

City of York Council and Centre for Applied Human Rights

Human Rights and Equity Analysis Tool (HREAT)

An Equality Analysis Tool is an evidence-based approach designed to help organisations ensure that any Policy, Criterion or Practice (PCP), is fair and does not create barriers to participation or disadvantage any protected groups from participation. This covers both strategic and operational activities.

City of York Council (CYC) combines this approach with York's commitment as a Human Rights City to produce a Human Rights and Equity Analysis Tool (HREAT).

This document enables CYC to evidence its legal duty to give 'due regard' to those with protected characteristics under the Equality Act and consider Human Rights at the same time.

Whether a HREAT is needed or not will depend on the likely impact that a PCP may have and relevance of the activity to equity and Human Rights.

The HREAT should be started when the need for a new PCP is first identified, or when an existing one is reviewed. It is essential to continue to update the HREIA during the life of the PCP, as and when new information is learned. It is not complete until the PCP is complete.

Non-discrimination is a minimum standard. The development of the HREAT should prompt critical discussion and highlight disproportionate impacts.

Balancing residents' rights and CYC duties can be very complex and sometimes there will be no 'win-win', so compromises or mitigations may need to be identified to ensure the best outcomes.

Finally, the value in a HREAT is in both the short and long term, by investing in this process CYC will create robust, meaningful, and empowering policies that are more likely to stand the test of time.

Who is submitting the proposal?

Directorate	Housing and Communities		
Service Area	Housing Allocations		
Name of proposal	Update to Housing Allocations Policy		
Lead Officer	Andrew Bebbington		
Date Assessment Started	9 February 2026 (Meeting with EDI / HREAT team)		
Date Assessment Completed			
Names of those who contributed to the assessment			
Name	Job Title	Organisation	Area of Expertise
Josh van den Dries	Housing Registrations Advisor	CYC	Housing Registrations
Andrew Bebbington	Housing Policy Officer	CYC	Housing Policy
Ian Taylor	Assistant Policy Officer	CYC	Housing Policy
Karen Boardman	Housing Regulatory Compliance Officer	CYC	Housing Strategy and Performance / Human Rights and Equity Champion / independent
Laura Swiszcowski	Head of Equity, Diversity and Inclusion	CYC	EDI / independent
Deepika Premadasa	Business Support Assistant	CYC	Business Support / independent

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Step 1 – Aims and intended outcomes

1.1	What is the purpose of the proposal
	Please explain your proposal in plain English avoiding acronyms and jargon. Consider using Age 9 English.
	<p>Update CYC's Housing Allocations Policy.</p> <p>Ensure the Housing Allocations Policy is legally compliant and fit-for-use by CYC staff.</p> <p>Ensure the policy is fair, transparent and can be understood by all service users</p> <p>Ensure the policy accommodates the needs of vulnerable service users.</p>

1.2	Are there any external considerations?
	<p>Legislation / government directive / codes of practice etc.</p> <p>Part 6 of the Housing Act 1996</p> <p>Human Rights Act 1998</p> <p>Freedom of Information Act 2000</p> <p>Children Act 1989</p> <p>Crime and Disorder Act 1998</p> <p>Homelessness Act 2002</p> <p>Equality Act 2010</p>

<p>Localism Act 2011</p> <p>Anti-social Behaviour, Crime and Policing Act 2014</p> <p>Homelessness Reduction Act 2017</p> <p>Children and Social Work Act 2017</p> <p>Data Protection Act 2018</p> <p>The Allocation of Housing (Qualification Criteria for Victims of Domestic Abuse and Care Leavers) (England) Regulations 2025</p> <p>Disability Discrimination Act 1995</p>
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1.3	Who are the stakeholders and what are their interests?
	Consider both internal and external stakeholders.
	<p>Internal:</p> <p>CYC Housing Registrations (social housing) team – Use the policy in their day-to-day work.</p> <p>CYC Housing Options (homelessness) team – Refer to the policy in their day-to-day work.</p> <p>CYC Housing Policy team – Keep the policy legally compliant and fit for use.</p> <p>CYC Housing department management – Respond to MP enquiries and complaints for decisions made under the policy.</p> <p>External:</p> <p>Service users – Applicants looking for social housing tenancies in the CYC area.</p> <p>Partner Landlords – Housing associations whose properties are allocated by CYC under the policy.</p> <p>Regulator of Social Housing – Assesses standards, transparency and accountability of social housing allocation.</p> <p>Housing Ombudsman – Reviews housing allocation decisions made by local authorities, on behalf of applicants.</p>

1.4	What results / outcomes do we want to achieve and for whom?	
	Explain what outcomes you want to achieve for stakeholders, staff and the wider community. Demonstrate how the proposal links to the Council Plan (2023- 2027) and other corporate strategies and plans. Highlight how the proposal meets the objectives of Equalities, Affordability, Climate and Health.	
	<p>Goals:</p> <p>Ensure the Housing Allocations Policy is legally compliant and fit-for-use by CYC staff.</p> <p>Ensure the policy is fair, transparent and can be understood by all service users</p> <p>Ensure the policy accommodates the needs of vulnerable service users.</p>	

Step 2 – Resources utilised

3.1	What sources of data, evidence and consultation feedback have you used to help understand the impact of the proposal on equality rights and human rights?	
	Please consider a range of sources, including consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, the views of equality groups, as well your own experience of working in this area etc.	
	Source of data / supporting evidence	Reason for using this source
	Consultation with EDI / HREAT colleagues – Josh van den Dries, Karen Boardman, Laura Swiszcowski, Deepika Pramadasa (9 February 2026)	Source of quick feedback and original ideas on the Housing Allocations Policy. Discussed draft update to the policy which could impact on vulnerable groups. Only Josh van den Dries is familiar with the policy – others offered independent views.

<p>Hillingdon Borough Council – Equality and Human Rights Impact Assessment of their Social Housing Allocation Policy (Published 22 October 2024)</p>	<p>Available online. Helpful example of an HREA on another local authority’s housing allocations policy. Useful to see content and presentation of assessment results. Most of the document is population data, with limited HREA analysis or discussion.</p>
<p>Meeting with Leeds City Council – EDI and Housing / Homelessness staff (11 March 2026)</p>	<p>Officers spoke with Leeds City Council about their LGBT+ strategy for the city, with a focus on inclusivity in housing policy. CYC and Leeds agreed to share knowledge and copies of any HREA assessments.</p>
<p>Meeting with Trans Action Group (TAG) York (26 March 2026)</p>	<p>Collecting direct feedback and suggestions on proposed updates from vulnerable group (LGBTQ+).</p>
<p>CYC Business Intelligence Team York Open Data (website) Data on York population vs. Housing Allocations service users:</p> <ul style="list-style-type: none"> • Diversity • Protected characteristics • Age ranges (age below 20, 20-35. 35-45 etc) • Applicant type (e.g., single applicant, couple, family with young children, family with older children) • Physical disability or health conditions • Other demographic categories relevant to allocation decisions 	<p>Sometimes the differences in outcomes between groups are not explained only by vulnerability status or diversity characteristics. Looking at the data across multiple categories could give a clearer understanding of why certain groups may have lower success rates in accessing housing support, even when they fall within the same vulnerability category.</p> <p>For example, if a particular group of applicants (such as trans people) appear to have lower success rates, it may be because a high proportion of them fall into another category—such as being young (say age 25-35), single and applicants with no physical (visible) disability—which may influence priority within current allocation criteria.</p> <p>Viewing the data in this layered way could help identify whether the issue relates to policy, prioritisation criteria, or whether some groups are <u>unintentionally disadvantaged</u> by how the system currently operates.</p>

Step 3 – Screening the impacts or effects.

3.1	<p>Equality-related obligations derive from the Equality Act of 2010 and the Human Rights Act of 1998.</p>
	<p>Once you have engaged with stakeholders you will need to identify how this proposal impacts on their human rights and equalities.</p> <p>Although table one looks complex, its purpose is to facilitate an initial screening of equalities and human rights impacts of your proposal. Many human rights and equalities will not be affected by the decision you are seeking Executive or Council approval for and so can be left blank. The aim here is to identify pressure points regarding human rights and equalities that require attention.</p> <p>Please see the Appendix for details of the protected characteristics and human rights to consider.</p> <p>The rights listed below in the first column are the relevant ones from the Human Rights Act, and the York Human Rights City Network Indicator Report (non-discrimination, education, health and social care, housing, a decent standard of living). The human rights in the Indicator Report were selected by residents of York as their priority rights. In the first row the protected characteristics under the Equality Act are listed, to which ‘Everyone’ has been added to capture impacts that affect everyone without distinction.</p>

Step 3.1 Table 1 – Screening the impacts or effects

David Smith 07/02/2024

ANNEX B

Equalities Human Rights	Everyone	Age inc financial, digital exclusion impacts	Disability inc financial, digital exclusion impacts	Gender	Gender reassignm ent inc Trans, Non-binary, Intersex	Marriage and civil partnershi p	Pregnancy and maternity	Race	Religion and belief	Sexual orientation	Carers inc financial, digital exclusion impacts	Low-income groups inc financial, digital exclusion impacts	Veteran, armed forces community	Other – Those with experience of Care
Right to life*														
Prohibition of torture*														
Prohibition of slavery and forced labour*														
Right to liberty, movement and security (including freedom of movement)***					✓					✓				
Right to a fair trial*														
No punishment without law*														

ANNEX B

Right to private and family life ^{***1}				✓	✓					✓				
Freedom of thought, conscience, and belief ^{***}														
Freedom of expression ^{***}														
Freedom of assembly ^{***}														
Freedom from discrimination	✓													
Right to marry ^{***}														
Right to property ^{***}	✓													
Right to education ^{***}														
Right to free elections ^{***}														
Right to housing ^{***}	✓													

¹ Suggestion from Trans Action Group York: ‘ Right to Private life is a particular pressure point for the LGBT+ community. Sexual orientation and gender matters are highly private and when it comes to have to disclosing them in order to explain difficulties for housing, make right to private life particularly relevant and boxes should be ticked for Gender, Gender reassignment, Sexual Orientation’

Step 3.2 Table 2 – Assessing the impact of your proposal

Here you will need to record the details on all the impacts identified for both Human Rights and those with Protected Characteristics.

Where you have identified an impact on a protected characteristic/human right in the table above, please indicate whether this is positive or negative and give a description of this impact. If you run out of rows, please add as necessary.

Rights clashes and restrictions

Where rights clash or are being restricted, you will need to explain how the decision has been taken, that the limitation on human rights is provided by law, for a legitimate purpose (justified), and proportionate (the minimum necessary restriction on rights).

First, think about what equalities or rights might be engaged by the proposal, and describe the likely impact of the proposal, and provide an evaluation.

Use the following questions to inform your responses if human rights or equalities are limited or qualified in any way:

- Why are a person's rights being restricted?
- What is the problem being addressed by the restriction on someone's rights?
- Will the restriction lead to a reduction in the problem?
- Does that restriction involve a blanket policy, or does it allow for different cases to be treated differently?
- Does a less restrictive alternative exist?
- Has sufficient regard been paid to the rights and interests of those affected?
- Do safeguards exist against error or abuse?

Table 2

Characteristic/Human Right affected	Positive / Negative impact	Impact Description	Evaluation or justification
<p>Disability (including mental health)</p> <p>2. Disregarding benefit payments for disability or ill health (e.g. PIP) when assessing household income.</p> <p>Household income thresholds* (beyond which applicants are ineligible for the register) are:</p> <p>1 bedroom property: £54,000 2 bedroom property: £66,000 3 bedroom property: £72,000 4+ bedroom property: £81,000</p> <p>* Please note these are proposed thresholds for the updated policy and not yet final.</p>	<p>Positive</p>	<p>Reducing a potential hurdle to joining the register for households receiving health-related benefit payments.</p>	
<p>Gender reassignment</p> <p>Sexual orientation</p> <p>Care leaver</p>	<p>Negative</p>	<p>Does this indirectly discriminate against people vulnerable to difficult family relationships /</p>	<p>Is 2.3 sufficiently balanced by the local connection exceptions in 2.4? (Domestic abuse,</p>

<p>Domestic abuse victims</p> <p><i>2.3 Local connection requirements – Family (parent, adult sibling or adult child living in York for 5+ years) and must have a ‘meaningful relationship’.</i></p> <p><i>All local connection requirements – family, employment, living in York – can be a struggle for LGBTQ+ applicants. Unfortunately indirectly discriminates – historically not written with such applicants in mind.</i></p>		<p><i>estrangement / no children?</i></p> <p><i>Potential discrimination here – what are we defining as a ‘meaningful relationship’? e.g. Trans applicant might have biological family in York but no close relationship, do we not allow family local connection for that reason? Do we allow for non-biological family instead in these cases?</i></p> <p><i>TAG (Trans Action Group) – Trans applicants may not disclose their abusive household, how do we make the policy as</i></p>	<p><i>hate crime, care leavers).</i></p> <p><i>Action: Suggest adding ‘Discretion can be applied if the applicant is estranged from their immediate family.’</i></p> <p><i>Do we allow for wider relatives on a case-by-case basis? Do we update the policy to allow parent, adult child, adult sibling by default – and then consider ‘meaningful relationship’ for more distant relatives e.g. grandparents, cousins, uncles, aunties, friends.</i></p>
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		<p><i>welcoming as possible.</i></p> <p><i>LS made the point that 'meaningful relationship' was broadened in bereavement policy to include non-biological family, so why not in Housing Allocations Policy?</i></p>	<p><i>AB will run by NS (Housing Registrations Manager).</i></p> <p><i>Going to have to spend time with individual applicants in particular – take evidence on board, but evidence from family, support services etc. may be unreliable. May need to take a leap of faith and believe victims.</i></p> <p><i>Local connection to community in York is critical to consider – 'substitute family' rather than limit connection to</i></p>
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			family. Need to write this recognition in black & white.
<p>Disability (including mental health)</p> <p>2.3 Local connection requirements – Excludes residency in student halls.</p>	Negative	<p>Student halls excluded for local connection residency – could disadvantage disabled students who on the whole may be more likely to live in student halls, as these are often more viable for adapted properties.</p>	<p>Is York their 'primary residence' or do they have a suitably adapted home elsewhere, e.g. with family?</p> <p>Disabled students who would otherwise meet local connection criteria, 'but for' living in student accommodation?</p>
<p>Care leavers</p> <p>Veterans / Armed Forces</p> <p>Domestic abuse victims</p> <p>2.4 Local connection exceptions –</p>	Positive	<p>Widens access to social housing in York, by expanding the local connection exceptions for three vulnerable groups.</p>	<p>Legal requirement under The Allocation of Housing (Qualification Criteria for Victims of Domestic Abuse</p>

<p><i>Now includes all care leavers, from any local authority.</i></p> <p><i>Now explicitly specifies that DA victims are exempt from requirement even where coming from temporary accommodation.</i></p> <p><i>Now includes separated spouses of Armed Forces – previously only bereaved spouses.</i></p>			<p><i>and Care Leavers) (England) Regulations 2025.</i></p>
<p>Domestic abuse victims</p> <p><i>2.9 Existing tenants and their households –</i></p> <p><i>Now specifies that DA victims are exempt from the ban on applicants owing 8 weeks’ current rent arrears for temp or supported accommodation.</i></p>	<p><i>Positive</i></p>	<p><i>Removes a potential hurdle to victims of domestic abuse accessing social housing in York. Relevant to cases of financial abuse and/or coercive control, which may cause rent arrears to accrue in the victim’s name.</i></p>	
<p>Gender reassignment</p> <p>Sexual orientation</p> <p>Domestic abuse victims</p>	<p><i>Negative</i></p> <p><i>LS: Are we considering</i></p>	<p><i>Does extra priority for overcrowding favour families, and indirectly discriminate against those who don't have</i></p>	<p><i>CYC will continue awarding additional priority to those with children (and</i></p>

<p>Disability (including mental health and learning disabilities)</p> <p>3. Priority for overcrowding (e.g. lacking 1 room, 2+ rooms)</p>	<p>compound protected characteristics or vulnerabilities? <i>Within a band. Do the management decision and direct offer sections of the policy allow sufficient priority for these cases?</i></p> <p><i>Is there enough guidance on this in the policy, or separately? Aimed at managers considering particular protected, compound characteristics?</i></p>	<p>children (or custody of their children)?</p> <p><i>Larger households and smaller households are not 'competing' for the same properties – so is this discriminatory at all?</i></p> <p><i>MT: There is some degree of competition between households of different sizes – where needs intersect, e.g. health needs putting you into the bracket for a larger property, into competition with a family needing more rooms due to children who may be in gold band, for example. [CYC note: But if two customers require the</i></p>	<p><i>perhaps those in gold are disproportionately needing larger/family houses).</i></p> <p><i>However CYC has other routes such as management transfer, DA banding which perhaps suit the particular needs of vulnerable groups such as LGBTQ+.</i></p> <p><i>Recognise there is potential for discrimination (e.g. against inter-generational families, which may be a cultural or religious choice) due to our housing stock – however</i></p>
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		<p><i>same size property, regardless of the reason for this, banding criteria will be applied to their circumstances in the same way. If someone needs a 4 bed including an extra room for a child with H&W needs, and another needs a 4 bed due to family size, they will both be banded accordingly.]</i></p> <p><i>This crosses over with Appendix 8 and room allocation for children – affects size of property and banding.</i></p> <p><i>Adverts for housing need some improvement – no room sizes etc.</i></p>	<p><i>there are robust plans in place with CYC to acquire a larger proportions of larger homes.</i></p>
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<p>Age (older persons)</p> <p>Domestic abuse victims</p> <p>3.2. Gold band –</p> <p><i>For applicants downsizing from a social housing 1 bed flat or house (any size) into an independent living community or bungalow. (Previously would be silver for under-occupying by 1 room.)</i></p> <p><i>For applicants referred by a refuge due to fleeing DA. (Previously silver for risk of DA – generally go to Housing Options instead.)</i></p>	<p><i>Positive</i></p>	<p><i>Increases priority awarded for:</i></p> <ul style="list-style-type: none"> • <i>Over 55s downsizing into age-restricted accommodation.</i> • <i>Domestic abuse victims currently in a refuge.</i> 	
<p>Domestic abuse victims</p> <p>3.3. Silver band –</p> <p><i>Applicants at risk of DA in their home. (Previously not written in policy – generally go to Housing Options instead.)</i></p>	<p><i>Positive</i></p>	<p><i>Applicants at risk of domestic abuse in their current property were previously awarded ‘silver band’, however this was not written in the policy. Now written into policy and victims / support services can</i></p>	<p><i>If fleeing – go through Housing Options, who can award higher priority.</i></p>

		<i>understand this before applying.</i>	
<p>Care leavers</p> <p>3.4. Bronze band –</p> <p><i>Awarded by default for care leavers with no local connection to York (i.e. leaving the care of another local authority).</i></p>	<i>Positive</i>		
<p>Gender reassignment</p> <p>Sexual orientation</p> <p>Domestic abuse victims</p> <p>Age (older persons)</p> <p>4.5.2 – Direct Offer suitability and refusal –</p> <p><i>Specifies that: ‘A suitable Direct Offer may be made anywhere in the City CYC Local Authority Area that:</i></p> <ul style="list-style-type: none"> <i>meets the applicant’s essential needs for health and safety, and</i> 	<i>Negative</i>	<i>Is the wording of 4.5.2 suitably broad to safeguard applicants who may be at risk in certain areas / from other tenants (e.g. LGBTQ+, DA, OAPs)?</i>	<i>Already account for safety area choices – e.g. not moving DA victims to unsafe areas of York. We do also have a sensitive let policy (Appendix 17) whereby we vet applicants to be placed into properties next to difficult neighbours.</i>

<ul style="list-style-type: none"> <i>would not have a substantial adverse impact on the applicant's' wellbeing.'</i> 			<p><i>Must listen to the individual explain why a particular area or property wouldn't suit them. Listen to individuals. Monitor changes – if things are fine at first, but become bad, do not demote priority based on having to reapply due to this change.</i></p>
<p><i>Gender reassignment</i></p> <p><i>Sexual orientation</i></p> <p><i>Domestic abuse victims</i></p> <p><i>Race (including Travellers)</i></p> <p><i>Immigration status</i></p>	<p><i>Positive</i></p>	<p><i>Additional opportunity for vulnerable social housing tenants to move away from neighbour disputes, etc.</i></p> <p><i>Separate to management transfer criteria (for persistent, targeted abuse or</i></p>	

<p>Disability (including mental health and learning disabilities)</p> <p>4.5.4 Direct Offers (management decision) –</p> <p><i>Proposed option for direct let in cases of: ‘Intractable long term neighbour disputes within existing social housing tenancies and referred by the Housing Management service, where there is no prospect of resolution by mediation, neighbourhood management or eviction and it is clearly evidenced that all other options have been pursued to resolve the dispute with the tenants remaining at their current properties.’</i></p>		<p><i>harassment), which will remain.</i></p>	
<p>Disability (including mental health and learning disabilities)</p> <p>4.5. Auto-bidding –</p> <p><i>Now specifies that ‘customers who have additional needs may choose auto-bidding.’</i></p>	<p><i>Positive</i></p>	<p><i>Improves access to the bidding system for vulnerable applicants, who can now request ‘auto-bidding’ from the start. Previously auto-bidding would need to be suggested and approved by Housing Registrations. Could</i></p>	

		<i>mitigate digital exclusion.</i>	
<p>Domestic abuse victims</p> <p><i>Appendix 5: At risk of homelessness –</i></p> <p><i>Domestic abuse is now specified as a reason for being at risk of homelessness.</i></p>	<i>Positive</i>	<i>Now written into policy and victims / support services can understand this before applying.</i>	
<p>Domestic abuse victims</p> <p><i>Appendix 7: Management transfer (emergency move) –</i></p> <p><i>Now specifies that management transfer includes domestic abuse (meeting the criteria in the table of Appendix 7). Added a paragraph at the end explaining that ‘If a CYC tenant is experiencing domestic abuse, a management transfer could be an option agreed to support them to feel safe and secure.’</i></p>	<i>Positive</i>	<i>Increased likelihood of a management transfer being applied / approved for CYC tenants experiencing DA.</i>	
<p>Gender reassignment</p> <p><i>Appendix 8: Overcrowding –</i></p> <p><i>Children are entitled to their own room at age 16. Two children of same sex can share a</i></p>	<i>Negative</i>	<i>Could this disadvantage children under 16 identifying as a different gender/sex to which</i>	<i>Do we add a line about applying discretion in exceptional circumstances?</i>

<p><i>room until eldest is 16. Two children of different sexes can share until the eldest is 10.</i></p>		<p><i>they were born (or no gender)?</i></p> <p><i>BE: What do we do if a parent is not aware of their child's gender identity? How do we find this out? And critically how do we avoid 'outing' children in these circumstances?</i></p> <p><i>MT: Have to acknowledge that unfortunately we are sometimes going to miss children in this situation. Unfortunate there is not a pathway in this situation, where children don't feel safe or able to talk about this with family.</i></p>	<p><i>What proofs do we ask for – equivalent to health grounds for an extra room – independent confirmation from e.g. school, medical professionals, Mermaids.</i></p> <p><i>Note CYC policy used to be that same sex could share until age 21 – CYC dropped it to 16.</i></p>
<p>Pregnancy and maternity</p>	<p><i>Positive</i></p>	<p><i>Potentially increases priority banding for</i></p>	

<p>Domestic abuse victims</p> <p><i>Appendix 8: Overcrowding –</i></p> <p><i>Proposed change to consider unborn child as part of household from 20 weeks.</i></p>		<p><i>pregnant persons (based on number of bedrooms needed when unborn child is included).</i></p> <p><i>Previously would not consider unborn children when assessing housing need.</i></p>	
<p>Disability (including mental health and learning disabilities)</p> <p>Carers</p> <p><i>Appendix 8: Overcrowding –</i></p> <p><i>We can award an extra bedroom (at our discretion) where a couple require separate bedrooms for health reasons. A substantial risk to either/both partners must be shown.</i></p>	<p><i>Positive</i></p>	<p><i>Previously, this discretion could only be exercised for adults where: ‘An applicant needs a bedroom for a carer or to facilitate specialist medical treatment’.</i></p> <p><i>Less pressure on care professionals to provide evidence.</i></p>	

		<i>More opportunity for informal carers.</i>	
<p>Domestic abuse victims</p> <p><i>Appendix 10: Overlooking a successful bid –</i></p> <p><i>1.1. Successful bids by applicants with former social housing-related debt will be overlooked (in favour of other bidders), unless the applicant is fleeing DA and has ‘indicated a willingness to develop a repayment agreement.’</i></p> <p><i>2.1. Successful bids by applicants in breach of tenancy conditions or with current social housing arrears will be overlooked unless they need to move due to DA.</i></p>	<i>Positive</i>	<i>Removes a potential hurdle to victims of domestic abuse accessing social housing in York. Relevant to cases of financial abuse and/or coercive control, which may cause rent arrears or unacceptable behaviour to accrue in the victim’s name.</i>	
<p>Disability (including mental health and learning disabilities)</p> <p><i>Appendix 10: Overlooking a successful bid –</i></p> <p><i>2.2. Successful bids may be overlooked from applicants requiring major adaptations where</i></p>	<i>Negative</i>	<i>Chance that applicants requiring adaptations may be overlooked for a successful bid where the relevant property cannot be adapted to meet their needs.</i>	<i>Some properties simply cannot be suitably adapted – is there anything CYC can do about this?</i>

<p><i>these cannot be implemented in the property (and no alternative suitable accessible property is available).</i></p>			<p><i>'Major' is the key word here.</i></p> <p><i>There is wording elsewhere in the policy about making every effort to offer adapted properties to suitable applicants.</i></p> <p><i>Captured in:</i></p> <ul style="list-style-type: none"> <i>• section 4.2, and</i> <i>• Appendix 10, paragraph 2.3,</i> <p><i>of the Policy.</i></p>
<p><i>Veterans / Armed Forces</i></p> <p><i>Appendix 15: Armed Forces –</i></p> <p><i>Definition has been created to reflect the relevant 2025 regulations. Includes all current and former regular and reserve forces,</i></p>	<p><i>Negative</i></p>	<p><i>Separated spouses get the local connection exemption under section 2.4 – but not the automatic bronze banding / eligibility that Armed</i></p>	<p><i>Could be resolved by the separated spouse going through Housing Options, would not need a local connection as gets</i></p>

<p><i>bereaved spouses – but not separated spouses.</i></p>		<p><i>Forces get under section 3.</i></p> <p><i>North Yorkshire Council's Common Allocations Policy (includes a local connection exception, but not additional banding preference, for separated spouses as of 16 June 2026).</i></p> <p><i>Leeds Council's Lettings Policy (does not specifically include a local connection exception for separated spouses, only bereaved, as of 16 June 2026).</i></p>	<p><i>the exemption under 2.4.</i></p> <p><i>Check the law on word 'spouse' - does this include civil partner, other partners. JVDD: The regulations say 'spouse or civil partner'.</i></p>
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		<p><i>Sheffield Council's Housing Allocations Policy (does not specifically include a local connection exception for separated spouses, only bereaved, as of 16 June 2026).</i></p> <p><i>Lichfield District Council's Allocation Scheme 2023 (does not specifically include local connection exception for separated spouses, only bereaved, as of 16 June 2026).</i></p> <p><i>Peterborough City Council's Housing Allocation Policy (includes a local connection exception,</i></p>	
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		<i>but not additional banding preference, for separated spouses as of 16 June 2026).</i>	
<p>Veterans / Armed Forces</p> <p><i>Appendix 15: Armed Forces –</i></p> <p><i>Armed Forces awarded silver, gold or emergency band (i.e. higher than the default bronze) will have their application backdated by 6 months.</i></p>	<i>Positive</i>	<i>Backdating banding reduces the time it takes applicants to find a new property.</i>	<i>Regulation that we have to award additional priority in some way – reflects policy of other councils.</i>
<p>Disability (including mental health and learning disabilities)</p> <p><i>Appendix 16: Health and wellbeing –</i></p> <p><i>Gold band preamble now worded to allow for episodic ill health and specifically includes mental health (not just physical).</i></p>	<i>Positive</i>	<i>Clearer which health conditions can be considered for a gold band health award. Applicants and supporting services can understand this before applying.</i>	
<p>Domestic abuse victims</p> <p>Veterans / Armed Forces</p>	<i>Positive?</i>	<i>Could defining terms restrict (or strengthen) the rights of vulnerable groups in</i>	<i>We do consider applicants on a case-by-case basis, especially</i>

<p><i>Appendix 21: Definitions –</i></p> <p><i>New appendix defining key terms such as ‘Armed Forces’ and ‘Domestic Abuse.’</i></p>		<p><i>any way? ‘Domestic Abuse’, ‘Armed Forces’.</i></p> <p><i>Are we missing any key definitions that could support vulnerable users?</i></p> <p><i>Applicants that self-identify as being in a certain vulnerable group or characteristic?</i></p>	<p><i>when it comes to e.g. health and wellbeing (Appendix 16). We require supporting information to verify conditions, but is this done in a necessary and proportionate?</i></p> <p><i>Flexibility of accepting meaningful evidence without being too prescriptive.</i></p>

Step 4 – Gaps in data and knowledge

4.1	What are the main gaps in information and understanding of the impact of your proposal?														
<p>When conducting your screening, you may have discovered gaps in data or knowledge that make it difficult to assess whether your proposal had a positive or negative impact on human rights/equalities.</p> <p>Please indicate actions you will take to resolve this gap.</p> <p>As your proposal progresses you may be able to resolve this knowledge gap –please indicate when it was resolved.</p>															
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Step 5 - Maximising positive impacts

5.1	What has been done to optimise opportunities to advance equality / human rights or foster good relations?
	HREAT (this document).
	Consultation with other councils and rights / advocacy groups.

Step 6 – Recommendations and conclusions of the assessment

6.1	Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision.	
	Important: If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column. There are four main options you can take:	
	No major change to the proposal	The HREAT demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality / human rights and foster good relations, subject to continuing monitor and review.
	Adjust the proposal	The HREAT identifies potential problems or missed opportunities. This involves taking steps to remove any barriers, to better advance quality or to foster good relations.
	Continue with the proposal	You should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations.

	(despite the potential for adverse impact)	
	Stop and remove the proposal	If there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the proposal altogether. If a proposal leads to unlawful discrimination it should be removed or changed.
	Option Selected	Conclusion / justifications
	Adjust the proposal	The HREAT exercise flagged up potential problems or missed opportunities. Wording will be revisited / revised in the updated Housing Allocations Policy to capture these points.

Step 7 – Summary of agreed actions resulting from the assessment

7.1	What action, by whom, will be undertaken as a result of the impact assessment.
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List below the actions or mitigations that have been identified and who will be responsible to carrying them out. Add as many lines as you need.				
	Impact / Issue	Actions to be taken	Person Responsible	Timescale
	Various suggestions in Table 2 above to strengthen the rights of vulnerable applicants.	Revisit and revise wording of the updated Housing Allocations Policy.		

Step 8 - Monitor, review and improve

8.1	How will the impact of your proposal be monitored and improved upon going forward?
	Consider how will you identify the impact of activities on protected characteristics, other marginalised groups and human rights going forward? How will any learning and enhancements be capitalised on and embedded?
	Extract data from Open Housing to monitor increase / decrease in vulnerable groups' success rates.

Appendix

Equity, Diversity & Inclusion (EDI): Protected characteristics

Under the public sector duties introduced by the Equality Act 2010 public bodies must have due regard for the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the act, such as the failure to make reasonable adjustments for disabled people
- Advance equality of opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who share a protected characteristic and those who do not

These duties relate to the nine protected characteristic groups defined by the Equality Act 2010 (outlined in the table below).

The Council recognises that a person's socio-economic background and whether they live in a rural or urban location can be important factors in determining fair access to services, employment and treatment. When carrying out analysis, you must also consider socio-economic issues and rural / urban location issues. In addition to the nine protected characteristic the HREAT includes the following equality groups:

- Carers
- Low income groups
- Veterans, armed forces community
- Experience of care/Other (other groups that are impacted)

Human rights differ from equalities in two main ways:

- First, human rights apply to everyone and not just groups with protected characteristics.
- Second, they allow for the balancing of rights, priorities, and risks. Many rights are not absolute and can be limited or qualified in particular circumstances.

The following guidance identifies which rights are most likely to be engaged by proposals in certain policy areas. This doesn't mean that you should not consider whether other rights might be engaged.

Right	Description ²	Focus Area
Right to life	<p>Nobody, including the Government, can take someone's life away. Public authorities must take appropriate measures to safeguard life including by protecting people whose life might be in danger.</p> <p>Public authorities should also consider the right to life when making decisions that might endanger or affect life expectancy.</p> <p>When public officials may be involved in an instance when someone died, public authorities must conduct an investigation.</p>	<p>Benefits and money</p> <p>Births, deaths and marriages</p> <p>Children and families</p> <p>Environment and animals</p> <p>Health and social care</p> <p>Housing</p> <p>Planning and building</p> <p>Waste and recycling</p>

² The wording of each description box has been adapted from the following sources: [Equality and Human Rights Commission](#) or [British Institute for Human Rights](#).

<p>Freedom from torture and inhuman or degrading treatment</p>	<p>Torture consists in causing very serious and cruel physical or mental pain or suffering.</p> <p>Inhuman treatment or punishment is treatment which causes intense physical or mental suffering. Degrading treatment means treatment that is extremely humiliating and undignified.</p> <p>Inhuman or degrading treatment could include: serious physical assault; very severe detention conditions or restraints; serious physical or psychological abuse in a health or care setting.</p>	<p>Children and families Health and social care</p>
<p>Prohibition of slavery and forced labour</p>	<p>Slavery is when someone owns someone else like a piece of property.</p> <p>Servitude is when someone provides services to a person for no reward and is unable to stop due to coercion.</p> <p>Forced or compulsory labour is when someone is forced to do work to which they have not agreed to, under the threat of punishment.</p>	<p>Children and families Jobs, training and volunteering People and communities</p>
<p>Right to liberty and security</p>	<p>It focuses on protecting individuals' freedom from unreasonable detention, as opposed to protecting personal safety. However, there is case law from</p>	<p>Health and social care Housing People and communities</p>

	<p>other jurisdictions where this right also covers personal safety in conditions other than detention.</p> <p>Under the HRA 1998 and the ECHR, it means that no one can be imprisoned or detained without good reason.</p>	
Right to a fair trial	<p>This right is triggered when someone is charged with a criminal offence and have to go to court, or a public authority is making a decision that has an impact on someone's civil rights or obligations.</p>	<p>Environment and animals Health and social care People and communities Streets, roads and pavements</p>
No punishment without law	<p>No one can be charged with a criminal offence for an action that was not a crime when it was committed.</p> <p>Public authorities must explain clearly what counts as a criminal offence so that people know when they are breaking the law.</p>	<p>Environment and animals People and communities Streets, roads and pavements</p>
Right to private and family life, home and correspondence	<p>This includes one's right to determine their sexual orientation, lifestyle, and the way one looks and dresses. It also includes the right to control who sees and touches one's body. It further covers one's right to develop their personal identity and to forge friendships and other relationships, the right to</p>	<p>Benefits and money Births, deaths and marriages Children and families Health and social care Jobs, training and volunteering</p>

	<p>participate in essential economic, social, cultural and leisure activities. In some circumstances, public authorities may need to facilitate the enjoyment of one's right to a private life, including their ability to participate in society.</p> <p>It also means that personal information about anyone (including official records, photographs, letters, diaries and medical records) should be kept securely and not shared without their permission, except in certain circumstances.</p>	<p>Parking and permits Planning and building Schools and education Sports and leisure</p>
Freedom of thought, conscience and belief	<p>This may include the right to change religion or beliefs, the right to put one's thoughts and beliefs into action, for example by exercising the right to wear religious clothing, the right to talk about one's own beliefs or take part in religious worship. Public authorities cannot stop anyone from practising their religion, without very good reason.</p> <p>This right protects a wide range of non-religious beliefs including atheism, agnosticism, veganism and pacifism.</p>	<p>Business Schools and education</p>
Freedom of expression	<p>This includes the right to express views aloud (for example through public protest and demonstrations)</p>	<p>Business Environment and animals</p>

	or through published articles, books or leaflets, television or radio broadcasting, works of art, the internet and social media. It further protects the right to receive information from other people by, for example, being part of an audience or reading a magazine.	People and communities Schools and education Sports and leisure
Freedom of assembly and association	This encompasses the right to form and be part of a trade union, a political party or any another association or voluntary group. Nobody has the right to force anyone to join a protest, trade union, political party or another association.	Environment and animals Jobs, training and volunteering People and communities Travel and transport Streets, roads and pavements
Right to marry and start a family	Right of men and women of marriageable age to marry and to start a family.	Births, deaths and marriages Children and families
Right to property	No public authority, without very good reason can take away one's property, which may include things like land, houses, objects, shares, licences, leases, patents, money, pensions and certain types of welfare benefits. This right applies to companies as well as individuals.	Benefits and money Business Council tax Environment and animals Housing Planning and building Travel and transport Streets, roads and pavements

		Waste and recycling
Right to education	This right protects one's right to an effective education within the UK's existing educational institutions. It relates to primary, secondary, and higher education. Parents have a right to ensure that their religious and philosophical beliefs are respected during their children's education.	Children and families Environment and animals Jobs, training and volunteering People and communities Schools and education Sports and leisure
Right to free elections	Public authorities must support the right to free expression by holding free elections at reasonable intervals. These elections must enable anyone to vote in secret.	Births, deaths and marriages People and communities
Right to housing	Adequate housing must provide more than four walls and a roof. For housing to be adequate, it must, at a minimum, meet the following criteria: Security of tenure, that is legal protection against forced evictions, harassment and other threats; availability of services, materials, facilities and infrastructure; affordability, which means that housing is not adequate if its cost threatens or compromises the occupants' enjoyment of other human rights; Habitability, which relates to physical safety or adequate space, as well as protection	Benefits and money Housing People and communities Planning and building Waste and recycling

	<p>against the cold, damp, heat, rain, wind, other threats to health and structural hazards; accessibility, in that it must accommodate the specific needs of disadvantaged and marginalised groups; location, which means that it must not be cut off from employment opportunities, health-care services, schools, childcare centres and other social facilities, or it must not be located in polluted or dangerous areas; cultural adequacy, which means that it must respect and take into account the expression of cultural identity.</p>	
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There are three types of human rights in the Human Rights Act:

- **Absolute rights** – cannot be breached in any circumstances e.g. right to life and to protection from torture and inhuman or degrading treatment.
- **Limited rights** – can only be restricted in specific situations e.g. a person can be deprived of their liberty if they are convicted of an offence and imprisoned.
- **Qualified rights** – human rights can be restricted if it is in the interests of the wider community or to protect other people’s rights e.g. freedom of movement and assembly were restricted during the Covid-19 pandemic in the interests of public health.

As limited and qualified rights are not absolute, they sometimes have to be balanced in decision making. In Table 1, absolute rights are indicated with an *; limited rights with a **; and qualified rights with a ***.