

EQUALITY IMPACT ASSESSMENT

Housing Allocation Scheme Review

This report sets out details of the equality impact assessment undertaken in relation to the review of the Housing Allocation Scheme (policy). It identifies areas of possible risk 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's Housing Allocation Scheme is relevant in relation to its potential impact for all of the equality groups.

Age: Bromley's system of allocating housing (Choice Based Lettings) 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 scheme needs to be accessible to all age groups.

Ethnicity: Black and minority groups are currently represented on the housing register. Access to the scheme 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's Housing Allocation Scheme. 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.

Gender: People of all genders are eligible for the scheme and therefore the scheme needs to be accessible in an appropriate manner and available in appropriate formats.

Sexual orientation: People of all sexual orientation are eligible for the scheme, (lesbian/gay, transgender or bi-sexual). Access to the scheme should be equally available to all.

Faith Groups: People from any Faith Group are eligible for the scheme. Access to the scheme should be equally available to all.

Areas of focus for the Equalities Impact Assessment.

Bromley's Housing Allocation Scheme 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 Housing Allocations Scheme 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 Housing Allocation Scheme 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.

Consultation

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

- Focus groups attended by Registered Social Landlords; LBB internal staff; the public; clients with learning disabilities; and voluntary agencies in which all feedback was noted and reflected in the review of the housing allocation scheme.
- Proposed housing allocation policy sent to all partner Registered Social Landlords/other relevant stakeholders for comment.

Assessment

General

The Housing Allocation Scheme (policy) was developed with a focus on equality. All users must have equal access to the service and eligibility within the scheme must be allocated on a fair basis. The key factors looked at in this assessment were the reasonable and local preference categories fundamental to the scheme (eligibility criteria) as well as waiting times for housing allocation. The following are some of the main findings from the focus groups carried out April-June 2010:

Reasonable and local preference categories

Participants acknowledged the fundamental difficulties in assessing degrees of needs within categories; however, certain pattern did emerge. In particular, that those who are:

- a) owed a duty by any local authority such as social services Child in Need referrals should be given high priority
- b) homeless: have dependent children/medical needs or are over 60 should be given high priority
- c) looking to downsize by two bedrooms (also known as under-occupiers) should be given high priority – to free up housing stock
- d) who need to move on medical grounds or welfare grounds, including grounds relating to a disability should be given medium priority
- e) elderly and wanting sheltered housing should be given high to medium priority
- f) participating in voluntary work should be given low priority – however, ideally they should be incentivised to continue contributing to the community
- g) overcrowded by one bedroom should be given low priority – there are other options available to them
- h) intentionally homeless should be given low to none priority

Lessons learnt

- Focus group invitees/attendees were not provided with a detailed agenda/running order of the focus group – this may have deterred some from attending due to not knowing what to expect; if they would be interested etc.
- This may have also deterred some from attending due to not being aware of the help/accessibility available for those with access problems.

Conclusion

The table below sets out considerations which have been taken into account to help reduce the adverse effects the reviewed housing allocation scheme may have for individual groups.

In addition, in order for the reviewed policy, which will establish a new set of banding criteria, to be implemented; the housing register will need to be closed and later re-opened, and subsequently those currently on the housing register will need to re-apply.

Therefore:

- a) Providers and other relevant groups will be informed about the closure of the housing register
- b) Providers and other relevant groups will be informed about the re-opening of the housing register
- c) A summary of the reviewed policy will be published on-line and in paper format
- d) The housing options webpage will be updated (private housing will be promoted as an option for those seeking to be housed but who have little chance of via the Housing Allocation Scheme)

The Council and its partners need to ensure that sufficient resources are available to help people with queries etc. once the reviewed Housing Allocation Policy becomes operational.

Bromley Housing Allocation Scheme Equality Impact Assessment issues and considerations

| Target Group | Potential Adverse Effects | Considerations In Place | Future Considerations |
|----------------------|--|---|--|
| AGE | | | |
| Leaving Care (16-25) | <ul style="list-style-type: none"> • Undesirable Independence • Vulnerability • Segregation and Isolation • No access to IT | <ul style="list-style-type: none"> • Support Officers (Leaving Care Team) • Library assistance available • Library IT equipment available | |
| Vulnerable Adults | <ul style="list-style-type: none"> • Loss of Contact with Support Services • Increasing Vulnerability resulting in a lack of Development • No access to IT | <ul style="list-style-type: none"> • Support Officers (Support & Resettlement) • Library assistance available • Library IT equipment available • Voluntary agencies assistance available | <ul style="list-style-type: none"> • Training to be offered to specialist groups who can offer support. E.g. Bromley Gypsy Traveller's Project. The provision of additional pc facilities at their office is also being considered. |
| Elderly | <ul style="list-style-type: none"> • Lack of Incentive to move • Inappropriate accommodation for needs • Increased isolation from support services and/or family • No access to housing options • No access to IT | <ul style="list-style-type: none"> • Support Officer visits to clients • Library assistance available • Library IT equipment available • Voluntary agencies assistance available • Auto bidding | |
| ETHNICITY | | | |
| Gypsy Travellers | <ul style="list-style-type: none"> • Undesirable move to a "Bricks & Mortar" property • Reduced engagement with LA Housing • Illiteracy • No access to IT | <ul style="list-style-type: none"> • Dedicated Support Officer • LA housing plot allocations for sites • Library assistance available • Library IT equipment available • Voluntary agencies assistance available • IT equipment available at the BGTP | <ul style="list-style-type: none"> • Training to be offered to specialist groups who can offer support. E.g. Bromley Gypsy Traveller's Project. The provision of additional pc facilities at their office is also being considered. |
| Minority Groups | <ul style="list-style-type: none"> • Language barriers • Vulnerability • Isolation from support groups | Language service on website: <ul style="list-style-type: none"> • 9 languages (English, Turkish, Somali, Portuguese, French, Arabic, Cantonese, Bengali, and Polish). | |

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| | <ul style="list-style-type: none"> • Segregation and isolation within community • No access to IT | <p>This applies to the headline information on the screens but not the individual detailed text.</p> <ul style="list-style-type: none"> • On going updates on languages from Home Connections. Visual user guides to enable screen recognition. • Council has access to interpreter services and does offer to translate leaflets if required by means of a general translation leaflet. Homeseekers pack includes information on translation if required. • Library assistance available • Library IT equipment available | |
| DISABILITY | | | |
| Physical disability | <ul style="list-style-type: none"> • Inappropriate accommodation for needs – mobility issues • No access to IT • Isolation from Support Services | <ul style="list-style-type: none"> • CBL property adverts state access information • Library assistance available • Library IT equipment available • Voluntary agencies assistance available | |
| Visually impaired | <ul style="list-style-type: none"> • Inappropriate accommodation for needs • No access to IT • Accessibility • Isolation from Support Services | <p>Bromley Homeseekers Website:</p> <ul style="list-style-type: none"> • Browse Aloud – facility to listen to instructions on how to use the system with the use of headphones in a public location • Larger text facility • Colour contrast alteration to assist viewing • Accessibility standards on websites e.g. Alt Text, plain backgrounds, etc • Library assistance available • Library IT equipment available | |

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| Hearing impaired | <ul style="list-style-type: none"> • Inappropriate accommodation for needs • No access to IT • Accessibility – only being able to nominate one named person for authorisation purposes • Isolation from Support Services | <p>Bromley Homeseekers Website:</p> <ul style="list-style-type: none"> • Quick visual guides to access the system are available to all users as well as a DVD • Library assistance available • Library IT equipment available | <ul style="list-style-type: none"> • Council to look at current working practices re: organisations with a Service Level Agreement for LBB, in order to allow more than one named person to act on client's behalf • Registered Social Landlords/Council departments to look into how they work with Deaf Access - possible periodical review whereby all trained, CRB checked staff and volunteers deemed suitable to assist Deaf BSL user clients with their business are listed as acceptable authorised persons. Possible update as and when necessary. |
| Learning disability | <ul style="list-style-type: none"> • Dependency on LA Housing • Access to IT • Isolation from Support Groups | <ul style="list-style-type: none"> • Plain English accreditation on written material • Library assistance available • Library IT equipment available | |
| Mental disability | <ul style="list-style-type: none"> • Inappropriate accommodation for needs • Access to IT • Isolation from support groups | <ul style="list-style-type: none"> • Plain English accreditation on written material • Library assistance available • Library IT equipment available | |
| GENDER | | | |
| Transgender | <ul style="list-style-type: none"> • Access to IT • Isolation and Segregation | <ul style="list-style-type: none"> • Library assistance available • Library IT equipment available | |
| SEXUAL ORIENTATION | | | |
| Bisexual | <ul style="list-style-type: none"> • Access to IT • Isolation and Segregation | <ul style="list-style-type: none"> • Library assistance available • Library IT equipment available | |
| Lesbian/Homosexual | <ul style="list-style-type: none"> • Access to IT • Isolation and Segregation | <ul style="list-style-type: none"> • Library assistance available • Library IT equipment available | |

| FAITH GROUPS | | | |
|---------------------|--|--|--|
| Minority Groups | <ul style="list-style-type: none"> • Language barriers • Vulnerability • Isolation from support groups • Segregation and isolation within community • No access to IT | <p>Language service on website:</p> <ul style="list-style-type: none"> • 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. • On going updates on languages from Home Connections. Visual user guides to enable screen recognition. • Council has access to interpreter services and does offer to translate leaflets if required by means of a general translation leaflet. Homeseekers pack includes information on translation if required. | |