

# MID SUSSEX DISTRICT COUNCIL

## Equality Impact Assessment

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

**Division:** Assistant Chief Executive

**Lead Officer:** Julian Till, Housing Needs Manager

**Date Assessment completed:** February 2017

### 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 April 2016. Changes to the scheme are designed to address issues that have come up over the last 12 months and are in anticipation of the likely requirements of the Homelessness Reduction Bill. The new scheme will take effect from 1 April 2017.

The main changes are as follows:

#### 1. Applicants who are disqualified from joining the housing register

Add exemption from disqualification for Affinity Sutton tenants who need to move to supported housing.

#### 2. Care Leavers

Add exemption from disqualification because of a lack of a local connection for young people leaving West Sussex County Council care who wish to be accommodated in Mid Sussex.

#### 3. Applicants in supported housing who are ready to move on

Extend the priority that is currently given to those who are ready to move on from supported housing into general needs housing to those who are ready to move on from a mental health hospital into the community.

#### 4. Accessible Housing – special rules

Extend the priority given to bids from applicants in Mobility Group 1 (full-time wheelchair users) and Mobility Group 2 (part-time wheelchair users) on homes advertised as suitable for Mobility Group 1 to such applicants who are in band D.

#### 5. Armed Forces Personnel – special rules

Extend the priority given to bids from Armed Forces Personnel over bids from other applicants in their band to those in band D. There is no legal requirement to do this, but it would seem reasonable to make this amendment. There are currently 9 applicants in band D who would benefit from this amendment.

#### 6. Privacy Notice

It has become necessary to add a Privacy Notice to the Scheme to advise applicants that the Council may share their personal data internally and with other organisations as allowed by law.

We also need to advise applicants that we may get information about them from, or give information to, certain third parties to prevent or detect crime or fraud or protect public funds, including government departments, local authorities, private sector companies and credit reference agencies. We need also to advise applicants that we may obtain information about them from social media.

#### **7. Other minor textual changes to clarify, but not change, the meaning.**

There are several minor textual changes to some paragraphs that are required to clarify, but not change, the meaning of the Scheme. A revision of the Allocation Scheme is an opportunity to make these minor changes that occur from time to time.

The revised scheme will be considered by the Scrutiny Committee for Community, Housing and Planning on 7 March and Full Council on 29 March. Should Council give its approval, the new scheme will be implemented from April 2017.

#### **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 schemes will have implications for housing associations that rely on the Council to provide nominations to their vacant tenancies and for organisations that provide supported housing, or who provide housing related support and/or housing advice to vulnerable people in housing need. Revisions will also affect those who are on the Housing Register for Affinity Sutton.

#### **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, need for adapted accommodation 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?**

An analysis has previously been undertaken of lettings in relation to the characteristics of those on the Register. This shows that lettings in relations to ethnicity are broadly consistent with the composition of those on the Register. Detailed information including factors such as disability and age are included in section 2.3.

#### **1.5 Are contractors or partnerships used to deliver the service?**

The Council is a member of the Sussex Homemove Scheme, which is a partnership of authorities in East and West Sussex that operates Choice-Based Letting. Administration of the Common Housing Register is contracted to Affinity Sutton and provided by their Homemove Team. The changes to the allocation 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, approximately 330 people are flagged as being vulnerable. This breaks down as follows:

- 6% mental health problems
- 5% older people
- 4% physical disabilities
- 2% with learning difficulties
- 1% domestic violence/harassment/ASB
- 1% drug or alcohol problems
- 1% ex-offenders

The protected groups and other characteristics most affected by the proposed changes are:

- Disability
- Age

Current measures to provide for these groups include:

- Assisted bidding, where bids for properties are made on behalf of vulnerable applicants by the Affinity Sutton Homemove Team and Council 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.

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

- Ethnicity
- Low income or skill level
- Living in rural areas.
- The needs of faith groups and faith issues
- The needs of men and women
- 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 scheme have been raised with the Council's Registered Provider partners of 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**

The proposed changes that may have a differential impact on the protected groups are those relating to:

- Amendment 1: applicants who are disqualified from joining the housing register
- Amendment 2: care leavers
- Amendment 3: applicants in supported housing who are ready to move on
- Amendment 4: accessible housing – special rules.

### Amendment 1: applicants who are disqualified from joining the housing register

Affinity Sutton tenants are currently disqualified from joining our housing register as they have an alternative means to transfer to another tenancy in Mid Sussex and their landlord has opted out of the Council's Common Housing Register Partnership. We currently exempt from disqualification Affinity Sutton tenants who need housing suitable for those using a wheelchair or those who need Extra Care housing, and so an extension of this exemption to those Affinity Sutton tenants who need to move into supported housing would be reasonable.

This will be advantageous under the protected groups of age and disability. It is anticipated that the change will affect up to 5 Affinity Sutton tenants per year, who will be able to move into supported housing.

### Amendment 2: care leavers

The proposal to add exemption from disqualification from joining the Register because of a lack of a local connection for young people leaving West Sussex County Council's care who wish to be accommodated in Mid Sussex, is in anticipation of the Homelessness Reduction Bill. This is expected to deem that care leavers have a local connection with the area of the local authority that is responsible for them under the Children Act 1989 if they become homeless.

This will be advantageous under the protected group of age and is expected to be of benefit to up to 5 care leavers per year.

### Amendment 3: applicants in supported housing who are ready to move on

This will mean that an applicant who is residing in a mental health hospital and would otherwise be homeless, will be treated as if they were an applicant living in supported housing. This is intended to avoid such people being discharged into a homeless situation where the hospital is prepared to delay discharge in the interest of sustaining the patient's well-being.

This amendment will be advantageous under the protected group of disability and is expected to be of benefit to up to 5 patients in mental health hospitals per year.

### Amendment 4: accessible housing – special rules

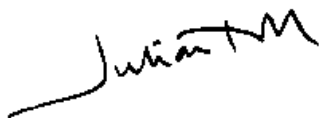
This amendment extends the priority given to bids from applicants in Mobility Group 1 (full-time wheelchair users) and Mobility Group 2 (part-time wheelchair users) on homes advertised as suitable for Mobility Group 1 to such applicants who are in band D. Currently, if a suitable applicant from band A, B, or C has not bid for the home then other applicants who have bid are considered with priority cascaded down the bands, even where the applicant does not have a need for a wheelchair suitable home. Extending the priority to such applicants in band D will ensure that an adapted home is more likely to go to someone with a suitable disability.

This will be advantageous to the protected group of disability and based on the current Register, there are 17 applicants in Mobility Groups 1 & 2 in band D who could benefit from the amendment.

## 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
Further review of the operation of the revised allocation scheme following a year of operation.	Emma Shuttleworth	April 2018



Date: 22/2/17

Julian Till Housing Needs Manager



Date: 22/2/17

Judy Holmes Assistant Chief Executive