demotion period of 6 months. After this, the local authority would reassess the applicant’s situation. If the applicant has not taken all reasonable steps to resolve the issue that led to the demotion, the lower banding would remain in place indefinitely until sufficient evidence is provided.
- **Additional Bedroom for pregnant households:** The current policy does not recognise unborn children as part of the bedroom need assessment until their birth. It is proposed that households who currently have a one bed housing need and include a pregnant applicant will be assessed as needing an additional bedroom once the pregnancy reaches 28 weeks / the start of the third trimester.

9. Considering the available evidence, what type of impact could this function have on any of the protected characteristics?

Negative – it could disadvantage and therefore potentially not meet the General Equality duty;

Positive – it could benefit and help meet the General Equality duty;

Neutral – neither positive nor negative impact / Not sure

	Potential Negative	Potential Positive	Neutral	Reasons	Options for mitigating adverse impacts
Age – Young People			X	The proposed changes are anticipated to have a neutral impact on younger people on the housing	

				register/HomeseeckerPlus scheme. 70% of people on the housing register/HomeseeckerPlus scheme are aged 20-49 years. More younger people are applying to join the housing register/HomeseeckerPlus scheme in Gloucester City.	
Age – Older People	X	X	X	<p>There are limited numbers of older people on the Housing register/HomeseeckerPlus scheme. For those that are on the register/scheme the changes are anticipated to have a mixed impact – see below.</p> <ul style="list-style-type: none"> • The change in emergency banding for downsizing is more likely to have a negative impact on older people as they are more likely to be under-occupying family housing than younger households. • The change related to an additional bedroom is more likely to have a positive impact on older people as the prevalence of disability and medical issues increases with age. • The employment and local connection change is likely to have a neutral impact on older people as they are less likely to be working or have working children in their household who the change would apply to. 	<ul style="list-style-type: none"> • Retain Emergency Banding where downsizing releases larger family homes or adapted properties in high demand. • Allow discretion for older or disabled tenants where moving supports health, mobility, or independence. • Publish clear guidance with examples so applicants understand when Emergency Banding applies. • Monitor Emergency Banding awards by age profile and review criteria if older tenants are disproportionately affected.
Disability		X		<ul style="list-style-type: none"> • Additional bedroom need: allowing those households who cannot share a bedroom due to medical or disability reasons to be awarded an additional bedroom should have a positive impact on applicants on the housing register/HomeseeckerPlus scheme. 	

				There are just over 6,000 households registered on the HomeseekerPlus scheme with a disability, but we do not hold data on how many of these would benefit from the proposed new category for being awarded an additional bedroom.	
Sex – Male			X	Changes proposed are not anticipated to have a specific impact on applicants according to gender (with the exception of those who are pregnant as set out separately under ‘pregnancy and maternity’ below, and also to older people where there will be proportionately more females than males in the later years – also set out separately under ‘older people’, above).	
Sex – Female			X		
Race including Gypsy and Travellers (GRT)			X	The race of applicants on the housing register is predominantly white – more so than England as a whole but this is reflective of the wider population of the area. The only slight variation is that in Gloucester City there are fewer white persons and more Black or Mixed Ethnic group households than the wider population in that area. There are very limited numbers of GRT households on the housing register/HomeseekerPlus scheme. GRT groups can be disadvantaged by local connection criteria so it has been recommended that working procedures clarify that special circumstances in relation to the local connection qualification criteria should apply to GRT households so that the local connection	Procedures will clarify that local connection requirements do not disadvantage GRT households, with officer training and monitoring to ensure consistency

				requirement does not apply to these households.	
Religion or Belief			X	Changes proposed are not anticipated to have a specific impact on applicants according to religion.	
Sexual Orientation			X	Only 388 applicants completed the sexuality field on their housing application so this data is not statistically reliable. However, the changes proposed are not anticipated to have a specific impact on applicants according to sexual orientation.	
Gender Reassignment			X	Changes proposed are not anticipated to have a specific impact on applicants according to gender reassignment.	
Pregnancy and maternity		X	X	There were nearly 600 households on the housing register/Homeseecker Plus scheme who included a pregnant woman. However, in the main, these proposed changes are not anticipated to have a specific impact on applicants according to pregnancy & maternity. The exception is that one of the proposed changes includes allowing for an extra bedroom for females who are pregnant with their first child and in their third trimester. This proposed change is likely to have a positive impact on this group.	
Geographical impacts on one area			X		
Other Groups			X		

Rural considerations: ie Access to services; leisure facilities, transport; education; employment; broadband.			X	None of the changes are specific to geography and not expected to impact rural areas more than urban areas.	
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10. Action plan (add additional lines if necessary)

Action(s)	Lead Officer	Resource	Timescale
Downsizing change: Draft clear guidance on when Emergency Banding applies, with examples, including safeguards for older/disabled tenants.	HomeseekerPlus Policy Lead	Officer time	Before policy implementation
Ensure discretion is retained for older/disabled tenants where downsizing supports health, mobility, or independence	Local Authority Housing Managers	Existing staff capacity	Ongoing from implementation
Monitor Emergency Banding awards for downsizing by age profile and report to Partnership Board	HomeseekerPlus Data Analyst	Locata system data Officer time	Quarterly monitoring reports
Train staff on equality considerations in banding decisions, including trauma-informed and disability-aware practice	HomeseekerPlus Partnership Training Lead	Training budget	Within 6 months of implementation
Review outcomes after 12 months; adjust criteria if older tenants are disproportionately affected	HomeseekerPlus Management Board	Officer time	12 months post-implementation

11. Is there is anything else that you wish to add?

Research into creating this EIQ was carried out by ARK Consultancy on behalf of the HomeseekerPlus Partnership

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Declaration

We are satisfied that an equality impact assessment has been carried out on this policy, service, strategy, procedure or function and where an negative impact has been identified actions have been developed to lessen or negate this impact. We understand that the Equality Impact Assessment is required by the District Council and that we take responsibility for the completion and quality of this assessment.

Completed By:	Thomas See/ Caroline Clissold (as Homeseeker Plus leads for the Homeseeker Plus Partnership on behalf of the districts)	Date:	26/01/2026
Line Manager:	Jon Dearing	Date:	26/01/2026
Reviewed by Corporate Equality Officer:	Cheryl Sloan, Assistant Director Workforce Strategy and Tranformation, Publica.	Date:	29/01/2026
Further reviewed, updated and signed off by Head of Strategic Housing for Cheltenham Borough Council:	Martin Stacy	Date:	20/02/2026