

# **Equality Impact Assessment (EIA)**

Derby Homefinder Allocations Policy  
January 2011

## 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: Derby Homefinder Allocations Policy

Assessment team leader name: Kim Morgan

Department responsible: Housing and Advice Services

Service Area: Housing Options

Members of assessment team:

<b>Name</b>	<b>Position</b>	<b>Area of expertise</b>
Lisa Callow	Housing Options Manager	Head of Service for Homelessness and Housing Register Management
Kim Morgan	Housing Advice Manager (Register)	Manager responsible for the housing register and Derby Homefinder.
Ann Webster	Lead on Equality and Diversity Derby City Council	Equality and Diversity
Pamela Thompson	Consultation and support officer Derby City Council	Consultation , equality and diversity

Abdullah Shahjan	Member of Ethnic Minorities Community Diversity Forum	Knowledge and experience of equalities issues
Towana Graham	Derby Race and Equality Council	Knowledge and experience of equality issues
Mike Mudzamir	Zim-Derby	Knowledge and experience of equality issues

## Overview

The Allocation Policy explains the rules that determine how Derby City Council and the Derby Homefinder Landlords allocate social housing properties.

The Allocations Policy aims to address housing need whilst contributing to the development of balanced and sustainable communities.

The Council is required to make the most effective use of all housing tenures to balance the prevailing housing market, to include social housing stock in the city.

The Allocation Policy explains who is eligible to apply for housing and how priority is given to different applicants.

As there are not enough social housing properties in Derby to meet the demand, it is necessary to prioritise applicants so that properties that become available are offered fairly. The policy has been framed to address this aim. It also aims to prevent homelessness and assist people in urgent housing need to access a home that will meet their requirements.

Derby City Council offers available properties through a 'choice based lettings' scheme called "Derby Homefinder". This aims to give customers more choice in where they live. It also gives more transparency to the allocation process as feedback is given on how each property is let.

This Allocation Policy has been written to meet the duties of Part VI of the Housing Act 1996, as amended by the Homelessness Act 2002.

Part VI of the Housing Act 1996 covers:

- selecting tenants to local authority properties
- transfers that are requested by local authority tenants
- local authority properties to current tenants of registered social landlords

- nominations that the Council makes to registered social landlords.

The Housing Act 1996, as amended by the Homelessness Act 2002, also sets out the housing circumstances of those applicants we must give reasonable preference to when we decide who will be offered a property.

The Policy takes account of the Allocation of Accommodation Code of Guidance for Local Housing Authorities 2008, Housing and Regeneration Act 2008 and Fair and Flexible Statutory Guidance 2009.

<b>Question (1)</b>	<b>Response/ findings</b>
<p>What are the main aims and objectives or purpose of the policy, practice, service or function that you are assessing?</p>	<p>The principle aims and objectives are as follows:</p> <ul style="list-style-type: none"> <li>To prevent and reduce homelessness</li> <li>To provide settled and stable accommodation for those experiencing homelessness</li> <li>To help people in housing need choose where they would like to live</li> <li>To make the best use of the limited social housing stock available in the city</li> <li>Ensure the allocation of social housing is open, fair and accountable to applicants and staff</li> <li>Help create safe, mixed and balanced communities</li> <li>Reduce the time properties are void between lettings</li> <li>Reduce the number of refusals</li> <li>Ensure the policy has flexibility to address specific local issues</li> <li>Create a single point of access to all social housing in the city</li> </ul>
<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 allocations policy is the local authority's responsibility. The council work in partnership with a number of other stakeholders. This includes 12 Registered Social Landlords and Derby Homes the council's arms length management organisation. Derby Homes and the Housing Options Centre are responsible for processing housing applications and awarding the appropriate band and housing needs (where applicable) to an application. Derby Homefinder advertises available properties to rent in the city. The Derby Homefinder landlords allocate the properties.</p>
<b>Question (3)</b>	<b>Response/ findings</b>
<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>	<p>People applying for housing including existing social housing tenants and providers of social housing in the city.</p>
<b>Question (4)</b>	<b>Response/ findings</b>

<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>	<p>Achieve a policy</p> <ul style="list-style-type: none"> <li>● that is fair and transparent</li> <li>● addresses urgent housing need</li> <li>● prevents homelessness</li> <li>● is legally compliant</li> <li>● ensures that available properties are let fairly and efficiently</li> </ul> <p><i>Why, and for whom?</i></p> <ul style="list-style-type: none"> <li>● People who are homeless or threatened with homelessness</li> <li>● People in urgent housing need.</li> <li>● People who need to move for medical or welfare reasons including disability</li> <li>● People who are living in unsanitary or overcrowded housing.</li> </ul>
<p><b>Question (5)</b></p>	<p><b>Response/ findings</b></p>
<p>What existing or previous inspections of the policy, practice, service or function are there (other than EqIAs)? For example, Best Value Inspections, policy reviews, research into the effects of a policy or practice.</p> <p>What did they tell you?</p>	<p>A Best Value Review was completed in 2000 and Excellent status achieved. The Allocations Policy was reviewed in 2002 and 2007 to ensure it complied with new legislation and changes brought about via case law. An Equalities Impact Assessment was completed on the previous allocations policy in 2007. An Equalities Impact Assessment was carried out in 2010 on the new Homelessness Strategy 2010-2015. Derby Homes Mock Inspection carried out in 2009/10 Currently an internal audit inspection being carried out on the allocations process and policy.</p> <p>All issues identified via the inspection process have been actioned. We are awaiting the outcome of the internal audit inspection.</p>
<p>Identifying potential equality issues and factors</p>	
<p><b>Question (6)</b></p>	<p><b>Response/ findings</b></p>

<p>What do you already know about the equality impact or need? For example, from research, feedback, consultation or any performance monitoring</p>	<p>We received an Ombudsman complaint regarding the allocation of adapted properties. This identified that our policy was not clear on how adapted properties are allocated. This was also highlighted via the Disability Consultation Focus Group.</p> <p>The Older People's Consultation identified that there was not enough information or advice for older people about their housing options. Other consultation focus groups discussed whether or not properties should be designated for people over the age of 40 and concluded that in the main this was not appropriate.</p> <p>The Younger People's Consultation Focus Group raised concerns about the lack of accommodation available to people under the age of 25.</p> <p>We produce monthly statistical information on the breakdown of the housing register and allocations. This is monitored through section managers meetings on a monthly basis. Our monitoring information does not highlight any concerns other than, the difficulties that younger people face in trying to access social housing.</p> <p>We also produce quarterly statistical information for the Derby Homefinder Landlords. This again does not give rise to any concerns.</p>
<p><b>Question (7)</b></p>	<p><b>Response/ findings</b></p>
<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>	<p>The monitoring reports indicate that there are no issues about access and take up of services. Our statistical information evidences this for example, BME applicants make up 24% of the housing register and receive 25% of lettings (June 2010)</p> <p>We believe that there are people in the community who need, but do not access our services for one reason or another. This may be for example because of, language difficulties, disability, and mental ill health. To address this we intend to provide training to statutory and non statutory agencies to ensure that vulnerable people know what services we provide and how they can access them.</p> <p>We are aware that older people do not use IT systems as easily or frequently as younger people. We have introduced an Auto Bidding System on the Choice Based Lettings module to enable us to auto bid on behalf of older people. We are currently trialling this approach and will roll out to other vulnerable people if successful. Other vulnerable applicants can access this service now, however, our computer software needs improving, for this to function more effectively.</p>
<p><b>Question (8)</b></p>	<p><b>Response/ findings</b></p>

<p>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?</p>	<p>We are aware that there are increasing numbers of housing applications from Eastern European Nationals. We have seen an increased need for larger properties for larger families, and an increased demand for two bed properties due to split households. We will in the near future see an increased demand for housing from people with learning disabilities coming out of residential care. We also have an increasing older population.</p> <p>We need to increase our understanding of diversity issues, we will arrange for further cultural and diversity training for our staff.</p> <p>We need to plan, through the housing strategy, how to respond in development terms, to the increasing demands we are facing, in particular to larger families, older people (extra care) and accommodation which is suitable for people with learning and or physical disabilities.</p> <p>We need to ensure that we are providing applicants who are looking at housing options with every possible option available to them, including consideration of assistive technology to allow vulnerable and older people to remain at home, or continue living independently.</p>
<p><b>Question (9)</b></p> <p>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?</p>	<p><b>Response/ findings</b></p> <p>Policies and procedures can be confusing for people not familiar with our systems, or who have a learning disability or difficulty, mental ill health problem, visual impairment or a language difficulty. Interpretation services are needed – and provided - to ensure people maximise their options to secure accommodation.</p> <ul style="list-style-type: none"> <li>We provide translation services via language line</li> <li>We employ multi lingual staff</li> <li>Arrange for interpreters when necessary</li> </ul> <p>We have specialist officers such as Domestic Violence, Community Care and Young Persons Housing Officers. These officers offer specific advice to vulnerable people and work with support workers to ensure they can access our services.</p> <p>We provide a specialised service at our Single Point of Entry for single people and couples at Milestone House. A Probation Officer on secondment from the probation services is based here for people with an offending history. We also have a New Communities Advisor who provides advice to agencies supporting new and emerging communities.</p>
<p><b>Question (10)</b></p>	<p><b>Response/ findings</b></p>



<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>	<p>Monthly and quarterly management statistics.  Customer service monitoring is carried out at the Housing options Centre, Milestone House and more broadly for the Council by Derby Direct.  Monitoring is currently recorded across the four equality groups of age, gender, ethnicity and disability. It will be rolled out to cover religion/belief and sexuality in 2011.  When reviewing the Allocations Policy in 2010 we carried out comprehensive consultation. This included holding a series of consultation meetings with statutory, non statutory agencies, customers and councillors. We also consulted with all the Derby Homefinder landlords via a questionnaire and researched other local authority CBL policies. We also benchmark with CBL North.</p> <p>The data is stored electronically or in hard copies and is readily accessible for scrutiny and analysis.</p>
<p><b>Question (11)</b></p>	<p><b>Response/ findings</b></p>
<p>Do any equality or diversity objectives already exist? If so, what are they and what is current performance like against them?</p>	<p>As a local authority we are working towards excellence in equality in local government.  We have an equalities statement in the allocations policy  We monitor allocations on a regular basis (see Question 7 for an example of what is monitored).</p>
<p><b>Question (12)</b></p>	<p><b>Response/ findings</b></p>
<p>Is the service having a positive or negative effect on particular people in the community, or particular groups or communities?</p>	<p>It is having a positive effect as we are housing people who are in housing need or homeless/threatened with homelessness.  On a negative perspective choice based lettings raises peoples expectations and aspirations about housing that cannot be met or fulfilled due to the lack of supply of accommodation in the city. Demand for housing outstrips supply.</p>



## 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
Customer satisfaction surveys	During and after visits to Council premises	From customers and service users visiting the Housing Options Centre and Milestone House	Generally there are good or very good levels of customer satisfaction with the services provided. Where feedback identifies necessary action for any of the equalities groups this is responded to appropriately. For example, improved access and alterations to make HOC DDA compliant were brought about following customer feedback.	No collection of data on sexuality or religion/belief. It is intended to incorporate monitoring of these groups when the new Allocations policy is implemented in 2011

Customer complaints	Complaints collected in Housing Options Centre and Milestone House. All dealt with via DCC's complaints procedure. These are monitored through the section manager's monthly meetings.	Housing Options Centre / Milestone House	Generally it tells us that we are not providing enough information. Complaints about customer inability to access social housing are often confused with complaints about service delivery.	We need to produce more information on the website regarding peoples chances of being housed through Derby Homefinder and increased information about other housing options that maybe more realistic for customers. This will be addressed through the HOAMES system and updated Derby Homefinder website.

Performance information	Produce monthly and quarterly monitoring reports. These are monitored through section managers meetings which are held on a monthly basis. Derby Homefinder steering group is held on a 6 monthly basis and all performance reports are detailed and evaluated at these meetings. Information provided for Derby Homes Housing and Equalities meetings held quarterly.	The information is retrieved via our computer system and Abrisas Software.	It tells us that demand for housing outstrips supply and approximately only 18% of people on the housing register are housed. It evidences that there is a high demand for two bed accommodation and that younger, single people are less likely to get an offer of housing than other applicants on the housing register. It evidences that the number of lettings to BME applicants is representative of BME applicants on the housing register.	No collection of data on sexuality or religion/belief as yet but it is intended to incorporate monitoring of these groups from 2011.
Take up and usage data	Abrisas IT system	Information collected from computer system.	We use the data to contact applicants who have been on the list for 12 months and who are not actively bidding on the Homefinder system. We use this information to ascertain if they still want housing and if they know how to use the system.	Review categories of nationality on the housing register to ensure that new and emerging communities are identified.
Comparative information or data where no local information	Local information collected on state of housing market, affordability of housing, supply of housing In addition to this we benchmark through a CBL group.	Strategic Housing Market Assessment Study 2007	In terms of the benchmarking we carry out it allows us to identify areas for improvement and where we are doing well in service provision.	

<p>Census, national or regional statistics</p>	<p>2001 Census</p> <p>2007 – population review by ONS / DWP has reflected increase in Derby’s population due to migration</p> <p>Overall national picture of increased migration and increasing diversity of communities and cities.</p>		<p>Derby’s population reflects national trends in migration, diversity, and age profile.</p>	
<p>Access audits or assessments such as DDA assessments</p>	<p>DDA Assessment of Housing Options premises</p>	<p>DDA</p>	<p>Housing Options Centre and Milestone House are DDA compliant.</p>	
<p>Workforce profile</p>	<p>Information is held corporately about the workforce profile of staff within our service. The staff who work within housing options are of different ages, ethnicity, religion and gender. Several members of staff consider themselves to be disabled. We have several bi lingual staff.</p>	<p>Housing Options Centre</p>	<p>There are no staff from new and emerging communities employed within our section.</p>	

<p>Monitoring and scrutiny outcomes</p>	<p>Scrutiny commission carried out a review of the previous allocations policy and recommendations have been implemented. In the current allocations policy review all members were invited to attend consultation groups and a specific consultation meeting was arranged with members.</p>		<p>Scrutiny commission did provide 20 recommendations from the review in 2007. These have been actioned.</p>	<p>Additional member training needs to be provided once the new allocations policy has been approved and agreed.</p>
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## Analysing the information and data and setting equality objectives and targets

A number of equalities objectives have been identified as part of the strategy consultation process and these are detailed on pages 28-29. Additional objectives identified in this EqIA are tabulated below and also repeated in the table on 29-30.

Service or function	Policy or practice	Findings	Which groups are affected and how	Whose needs are not being met and how?
Housing Options Centre / Milestone House	Allocations Policy	Currently information not collected on sexuality and religion/belief	These two equality groups could be affected in terms of access to the housing register.	Possibly these two equality groups. <b>Action:</b> commence monitoring of these groups when the new policy is implemented.
Housing Options Centre / Milestone House	Allocations Policy	The corporate language box is not representative of applicants on the housing register.	Persons for whom English is not their 1 <sup>st</sup> language	<b>Action:</b> Review this information to show that it is representative of applicants on the housing register and to take account of new and emerging communities.
Housing Options Centre / Milestone House	Allocations Policy	The findings were that older people had greater difficulty accessing our service and information.	Older Persons.	<b>Action:</b> Improve the information available to older people about housing options on the Derby Homefinder website.
Housing Options Centre / Milestone House	Allocations Policy	That the allocations policy is not clear on how adapted properties are allocated.	Applicants and their families with a disability.	<b>Action:</b> Amended the policy to ensure there is clarity about how adapted are allocated.



Housing Options Centre / Milestone House	Allocations Policy	Applicants are not informed if their bid has been unsuccessful.	Everyone	<b>Action:</b> Improve the information available on the Derby Homefinder website. Subject to resources/ costs.
Housing Options/ Milestone House	Allocations Policy	Support agencies/ workers do not always understand the allocations policy and how it works.	Vulnerable People	<b>Action;</b> Training to be provided to all relevant support agencies.
Housing Options/ Milestone House	Allocations Policy	Currently an internal audit is being carried out of allocations. We await the findings	Everyone	<b>Action;</b> To review the audit report and agree to implement relevant actions.

## Objectives - process, impact or outcome based

The main objectives are recorded on the table below on page 27 onwards. In addition to those the following specific, quantifiable objectives are drawn from the HOC business plan and will apply across all equality strands.

<b>Objective/Target:</b>	<b>Implement New Allocations Policy</b>
Specific	Yes
Measurable	Yes –through new policy implementation.
Achievable	Yes*
Relevant	Yes
Timed	To be achieved by May 2011 subject to all software changes being in place.

## 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
		20010/11	20011/12	2012/13		
<b>Ensure the IT system does not disadvantage sections of the community</b>	Update the Derby Homefinder website monitors across all six equality strands.				Kim Morgan	<b>Annual and ongoing</b>
<b>Ensure persons of all nationalities are welcomed appropriately</b>	Install 'welcome signs' in all the most widely used languages at HOC and Milestone House				Lisa Callow	
<b>Increase access to 'difficult to reach' households.</b>	Provide training for support agencies so that they can advise applicants of how to access housing.				Kim Morgan	
<b>Ensure that feedback on our services are representative of vulnerable applicants on the housing register</b>	Monitor access to the housing register				Kim Morgan	<b>Annual and ongoing</b>
<b>Improve engagement with older persons and improve links with organisations such as Age UK.</b>	i) Carelink – through 'First Contact' iii) Homefinder Website has recently been updated with more information and a link set up through to EAC website. Details of older persons accommodation needs to be updated. Improved information about Carelink services will be available on the HOAMES website.				i) Anne Marriott ii) Kim Morgan	

<b>Ensure vulnerable people are not disadvantaged by our Self serve IT system</b>	Roll out Automated bidding for all vulnerable groups where requested				Jane McCrea	
<b>Increase staffs knowledge of diversity and equality issues</b>	Arrange diversity and equalities training				Kim Morgan	