

## **EQUALITY IMPACT ASSESSMENT**

### Choice Based Lettings Housing Allocation Scheme

This report sets out details of the equality impact assessment undertaken in relation to the introduction of Bromley Homeseekers, a Choice Based Lettings service.

It identifies areas of concern and further actions required to reduce any potential adverse effects on people within the equalities categories who will be required to use the service.

Under the Race Relations Act 1976 (amended in 2000 and 2003) all local authorities must have due regard to the need:

- To eliminate unlawful racial discrimination
- To promote equality of opportunity
- To promote good relations between persons of different race

The Act requires public bodies to assess the impact of all functions and policies on the promotion of race equality. Bromley Council has broadened the scope of impact assessments to include gender, age, disability and sexuality. Equality Impact Assessments, which are carried out for any proposed new policy, are intended to ensure that policies do not discriminate and that, where possible, they actively promote equality.

Bromley Homeseekers is relevant in relation to its potential impact for all of the equality groups.

**Age:** Bromley Homeseekers can be used by anyone aged 18 or over who applies to join the common housing register or age 16 if being supported by the Leaving Care Team or the Support and Resettlement Team. The service needs to be accessible to all age groups.

**Ethnicity:** Black and minority groups are currently represented on the housing register currently 22% have assessed themselves as being from a black or minority ethnic background. Access to the service should be equally available to persons of all ethnicities and information available in appropriate formats.

**Disability:** Many people with disabilities will need to access Bromley Homeseekers. They may range from people with a physical disability requiring fully wheelchair adapted properties to people with other disabilities who may need to be supported in accessing the service. There is

potential to discriminate if the service does not include adapted accommodation or information is not available in appropriate formats or access to the system is not available

**Gender:** The Service can be used by people of all genders and needs to be accessible in an appropriate manner and available in appropriate formats.

**Sexual orientation:** The service can be used by people of all sexual orientation, (lesbian gay, transgender or bi-sexual) Access to the service should be equally available to all.

**Faith Groups:** People from any Faith Group can access the service. Access to the service should be equally available to all.

## **Areas of focus for the Equalities Impact Assessment.**

Bromley Homeseekers does not directly discriminate in terms of any of the relevant legislation (Race Relations Act, Disability Discrimination Act, Sex Discrimination Act, Equal Pay Act and Human Rights Act). The policy behind prioritisation and allocations also follows guidelines and ensures that there is no scope for discrimination.

The focus of the assessment is therefore to consider whether the Choice Based Lettings Service might indirectly discriminate against any of the equality groups in any of the following ways:

- By excluding a specific equality category or sub group
- By affecting some equality categories or sub-groups disproportionately
- If the service cannot be accessed equally by all equality categories
- If there are barriers that might inhibit access to the service or its benefits.

Arising from this analysis, a number of issues have been identified where the Choice Based Lettings Service may have an adverse effect on one or more of the equality categories and appropriate action has been identified to minimise each effect. See Appendix A

## **Information and Data**

In carrying out the assessment a number of data sources were used.

These included:

- Data from Anite, the current IT system used by the Council to record details of all applicants on the housing register.

- Bromley Homeseekers survey 2007

## **Consultation**

Consultation to provide relevant information for this assessment has included the following:

- Survey of all applicants on the councils' housing register and of all Broomleigh tenants currently registered for a transfer. (5000 in all sent out and 24% returned)
- Proposed policy sent to all partner RSL's for comment

## **Assessment**

### ***General***

The Choice Based Lettings Housing Allocation Policy was developed with a focus on equality. All users must have equal access to the service and regular monitoring of those who are not bidding will provide relevant data to address any concerns. The key factors looked at in this assessment were eligibility criteria, application process including access to the service, equality policies and monitoring.

The following are some of the main findings from the Bromley Home seekers survey carried out in 2007:

#### General findings

- a) 81% of those surveyed were in favour of a Choice Based Lettings System.
- b) Those in the lower Bands D&E and Broomleigh tenants particularly understood how to bid.
- c) 80% overall thought that it was clear how properties would be advertised in particular those from Bands C&D and Broomleigh tenants
- d) 52% of those surveyed had internet access at home. Broomleigh tenants and Band D applicants had the highest levels of access and those in Band B had the lowest.
- e) 85% of people knew that they could get access to the internet in the libraries
- f) Most people did not have access to interactive TV. This was similar across all equality groups.

- g) 72% of people said that it was very important to advertise in a weekly free sheet. Post offices, supermarkets and libraries were the places most people were likely to pick up a copy from. Band A cases and single persons were more likely to pick it up from a voluntary or community organisation.
- h) 58% of people said they would not pay for a weekly sheet.
- i) 40% of people said they would use the internet to bid, 32% would use the phone, 9% would text and only 2% would use interactive TV. There was no significant difference in how people wished to bid broken down by household size, ethnicity, age or disability.
- j) 61% of respondents said they would not need help applying and 37% said they would. 81% of under 20's said they would need support from a housing officer. 36 % overall felt they would need help from a carer or other non housing council officer.

#### Age

- a) People over the age of 60 had significantly lower levels of knowledge of other Choice Based lettings schemes.
- b) People over 70 were unsure about the scheme, 28% of them responded to this effect.
- c) People over 70 were less likely to understand how to bid for a property.
- d) People over 60 were significantly less sure than average as to how properties would be advertised.
- e) 37% of over 60's and only 9% of over 70's have access to the internet at home.
- f) Older people were less aware than average of library internet access.
- g) Slightly higher numbers of older people over 60 would need some assistance to bid.

#### Ethnicity/Race

- a) People from Indian, Pakistani and White backgrounds all liked the idea of Choice Based Lettings more than average. People from Caribbean, African, Other Black/Black British or Mixed White and Caribbean and African were much less certain about the proposed scheme.
- b) All Asian groups, people from African Origins, White Irish and Other Group respondents were all less clear than average on how to bid for a property. People from Caribbean or mixed White/Caribbean backgrounds had above average understanding, which may suggest that there may be language barriers impairing the understanding of some groups.
- c) People of Pakistani, Bangladeshi and White Irish Origin were less clear than average as to how properties would be advertised.
- d) Bangladeshi and White Irish households have less internet access than average.

- e) People of Bangladeshi origin were less aware than average of library internet access and also felt it was more important that properties were advertised in a weekly free sheet.
- f) All BME groups except Caribbean said they would need more support than average to bid.
- g) 9% of all respondents said they would need translation help. This was higher amongst Pakistani (50%), Bangladeshi (36%), other Asian (67%) African (21%), Other Black (20%), Chinese (67%), and Other Ethnic Group (32%) respondents.

#### Disabilities

- a) People with disabilities were almost as likely to say they liked the idea of being able to choose properties as those without disabilities.
- b) People with disabilities were less certain than average on how to bid for a property.
- c) People with disabilities were also significantly less sure than average as to how properties would be advertised.
- d) 40% of people with disabilities had home internet use.
- e) People with disabilities were less aware than average of library internet access.
- f) Over half of respondents with disabilities felt that they would need support from a housing officer.

### **Conclusion**

Appendix A sets out actions which will be required to help reduce the adverse effects that Bromley Homeseekers may have for individual groups.

The majority of people were in favour of implementing a choice-based lettings service. Some BME groups and older people were less certain and so work will need to be done with these groups to establish their concerns and address them.

Older people in particular were less aware of CBL schemes elsewhere and a focussed effort will be required to make sure that this group understands the new system.

There will need to be some targeted work with some BME groups, disabled people, older people and those in Band A on how to apply and how to make a bid to ensure that they are not disadvantaged by the new system from the outset.

People with access to the internet are more likely to use this method to bid. Overall the web is the most preferred way to bid. Work will be required to promote the use of the web and the use of libraries to take part in CBL amongst those without direct access at home. BME groups,

older single person households and people with disabilities have less access to the web. Work will be required to work with these groups to promote the use of the internet and to establish what the barriers to accessing the web may be.

Over a third of Bromley Homeseekers would need support to apply for properties. The Council and partners need to ensure that sufficient resources are available to help this number with the new system.

Bromley Homeseekers Equality Impact Assessment issues and actions				
Issue	Potential Adverse effect	Actions to date	Future Actions	Target outcomes
Access to internet for applicants and tenants	Those without access to a PC may be disadvantaged in accessing Bromley Homeseekers.	The responses from applicants and tenants re registering to join Bromley Homeseekers have been monitored in more detail. As at 04/06/08 of 2540 review replies from tenants and applicants, 21.6% have said they have no access to a PC. 39% have own PC, 20.8% can access via friends/relatives, 7.6% can access at work and 11.1% can access at a library.	Further promotion of libraries as a place to access Bromley Homeseekers. A map to be included within the Homeseekers pack sent to all applicants will show the location of all libraries and information on opening times to be provided. The map will also show where other access points are located including Council and Housing Association offices.	Reduce the level of tenants /applicants who are unable to access a PC.
		While the register is closed self assessment is being promoted at the libraries to get applicants used to the idea of using the libraries as a place to access the internet.	Analyse the applicants/tenants who have responded that they do not have access to a PC. Identify any specific groups that may need further information or assistance.	
		Questionnaire sent to all HA's and Voluntary agencies asking if they have office facilities with pc access for applicants and tenants to access and the level of support they are able to provide.	Automated bidding is to be introduced for the most vulnerable clients. Support will be available for applicants attending the housing reception at Joseph Lancaster Hall	Further reduce the level of applicants/tenants without access to a PC and identify further areas of additional support.
			Applicants who are not familiar with using the internet are able to book individual sessions in advance at the library.	Reduce the number of applicants unable to bid.

			Monitoring to be put in place to identify non-bidders and officers to follow up to identify reasons. E.g. access or usage difficulties especially in relation to vulnerabilities.	Any groups of applicants that are having difficulty can be identified and measures put in place to deal.
	Compare access to the system by ethnicity to identify any potential access issues.	Currently 22% applicants on existing register describe themselves as black or from an ethnic minority.	Monitor access to Bromley Homeseekers self assessment by ethnicity to highlight any issues	
			Ongoing monitoring of how applicants are bidding to identify any promotional work needed.	
			Printing facilities available at various locations for applicants to request a printed version of properties available so that they can bid by text or telephone.	
Understanding of Bromley Homeseekers by LBB,RSL staff and voluntary organisations in order to support applicants/tenants	Staff not able to support due to lack of knowledge leading to a potential lack of customer service.	Questionnaires, fliers, newsletters sent to RSL's. Seminar days already held to give information to RSL's and voluntary groups about choice based lettings. Updates given to Housing staff at Divisional days/Senior Managers meetings.	Attendance at individual LBB team meetings as requested. Training Plan being drawn up for RSL, LBB housing and library staff. Other agencies will be given training as required. Practical demonstration planned for Members and RSL staff on 17 July 2008.	General awareness by all staff who come into contact with applicants/tenants to be able to advise them on the process, answer questions and give support where needed.
		Stakeholder map drawn up of all RSL's, Voluntary Agencies, all ACS Senior Managers and other relevant Officers within the Council. Any newsletters or communications regarding Bromley Homeseekers is sent to all those included.		



<p>Lack of understanding from applicants/tenants as to how system works.</p>	<p>Applicants with severe housing needs being unable to access the system. Potential for applicants occupying temporary accommodation not bidding therefore no through flow temporary accommodation for new applicants.</p>	<p>Homeseekers Pack will be sent to all applicants/tenants included in Bromley Homeseekers scheme. This will include a DVD on how to use the system, a quick guide to accessing the system, Information on where to access the system, A sheet of FAQ's and other general information about the scheme.</p>	<p>Achieve a better understanding for applicants and tenants on how the scheme works.</p>
	<p>Not meeting the Government targets for the reduction of the use of temporary accommodation use reduction which could lead to loss of funding.</p>	<p>Housing Provision Officers to offer sessions at Libraries to offer support to applicants/tenants on how to use the system. They will also be available to assist applicants in Joseph Lancaster reception area. Telephone assistance will be available for applicants. Other support surgeries to be identified.</p>	
<p>Unable to access the system due to vulnerability/disability</p>	<p>Applicants/tenants with any form of disability/vulnerability may not be able to access the system in order to bid and meet their housing needs.</p>	<p>Bromley Homeseekers site allows users to use keyboard shortcuts if they have difficulties using a mouse.</p>	

	Physical disability	Discussions with Occupational therapy team re choice based lettings and how current procedures will change.	On going discussions with Occupational therapy Team to move towards the Accessible Housing Register categories for applicants and Properties. Introduction for Automated bidding for vulnerable clients. Criteria are to be introduced to keep this only for the most vulnerable clients. Special needs list will be monitored so that contact can be made with applicants when suitable properties become available.
	Visually Impaired	The Bromley Homeseekers site will have accessibility option for those with visual impairments. The text on the screen can be enlarged for those partially visually impaired. The colour contrast on the site can also be changed to assist viewing. For those whose sight is too limited to view the site there is a facility to listen to instructions on how to use the system with the use of headphones if in a public location.	
	Hearing Impaired	Quick visual guides to access the system will be available to all users as well as a DVD.	
	Learning Disabilities		On going discussion to take place between officers to decide on best way forward of this client group.

	Language barriers.	Home Connections have incorporated 9 languages ( English, Turkish, Somali, Portuguese, French, Arabic, Cantonese, Bengali, and Polish). This applies to the headline information on the screens but not the individual detailed text. The telephone bidding service is available in the same 9 languages plus Punjabi, Spanish, Sylheti, Urdu, Vietnamese and Yoruba.	On going updates on languages from Home Connections. Visual user guides to enable screen recognition. Introduction of automated bidding for vulnerable applicants.	To ensure that language is not a barrier to accessing the system.
		Applicants /tenants are asked if they happy for us to contact in English. If No, we ask which is their first language and whether an interpreter is required. Council has access to interpreter services and does offer to translate leaflets if required by means of a general translation leaflet.		
		Homeseekers pack and policy will include information on translation if required.		
	Elderly	Involved residents at a sheltered unit in UAT testing for Self Assessment. No adverse comments.	Those who do not have access to a PC, cannot access a library will be considered for automated bidding.	
			Printing facilities available at various locations for applicants to request a printed version of properties available so that they can bid by text or telephone.	
	Other Vulnerable Clients	LBB S&R team aware of changes that CBL will bring and are looking at ways they can support clients.	Particularly vulnerable client will be considered for Automated bidding. S&R officers investigating the possibility of lap tops with system access so they can support some when visiting in their homes.	
			Training to be offered to specialist groups who can offer support. E.g. Gypsy traveller's project. Consider the provision of additional pc facilities at their office.	

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