

Equality Analysis (EIA) Form

A) Description

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

Redesign of the allocation arrangements for Herefordshire

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

AWB Strategic Housing

Date of assessment

February 2018

Names and job titles of people carrying out the assessment

Trea Connon, Strategic Housing Officer

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 allocation of social housing is one of the core functions of the council in its role as strategic housing authority. It encompasses the development and implementation of an allocation policy and the nomination of applicants to registered providers in accordance with that policy. It requires the monitoring of the outcome of the policy to ensure that the scheme is meeting the needs of those identified in the policy as being most in need of housing and that they are being successful in obtaining social housing. In particular the council must be satisfied that those in the reasonable preference categories are receiving a 'head start' for social housing.

The dissolution of the Home Point partnership represents a challenge to the council and registered providers to develop a coherent and practical pathway to enable those with a housing need to access social housing. The result of the negotiations is a commitment to a 'no wrong door' approach so that prospective applicants receive appropriate advice, information and support at first contact and thereafter.

The council will retain and maintain the housing register, assessing need and placing applicants in the relevant band. This information will be shared with providers either through data transfer arrangements or the traditional nomination process. Data transfer will enable applicants to bid for properties advertised by the major providers through their websites and/or the Home Hunt IT system in a similar manner to that experienced by applicants currently through the Home Point website.

The aim of the new arrangements are to:

- ensure that the housing register and nomination process is understandable and transparent to applicants
- meet the legal requirements for the allocation of social housing
- provide some choice of affordable rental homes to meet applicants needs
- ensure consistency in the way in which applicants access affordable and social rented housing through the council's housing register
- ensure and promote equality of opportunity in accessing the council's housing

- register
- support better 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

Location or any other relevant information

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

The guidance and working procedures for the housing register and allocations will need to be reviewed following approval of the policy and prior to implementation.

The process will be reviewed after 12 months of operation as part of the policy review to ensure that it is meeting the stated objectives.

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

Local resident households or those with a strong local connection and in recognised housing need.

Applicants in housing need will be given the opportunity to access social housing through the nomination/data transfer process for vacant properties owned or managed by registered providers. The definition of housing need within the allocation policy has been increased to reflect adequately the reasonable preference categories.

Those looking for affordable housing who do not qualify for the council's housing register will be able to apply directly to the housing associations for the proportion of their stock that is not subject to the nomination agreements. Applicants who would qualify for the council's register can choose to go directly to the housing associations for this percentage of the stock using both pathways to increase their chances of being housed.

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) who own and manage the social housing stock in Herefordshire. The Providers are required to cooperate to such an extent as is reasonable in offering accommodation to people with priority under the housing authority's allocation scheme.

Providers need to let their social housing stock efficiently and generally 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 housing register team 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:

There is some concern that the procedure arising from the dissolution of the Home Point partnership and the potential complexity for new applicants may have a negative impact. The current system is already fairly complex and it is not clear that applicants understand it fully.

The dissolution of the one stop shop Home Point choice based lettings (CBL) partnership represents a challenge for the council and housing providers, requiring the development of a coherent and practical customer journey for prospective applicants. The result of the negotiations with providers is a commitment to a 'no wrong door' approach so that prospective applicants receive appropriate and shared advice, information on all the options and support at first contact and thereafter. This should ensure that groups who may be adversely affected by the change from a single application to the potential for multiple applications understand what they need to do to meet their needs most appropriately. It should be noted that the majority of respondents to consultation in 2017 did not indicate a concern about the complexity of the arrangements or the need for support to access the options that would become available to them. This was irrespective of any protected characteristics which were identified by the respondent.

Nevertheless, earlier research on CBL systems suggests that there may be an impact on:

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

Application to the register and the letting of properties will largely remain 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.

It would seem likely that those on lower incomes, in rural areas and with limited access to the internet may be adversely affected whereas the more computer literate with easy access to the internet via multiple devices will benefit from the changes to the system.

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 monitor for age, so that it is possible to state that there are 191 applications from people aged 65 or over out of a register currently standing at 1228.

776 applications are headed by a female and there are 1082 white British applicants.

However, other data, particularly in relation to the characteristics of successful applicants, has proven difficult to obtain. Although there are indications that the council is meeting most

of its statutory duties, improvement in data collection and analysis is required to ensure that this is the case.

Of the 175 responses to the consultation in 2017 on the proposal to move away from the Home Point service, 117 indicated they would use both options to obtain social housing (apply to the council and directly to registered providers). This pattern is replicated through the age groups, including those over 65 where 7 of the 11 respondents indicated they would use both options to apply for social housing.

60 of the respondents were then on the Home Point register, 62 were living in social housing and 8 were from people who had not qualified for the register. These groups also indicated that they would generally use both options, including the 8 who had not qualified at the time.

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 arrangements are considered likely 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	Information is available in different formats for those with impairments. Support will be available from a variety of providers to help applicants understand and access the various options. 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	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	The arrangements are considered likely to have a neutral impact on this group.
Faith/religion	Further data will need to be collected to assess impact. However, the new arrangements are considered likely to have a neutral impact on this group.
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.
Sexual orientation	Further data will need to be collected to assess impact.
Pregnant women & women on maternity leave	Further data will need to be collected to assess impact. However, the new arrangements are considered likely to have a neutral impact on this group.

E) Consultation

Did you carry out any consultation?

Yes

Who was consulted?

Registered provider partners and through public consultation via the Herefordshire Council website.

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

Do you use diversity monitoring categories? Some currently. More will be monitored with the introduction of the new policy
(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?

Currently not collecting diversity monitoring data. This will form part of the monitoring process following introduction of the new policy and the future arrangements for allocations.

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	August 2018	S
b)	Ensure that continued support is available for groups most likely to be impacted by the use of IT.	Staff time	August 2018	S
c)	Review the effectiveness of the current provision of translation services through the IT system	Staff time	August 2018	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.