

Equality Analysis (EIA) Form

A) Description

Name of service, function, policy (or other) being assessed

Housing Allocation policy for Herefordshire

Directorate or organisation responsible (and service, if it is a policy)

AWB Commissioning (Housing Partnerships)

Date of assessment

January 2016

Names and job titles of people carrying out the assessment

Trea Connon, Commissioning Officer (Housing Partnerships)

Accountable person

Martin Samuels, Director of Adult and Wellbeing

What are the aims or main purpose of the service, function or policy? What does it provide and how does it provide it?

The policy is based on the reasonable preference categories which are set by law and must be given a 'head start' in a local authority's Allocation Policy.

The policy establishes the rules and processes by which people get access to social and affordable rented housing. The council and the major registered providers within the county operate a common housing register and allocate housing through a choice based lettings scheme known as Home Point.

The key aims of the policy are to:

- meet the legal requirements for the allocation of social and affordable rented housing
- provide housing choice of affordable homes to meet applicants needs
- ensure that the housing allocation process is transparent to applicants
- maximise the best use of existing housing stock within the county
- help to prevent homelessness and minimise the use of temporary accommodation
- contribute to the development of sustainable communities
- let housing association's accommodation fairly and in an open and transparent way
- ensure consistency in the way in which applicants access affordable and social rented housing

The policy establishes the qualifying criteria for inclusion on the housing register and the main criteria for allocating housing. It also sets out the procedures for the policy's operation and explains the relationship between it and housing providers' own policies and practices.

Location or any other relevant information

List any key policies or procedures to be reviewed as part of this assessment.

The Home Point guidance and working procedures will need to be reviewed following approval of the policy and prior to implementation.

Who is intended to benefit from the service, function or policy?

Local resident households in housing need and the wider community. Applicants in need will be given the opportunity to access affordable housing. It will provide choice to applicants, balanced against the shortage of social housing.

There are a number of specific groups who are expected to benefit from the change in policy. These include certain groups who currently do not qualify for the housing register but who are generally accepted as having a housing need, as identified in the Code of Guidance, such as those lacking or sharing facilities with non-family households.

It is intended that those who fall into the 'reasonable preference' categories will have the degree of priority required in the legislation.

Who are the stakeholders? What is their interest?

Potential social housing tenants and some existing social housing tenants. Their interest relates to access to the register and ability to bid for available social housing properties.

Registered Providers (aka Housing Associations) own and manage the social housing stock in Herefordshire. The Providers are required to cooperate with the council to ensure its statutory duties are delivered. Providers need to let their properties efficiently and to those in housing need.

B) Partnerships and Procurement

If you contract out services or work in partnership with other organisations, Herefordshire Council remains responsible for ensuring that the quality of provision/ delivery meets the requirements of the Equality Act 2010, i.e.

- Eliminates unlawful discrimination, harassment and victimisation
- Advances equality of opportunity between different groups
- Fosters good relations between different groups

What information do you give to the partner/contractor in order to ensure that they meet the requirements of the Act? What information do you monitor from the partner/contractor in order to ensure that they meet the requirements of the Act?

Herefordshire Council expects all partners to ensure that they comply with the Equality Act 2010 and have their own Equality policies available.

The Home Point partnership will monitor various aspects of the scheme including applicants to the register, exclusions and those who successfully bid for social housing.

Are there any concerns at this stage that indicate the possibility of inequalities/negative impacts? For example: complaints, comments, research, and outcomes of a scrutiny review. Please describe:

The 2004 National Evaluation of choice based lettings (CBL) schemes does not suggest any negative equality impact on the grounds of race. Barriers tend to relate to recent immigrants who do not speak English to a high standard.

Taking a broad view of the term 'Disability' the National Evaluation suggests that CBL may impact on:

- Very elderly or infirm
- People with learning difficulties
- People with limited literacy
- People with mental health issues.

Research undertaken by the Joseph Rowntree Foundation (2012) in a northern rural local authority area found that:

- vulnerable groups were not disadvantaged by CBL

- there were disproportionately fewer older persons bidding and a high numbers of older persons requiring assistance to bid.

Application to the register and bidding for properties is largely an online process. Generally older and disabled people may be less likely to have IT access in the home, and, in some cases, may have greater difficulty visiting public offices where IT facilities are available. Herefordshire is predominantly a rural county with 95 per cent of the land area classified as 'rural', and 53 per cent of the population live in these rural areas. This can make accessing services more difficult.

The current online application process has proved difficult for some applicants. This seems to be largely due to the need to complete a housing options questionnaire as an integral part of the application. The questionnaire will be retained, as this provides useful individualised housing advice but it will be a standalone tool, separate from the online application.

C) Information

What information (monitoring or consultation data) have you got and what is it telling you?

The monitoring information that we currently have is limited. We are able to identify the number applications which include a household member who is registered disabled. We can also monitor for age. However, other data has proven difficult to obtain. Therefore, although the indications are that generally the council is meeting its duties, improvement in data collection and analysis is required to ensure that this is the case.

D) Assessment/Analysis

Describe your key findings (eg. negative, positive or neutral impacts - actual or potential). Also your assessment of risk.

Strand/community	Impact
Race	The policy is considered to have a neutral impact although there may be barriers, which may have a racial or nationality dimension, relating to recent immigrants who do not speak English to a high standard.
Disability	Those with disabilities where their current housing circumstances have a significant impact on their health and wellbeing will benefit from high priority under the proposed scheme. Information is available in different formats for those with sight impairments. Generally, older and disabled people may be less likely to have IT access in the home and in some cases may have greater difficulty in accessing public offices.
Age	Older social housing tenants under-occupying their properties will have a high level of priority. Those in need of sheltered accommodation due to medical need will be assisted within the policy. Generally, older and disabled people may be less likely to have IT access in the home and in some cases may have greater difficulty in accessing public offices.
Gender	Married, civil partners and co-habiting couples, same sex couples, and siblings, who wish to live together, can make applications.
Faith/religion	Further data will need to be collected to assess impact. However initially the Policy is considered to be neutral.
Marriage/civil partnership	It is not considered that that the policy will impact negatively on this group.
Gender reassignment	Further data will need to be collected to assess impact. However initially the Policy is considered to be neutral.

Sexual orientation	Further data will need to be collected to assess impact. However initially the Policy is considered to be neutral. Same sex couples can make joint applications.
Pregnant women & women on maternity leave	Pregnant women are protected under the Homelessness legislation, which is reflected within the banding.

E) Consultation

Did you carry out any consultation? **Yes**

Who was consulted?

Registered provider partners, statutory and voluntary groups.

Describe other research, studies or information used to assist with the assessment and your key findings.

Piloting Choice-Based Lettings: An evaluation, ODPM 2004
North Yorkshire Home Choice Evaluation, JRF 2014

Do you use diversity monitoring categories? **N**

(if No you should use this as an action as we are required by law to monitor diversity categories)

If yes, which categories?

- Age
- Disability
- Gender Reassignment
- Marriage & Civil Partnership
- Pregnancy & Maternity
- Race
- Religion & Belief
- Sex
- Sexual Orientation

What do you do with the diversity monitoring data you gather? Is this information published? And if so, where?

F) Conclusions

	Action/objective/target OR justification	Resources required	Timescale	I/R/S/J
a)	Establish effective diversity monitoring indicators and protocols	Staff time, internal and partners	Sept 2016	S
b)	Ensure that continued support is available for groups most likely to be impacted by the use of IT.	Staff time	Sept 2016	S
c)	Review the effectiveness of the current provision of translation services through the IT system	Staff time	Sept 2016	S
d)				

(I) Taking immediate effect.

(R) Recommended to Council/Directors through a Committee or other Report*.

(S) Added to the Service Plan.

(J) To be brought to the attention of the Equality Manager.

*Summarise your findings in the report. Make the full assessment available for further information.

NB: Make sure your final document is suitable for publishing in the public domain.