



**Home-Options Choice Based Lettings Scheme
Partial Equality Impact Assessment Form**

Title of policy, service or process being assessed	Home-Options Allocation Policy Review 2014/5
Lead Officer conducting assessment	Phil Campbell, Home-Options Co-ordinator (DHOP)
Date of assessment	14 January 2015
Reason for assessment	The Allocation Policy is being reviewed in response to changes to government guidance and prevailing market conditions.
Equalities Lead Officer	Phil Campbell

Purpose, aims and objectives of the policy, service or process under impact assessment	
<p>To:</p> <ul style="list-style-type: none"> • ensure fair policies and procedures for the allocation of vacant properties taking into account the requirements of the Housing Act 1996, Homelessness Act 2002, Localism Act 2011 and appropriate Government guidance • To meet the housing requirements of those in the greatest need • House as many households as possible from the housing register in the fairest way possible • To make more efficient use of available housing stock. • To increase satisfaction in the allocation system • To reduce RP “void” times, help tackle low demand and reduce the number of refusals 	
Which organisations are involved in its implementation?	
<ul style="list-style-type: none"> • High Peak Borough Council • Amber Valley Borough Council • Erewash Borough Council • Dales Housing 	<ul style="list-style-type: none"> • Futures Homescape Ltd • emh homes • Derbyshire Dales District Council • Locata Housing Services (supplier)
Main customer groups (beneficiaries) / stakeholders	

<p>Customer Groups:</p> <ul style="list-style-type: none"> • Housing register applicants, including homeless people, vulnerable clients, private sector tenants, owner occupiers • Tenants of registered providers 	<p>Other stakeholders:</p> <ul style="list-style-type: none"> • Registered providers (councils or housing associations) • Support providers – both commissioned by DAST and independent • Private sector landlords • Social Care & Health – Adult Services & Children’s Services • CAB & other advice agencies.
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Which other local authority or partner functions are affected by the policy, service or process. Do any of the objectives directly support or hinder another policy or service?

Strategic Housing Service – providing affordable homes
Homelessness and Housing Advice Service – dealing with homelessness and housing advice
Customer Contact - general enquiries

Home Options-assists local authorities in meeting its obligations to house qualifying homeless persons and contributes to the Housing Strategy by meeting housing need. Housing is recognised as a determinant of good health and thus contributes to the wider agenda of residents’ well-being.

Context

Social Housing is a limited resource. More applications are received every year than there are houses available as shown by the applications and lettings since 1 April 2014:

Age Band	No. Applicants	% Applicants	No. Housed	% Housed
Under 25	1393	22.2%	268	16.7%
Between 25 and 39	2413	38.4%	517	32.3%
Between 40 and 45	528	8.4%	118	7.4%
Between 45 and 49	423	6.7%	105	6.6%
Between 50 and 54	367	5.8%	106	6.6%
Between 55 and 59	280	4.5%	96	6.0%
60 and over	879	14.0%	391	24.4%
Total	6283	100.0%	1601	100.0%

There is also a mis-match between the property needs of applicants and the type of available properties. This is governed by landlords’ policies and the type of housing stock they have available and, as such, is outside the scope of this assessment.

The aim of the Home-Options policy is to ensure that this scarce resource is allocated fairly and transparently.

A note on data sources.

Information has been sourced from data held on the Locata system used to provide the Home-Options service. Generally speaking, the data will be based upon the head of household, unless otherwise noted.

Where data is used, it will be indicated if it refers to all applicants, a sub-set of applicants or sample of applicants. External data sources will also be noted.

Key questions	Positive effects	Negative effects	Don't know	Evidence																		
<p>Does the policy, service or process have a positive or negative impact on people of a particular age? Describe how and which</p>	<p>One policy that applies universally across the four areas, with a degree of localism based upon local lettings policies.</p> <p>Bidding is available via a number of methods to suit all ages i.e. text, telephone, internet and assisted bidding. Staff can also place bids for vulnerable applicants.</p> <p>Personalised property sheets are available for vulnerable people.</p>	<p>No evidence that older people are unable to access the website or place bids.</p>		<p>Home-Options Allocations Policy</p> <p>The age profile of housing register applicants.</p> <p>Home-Options website</p> <p>Home-Options online application forms and guidance notes.</p>																		
	<p>Age 16/17</p> <p>Applicants can register from the age of 16. There are currently 6 live applicants.</p> <p>73 16/17 year old applicants have been housed since 2007:</p> <table border="1" data-bbox="331 906 994 1302"> <thead> <tr> <th data-bbox="331 906 692 979">Status (all current 16/17 year old applicants)</th> <th data-bbox="692 906 994 979">No.</th> </tr> </thead> <tbody> <tr> <td data-bbox="331 979 692 1023">Excluded/Suspended</td> <td data-bbox="692 979 994 1023">5</td> </tr> <tr> <td data-bbox="331 1023 692 1066">Housed</td> <td data-bbox="692 1023 994 1066">73</td> </tr> <tr> <td data-bbox="331 1066 692 1109">Live</td> <td data-bbox="692 1066 994 1109">6</td> </tr> <tr> <td data-bbox="331 1109 692 1152">Offered</td> <td data-bbox="692 1109 994 1152">1</td> </tr> <tr> <td data-bbox="331 1152 692 1195">Online to be Validated</td> <td data-bbox="692 1152 994 1195">9</td> </tr> <tr> <td data-bbox="331 1195 692 1238">Pending</td> <td data-bbox="692 1195 994 1238">10</td> </tr> <tr> <td data-bbox="331 1238 692 1281">Removed</td> <td data-bbox="692 1238 994 1281">163</td> </tr> <tr> <td data-bbox="331 1281 692 1302">Total</td> <td data-bbox="692 1281 994 1302">267</td> </tr> </tbody> </table>	Status (all current 16/17 year old applicants)	No.	Excluded/Suspended	5	Housed	73	Live	6	Offered	1	Online to be Validated	9	Pending	10	Removed	163	Total	267	<p>16/17 year olds can register with Home-Options but cannot legally hold an interest in land or property. This continues to cause problems to providers in terms of interpretation and consistency.</p>		<p>Applicant records.</p>
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	<p>Age 18 – 54</p> <p>Older Applicants (50+) willing to accept sheltered accommodation will qualify to apply even if they would not normally meet the local residence requirement.</p>	<p>Age designation of properties can impact upon people in this age group (landlord tenancy policies – outside the scope of this assessment).</p>	<p>Impact unclear although partners are looking at how to maximise use of stock.</p>	<p>Applicant records.</p>
	<p>Age 55+</p> <p>Older people have a greater choice of property as the majority of vacancies are designated for those over the age of 55.</p> <p>Older people can access help across the four LA areas for assistance with completing an application form, receiving advice or expressing interest in property.</p>	<p>Older owner occupiers with equity above the threshold may be expected to use their equity to secure accommodation and receive lower priority for accommodation.</p>		<p>Applicant records.</p>
<p>Does the policy, service or process have a positive or negative impact on all people with disabilities? Describe how and which</p>	<p>Any medical condition or disability is assessed in relation to current accommodation.</p> <p>Home-Options assess applicants (on an individual basis) and property in relation to mobility level allowing the matching of applicants to properties that are more suitable.</p> <p>Injured service personnel do not need a local connection to qualify for registration (in accordance with The Allocation of Housing (Qualification Criteria for Armed Forces Personnel) (England) Regulations 2012).</p> <p>Properties are advertised with mobility levels clearly identified. Adapted properties are advertised with details of the adaptations and</p>	<p>Website – no high-contrast or Browsaloud option.</p>		<p>Home-Options Allocation policy.</p> <p>Data is recorded on the Locata system recording an applicant's disability and need for adapted property.</p> <p>No complaints received about the application process.</p>

Key questions	Positive effects	Negative effects	Don't know	Evidence
	<p>priority is given to people who need those adaptations in the first instance.</p> <p>Single applicants who require a carer are allowed to bid on 2 bedroom properties, as can applicants who require an extra bedroom on medical grounds (Housing Benefit Size Criteria rules may apply).</p>			

Key questions	Positive effects	Negative effects	Don't know	Evidence
<p>Does the policy, service or process have a positive or negative impact on people with particular disabilities including limiting long-term illnesses and learning disabilities? Describe how and which</p>	<p>The Allocations Policy has local connection criteria allowing those who require assistance to either move closer to someone to get support or to move someone closer to support the applicant. The policy may also grant a local connection to applicants who need to move to access specialist medical treatment.</p> <p>Under the Allocation of Housing (Qualification Criteria for Armed Forces Personnel) (England) Regulations 2012, Injured service personnel have no local connection bar if they wish to join the housing register.</p> <p>Vulnerable applicants with a learning disability who need to access day centres, volunteering opportunities, be-friending groups, etc. may qualify for a local connection if they are from out of the area.</p>	<p>Stock distribution – availability of local lettings, type and size can sometimes create issues for people with physical or mobility impairments requiring ground floor access and accommodation</p> <p>Inconsistent approach across the partnership, influenced by stock levels and type.</p> <p>Not always clear for applicants as to what property types they may be able to access – improved adverts will be introduced as part of website upgrade.</p> <p>Property information is held in free text fields. There is no element against which the fact a property is adapted can be recorded – this will be addressed with improved adverts.</p>		<p>Applicant records can be monitored to pick up those registered but failing to bid.</p>
	<p>People with physical or mobility disabilities or impairments</p> <p>The policy gives priority to those applicants for whom a move would improve their health.</p>			<p>Home-Options Policy.</p> <p>Applicant records.</p>

Key questions	Positive effects	Negative effects	Don't know	Evidence
	<p>People with learning disabilities or mental health needs</p> <p>The Home-Options Policy has been amended to help applicants with a learning disability to move to access support services, befriending groups, etc.</p>		<p>The impact of the change to the policy will be monitored.</p>	
<p>Does the policy, service or process have a positive or negative impact on any ethnic groups? Describe how and which</p>	<p>Anyone living in the Home-Options area may apply for housing (assuming they are eligible to apply). Priority is given to applicants with a local connection (in line with the Localism Act), which can be achieved after six months' residence).</p> <p>Information about the local area is available via a link to Google Maps on property adverts.. This helps applicants to make decisions on suitability of accommodation in relation to local facilities (schools, GP, places of worship, shops, public transport).</p> <p>Home-Options application forms request that applicants provide their details of ethnicity so information is collected and can be reported on.</p>	<p>Some properties require applicants to have a local connection. This is due to planning restrictions or landlords' policies so it is outside the scope of this assessment.</p>		<p>Applicant records.</p> <p>No high levels of demand from particular groups identified to date.</p> <p>Performance reports highlights lettings statistics – no major derivations have been noted between applications and lets.</p>
<p>Does the policy, service or process have a positive or negative impact on particular minority ethnic communities? Describe how and which</p>	<p>Anyone living in the Home-Options area may apply for housing (assuming they are eligible to apply for housing in the UK). Priority is given to applicants with a local connection (in line with the Localism Act), which can be achieved after six months' residence).</p> <p>Information about the local area is available via a link to Google Maps on property adverts. This helps applicants to make decisions on suitability of accommodation in relation to local facilities (schools, GP, places of worship, shops, public</p>	<p>National Park and exception sites and local connection criteria may preclude some BME groups as there is a period of residency qualification. This is due to planning restrictions or landlords' policies so it is outside the scope of this assessment.</p> <p>Emerging EU migrant community – lack of monitoring.</p>	<p>Overcrowding can still become an issue with some groups although lack of larger social housing, particularly with new builds, may have an impact on those BME groups with larger</p>	<p>Applicant records.</p>

Key questions	Positive effects	Negative effects	Don't know	Evidence
	<p>transport).</p> <p>Priority for overcrowded households could have a positive impact for some BME groups who live in larger extended households.</p> <p>Those experiencing harassment (including racial harassment) are placed in the top band, giving a positive impact to this group.</p> <p>101 applicants are from Eastern Europe, of which 85 are Poles (source: passport issuing country). 63.4% of Eastern European applicants have placed a bid. 55 applicants in total have been removed.</p>		households.	
<p>Does the policy, service or process have a positive or negative impact on women or men? Describe how and which</p>	<p>Allocations policy places those experiencing domestic violence & harassment in the top band, giving a positive impact to this group – not gender specific.</p> <p>Offer of family accommodation is linked to residency of the children, not the gender of the parent, so is focussed on the needs of the child(ren).</p>			Applicant records.
<p>Does the policy, service or process have a positive or negative impact on women or men in particular communities? Describe how and which</p>	N/A	N/A	N/A	N/A

Key questions	Positive effects	Negative effects	Don't know	Evidence
<p>Does the policy, service or process have a positive or negative impact on people with particular sexuality/sexual orientation? Describe how and which</p>	<p>Same-sex couples can access the same type of property as heterosexual couples.</p> <p>Banding does not differ in respect of sexual orientation. If any household is being intimidated/ threatened they can be placed in Band A – Harassment.</p>	<p>Sexuality information is requested in the online form, although not marriages/civil partnerships.</p> <p>Marital status question is to be added to the revised application form.</p>	<p>Question not asked on the application form.</p>	<p>Home-Options allocation policy</p>
<p>Does the policy, service or process have a positive or negative impact on people with particular religion or belief? Describe how and which</p>	<p>Information about the local area is available via a link to Google Maps on property adverts. This helps applicants to make decisions on suitability of accommodation in relation to local facilities (schools, GP, places of worship, shops, public transport).</p> <p>Online bidding allows bidding around the clock and over a period of days so no religious groups are unduly disadvantaged.</p>		<p>The cultures of some applicants may affect the size and type of accommodation they can take up.</p>	<p>Home Options - Allocations Policy</p>
<p>Does the policy, service or process have a positive or negative impact on transgender people reassigned? Describe how and which</p>	<p>If any household is being intimidated / threatened they can be placed in Band A – Harassment and re-housed.</p> <p>Applicants can declare their transgender status on their application so impacts can be monitored.</p>			<p>Applicant records.</p>

Key questions	Positive effects	Negative effects	Don't know	Evidence
<p>Does the policy, service or process have a positive or negative impact pregnancy and maternity? Describe how and which</p>	<p>Applicants can declare their pregnancy on their application.</p>	<p>The Allocation Policy does not recognise pregnancy in women in relation to calculating bedroom need; however this is in recognition of the high demand for family accommodation and the Housing Benefit social housing size criteria that does not grant housing benefit for an additional child until that child is born.</p>		<p>Applicant records.</p>
<p>Does the policy, service or process have a positive or negative impact marriage and civil partnership? Describe how and which</p>		<p>Additional question to be added to the application form to enable recording and monitoring to take place.</p>	<p>To be monitored once question added to the application form.</p>	
<p>Issues affecting all groups</p>	<p>The Home-Options allocation policy recognises harassment and applicants may be given additional priority to move, if required.</p>	<p>Hate crimes (also known as bias-motivated crimes) occur when a perpetrator targets a victim because of his or her perceived membership in a certain social group, Hate crime and/or fear of hate crime is a major issue for some customers and this needs to be considered.</p>		<p>Home-Options Allocation Policy.</p>

Outsourced services	
<i>If your policy, service or process is partly or wholly provided by external organisations/agencies, please list any arrangements to ensure that they promote equality and diversity (Include this in your improvement plan)</i>	
Training has been provided for housing association and support providers' staff by the Home-Options partnership with over 400 support workers being provided with training.	
Relations between different equality groups	
Does your assessment show that a policy or process may amount to potential adverse impact between different equality groups? If yes please explain how the improvement plan is going to tackle this issue	Home-Options partners are already addressing the shortfall of accommodation for younger people by re-designating some accommodation previously designated for older people.

Summary of replies from individuals and stakeholders previously consulted including any previous complaints on equality and diversity issues about the policy or process

Consultation has taken place on the draft Home-Options allocations policy with responses received from applicants and stakeholders (including organisations working with people highlighted in the equality strands). The responses were in favour of the proposed changes.

Current arrangements for regular monitoring of the impact of the policy, service or process on the customer groups / stakeholders identified. Under which equalities strands do you consider this information to be insufficient?

Performance reports highlight any areas for action/concern across equality strands.

If an existing policy, service or process, has it achieved its intended outcomes for the customer groups / stakeholders identified? If not, what are the factors which have caused this and are there any equalities issues?

The Home-Options Partnership is responsible for prioritising applicants according to their housing needs and allocating a scarce social-rented resource in a fair and transparent way. The success of Home-Options has allowed the partnership to deliver supported services through partner agencies. This will provide a greater level of choice in accommodation tenure, advice and support.

If a new policy, service or process, what factors could cause a difference between its aims and intended outcomes and what is actually achieved and are there any equalities issues?

N/A.

Can you think of any intentional or unintentional factors that could contribute to negative or differential impact?

N.B. If nothing additional to answers to key questions move on.

Age-designated property

Landlords hold certain properties for applicants above a certain age. Sheltered/retirement housing is purpose-built accommodation for older people and therefore let to those over a specific age. Due to demand issues, some of this property is now being re-designated from sheltered to general needs.

Other properties may be age-designated under local lettings policies due to previous issues of anti-social behaviour where there have been clashes of life styles between age groups.

Local lettings policies

A local lettings policy may be developed for new and existing developments as long as they are justified and are based on an agreement between the local council and the registered provider. Policies should be evidence based so should not be subject to subjective judgements i.e. inflexible age restrictions.

Any existing actions to improve equalities outcomes – including how these are currently communicated both internally and externally?

Equalities information is monitored for any discrepancies between equality groups. These are shared on a periodic basis.

Key issues resulting from this initial equality impact assessment and potential measures to minimise or remove any adverse impact and ensure better promotion of equality and diversity

None.

Is there a need to gather better or more information for the assessment? If so what and on which customer groups?

Additional monitoring of applicants who are married or in a civil partnership will be introduced.

Should this policy, service or process proceed to full EIA? Explain why

No. Monitoring is in place and there is no evidence that any equalities groups are being unduly disadvantaged.

Signed _____(Completing Officer) Signed _____(Equalities Lead Officer)

APPENDIX 1

Based upon a sample of all applicants who have registered for housing since 1 April 2014 (applicants who are live, under offer or who have been housed since applying).

Applicant Age Band	Accessed Website	No Access	Total
Under 25	82.1%	17.9%	100.0%
Between 25 and 39	85.9%	14.1%	100.0%
Between 40 and 45	79.1%	20.9%	100.0%
Between 45 and 49	78.6%	21.4%	100.0%
Between 50 and 54	80.7%	19.3%	100.0%
Between 55 and 59	73.4%	26.6%	100.0%
60 and over	68.7%	31.3%	100.0%
Total	79.7%	20.3%	100.0%

It is apparent that there are high levels of internet access across all age groups.

Applicant Age Band	Bid	No Bids	Total
Under 25	64.3%	35.7%	100.0%
Between 25 and 39	66.6%	33.4%	100.0%
Between 40 and 45	66.1%	33.9%	100.0%
Between 45 and 49	61.5%	38.5%	100.0%
Between 50 and 54	55.2%	44.8%	100.0%
Between 55 and 59	57.1%	42.9%	100.0%
60 and over	64.8%	35.2%	100.0%
Total	64.2%	35.8%	100.0%

Despite any difference in access by age band, it is clear that applicants can still register bids for properties. The most likely reason for disparities between the two is the type of accommodation that is available and the requirements of the applicants.