

## **Stage 1: Equality Impact Assessment**

### **1. What are the main aims purpose and outcomes of the Policy and how do these fit with the wider aims of the organization?**

Concern has been expressed that the current Allocation Scheme inadvertently contributes to areas of deprivation. The new Scheme seeks to redress this and is intended to support the realisation of the council's key priorities.

Greater weight will be given under the new scheme to applicants who aid their community through work, volunteering or other commitments. This will help achieve key priority one – 'a growing economy'; and Key priority two – 'a decent place to live' by creating communities with a mixed socio-economic background.

The new allocation scheme will be easier to understand and therefore provide a more transparent process that will help to achieve the council's third priority of 'excellent corporate and customer services'.

### **2. How do these aims affect our duty to:**

- **Eliminate unlawful discrimination, harassment and victimization and other conduct prohibited by the act.**
- **Advance equality of opportunity between people who share a protected characteristic and those who do not.**
- **Foster good relations between people who share a protected characteristic and those who do not.**

The proposed policy will ensure fair and transparent treatment of all applicants. Monthly monitoring of the outcomes from access to the housing register and bidding activity will provide continuous reassurance.

The proposed policy will equalise opportunity to access the register between those with and those without protected characteristics and should foster good relations between these groups.

### **3. What aspects of the policy including how it is delivered or accessed could contribute to inequality?**

The proposed policy will not contribute to inequality.

The new Allocation Scheme will have clear roles and responsibilities defined

in order to ensure clarity of decision making and implementation.

**4. Will the policy have an impact (positive or negative) upon the lives of people, including particular communities and groups who have protected characteristics ? What evidence do you have for this?**

The policy seeks to provide a fairer system of weighting applicants based on their time waiting on the housing register. This will apply to all applicants.

All applicants will be provided with advice and the opportunity either directly from the council's services or other agencies to achieve the necessary status to come within the Community Contribution Band where the largest proportion of subsidised housing vacancies will be allocated.

Persons with a medical or welfare need will be safeguarded by ensuring that a fair proportion of subsidised housing vacancies are provided to this category based on evidence of number of households with those characteristics on the housing register and vacancies arising.

If the answer to the second question has identified potential impacts and you have answered yes to any of the remaining questions then you should carry out a full EQIA set out as stage 2 below.

**Stage 2: Equality Impact Assessment**

<b>Name of Policy/Service/Function</b>
Housing Allocation Scheme
<b>Purpose</b>
What are you trying to achieve with the policy / service / function?
The council's Allocation Scheme is now over 10 years old and does not properly support the council's current priorities. The Housing Consultative Board is invited to review a new Allocation Scheme that will better promote sustainable and economically active communities; and provide a more transparent and easier to

understand framework for prioritizing applicants for subsidized housing.

The proposed new Allocation Scheme represents a radical departure from the current Scheme. This reflects the changes in policy direction both at a national and local level. Social housing (now referred to as 'subsidised housing' due to the variance in tenure and rent charged) has become increasingly scarce as more households find it difficult to obtain mortgages and an adequate deposit to enter into home ownership.

Concern has been expressed that the current Scheme creates perverse incentives, such as giving priority to applicants who claim welfare benefits. In effect the message being delivered is that an applicant is better placed if they remain on welfare benefits when a more considered approach would be to encourage applicants into work or training.

The unintended consequence of the current approach is that areas where there are clusters of deprivation and high dependency on welfare also correlate with subsidized housing as the dominant form of tenure. Evidence from the work carried out as part of the Troubled Families project has demonstrated that in some of these communities there are generational challenges to overcome in relation to work ethic and giving back to the community.

Who defines and manages it?

The council has a statutory duty under Part 6 of the Housing Act 1996 to adopt an Allocation Scheme "for determining priorities, and as to the procedure to be followed, in allocating housing accommodation. For this purpose 'procedure' includes all aspects of the allocation process, including the persons or descriptions of persons by whom decisions are to be taken".

As such the Allocation Scheme will define those officers that are responsible for taking specific decisions.

Who do you intend to benefit from it and how?

All applicants who meet the qualifying criteria to remain on the Housing Register will benefit as the register will be reduced, and we will be able to provide them with a realistic expectation of how long it will take to be housed.

Those who provide a community contribution, such as those who are employed or volunteering will also benefit as they will be placed in a specific band which will give them access to a greater proportion of vacant dwellings through the Kent Homechoice lettings scheme.

By using access to subsidised housing as an incentive to enter into work, training/education or provide a community contribution it is anticipated that worklessness will be reduced and stronger, more sustainable communities will be encouraged.

What could prevent people from getting the most out of the policy / service / function?

A failure to engage with services that exist to help people into employment or engage in a positive activity.

How will you get your customers involved in the analysis and how will you tell people about it?

Customers are being consulted via the Kent Homechoice website. Once the policy has been adopted, we will undertake a large scale publicity campaign which will include direct letters to customers to inform them of the changes and how it will impact them.

**Evidence**

How will you know if the policy delivers its intended outcome / benefits?

The new policy will take time to become understood and for the outcomes to be delivered. In addition it is proposed to collate a year's worth of data to be able to carry out a meaningful assessment to determine if the policy has the desired outcomes and a review will be undertaken at this point. The quota used to determine how many properties are allocated to each band will be assessed on a quarterly basis to establish the correct ratio.

How satisfied are your customers and how do you know?

We have undertaken a public consultation via the Kent Homechoice website.

This website is the way in which Housing Register applicants bid for social housing properties and so all affected residents will have a chance to view and comment on the proposals. This consultation is due to finish on 9<sup>th</sup> November and an update will be made including those results. The initial responses do indicate that the response will be generally favourable.

What existing data do you have on the people that use the service and the wider population?

The Housing Register holds comprehensive data on those who request a move into subsidised housing, including household composition and most protected characteristics.

What other information would it be useful to have? How could you get this?

Consultation responses from customers and stakeholders such as housing associations, social services, pressure groups and voluntary organisations will be required, this will be collated and processed when the consultation closes on 9<sup>th</sup> November

Are you breaking down data by equality groups where relevant (such as by gender, age, disability, ethnicity, sexual orientation, marital status, religion and belief, pregnancy and maternity)?

Data has been broken down from the Housing Register by equality groups to ascertain the impact on these issues.

Are you using partners, stakeholders, and councillors to get information and feedback?

We have emailed the new policy to all Housing stakeholders and are having a meeting with Housing Associations that work within the borough to get feedback. This consultation closes on 2<sup>nd</sup> November.

### **Impact**

Are some people benefiting more – or less - than others? If so, why might this be?

Those without a defined local connection, or a housing need defined by the statutory preference categories will not be able to access the housing register but will receive advice and assistance on alternative forms of housing. The subsidised housing stock is limited and best use of this stock is made by giving it to local residents in need.

Information from Quarters 1 & 2 of the P1E Homelessness Activity Return indicates that single females with dependent children are the predominate characteristic of households assisted through the homelessness legislation. This may mean that they receive greater assistance into the private rented sector than other groups.

Customers that are either homeless or at risk of being homeless will be disadvantaged as they will no longer be awarded maximum points and be placed near the top of any shortlist. The new power to discharge Housing Duty into the Private Rented Sector will mitigate this.

### **Actions**

If the evidence suggests that the policy / service / function benefits a particular group – or disadvantages another - is there a justifiable reason for this and if so, what is it?

The new policy is designed around a principle of fairness and housing will be allocated depending upon the length of time that people have been in need of housing. The current system of pointing people per individual circumstances takes little account of how long people have been waiting to be housed and has created an unrealistic expectation by many customers of when and if they will be

housed. The new policy redresses the fact that certain groups, such as homeless applicants and pregnant women, were prioritised under the old scheme at the expense of other applicants.

Is it discriminatory in any way?

The policy is not discriminatory as it allocates housing to all applicants who meet the qualification criteria for the register in the same manner.

Is there a possible impact in relationships or perceptions between different parts of the community?

There is always tension between those who receive subsidised housing and those who want it. There is a perception amongst some parts of the community and popularised in some media that persons from abroad have an advantage in obtaining subsidised housing. The new policy makes it clear how subsidised housing is accessed and prioritised and is expected to reduce this anecdotal accusation through being more transparent than the current policy.

What measures can you put in place to reduce disadvantages?

Although it is envisaged that the new policy will reduce discrimination, it will be carefully monitored in the first year to ensure that this standard is being met. The Housing Service will monitor and review those that are housed on a quarterly basis to ensure that there are no adverse impacts and a full review will be done a year after implementation which will establish if any amendments are to be made.

The system will also use a quota system to allocate the number of properties to bands. This will also be monitored closely in the first year so that we can establish the appropriate ratio.

Do you need to consult further?

This will depend on the consultation responses that we receive and if significant changes are required to the scheme.

If no significant changes are required no further consultation will be needed.

Have you identified any potential improvements to customer service?

The proposed policy will be much more transparent and understandable by customers and this should improve customer service and, after the implementation phase and initial queries, reduce the number of enquiries and complaints.

As we will need to update our webpages and leaflets in conjunction with this, we will take the opportunity to review these and ensure that they provide the best standard possible for the customer.

Who should you tell about the outcomes of this analysis?

The Cabinet Member, Overview and Scrutiny Committee and Housing Consultative Board

Have you built the actions into your Service Plan or Policy Implementation Plan with a clear timescale?

The review of the Allocation Scheme was included in the Service Plan with clear timescales.

When will this assessment need to be repeated?

This assessment will be amended if there are any changes as a result of the consultation. A stage 1 assessment will be done at the one year review stage and a full assessment will be undertaken if necessary.