

MID SUSSEX DISTRICT COUNCIL

Equality Impact Assessment

Title of Policy/Service/Contract: Revisions to the Council's Housing Allocation Scheme

Division: Housing, Environmental Health and Building Control

Lead Officer: Julian Till, Housing Needs Manager

Date Assessment completed: October 2014

1. SCOPING

1.1 Aims of the service:

The Council's Housing Allocation Scheme seeks to provide a fair and transparent way of allocating affordable housing to those in housing need who are on the Mid Sussex Common Housing Register through a process of Choice-Based Lettings.

A revised Housing Allocation Scheme was adopted with effect from 1 May 2014 and implementation of this scheme has brought to light the need for a number of further revisions. The amendments were significant in tightening the local connection criteria and excluding those without a local connection from the Register. Also in excluding Affinity Sutton tenants, when they move on to their own national housing register.

The specific changes to the scheme that are now proposed and have equality implications cover the following aspects of the current housing allocation scheme:

- First lettings of larger new housing developments- where schemes have 250 or more new homes in total, removing the current policy of giving additional priority to first lettings of new developments to those with a specific local connection to the town or village in which the development is situated.
- Lettings of Rural Exception sites- allowing Affinity Sutton tenants excluded from our Housing Register to bid for homes on Rural Exception Sites, if they have the required local connection.
- Local Connection requirement to qualify to join the housing register- removing the exemption from the requirement to have a local connection to go on the Register for people accepted as homeless.
- Exceptions to disqualification for some Affinity Sutton tenants- allowing their tenants to stay on the Register who are in need of Extra Care or wheelchair accessible or fully adapted wheelchair housing.
- Exception to disqualification because of financial resources- allowing discretion for some applicants who own their homes to be on the Housing Register.
- Selection of applicants for supported housing- removing the consideration of housing related debt for candidates for supported housing allocated by the multi-agency panel.
- Move-on from supported housing- allowing those living in supported housing who are considered to be ready for independent living and moved into Band C to retain their priority date.
- Applicants who have applied as homeless to another council- it is proposed to move those accepted by the Council as homeless from Band C to Band D, if they have already been accepted as homeless by another council, regardless of their current housing circumstances.

The revised scheme will be considered by the Scrutiny Committee for Leisure and Community on 26 November and Full Council on 17 December 2014. Should Council give its approval, the new scheme will be implemented from January 2015.

1.2 Who the service affects and the main customers (internal or external)

The people affected by the proposed changes are those in housing need who are currently on the Common Housing Register and those who may seek to join it in the future. People affected are likely to be on low to modest incomes and disproportionately will be people who are vulnerable and have housing related support needs.

Revisions to the scheme will also have implications for housing associations that rely on the Council to provide nominations to their vacant tenancies and for organisations that provide supported housing.

Revisions will also have implications for those organisations who provide housing related support and/or housing advice to vulnerable people in housing need.

1.3 What equality information is available, including any evidence from engagement and analysis of use of services?

The Register contains information about each applicant's ethnicity, gender, age, income and whether they have a support need. We are able to analyse bidding patterns by age and other vulnerability and to identify those who will be affected by the proposed changes to the scheme.

1.4 What does the information tell us about the equality issues associated with the service and implications for the protected groups?

Exceptions to disqualification for some Affinity Sutton tenants

It is estimated that this proposal will affect 8 applicants requiring Extra Care housing and 13 applicants who require wheelchair accessible or fully wheelchair adapted homes and who are currently on the Council's housing register.

It is difficult to quantify for the remaining proposed revisions to the allocation scheme the exact numbers affected. Implications of the proposed changes are identified in section 2.1.

1.5 Are contractors or partnerships used to deliver the service?

The changes to the scheme do not have any direct procurement implications.

2. ASSESSMENT OF IMPACT: ANALYSIS AND ACTION PLANNING

2.1 Current measures taken by the service to address issues of the protected groups

In assessing issues associated with the protected groups, people on the Housing Register are likely to be on low incomes. Around 20% of those on the Register are flagged as being vulnerable. The protected groups and other characteristics most affected by the proposed changes are:

- Disability
- Age

- The needs of men and women
- Low income or skill level
- Living in a rural area

Current measures to provide for these groups include:

- Assisted bidding, where bids for properties are made on behalf of vulnerable applicants by the Homemove and Housing Needs Team.
- The existing allocation scheme and Choice-Based lettings process is designed to match suitably designed and adapted properties with people with mobility problems.
- Supported housing is allocated by multi-agency panels to ensure that vulnerable people are supported in finding accommodation that is right for them.
- Priority for first lettings of new developments is currently given to applicants with a local connection to the town or village where the new development is situated.
- Social housing is designed to be for people on low incomes and special measures are providing to ensure that people can access Choice-Based Lettings such as free use of the computers at public libraries in the District for people to bid for properties.

For the following remaining protected groups, no specific issues have been identified from the proposed changes to the Allocation Scheme:

- Ethnicity
- The needs of faith groups and faith issues
- The needs of gay men, lesbians, bisexual and heterosexual people
- The needs of transgender people
- Issues arising from pregnancy and maternity
- Issues arising from marriage and civil partnership

2.2 Consultation on the proposed changes

The proposed changes to the allocation schemes have been raised with the Council's Registered Provider partners on the Common Housing Register. Also with supported housing providers and those organisations which provide advice to those in housing need.

2.3 Issues arising from the proposed changes to the Allocation Scheme and how they are to be addressed

Local Connection requirement to qualify to join the housing register

The proposal to remove the exemption from the requirement to have a local connection to go on the Register for people accepted as homeless may have implications for vulnerable applicants, such as people fleeing domestic violence. In order to address exceptional cases, the scheme already enables the Council's Housing Needs Manager or their deputy to allow any applicant who cannot meet the Council's local connection criteria to join the register. This discretion would in future be extended to those who apply to the Council as homeless, so that those who have a justifiable reason to access social housing in Mid Sussex will be allowed to join the housing register.

Exceptions to disqualification for some Affinity Sutton tenants

Allowing these people to stay on the Council's Housing Register will continue to provide Affinity Sutton tenants in need of Extra Care or wheelchair accessible housing with access to such housing from other housing providers. It will therefore be of particular benefit to older people and those with a disability.

Lettings of Rural Exception Sites

Rural exception sites are designed to meet the needs of those with a strong connection to the parish concerned and this will include existing social housing tenants. Allowing Affinity

Sutton tenants who have the required local connection to such sites will increase the range of people in housing need in rural areas benefitting from Rural Exception Site lettings.

First lettings of larger new housing developments

The intentions of the current rules on first lettings on new developments are to help maintain local communities and give them a stake in new development. This can particularly assist in rural communities. However, larger new development schemes are designed to meet the housing need of the whole District and if priority for first lettings on these schemes were to be reserved for those with a local connection only with the nearest town or village, this would result in those in less housing need taking priority. The priority of addressing overall housing need is assessed as having a greater beneficial impact.

Move-on from supported housing

Proposals to protect the priority date of people ready to move on from supported housing when their band changes, will be of benefit to the clients of supported housing accommodation, who tend to be vulnerable and often with learning difficulties.

Exception to disqualification because of financial resources

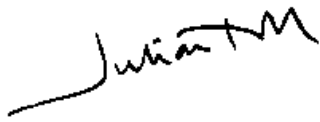
Generally applicants who own their home or have a legal interest in homeownership or have the financial resources to won accommodation, do not qualify to join the housing register. Amendments to the scheme propose that further exceptions should be considered where there are exceptional circumstances. This includes such cases as British citizens living here who own a property abroad, but where it not possible to bring the sale proceeds out of the country. This will assist those without immediately accessible financial resources.

The implementation of the allocation scheme will be regularly monitored, which will enable the impact of all of these changes to be kept under review.

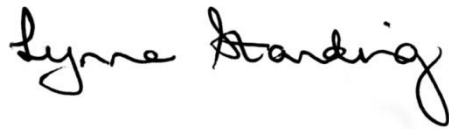
2.4 Action Plan

The Action Plan below is intended to demonstrate how the issues identified in this assessment are being addressed:

Action	Lead Officer	Timescale
Exercise discretion in exceptional cases to allow homeless applicants to join the Register without a local connection (e.g. a vulnerable applicant fleeing domestic violence.)	Julian Till	From January 2015
Exercise discretion in exceptional cases to allow those who have their own home, or a legal interest in one to join the Housing Register	Julian Till	From January 2015
Further review of the operation of the revised allocation scheme following a year of operation.	Julian Till	From January 2016



Julian Till Date: 3/11/14
Housing Needs Manager



Lynne Standing Date 3/11/14
Head of Housing, Environmental Health and Building Control