

Equality Impact Assessment (EIA)

Allocations Policy

June 2007

Equality impact, needs and requirements assessment form

Please use this form to record your findings, proposed actions, equality objectives and targets. Use the guidance notes to help you do the assessment or contact the Equality Standard Project Manager if you need some advice

About the policy, practice, service or function you are assessing

Name of policy, practice, service or function: Allocations Policy

Assessment team leader name: Lisa Callow

Date of assessment: 29 June 2007

Department responsible: Housing and Advice Services

Service Area: Housing Options

Other members of assessment team:

Name	Position	Area of expertise
Lisa Callow	Housing Options Manager	Head of Service for Homelessness and Housing Register management
John Sheil	Housing Strategy	Housing Strategy Unit / Derby City Council
Trisha Gadsby	New Communities Advisor	Advice and Strategy re New Communities – asylum seekers, refugees and migrants

Overview

In Derby there is a limited supply of accommodation. If there was sufficient accommodation to satisfy every housing need and every cultural and lifestyle choice, we would not require an allocations policy for Derby's social housing stocks. However, in Derby, as in other areas of the UK, we have increasing demands on a short supply of housing, so all choices cannot be met. However, we aim to satisfy the most pressing housing needs by operating within the structure of the allocations policy. It is a Government requirement that each Local Authority has an allocations policy for administering their social housing stock via Part 6 of the Housing Act 1996 and amended by the Homelessness Act 2002.

Derby City Council regularly reviews its Housing Allocations Policy to ensure that the most recent Government legislation and guidance is complied with, and this Equality Impact Assessment relates to the new allocations policy which was implemented in February 2007.

Question	Response/ findings
<p>What are the main aims and objectives or purpose of the policy, practice, service or function that you are assessing?</p>	<ul style="list-style-type: none"> • To enable people with housing need to choose where they live • To prevent homelessness • To enable common standards of working for partners of Derby Homefinder • To reduce the number of properties refused by applicants • To ensure properties are let as quickly as possible • To reduce the number of difficult to let properties • To ensure that people with the greatest housing need are prioritised for housing.
<p>Who implements, carries out or delivers the policy, practice, service or function? Please state where this is more than one person, team, department, or body – and include any outside organisations who deliver under procurement arrangements</p>	<p>The Housing Allocations Policy is a common policy agreed by the city council and all its partner housing providers who provide rented accommodation in the city. The policy is implemented by Housing and Advice Services, Housing Options Managers and employees, partner Registered Social Landlords, and Derby Homes council's Arms Length Management Organisation (ALMO)</p>
<p>Who is affected by the policy, practice, service or function, or by how it is delivered? Such as, who are the external and internal customers, groups, or communities?</p>	<ul style="list-style-type: none"> • Customers who apply for social housing and/or who approach Derby City Council (DCC) because they are homeless or threatened with homelessness. • Partners, including Derby Homes and Registered Social Landlords operating in Derby, who operate in accordance with the common allocations policy.

Question	Response/ findings
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<p>What outcomes do we want to achieve, why and for whom? For example, what do you want to be providing, how well, what changes or improvements, and what should the benefits be for customers, groups or communities?</p>	<ul style="list-style-type: none"> • To ensure a fair, and transparent system for the allocation of social housing in the city. • To maximise choice for people who have the most urgent need of housing and for anybody who applies for social housing. • To enable applicants to access housing through a variety of methods, ensuring vulnerable applicants can access the service. • To enable customers to be kept informed of the progress of their application and the likelihood of them being housed. • To provide applicants with other housing options as well as access to social housing. • The most extreme form of housing need is homelessness and DCC will 'do all it can to prevent homelessness'. (Housing Allocations Policy re-written 2006)
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Question	Response/ findings
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What existing or previous inspections of the policy, practice, service or function are there? For example, Best Value Inspections, policy reviews, research into the effects of a policy or practice.

What did they tell you?

The Allocations Policy was reviewed and approved in 2006. It was written following consultation with partner agencies, customers and focus groups and advocacy groups, and signed off by Chief Officers and Elected Members. Consultation also took place with other practitioners to pick up on good practice operating elsewhere.

This ensures that the resulting allocations policy is compliant with relevant housing acts and case law

A Disability Discrimination Act (DDA) assessment of the Housing Options Centre was requested to establish whether the premises was DDA compliant. The result was that "some alterations were required, works carried out late 2006 to reception/ waiting area now fully compliant".

Identifying potential equality issues and factors	
Question	Response/ findings

<p>What do you already know about the equality impact or need? For example, from research, feedback, consultation or any performance monitoring</p>	<p>Housing Allocations Policy 2006 : Section 2:9 states 'The Council and the Derby Homefinder landlords are committed to equal opportunities and to making sure that everyone is treated fairly'. Appendix 1 sets out our definition of equalities in relation to the Allocations Policy.</p> <ul style="list-style-type: none"> • Many of the Housing Options Centre's customers are vulnerable through disability, have additional needs through illness or through suffering disadvantage, domestic violence (affecting mainly women), harassment, chaotic lifestyles etc. Many applicants for housing have originated in other countries, have different ethnic backgrounds and cultures and many do not have English as a first language and/ or are unfamiliar with UK culture. Other people have housing difficulties because they are elderly and their existing accommodation does not meet their needs, or they are very young and unsupported in their housing need. • The Policy was developed in consultation with a wide range of customers and advocacy and support groups who advised on the effectiveness of the policy on behalf of customers, in order to reduce as far as possible any negative equality impact. <ul style="list-style-type: none"> • Research conducted in support of the City Council's Black and Minority Ethnic (BME) Housing Strategy, phases 1 and 2, identified concerns / difficulties for some communities in accessing services so actions
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	<p>were included in the updated strategy to try to address those problems. The BME Housing Strategy has been updated regularly.</p> <ul style="list-style-type: none"> • The Older Persons Housing Strategy has recently been compiled, seeking to examine housing need, housing specifically for older people, and particular difficulties for older people in accessing social housing through existing allocations of properties. • Performance monitoring is carried out via monthly statistics produced for the cabinet member for housing and for overview and scrutiny commission. The statistics will detail performance on allocations to specific groups such as homeless households and BME groups.
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<p>Is there any evidence of higher or lower take up under the policy or practice, or of the service or function for any particular groups? For example, who uses the service, who doesn't and why not?</p>	<ul style="list-style-type: none"> • Data shows that BME communities are over-represented in terms of applications for housing and allocations currently when compared to Census data. Any move away from this would be quickly picked up by the constant monitoring of take-up of the service which
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is integral to the Information Technology (IT) systems used.

However, consultation with BME communities has evidenced that some people struggle to communicate their needs or misunderstand the system, mainly through language differences.

- Because disability can directly affect need for housing and there is a shortage of already adapted social housing properties, steps are taken to ensure that those with the most pressing need for adapted accommodation are housed first. Social Services liaise with the Housing Options Centre to ensure that the most appropriate solution is found to meet these needs and that people are placed in the correct 'band' to be prioritised for housing.
- Derby City Council's Choice-Based lettings system (Derby Homefinder) enables customers to express interest in properties which most closely meet their needs in terms of lifestyle choice, such as where it is situated (near to support services/ families/ places of worship / with the partner of their choice, dependant always on the actual supply of accommodation, instead of those choices being made by housing advisors). This has led to a marked increase in applications for housing.
- The font for Internet – based information can be enlarged for people with sight impairments. Interpretation services – telephone (language line) and via interpreters are routinely used to ensure that people can explain their housing situation and understand

	<p>advice given. A facility will be available on-screen to translate information and applications into Derby's most frequently-spoken additional languages.</p> <ul style="list-style-type: none"> • Surgeries are held at Peartree Clinic to enable housing advice to be given more easily to people living in that area, where many people from BME communities are living. • Language Line is routinely used as a first-contact tool for people with English not as their first language. • We have induction loops in place for customers with hearing impairments and have a member of staff who is trained in using sign language. • Kiosks are available for customers to use in some local housing offices around the city and access to the derby homefinder website is available in libraries. • The telephony system is available for people who are house bound. • We look to provide home visits for vulnerable applicants where feasible • We also use Mincom at Housing Options Centre for hearing impaired customers • All letters to customers include "please contact us if you need help reading this document or any part of it translating in 7 languages common to Derby.
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Question	Response/ findings
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Have there been any important demographic changes or trends locally? For example is the population changing, and if so, how and what might that mean for the service or function?

- There has been an increase in the BME population of Derby – addition of asylum seekers, refugees and migrant workers, beside people arriving to study, work, marry or join family members already living in the City. Most are settling in the Normanton Peartree / Rosehill areas of Derby and express an interest in remaining in that area, but there is a very limited supply of council properties and affordable housing in that area. Some properties are below an acceptable standard and people are over-occupying properties, leading to overcrowding. The price of privately – rented accommodation has soared, leading to an increase in demand for social housing.
- BME housing strategy has considered additional / different housing needs arising from new communities and continues to try to address those needs – e.g., homes for larger families/ extended families, for more accommodation in particular areas of the City.
- There has been an increase in the number of teenage pregnancies / parents which increases the demand for assessment and support of some young people's housing needs .
- For households who have been accepted as statutorily homeless there is an increase in demand for two bed properties due to the number of split households.
- There is a need to provide a permanent site in Derby for the Travelling Community and this is being discussed via the Housing Strategy Unit to try to bring about a solution to this issue.
- Currently, 29% of the housing register is made up of people aged under 40. This is often due to the inability,

	particularly for young people, to buy their own homes and to access the private rented sector
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Question	Response/ findings
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Is there an indication that any of the policies or practices involved with the service or function creates particular problems or difficulties for any groups of customers or communities?

- People with English not as their first language or unfamiliar with the processes involved may struggle to understand the Homefinder system or how they can access accommodation in Derby, whether social housing or privately-rented properties.
- People unfamiliar with UK housing law may become victim to unfair tenancy conditions or illegal evictions, which may affect their housing, need.
- Some people who have recently arrived in Derby from abroad will have to provide evidence that they are eligible (in terms of their immigration or working status) to access social housing in the UK. Checking information supplied by customers can sometimes delay slightly the processing of their housing application, but any delay is kept to a minimum.
- People with learning disabilities may need advocacy, help and support to apply for housing.
- People with sight impairment can struggle to access Derby Homefinder on the internet, despite there being a facility to enlarge script on-screen, but Housing Staff can express interest in properties on their behalf and explain the system / apply for properties as necessary.

- Derby Direct are soon to assist with telephone enquiries concerning housing. Steps will be taken to ensure that any difficulties for people whose first language is not English in understanding information given over the telephone in connection with their housing need are recorded and alternative means of contact are used to give advice and assistance.

Question	Response/ findings
<p>What information or data exists? For example, statistics, customer feedback, complaints, research, monitoring – who keeps it and can you get hold of it?</p>	<ul style="list-style-type: none"> • New housing register management IT system (Abritas) keeps records of all applications for housing, all expressions of interest in properties offered on Derby Homefinder and all allocations of properties, by age, gender, ethnic origin. It also records where a person has a disability and how this affects their housing need. It provides an audit trail for all applications and what advice and assistance is given to each applicant, how long their application takes to process and includes a record of any homelessness prevention advice given. This information is updated daily and is frequently monitored by senior staff to ensure that applications are efficiently and fairly dealt with. Because this information is person-specific it cannot be shared with other customers, but it acts as a tool for managers to ensure services are delivered fairly. • Complaints are monitored, customer comments given via post-boxes in Housing Options reception. Complaints dealt with via central complaints process and always thoroughly investigated. Feedback given to complainant. • Customers can access information on the Derby Homefinder website which shows them their position on shortlists for properties they have bid for • Customers can contact Housing Options Centre and we will advise them if they have been bypassed for offers and the reasons why

Question	Response/ findings
<p>Do any equality or diversity objectives already exist? If so, what are they and what is current performance like against them?</p>	<ul style="list-style-type: none"> • BME Housing Strategy – all previous actions successfully dealt with, actions from updated BME strategy encompassing new communities ongoing. • Older Person’s housing strategy due for publication soon with a range of objectives to improve services for older people. • Initiative under way to identify all adapted properties suitable for people with disabilities – Council Housing at first, to be rolled out to other social housing providers. • Young persons’ housing needs / teenage parents, domestic violence advice, resettlement needs of refugees, the needs of ex offenders and housing needs of people with disabilities included in Allocations Policy/ Homelessness Strategy. • Ongoing encouragement to Social Housing Providers linked into Derby Homefinder to offer properties suitable for larger / extended families, a cultural need for which has been identified through the BME Housing Strategy. <p>A project is in place to support BME residents to move out of traditional overcrowded areas into other, predominantly white British, areas of the City if they choose.</p>

<p>Is the service having a positive or negative effect on particular people in the community, or particular groups or communities?</p>	<ul style="list-style-type: none"> • Service is generally having a positive effect as housing needs are met on a priority basis • There are some issues in relation to the provision of sites for Gypsies and Travellers in the Allocations Policy as this communities prefers to live iin close proximity to other travellers. No social housing stocks ever become available in groups of properties, only in isolation, as and when they become vacant, so this need cannot be met through the usual allocations policy. Due to this, an on-going search is proceeding for a mobile home site within the City boundary. • There is currently a particular shortage of larger properties, therefore there are particular pressures in regards to housing larger families.
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Collecting the information and data about how the policy, practice, service or function, impacts on communities

Please record your information and data in this table and think about:

what information or data you will need
using both quantitative and qualitative data
making sure that where possible there is information that allows all perspectives to be considered
identifying any gaps in the information/ data and what it can tell you

Data or information	When and how was it collected?	Where is it from?	What does it tell you? You need to consider all six equality strands where you can	Gaps in information
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<p>Consultation and community involvement</p>	<p>Consultation carried out on Allocations Policy as it was being written, BME Housing Strategy, Older Persons Housing – mixture of community and advocacy group were consulted for each Strategy.</p> <p>Legal advice sought to ensure Allocations Policy complies with the law.</p>	<p>Service users, advocacy groups, community groups, elected members, other agencies (statutory and voluntary) – for Allocations Policy.</p> <p>BME communities – pre-existing and newer communities consulted and feedback being given.</p> <p>Barrister experienced in Housing Law</p>	<p>Access to services for some BME communities is compromised by language difficulties and misunderstanding of processes.</p> <p>Some elderly people do not wish to live in some of the sheltered accommodation available. Steps are being taken to consult further and develop alternative housing more allied to their needs.</p>	<p>Sexuality and Religion not included as strands in discussions to date.</p>
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Performance information including Best Value	Best Value 3* and 'will improve'			
Take up and usage data	Abritas IT system (Formerly Academy) Ongoing	Records of all applications, expressions of interest through Derby Homefinder, and allocations of properties	Monitors applications on housing register by ethnic origin, age, gender and disability	Info on sexuality and religion not currently collected
Comparative information or data where no local information				
Census, national or regional statistics	2001 Census			
Access audits or assessments such as DDA assessments	2006 – Assessment of DDA compliance of Housing Options Centre	DDA access audits	Housing Options Centre on ground floor but door opening, access to wheelchair – height reception facilities non – compliant Work carried out 2006 to rectify and now certified compliant	

Workforce profile	Personnel collate data on workforce with aim of ensuring it reflects the local community make-up			
Where service delivered under procurement arrangements – workforce profile for deliverers	<p>Social Housing Providers / partners in Derby Homefinder have done or are - conducting their own EIA assessments.</p> <p>Two RSLs are specialist providers for BME communities and have a high proportion of staff from BME communities as part of their workforce.</p>			
Monitoring and scrutiny outcomes				

Analysing the information and data and setting equality objectives and targets

Please give your detailed findings in this table

Service or function	Policy or practice	Findings	Which groups are affected and how	Whose needs are not being met and how?
Allocations Policy	Allocations system	No research on satisfaction levels with new allocations policy	All	Review the functioning of the Allocations Policy within 12 months of launch.
	Allocations policy	Good uptake from over 60s, disabled, main ethnic groups and equal male/ female	Main groups receiving good service but no monitoring of Sexuality and Religious belief.	No monitoring of Sexuality and Religious belief

Objectives - process, impact or outcome based

Please give your proposed objectives/ targets in this table

Objective/Target:	Consider research to monitor to see if any gaps in service provision for New Communities
Specific	Analyse the report undertaken in 2006 to consider whether there are gaps in service provision
Measurable	Number of new groups accessing the service
Achievable	Survey based on previous work
Relevant	Best method to reach New Communities groups
Timed	31 March 2008

Objective/Target:	Investigate opportunities to monitor service uptake based on Sexuality and Religious belief
Specific	Assess if there is a need to monitor uptake
Measurable	Extent of need
Achievable	Need identified
Relevant	Best method to assess whether service is adequate for the needs of particular communities
Timed	By 31 March 2008

Objective/Target:	Undertake satisfaction survey of new allocations system
Specific	Ascertain satisfaction levels compared to previous system
Measurable	Satisfaction levels
Achievable	Undertake survey
Relevant	To assess satisfaction
Timed	By 31 March 2008

Monitoring and reviewing - incorporating into performance management

Please summarise your objectives and targets in this table with your proposed monitoring and reporting arrangements

Objective	Planned action	Target performance			Responsible lead officer	Reporting cycle, for example, quarterly
		2005/6	2006/7	2007/8		
Monitor to see if any gaps in service provision for New Communities	Liaise with community groups and consult with community / carry out a survey to see if any gaps	NA	NA	1 consultation by 31 March 2008	Lisa Callow	Annual

Investigate opportunities to monitor service uptake based on Sexuality and Religious belief	Assess whether this is a need to monitor	NA	NA	Liaise with key Sexuality and R	Lisa Callow	Annual
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Assess satisfaction levels of new allocations policy	U n d e r t a k e s u r v e y o f n e w a l l o c a t	N / A	N / A	U n d e r t a k e s u r v e y o f n e w a l l o c a t	Lisa Callow	A n n u a l
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