

MID SUSSEX DISTRICT COUNCIL

Customer Impact and Needs Assessment

Title of Policy/Service/Contract: Review of the Housing Allocations Scheme

Division: Housing, Environmental Health and Building Control

Lead Officer: Julian Till, Housing Needs Manager.

Date Assessment completed: September 2011

1. SCOPING

1.1 What are the aims of the policy, service/service change or contract?

This impact assessment concerns the review of the Mid Sussex District Council and Affinity Sutton Joint Housing Allocation Scheme. The scheme seeks to provide a fair and transparent way of allocating affordable housing to those in housing need, through the operation of the Common Housing Register and Choice-Based Lettings (CBL). The Allocation Scheme sets out the rules for determining 'eligibility' as well as the rules for assessing priorities and the procedures to be followed when applicants are allocated accommodation by the Council and Affinity Sutton.

CBL was introduced in April 2010 and the review proposes to make a number of changes to the allocations scheme, based on experience of its operation and who is being successful in gaining the limited amount of social housing available. In summary proposals are designed to achieve the following:

Local Connection- giving a greater priority to local Mid Sussex people

Making best use of the limited social housing stock- giving greater priority to people who currently live in social housing in Mid Sussex. This will make best use of the existing stock e.g. in helping people under-occupying to move to smaller properties and in providing adapted properties for people who need them.

Better management of customer expectations- emphasising to people in the lowest housing need that they should look at other housing options such as private rent or shared ownership.

The proposed changes to the Allocation Scheme that are most relevant to the impact assessment include the following:

- All applicants without a local connection with Mid Sussex will have their housing assessed, but will not be placed higher than Band C.
- Abolish Band C classification for all applicants requiring sheltered housing.
- Tightening of rules giving less priority to those with a housing related debt.
- The first lettings of new development go to applicants local to the parish. Proposal is that if a void is created by the move, this should also be allocated to a person local to the parish.
- Changes to the priority given for homes that are designed for, or have been adapted for people with mobility problems. This means that older people who are underoccupying social housing will have a greater chance of moving to bungalows, freeing up their family sized homes.

The new allocations scheme is expected to be introduced by March 2012.

A consultation exercise will be undertaken prior to the introduction of the new allocations scheme, running from 3 October to 28 November. People currently on the register will be surveyed on the proposed changes- those with e-mail addresses electronically and paper versions to the remainder. The survey will also be available

for completion by the public via the Council's website. There will be a consultation event with Registered Provider partners and other stakeholders on 9 November. The new scheme and the results of the consultation will be considered by Members at a meeting of the Better Lives Advisory Group on 18 January 2012.

1.2 Who does the service/policy/contract affect? Who are the main customers (internal or external)?

People who are homeless or threatened with homelessness. People in housing need. Anyone on the Common Housing Register. This affects in the main people on low to modest incomes. It will also disproportionately affect people who are vulnerable and have housing related support needs. Specifically these are people who are vulnerable due to physical or mental disability, learning difficulties, those suffering domestic violence, young people, old people, ex-offenders and substance misusers. The scheme will also have implications for Housing Association partners who have signed up to the Common Housing Register

The review of the scheme does not have any procurement implications

1.3 If your service is likely to use contractors you need to consider whether equality is a core contractual requirement by asking the following questions:

a) is the purpose of the contract to provide services directly to the public and is it considered relevant to equality?

N/A

b) Is the provision of Goods, Works or Services in question likely to affect, directly or indirectly, your ability to meet the duty to promote equality?

N/A

c) is the contract value £1 million or over?

N/A

If the answers to the questions are "no" then equality will not be a core requirement of the contract and will have a low relevance to equality issues, and if the answers are "yes", equality will be a core requirement of the contract and will have medium or high relevance to equality issue. See Appendix One of the MSDC Guidance Document "*Integrating Equality and Diversity into Procurement*" for further information on determining the relevance of equality and what measures you will need to consider to ensure contractors comply with the Council's equality policies and schemes and relevant legislation.

1.4 will the contract have an impact on the community and Race Relations or other Equality issues?

1.5 where Equality issues are identified as core, how will the Council consider it at each stage of the procurement/contract process?

1.6 where Equality issues are identified as core, what arrangements will we require for monitoring Equality aspects of the Contract throughout its lifetime?

1.7 is it necessary to include a reference to Equality in the Tender Advert / OJEU Notice?

1.8 is it necessary to include a reference to Equality in the Specification?

1.9 is it necessary to include Equality issues in the Key Performance Indicators?

1.10 is it necessary to request a Method Statement to indicate how an equitable service will be provided?

1.11 if the Contract is for Goods, will the goods which are to be supplied meet the needs of a particular racial or other minority group?

2. Assessment of Impact and Needs - Supported with evidence from Data and Consultation
(See Guidance Notes for information on completing this section)

	Opportunity to promote equality and/or barriers to service/differential impact	Evidence base (e.g. from consultation, local or national data)	Current actions taken to address these	Further actions required
Race	The review and proposed changes to the scheme are not anticipated to have particular implications for BME groups.	Ethnicity is monitored through the Common Housing Register application form. The allocation of properties is also monitored and shows that that the ethnic origin of our customers and allocation of properties broadly reflects the Mid Sussex population.	The existing allocations scheme is designed to provide equal opportunity and accessibility to people from different ethnic groups.	Consultation on the proposed changes to the allocations scheme will monitor the ethnicity of respondents.
Religion or Belief	The review and proposed changes to the scheme are not anticipated to have particular implications for religious groups.	Census information on the breakdown of religious groups. Experience of operation of the scheme.	Not applicable.	None
Disability	A major aspect of the proposed changes affects the priority given to disabled people from outside of the district, in terms of their eligibility for suitably adapted and accessible properties. Changes are designed to ensure that the principle is	Disability is monitored through the Common Housing Register applications form. We have previously consulted with a number of groups who work with disabled people who are already in or looking for suitably adapted	Existing allocations scheme and operation of Choice-Based lettings is designed to match suitably designed and adapted properties with people with mobility problems. Extra care accommodation continues to be allocated by multi-agency panels to ensure that vulnerable people are supported	The consultation exercise being undertaken on the proposed changes will include people on the register and representatives of disabled groups. The survey will monitor whether respondents have a disability. Once implemented, the implications of the proposed

	maintained that full-time wheelchair users should be given priority for homes that are fully adapted for wheel chair use.	accommodation	in finding accommodation that is right for them.	changes to the Allocations Scheme will be monitored through analysis of lettings.
Age	Older people often have mobility issues which are addressed in the disability section of this EIA. Older people will be affected by the proposal to stop placing applicants requiring sheltered housing in Band C, with their housing need instead assessed like other applicants. The majority of those currently underoccupying their properties and placed in Band A, but unable to move are older people. They will be assisted by the proposed changes.	Age is monitored through the Common Housing Register application form.	Does your Home Fit you campaign and underoccupation scheme implemented with Affinity Sutton and Age UK. Extra care accommodation continues to be allocated by multi-agency panels to ensure that vulnerable people are supported in finding accommodation that is right for them.	The consultation exercise being undertaken on the proposed changes will include people on the register and representatives of age related groups such as Age UK and the Youth Homelessness Action Group. The survey will monitor the age of respondents. Once implemented, the implications of the proposed changes will be monitored through the analysis of bidding patterns, the numbers of underoccupiers remaining in Band A and access to sheltered accommodation.
Gender and gender reassignment	None of the proposed changes to the scheme are expected to have any gender implications.	Gender is recorded in the monitoring section of the survey form. Monitoring of homelessness applications and those in refuge accommodation.	Housing related support is provided to women suffering domestic violence.	The survey will monitor the gender of respondents.
Socio-economic	Proposed change to tighten the rules relating to a	Monitoring of homelessness and housing advice	Current procedures are in place for dealing with applicants with a	The consultation exercise will include a range of

<p>factors e.g. Income or Skill Level, living in a deprived area</p>	<p>reduced priority to applicants with a housing related debt, will have implications for those on low incomes.</p>	<p>applications.</p>	<p>housing related debt with a social landlord. The Housing Needs Team refer people with housing related debt to the CAB.</p>	<p>organisations that assist people with housing related debts such the CAB and Shelter. People on the Common Housing Register with e-mail addresses will be surveyed electronically with the remainder provided with paper forms.</p>
<p>Living in a rural area.</p>	<p>Changes to the allocations scheme are designed to give priority to people with a local connection (those without a local connection cannot be higher than Band C). The first lettings of new developments go to applicants local to the parish. Proposal for the void created by this move to also be allocated to a person local to the parish, is designed to maximise the benefits of housing for local people.</p>	<p>Analysis of current register and preferences of people for the parish that they wish to live in.</p>	<p>Current practice is for priority in the first lettings of new developments to go to people with a local connection to the village/parish/town.</p>	<p>The consultation exercise will include Town and Parish Councils. Survey will monitor where respondents live. Monitoring of lettings by parish once the scheme is implemented.</p>

3. ANALYSIS AND ACTION PLANNING

Any gaps in information or provision, opportunities to promote equalities and/or barriers to services identified above need to be translated into SMART targets and recorded here. These actions then need to be incorporated into service plans so that they can be monitored at service level and also as part of a corporate equalities action plan.

Issue	Action/Target	Lead Officer	Deadline	How will impact be measured?
For all Protected Groups				
Ensuring that a comprehensive consultation exercise is undertaken that gains the views of relevant protected groups.	Consultation exercise to include survey of those on the Common Housing Register; Town and Parish Councils; Registered Providers; organisations that represent vulnerable people with housing needs; and to be available to the public through a web survey.	Julian Till	Six week survey from October-November 2011 Consultation event 9 November	Assessment of the results of the consultation exercise, differentiated by race, disability, age, gender and area of residence. Also of Town and Parish Councils, Registered Providers; and groups that represent people who are vulnerable and have housing related support needs.
Ensuring that once implemented the implications of the changes are properly monitored.	Monitoring of the allocation of properties after 6 months of operation.	Julian Till	October 2012	Analysis of the Common Housing Register and allocations of properties, particularly in respect of the changes to local connections, bandings for people wanting sheltered accommodation and allocation of properties with a mobility code.

4. Signing off this assessment and action plan

Signature ...*Julian Till*.....
Person undertaking the assessment

Date ...23/9/2011.....

Signature ...*Lynne Standing*.....
Head of Service

Date ...23/9/2011.....