

# Customer Access Review – Full Assessment

<b>Assessment details</b>	
<b>Assessment area</b>	<b>Housing Allocations' Policy</b>
<b>Date of assessment</b>	February 2023
<b>Directorate and Service</b>	Housing and Public Protection, Housing Services
<b>Manager</b>	Housing Solutions and Private Sector Manager / Housing Policy & Development Manager
<b>Officer conducting assessment</b>	Senior Housing Policy & Performance Officer
<b>Step 1: Scoping the assessment</b>	
<b>1. What are the aims and objectives of the activity or proposal?</b>	<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"> <li>• Provide a fair and transparent system by which people are prioritised for housing.</li> <li>• Help those most in need of housing.</li> <li>• Promote the development of sustainable mixed communities.</li> <li>• Make the best use of affordable housing in the Dartford borough.</li> <li>• Make efficient use of our resources and those of our partner housing associations.</li> </ul> <p>This assessment has been undertaken in conjunction with a review of the Housing Allocations' Policy.</p>
<b>2. Who will be affected by the activity or proposal?</b>	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).
<b>3. How does the activity or proposal contribute to: a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council?</b>	<p>a) The Housing Allocations' Policy relates to the Corporate Plan performance indicator HPI-27: Number of applicants on the Housing Register.</p> <p>b) The Housing Allocations' Policy contributes to the Corporate Plan strategic aim of 'facilitating quality, choice and diversity in the housing market, assisting in meeting housing need in Dartford and delivering high quality services to service users'.</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><b><u>Legislative and regulatory context</u></b>            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"> <li>• Housing Act 1996 (as amended)</li> <li>• Localism Act 2011</li> <li>• Allocation of Accommodation Code of Guidance 2012 (updated 2023)</li> <li>• The Homelessness Reduction Act 2017</li> <li>• Immigration Act 2016</li> <li>• Providing social housing for local people 2013</li> <li>• Improving access to social housing for victims of domestic abuse 2022</li> <li>• Improving access to social housing for members of the Armed Forces 2020</li> <li>• Domestic Abuse Act 2021</li> <li>• Allocation of Housing (Procedure) Regulations 1997, SI 1997/483</li> <li>• Allocation of Housing (England) Regulations 2002, SI 2002/3264</li> <li>• Allocation of Housing and Homelessness (Eligibility) (England) Regulations 2006, SI 2006/1294</li> <li>• Allocation of Housing (Qualification Criteria for Armed Forces) (England) Regulations 2012, SI 2012/1869</li> <li>• Housing Act 1996 (Additional Preference for Armed Forces) (England) Regulations 2012, SI 2012/2989</li> <li>• The Homelessness (Suitability of Accommodation) Order 2012 (as amended by the Homelessness Reduction Act 2017)</li> <li>• The Allocation of Housing (Qualification Criteria for Right to Move) (England) Regulations 2015</li> <li>• The Homeless (Review Procedure etc.) Regulations 2018</li> </ul> <p><b><u>Equality duties</u></b>            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><b><u>Allocation schemes</u></b></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 <a href="https://www.dartford.gov.uk/housing-policy/housing-strategy-policy-documents">https://www.dartford.gov.uk/housing-policy/housing-strategy-policy-documents</a>.</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 E), 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"><li>• 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.</li><li>• 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.</li><li>• Have a statutory obligation to provide reasonable preference to certain categories of applicants. The reasonable preference categories are:<ul style="list-style-type: none"><li>- (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)</li><li>- (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)</li></ul></li></ul>

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	<ul style="list-style-type: none"> <li>- (c) people occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions</li> <li>- (d) people who need to move on medical or welfare grounds, including grounds relating to a disability, and</li> <li>- (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)</li> </ul> <ul style="list-style-type: none"> <li>• Have discretion to determine priority between applicants with reasonable preference.</li> <li>• Have discretion to grant additional preference to particular descriptions of people who fall within the reasonable preference categories and have urgent housing needs.</li> <li>• 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"> <li>- (a) Former members of the Armed Forces</li> <li>- (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</li> <li>- (c) Bereaved spouse and civil partners of members of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner</li> <li>- (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.</li> </ul> </li> <li>• 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"> <li>- (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.</li> <li>- (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.</li> <li>- (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.</li> </ul> </li> </ul>

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<b>Step 1: Scoping the assessment</b>	<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"> <li>- (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</li> <li>- (b) Need to move because the tenant works in the district, or</li> <li>- (c) Need to move to take up an offer of work</li> </ul> <ul style="list-style-type: none"> <li>• 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.</li> </ul>
<b>Step 2: Information collection</b>	<p><b>5. What do you know about the groups of people who will be affected?</b> (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><b><u>Dartford’s population profile (Census 2021, Office for National Statistics)</u></b></p> <ul style="list-style-type: none"> <li>• <b>Sex</b> – 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</li> <li>• <b>Age</b> – 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%).</li> <li>• <b>Ethnicity</b> – 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%.</li> <li>• <b>Disability</b> – 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. In England overall, 17.7% of people are disabled.</li> <li>• <b>Religion</b> – 48.1% of Dartford’s population connect or identify with the Christian religion, followed by 3.8% Hindu, 3.5% Muslim, 1.7% Hindu, 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. In England and Wales overall, less than half the population (46.2%) described themselves as a ‘Christian’. ‘No religion’ was the second most common response accounting for 37.2%.</li> </ul>

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Step 2: Information collection	
	<ul style="list-style-type: none"> <li>• <b>Sexual orientation</b> – 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. In England and Wales overall, 89.4% identified as ‘straight or heterosexual’, 3.2% identified with an LGB+ orientation (‘gay or lesbian’, ‘bisexual’ or ‘other sexual orientation’). The remaining 7.5% did not answer the question in the Census.</li> <li>• <b>Gender identity</b> – 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’. In England and Wales overall, 93.5% indicated that their gender identity was the same as their sex registered at birth and 0.5% indicated that their gender identity was different from their sex registered at birth. 6.0% did not answer this question in the Census.</li> </ul> <p><b><u>Dartford’s housing register</u></b></p> <p>There are currently 1,012 applicants on Dartford’s housing register. Of these applicants:</p> <ul style="list-style-type: none"> <li>• 65 are in Band A (high housing needs)</li> <li>• 549 are in Band B (medium housing needs)</li> <li>• 213 are in Band C (reasonable preference)</li> <li>• 185 are in Band D (reduced priority)</li> </ul> <p>Currently, there are approximately 8,000 applicants in Band E who do not qualify to join the housing register.</p> <p>Latest published data for 2020-21, shows there were 343 dwellings let (220 local authority lets and 123 housing association lets). (Source: Local Authority Housing Statistics data returns, 2020-21, Department for Levelling Up, Housing and Communities)</p> <p><b>Characteristics of applicants on Dartford’s housing register</b></p> <p>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>

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- Age** – There is a higher proportion of applicants on the housing register in the age groups of 25 to 34, 35 to 44, and 75+ compared to the profile of Dartford’s overall population. The banding reason for just under three quarters of applicants aged 25 to 34 and 35 to 44 is ‘overcrowding’. The banding reason for just under two thirds of applicants aged 75+ is ‘needing sheltered accommodation’. There are a total of 1,592 household members listed as children of the main applicant on the housing register. Of these, 1,408 are children aged 17 or under.

18 to 24	9.5%
25 to 34	31.7%
35 to 44	30.0%
45 to 54	13.4%
55 to 64	7.0%
65 to 74	4.5%
75+	3.8%

- Sex** – There is a higher proportion of female main applicants than male main applicants compared to the profile of Dartford’s overall population.

Male	28.7%
Female	71.0%
Blank/Unknown	0.3%

- Disability** – 21.65% of housing applicants stated they have a mental health issue. This is followed by 21.1% stating learning disability and 9.6% are permanently disabled.

Disabled	3.2%
Permanently disabled	9.6%
Learning disability	12.1%
Visual impairment	4.5%
Hearing impairment	0.6%
Mental health issue	21.6%
Age related physical infirmity	4.6%
Age related mental infirmity	1.3%

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	Chronic condition	8.1%
	Permanent wheelchair user	0.0%
	(Please note that percentages will not add to 100% as applicants can select more than one disability category)	
6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings	There is limited information returned on the protected characteristics of religion and sexual orientation to provide meaningful data on these protected characteristics. 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><b><u>Information</u></b> Despite the housing application form including questions on the protected characteristics of religion and sexual orientation, limited information is collected from these questions. This information is voluntary and is reliant on applicants' willingness to provide it. The Housing Allocations' Policy makes clear that this information not a requirement for acceptance of an application. Information is not collected on the transgender protected characteristic.</p> <p><b><u>Consultation</u></b> <b><u>Housing register applicants</u></b> - 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><b><u>Housing associations</u></b> – 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> <p><b><u>Housing Advisory Board</u></b> – 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>	



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## Step 3: Assessing the equality impact

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:

- a) tackling unlawful discrimination
- b) promoting equality of opportunity
- c) promoting good relations

NOTES:

- 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

## Step 3: Assessing the equality impact

PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Age	<p><b>Housing schemes for older people</b>                      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"> <li>• Whether the applicant has a need for this specific type of accommodation with enhanced housing management</li> <li>• Whether the applicant's needs can be met by the accommodation</li> <li>• That the applicant has an understanding of the support provided and will engage with the service</li> <li>• That they will not present a risk to the vulnerable group of individuals who are already living there.</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>

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PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<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.</p> <p><b>Medical or welfare needs</b> 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 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>In exceptional circumstances, such as serious medical needs, local connection may be awarded to Council tenants living in the borough if this is less than two years.</p> <p>Applicants who have no local connection with the borough but are aged over 55 and who qualify for housing in a scheme for older persons, following a completed needs and risk assessment – are placed in Band D. Identified</p>	<p><b>Medical or welfare needs</b> Applicants from outside the borough are not currently subject to medical and welfare needs assessments, therefore it is not possible to determine whether such applicants would qualify for Band C due to needing to move to Dartford, where failure to meet that need would cause hardship to themselves or to others. For example, to give or receive care that is substantial and ongoing. The Policy will be amended to allow medical and welfare needs assessments for out of borough applicants.</p> <p>The Policy does not currently clarify circumstances where, applicants with medical needs or a disability, who cannot reasonably share a bedroom, may need an additional bedroom. The Policy will be amended to clarify that medical assessments can be carried out where there is significant supporting medical evidence that an additional bedroom is required.</p>		

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PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p>medical needs will be taken into account upon allocation of a property, for example wheelchair accessibility.</p> <p><b>Kent Agency Assessment</b>            There is criteria in the Housing Allocation’s 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). 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. Examples of situations where the Kent Agency Assessment can be used include:</p> <ul style="list-style-type: none"> <li>• Critical need to move due to extreme health and support needs that can only be relieved or improved by a move to alternative accommodation.</li> <li>• Adaptations are required to enable a person to live independently and their current accommodation is not suitable for those adaptations.</li> <li>• Client with severe mental health problems is receiving treatment and support from mental health services but is deemed to be at risk of harm in their current accommodation.</li> </ul>			

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PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p>Care leavers (aged 18+) are covered under the Kent Agency Assessment or under homelessness legislation.</p> <p><b>Accessible properties/disabled adaptations</b> 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 support from the Occupational Therapist and a Housing Surveyor. There is a budget to fund adaptations available.</p> <p><b>Young people</b> There is a nomination agreement in place with the YMCA for assisting homeless young people.</p> <p><b>Carers</b> Carers qualify for additional priority and are identified as the following;</p>	<p><b>Accessible properties</b> The current Housing Allocations’ Policy states that for some client groups only one offer of accommodation is made. This includes those needing adapted properties. However, in practice, applicants who have refused suitable adapted properties have been offered other properties. The Policy will be amended to remove reference to only one offer of accommodation for adapted properties.</p>		

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PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<ul style="list-style-type: none"> <li>• Applicants who undertake formal care of dependents and are in receipt of carers allowance or care element of a current disability benefit. Or;</li> <li>• 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.</li> </ul> <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><b>Targeted adverts</b> 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 (e.g GF accommodation).</p>			

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	Targeted adverts aim to ensure that applicants suited to a property are aware of and have the opportunity to submit a bid.			
<b>Disability</b>	<p><b>Medical or welfare needs</b> 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> <p>In exceptional circumstances, such as serious medical needs, local connection may be awarded to Council tenants living in the borough if this is less than two years.</p> <p>Applicants who have no local connection with the borough but are aged over 55 and who qualify for housing in a scheme for older persons, following a completed needs and risk assessment – are placed in Band D. Identified medical needs will be taken into account upon allocation of a property, for example wheelchair accessibility.</p>	<p><b>Medical or welfare needs</b> Applicants from outside the borough are not currently subject to medical and welfare needs assessments, therefore it is not possible to determine whether such applicants would qualify for Band C due to needing to move to Dartford, where failure to meet that need would cause hardship to themselves or to others. For example, to give or receive care that is substantial and ongoing. The Policy will be amended to allow medical and welfare needs assessments for out of borough applicants.</p> <p>The Policy does not currently clarify circumstances where, applicants with medical needs or a disability, who cannot reasonably share a bedroom, may need an additional bedroom. The Policy will be amended to clarify that medical assessments can be carried out where there is significant supporting medical evidence that an additional bedroom is required.</p>	<input type="checkbox"/>	<input type="checkbox"/>

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	<p><b>Kent Agency Assessment</b>            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). 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. Examples of situations where the Kent Agency Assessment can be used include:</p> <ul style="list-style-type: none"> <li>• Critical need to move due to extreme health and support needs that can only be relieved or improved by a move to alternative accommodation.</li> <li>• Adaptations are required to enable a person to live independently and their current accommodation is not suitable for those adaptations.</li> <li>• Client with severe mental health problems is receiving treatment and support from mental health services but is deemed to be at risk of harm in their current accommodation.</li> </ul>			

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PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p><b>Accessible properties/disabled adaptations</b> 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><b>Carers</b> Carers qualify for additional priority and are identified as the following;</p> <ul style="list-style-type: none"> <li>• Applicants who undertake formal care of dependents and are in receipt of carers allowance or care element of a current disability benefit. Or;</li> <li>• 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.</li> </ul>	<p><b>Accessible properties</b> The current Housing Allocations' Policy states that for some client groups only one offer of accommodation is made. This includes those needing adapted properties. However, in practice, applicants who have refused suitable adapted properties have been offered other properties. The Policy will be amended to remove reference to only one offer of accommodation for adapted properties.</p> <p><b>Hate crime victims</b> Hate crime can be motivated by hostility or prejudice based on a person's 'disability' or perceived 'disability'. The current Housing Allocations' Policy states that management transfers or reciprocal arrangements with other social landlords can be agreed due to extreme circumstances such as violent assault, harassment etc. Applicants requiring a management transfer are placed in Band A. Whilst management transfers and reciprocal arrangements apply, in practice, where violence, harassment or threats of violence are likely to be carried out due to hate crime, this is not explicit in the Policy. The Policy will be amended to clarify that management transfers or reciprocal arrangements include hate crime circumstances.</p>		



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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<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><b>Targeted adverts</b> 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><b>Local connection</b> 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>			

# Customer Access Review – Full Assessment

Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p><b>People with learning disabilities</b> An easy read leaflet on Kent Homechoice is available for people with learning disabilities.</p> <p><b>Accessible communication</b> In accordance with the Council's Equality &amp; 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"> <li>• Braille, audio tape and large print versions of documents</li> <li>• British Sign Language interpreting</li> </ul> <p>Calls can be received via Relay UK.</p>			
<b>Sex</b>		<p><b>Domestic abuse victims</b> While domestic abuse can affect anyone regardless of their protected characteristics, domestic abuse is closely related to the protected characteristic of 'sex'. Statistically more women are affected by domestic abuse than men. The Crime Survey for England and Wales (CSEW) estimated that 5.0% of adults (6.9% women and 3.0% men) aged 16 years and over experienced domestic abuse in the year ending March 2022; this equates to an estimated 2.4 million adults (1.7 million women and 699,000 men).</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
		<p>Statutory guidance on improving access to social housing for victims of domestic abuse strongly 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. The current Housing Allocations' Policy does not provide this exemption and will be amended to include this.</p> <p>The Policy is being reviewed in light of recent case law (R (TX) v Adur District Council [2022] EWHC 3340 (Admin) (21 December 2022)), where an allocations policy which restricted applicants from accessing the two highest bands if they did not meet a two year residence requirement was indirectly discriminatory against women, as they were more likely to have been victims of domestic abuse and to need to flee to another local authority area.</p> <p>The current Policy states that management transfers or reciprocal arrangements with other social landlords can be agreed due to extreme circumstances such as violent assault, harassment etc. Applicants requiring a management transfer are placed in Band A.</p>		

# Customer Access Review – Full Assessment

Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
		Whilst management transfers and reciprocal arrangements apply, in practice, in circumstances such as domestic abuse, this is not explicit in the Policy. The Policy will be amended to clarify that management transfers or reciprocal arrangements include domestic abuse circumstances.		
Gender reassignment		<p><b>Hate crime victims</b></p> <p>Hate crime can be motivated by hostility or prejudice based on a person's 'gender reassignment' or perceived 'gender reassignment'. The current Housing Allocations' Policy states that management transfers or reciprocal arrangements with other social landlords can be agreed due to extreme circumstances such as violent assault, harassment etc. Applicants requiring a management transfer are placed in Band A. Whilst management transfers and reciprocal arrangements apply, in practice, where violence, harassment or threats of violence are likely to be carried out due to hate crime, this is not explicit in the Policy. The Policy will be amended to clarify that management transfers or reciprocal arrangements include hate crime circumstances.</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
Race	<p><b>Accessible communication</b> In accordance with the Council's Equality &amp; 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"> <li>• Documents translated into other languages</li> <li>• Telephone and face-to-face language interpreting</li> </ul>	<p><b>Eligibility</b> The Housing Allocations' Policy currently states that people subject to immigration control and certain other people from abroad, excluded by law or regulation, are not eligible for social housing except those applicants who are subject to exemptions by virtue of the Allocation of Housing and Homelessness (Eligibility) (England) Regulations 2006/1294 as amended and/ or current immigration law. Whilst the provisions are prescribed by legislation, there is not sufficient information in the Policy setting out the provisions to provide guidance to applicants who are persons from abroad and subject to immigration control. The Policy will be amended to include a summary of these provisions.</p> <p><b>Hate crime victims</b> Hate crime can be motivated by hostility or prejudice based on a person's 'race' or perceived 'race'. The current Housing Allocations' Policy states that management transfers or reciprocal arrangements with other social landlords can be agreed due to extreme circumstances such as violent assault, harassment etc. Applicants requiring a management transfer are placed in Band A.</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
		Whilst management transfers and reciprocal arrangements apply, in practice, where violence, harassment or threats of violence are likely to be carried out due to hate crime, this is not explicit in the Policy. The Policy will be amended to clarify that management transfers or reciprocal arrangements include hate crime circumstances.		
Religion/Belief		<p><b>Hate crime victims</b></p> <p>Hate crime can be motivated by hostility or prejudice based on a person's 'religion' or perceived 'religion'. The current Housing Allocations' Policy states that management transfers or reciprocal arrangements with other social landlords can be agreed due to extreme circumstances such as violent assault, harassment etc. Applicants requiring a management transfer are placed in Band A. Whilst management transfers and reciprocal arrangements apply, in practice, where violence, harassment or threats of violence are likely to be carried out due to hate crime, this is not explicit in the Policy. The Policy will be amended to clarify that management transfers or reciprocal arrangements include hate crime circumstances.</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
<b>Sexual Orientation</b>		<p><b>Hate crime victims</b>                      Hate crime can be motivated by hostility or prejudice based on a person's 'sexual orientation' or perceived 'sexual orientation'. The current Housing Allocations' Policy states that management transfers or reciprocal arrangements with other social landlords can be agreed due to extreme circumstances such as violent assault, harassment etc. Applicants requiring a management transfer are placed in Band A. Whilst management transfers and reciprocal arrangements apply, in practice, where violence, harassment or threats of violence are likely to be carried out due to hate crime, this is not explicit in the Policy. The Policy will be amended to clarify that management transfers or reciprocal arrangements include hate crime circumstances.</p>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Pregnancy/Maternity</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Marriage and Civil Partnership*</b>	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	
<b>9. If 'no impact' or 'unknown' was selected, please explain</b>	There are no known circumstances where the Housing Allocations' Policy will have a disproportionate equality impact on the pregnancy and maternity protected characteristic group.

## Customer Access Review – Full Assessment

<p><b>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</b></p>	<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 to advertise all available council and housing association properties. The existing online platform used is Locata and this will be moving to a new site (Humme) in July 2023. 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 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"> <li>• Community Mental Health Teams</li> <li>• Early Intervention Teams</li> <li>• General Practitioners (GPs)</li> <li>• Health Visitors</li> <li>• Hospitals (not Mental Health)</li> <li>• Substance Misuse support services</li> <li>• Kent Association for the Blind</li> <li>• Mental Health in Patient Services</li> <li>• Mental Health Older People Service</li> <li>• Occupational Therapists</li> <li>• Probation /Community Rehabilitation Company</li> <li>• Social Care Professionals</li> </ul> <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>



# Customer Access Review – Full Assessment

<b>11. Any other comments</b>	<p><b>Advice and assistance</b> 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> <p><b>Band E</b> Under the current Housing Allocations' Policy, the following classes of person will not normally qualify to join the housing register and will be placed in Band E:</p> <ul style="list-style-type: none"><li>• Applicants who have not resided in the borough continually for the last two years at the point of application (there some are exceptions for members of the Armed and Reserve forces and social housing tenants wishing to move under the Right to Move, as outlined in question 4 of this assessment).</li><li>• Applicants who have been convicted of housing or welfare benefits related fraud where that conviction is unspent under the Rehabilitation of Offenders Act 1974 (any person may re-apply once this conviction is spent).</li><li>• Applicants whose income or assets exceed the limits set by the Council, as set out in the Council's Tenancy Policy.</li></ul>

# Customer Access Review – Full Assessment

<b>Step 3: Assessing the equality impact</b>	<ul style="list-style-type: none"> <li>• Applicants who owe arrears of rent or other accommodation charges to the Council, or other social landlord, in respect of the current tenancy or former accommodation. In assessing the application for registration, the Council will take into account the size of the debt, the means to pay and the degree of need.</li> <li>• Applicants who owe money to the Council in any other capacity.</li> <li>• Applicants in serious breach of their Tenancy Agreement.</li> <li>• Applicants who are regarded as homeowners, with some exceptions.</li> </ul> <p>The review of the Housing Allocations’ Policy proposes the removal of Band E from the allocations scheme. This proposed change to the policy will ensure that the Council is not retaining data for a long period of time on applications that have been assessed as not eligible to join the housing register and therefore unable to take part in the scheme. These applicants will be contacted and advised that there is no impact on them as they are already unable to bid for accommodation and that the Council will simply no longer hold their personal information. Applicants in Band E will be able to make a new application if their circumstances change.</p> <p><b>Appeals and reviews</b> 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><b>Complaints</b> 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>
<b>Step 4: Action plan</b>	
<p><b>12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:</b></p> <ul style="list-style-type: none"> <li>a) any gaps in information and consultation</li> <li>b) how any negative impacts on equality will be mitigated or eradicated</li> </ul>	

## Customer Access Review – Full Assessment

**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?**

<b>Information needs</b>	<b>Action</b>	<b>Intended outcome</b>	<b>Date for completion</b>	<b>How this will be monitored</b>	<b>Responsible officer</b>
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	February/March 2023	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 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	February/March 2023	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	April 2023	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

**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
Out of borough applicants are not able to have medical and welfare needs assessments (‘Age’ and ‘disability’ protected characteristic groups)	Amend the Housing Allocations’ Policy to allow medical and welfare needs assessments for out of borough applicants	Equality of opportunity for applicants to have medical and welfare needs assessments	February 2023	Monitored during the policy review process	Housing Solutions & Private Sector Manager / Housing Policy & Development Manager
The Housing Allocations’ Policy does not currently clarify circumstances where, applicants with medical needs or a disability, who cannot reasonably share a bedroom, may need an additional bedroom (‘Age’ and ‘disability’ protected characteristic groups)	Amend the Housing Allocations’ Policy to clarify that medical assessments can be carried out where there is significant supporting medical evidence that an additional bedroom is required	Consideration is given in the assessment of circumstances where applicants with medical needs or who are disabled cannot reasonably share a bedroom and may need an additional bedroom	February 2023	Monitored during the policy review process	Housing Solutions & Private Sector Manager / Housing Policy & Development Manager
Applicants needing adapted properties receive only one offer of accommodation (‘Age’ and ‘disability’ protected characteristic groups)	Amend the Housing Allocations’ Policy to remove reference to those needing adapted properties receiving only one offer of accommodation	Applicants needing adapted properties can receive more than one offer of accommodation	February 2023	Monitored during the policy review process	Housing Solutions & Private Sector Manager / Housing Policy & Development Manager
There is not sufficient information in the Housing Allocations’ Policy to set out the provisions regarding eligibility regarding persons from abroad and subject to immigration control (‘Race’ protected characteristic group)	Amend the Housing Allocations’ Policy to provide further detail on the provisions regarding eligibility regarding persons from abroad and subject to immigration control	Clarity is provided on eligibility criteria	February 2023	Monitored during the policy review process	Housing Solutions & Private Sector Manager / Housing Policy & Development Manager

## Customer Access Review – Full Assessment

Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
Victims of domestic abuse are not exempt from residency requirements and review priority for applicants affected by domestic abuse. (‘Sex’ protected characteristic group)	Amend the Housing Allocations’ Policy to exempt local connection criteria for victims of domestic abuse who have had to flee their home district and wish to apply to join the housing register; and amend following a review of priority for applicants affected by domestic abuse	Domestic abuse victims will not be subject to indirect disadvantage	February 2023	Monitored during the policy review process	Housing Solutions & Private Sector Manager / Housing Policy & Development Manager
Whilst management transfers or reciprocal arrangements apply, in practice, to circumstances where violence, harassment or threats of violence are likely to be carried out due to domestic abuse or hate crime, this is not explicit in the Housing Allocations’ Policy (‘Sex’ disability’, gender reassignment, ‘race’, ‘religion or belief’, and ‘sexual orientation’ protected characteristic groups)	Amend the Housing Allocations’ Policy to clarify that management transfers or reciprocal arrangements include domestic abuse and hate crime circumstances	Clarity is provided on management transfers and reciprocal arrangements	February 2023	Monitored during the policy review process	Housing Solutions & Private Sector Manager / Housing Policy & Development Manager

<b>Step 5: Decision making and future monitoring</b>	
<b>13. Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?</b>	Director of Housing & Public Protection
<b>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</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

## Customer Access Review – Full Assessment

Step 5: Decision making and future monitoring	
15. How will you continue to monitor the activity or proposal on protected characteristic groups?	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.  Other sources of monitoring include where any issues are highlighted through appeals, reviews, and complaints.
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

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|---|
| 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: 15 February 2023**

**Reviewed by Director of Housing & Public Protection: 15<sup>th</sup> February 2023.**