

Dale & Valley Homes

Equality Impact Assessment

Choice Based Lettings



Equality Impact Assessment Template

General Information

Date	1st June 2009
Directorate	Housing Operations
Name and Job Title of Responsible Officer	Ian Hornsby Housing Options Manager
Policy Under Consideration	Durham Key Options - Choice Based Lettings Policy

Identify the aims and the objectives of the policy.

What is the title of the policy that is under consideration?

Durham Key Options - Choice Based Lettings Policy

What are the aims and objectives of the policy?

Durham Key Options is fully committed to enabling applicants to play an active role in choosing where to live while also continuing to house those in greatest need. The choice based lettings scheme will enable applicants to have access to a range of available homes in County Durham. The scheme incorporates alternative housing options such as nominations arrangements with registered social landlords, private sector rented properties, low cost home ownership options, mutual exchange and mobility schemes. This increases choice and availability of accommodation

The aims and objectives of the Durham Key Options scheme are:

- To provide a transparent housing lettings system, easily understood and accessible to all, which covers all tenure types and provides true choice through the housing options approach
- To increase mobility across all tenures
- To provide real housing options including low cost or shared ownership, Homebuy and tailored advice, along with access to RSLs' and private landlords' properties
- To ensure a more effective use of housing stock across County Durham
- To provide mixed, cohesive and sustainable communities through choice and housing options
- To provide accurate information on lettings, including supply and demand, across the sub region to highlight future priorities for

development, investment and better inform the strategic planning process

- To increase the overall supply of properties and therefore assisting authorities in meeting statutory housing duties
- To realise efficiency saving on lettings across the sub region
- To meet the needs of homeless households – preventing homelessness by operating a functioning housing register and by adopting an extensive and robust housing options approach
- To build effective partnerships across all sectors in the region, statutory and voluntary as well as the private sector
- To build community cohesion - enabling housing applicants to have choice in where they live

Is an EIA required?

Yes / No

The CBL policy relates to and will have an affect on people as outlined in the general duties. D&Vhomes need to ensure that this policy is not discriminatory as it is relevant to all potential customers across County Durham. Dale & Valley Homes believe everyone should have equal opportunities to play a full part in their community regardless of their ethnicity, religion, geographic location, special needs, language differences, learning difficulties, sexual orientation, gender, age or disability. Further the Durham Key Options partnership is committed to including equality and diversity in everything we do. This includes eliminating unlawful discrimination, promoting equality of opportunity and access, and valuing diversity in the delivery of our services. When making decisions regarding applications we will take into account issues regarding equality and diversity .We collect equality information about applicants so that we can check whether we are providing a fair and equal service to everyone in the community.

Stage 1

Establish Whether the General Equality Duties are Relevant

Is the policy relevant to the General Equality Duties?

Yes / No

Which ones?

(tick as appropriate)

General Duties

Race	
eliminate unlawful racial discrimination	✓
promote equality of opportunity	✓
promote good relations between people of different racial groups	✓
Disability	
promote equality of opportunity between disabled persons and other persons	✓
eliminate discrimination that is unlawful under the Act	✓
eliminate harassment of disabled persons that is related to their disabilities	✓
promote positive attitudes towards disabled persons	✓
encourage participation by disabled persons in public life	✓
take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons	✓
Gender	
eliminate unlawful discrimination and harassment on the grounds of sex AND transgender	✓
promote equality of opportunity between women and men (not to discriminate on the grounds of marital status)	✓
Age, Sexuality, Religion and / or Belief	
eliminate direct discrimination	✓
eliminate indirect discrimination	✓
eliminate Harassment	✓
eliminate Victimisation	✓

Stage 2

Give brief details of the type of barriers / discrimination faced by target groups?

Barriers/Discrimination for target groups:

1. Disability.

- The CBL application form is quite detailed – a complex form may be a barrier to anyone wishing to apply to join the housing register i.e. visual impairment, learning disability.
- Applicants on the current housing register with a medical priority may be assessed differently under the new policy.
- Applicants with mental health problems /learning difficulties may need more support or help in accessing and using the scheme.
- Applicants with disabilities may have difficulty in viewing properties.
- Applicants who are illiterate will have particular problems in accessing and using the scheme

Proposed/existing measures - to help remove barriers:

- Automated bidding system available after initial application - this means bids can be placed on behalf of applicants using the criteria they set, no limit to refusals allows them greater choice.
- Browse Aloud incorporated into website.
- Adapted properties are included in system but limited to those with identified needs, also potential to adapt properties if necessary

2. Age.

- The CBL lettings system is web/internet based. Older people may not engage or be comfortable with this technology.
- Older applicants have a priority in bidding for certain property types e.g. bungalows

3. Gender

- Women are often the head of one parent families – so will form the majority of applicants
- Elements of the policy relating to domestic violence and relationship breakdown may have more relevance to women

Proposed/existing measures in place to help reduce barriers

- Victims of violence/harassment receive appropriate support and perpetrators would be placed in reduced choice banding

4. Race

- CBL may be a barrier for customers who do not have English as

a first language. They may not be able to complete the application form to access the scheme or may not be able to understand or engage in the bidding process.

- Some BME groups demonstrate high levels of illiteracy e.g Gypsy/Traveller/Roma groups. According to the National Literacy Trust (2007), there are over 8,000 children of traveller heritage in the school system. They are amongst the worst performing ethnic group in Britain with 3.9% achieving five top GCSE passes including English and maths in 2006.

Proposed/existing measures to remove barriers:

- Telephone bidding system includes language options
- Browse Aloud incorporated into website

5. Sexual Orientation

- Some customers may be subject to harassment due to their sexual orientation.
- Need to feel safe within particular areas may restrict options.
- Victims of violence/harassment receive appropriate support and perpetrators would be placed in reduced choice banding

6. Religion

- Applicants may express a desire to be close to a particular place of worship.

7. Financial

- High levels of benefit uptake indicate relative deprivation. Households with lower incomes may not have easy access to the Internet.
- Customer profile indicates high levels of unemployment this could also lead to low levels of access to the internet and therefore accessing the scheme.

Proposed/existing measures in place:

- Strong links with Individual Housing Support Team
- Well developed company Financial Inclusion strategy

Stage 3

Evidence Gathering

Please give the source and a brief summary of the information that you are using for the EIA.

Evidence includes data from Customer Profile; VMS satisfaction surveys; any recent consultation on this function; Complaints data; Status Survey 2008; Individual & Housing Support data on vulnerability; LPI and Service Standards data. **If there is not sufficient evidence, in your EIA Action Plan detail evidence to be gathered.**

Type of evidence

The Durham Key Options choice based lettings policy will be introduced in September 2009. Evidence of disproportionality or direct/indirect discrimination is not available at this time. However possible discrimination or disproportionality can be gauged from existing data from the Customer Profile, Status Survey and National Census as outlined below. Also we should take into account that it was widely recognised within the early development of Choice Based Lettings through the evaluation of the 27 pilot schemes, that without support for vulnerable groups these households would be disadvantaged by the customer centred approach of Choice Based Lettings (Piloting choice based lettings: an evaluation, ODPM, 2004)

Evidence

Evidence gathered from existing data includes:

- **Disability**

Customer profile information indicates that 34 % of people living in the D&V area have mobility linked disabilities. 13% have a sight linked disability. 13% have a hearing linked disability.

- **Age**

National Census (2001) statistics indicate that there are 19 million people aged 50 and over (40% of the adult population), it is estimated that this figure will increase by a further 3 million by 2020.

D&VH customer profile indicates that 41% of customers are in the age group 65+. (Data November 2008).

- **Gender**

STATUS Survey results ("How would you describe the composition of your household") shows that in 57.7% of cases the tenant is female. In 43% of cases the tenant is male.

- **Race**

D&VH customer profile indicates that 99.8% of customers are of white ethnic background. No figures available to indicate prevalence of groups/individuals where English is not the first language.

Studies show that the settled/housed Gypsy/Traveller population in County Durham numbers 30,000. Although statistics are not available relating to precise numbers in the Dale & Valley area it is reasonable to expect that a proportionate number of the overall gypsy population live in the Dale & Valley Homes area (6,000). A further 100 members of this community live on gypsy sites in the D&V area." A study of the Accommodation and Support needs of Gypsies and Travellers in County Durham – David Cumberland Housing Regeneration Ltd."

- **Internet Access**

The customer profile shows that 73.5% of customers do not have direct access to the Internet. (Customer Profile report December 2007)

Consultation carried out to date in respect of this policy or function

Summarise details of consultation, attendees and outcomes

Comprehensive consultation with customers, stakeholders and other groups has taken place ahead of the implementation of the policy. This consultation included:

- Focus groups with current housing applicants held in four geographic locations in the D&VH area.
- Resident groups, throughout the D&V area.
- Tenants Conferences (2008 and 2009)
- Wolsingham Agricultural show in the rural Weardale area.
- Voluntary Groups including those working with disabled and elderly groups
- Stakeholders including other RSL,s
- CAB presentation on the common lettings policy and the administration of this policy
- D&VH customer panel presentations and training sessions.
- Repairs and Maintenance and Decent Homes Contractors.

Outcomes of this consultation indicated that barriers are likely to exist in accessing and involvement in the scheme for the following groups;

1. Older applicants, particularly around completion of the application form and then accessing the scheme and "bidding" for properties.
2. Vulnerable groups/individuals. Access to the internet and difficulties in completing the application form and subsequently accessing the lettings process.

If you think the consultation has not been robust enough, **in your EIA Action Plan detail further consultation required**

Stage 4

Consider the Disproportionality

Based on evidence are there any signs that: -

one or more groups of people either **are experiencing** or **could experience** a less favourable service than other groups; ✓ *-Evidence that one or more groups could experience a less favourable service than other groups.*

OR

the needs of one or more groups are not being met. ✓

(Please tick as appropriate)

Give details

As outlined above there are clear signs that the DKO policy could in its administration lead to groups or individuals experiencing a less favourable service than other groups/individuals. It must be emphasised that this policy is not currently in place and elements of the policy are designed to provide opportunity to develop and maintain mixed/balanced communities and responses to local demographic changes for instance through the local lettings policy. Similarly, the quota system will randomly apportion available properties to bands (according to agreed ratios) and will ensure impartiality in which properties are allocated to which needs bands ,also assisting mixed and balanced communities.

Can this bias be justified?

Can the different treatment be justified?

Or

Is there a positive action to one or more of the groups covered in order to address equality? ✓

Or

Is there no explanation for this bias?

NB IF THERE IS NO EXPLANATION FOR BIAS, THIS POLICY OR FUNCTION IS DISCRIMINATORY, PLEASE TAKE IMMEDIATE ACTION - CONTACT RELEVANT DIRECTOR

Give details: -

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If there is disproportionality, consider an alternative way forward

Can the policy/function be amended or changed in order to address the issues that have been identified and to ensure that the original aims of the policy are met?

Do we need a positive action programme?

Give details

Measures to deal with possible direct/non direct disproportionality or discrimination will form the basis of the action plan (below).

Stage 5

Action Plan

What disproportionality has been identified?	How will you address it?	What outcome do you expect to see?	How will you monitor this?	How will you evaluate this?	Who will be responsible for making sure this happens?	What timescales are you working to?	Are there any resource implications?
<ul style="list-style-type: none"> ➤ Application form is quite detailed and complex ➤ Medical priority may be affected. ➤ Customers with mental health problems /learning difficulties may need support in accessing the scheme. ➤ Applicants who cannot read/write will have problems completing form and accessing the scheme. ➤.Applications from disabled/wheelchair users will be dealt with differently for some property types 	<ul style="list-style-type: none"> ➤ Ensure that the application form is available in all formats. ➤ Put in place procedures to identify and support vulnerable applicants. ➤ Full use of and training in the Customer Profile by staff working in the CBL /allocations process to help identify vulnerability. ➤ Work with voluntary and other groups to help ensure vulnerable groups /individuals can access the scheme. ➤ Website to include browse aloud function. ➤ Ensure strong links with OT /DCC around allocation of adapted properties. ➤ Emphasis on home visits by CBL staff to vulnerable applicants. ➤ Consider automated 	<ul style="list-style-type: none"> ➤ Increased /proportional uptake by disabled groups/individuals in registering with the scheme. ➤ Proportional uptake in accessing the scheme by groups/individuals affected by disability. 	<ul style="list-style-type: none"> ➤ Monitor applications received.Liase with voluntary groups. ➤ Scrutinise previous lettings processes. ➤ Monitor bidding practises by group. ➤ Monitor allocations by group. 	<ul style="list-style-type: none"> ➤ At a sub regional level with partners at monthly partnership meetings. ➤ VMS surveys. ➤ Effective scrutinising and monitoring of IT system. ➤ Effective reporting mechanisms. 	<ul style="list-style-type: none"> ➤ Housing Options Manager ➤ DKO partnership Project Board ➤ Durham County Council. 	<p>The DKO CBL scheme is due to commence in September 2009. Monitoring of the scheme when implemented will take place:</p> <ul style="list-style-type: none"> ➤ Monthly ➤ Quarterly ➤.Annually. 	Staff time

	<p>bidding in all appropriate cases</p> <ul style="list-style-type: none"> ➤Ensure that bidding is made available and that users are aware 						
<ul style="list-style-type: none"> ➤Lettings system will be internet based.Older people may not engage /be comfortable with this technology. ➤Older applicants will have a priority in bidding for certain property types. 	<ul style="list-style-type: none"> ➤.Ensure that other methods of advertising are as widely used.e.g newsletters at outlets throughout the area. ➤Ensure that all bidding methods are widely advertised. ➤ Access to CBL staff is easy – emphasis on home visits to elderly and vulnerable applicants. ➤Ensure processes in place to identify older applicants. 	<ul style="list-style-type: none"> ➤Proportional number of applicants within this group registering onto the scheme. ➤ Proportional uptake and involvement in lettings scheme by elderly applicants. 					
<ul style="list-style-type: none"> ➤Women are often head of one parent families so should form a majority of applicants accessing the scheme. ➤.Elements of the DKO policy relating to domestic violence and relationship breakdown may have more relevance to 	<ul style="list-style-type: none"> ➤ Work with voluntary and domestic violence groups to ensure that those affected by DV can access the scheme. ➤ Work with housing solutions teams to ensure those made homeless through DV can access the scheme. 	<ul style="list-style-type: none"> ➤Women to access and register for the lettings scheme proportionately as a group based on relevant area population statistics. 	<ul style="list-style-type: none"> ➤Monitor applications/registrations through IT reports by gender. ➤Monitor bidding practises using system generated reports by gender. ➤Monitor 				

women			referrals and subsequent applications and bids/allocation s made DV agencies. other agencies				
<p>➤CBL application form may be a barrier for customers who do not have English as their first language.</p> <p>➤This group may not be able to access the scheme and readily engage in the bidding process</p> <p>➤Some BME groups demonstrate high levels of illiteracy e.g gypsy/roma/traveller groups.</p>	<p>➤Ensure that all literature is readily available in other common languages.</p> <p>➤Ensure translation services are reasonably available on demand</p> <p>➤Ensure that the website has a translation facility for identified common languages.</p> <p>➤Work with agencies supporting identified BME groups including gypsy /traveller/roma liaison agencies.</p> <p>➤Continued consultation with customers</p> <p>➤Training in the use of the DKO partnership staff guide to Vulnerable Support plans. Ensure that the VPSP,s become embedded within the DKO/CBL lettings process</p> <p>➤Awareness of and compliance with the DKO Vulnerable Applicants Strategy.</p>						

Under the terms of the Equality Duty Dale & Valley Homes is required to make arrangements for publishing the results of the assessment and consultation that has been carried out.

Please indicate how you recommend that this should be undertaken: -

Intranet and website

Confirmation

Signature of Completing Officer...Ian Hornsby, CBL Manager

Signature of Director.....Pat Wanless.....

Date..... 13 August 09.....

Once completed please return to Louise Butler, Equality & Diversity Officer