

Appendix 3

MID SUSSEX DISTRICT COUNCIL Equality Impact Assessment

Title of Policy/Service/Contract: Revisions to the Council's Housing Allocation Scheme

Division: Assistant Chief Executive

Lead Officer: Emma Shuttleworth, Business Unit Leader Housing Services

Date Assessment completed: 21st February 2019

1. SCOPING

1.1 Aims of the service:

The Council's Housing Allocation Scheme seeks to provide a fair and transparent way of allocating affordable housing to those in housing need who are on the Mid Sussex Common Housing Register through a process of Choice-Based Lettings.

A revised Housing Allocation Scheme was adopted with effect from 1st April 2018. Changes to the scheme are designed to address issues that have come up over the last 12 months. The changes are also made in order to comply with the requirements of the Homelessness Reduction Act, other national guidance and case law.

The main changes are as follows:

1. In future, Clarion tenants living in Mid Sussex, will be eligible to join the Council's Housing Register. This is intended to ensure that fair access to all social housing in Mid Sussex is maintained for all those who are in housing need.
2. Bids from homeless applicants where the Council has a duty to ensure they have accommodation available to them under s.193 of the Housing Act 1996, (subject to some exceptions) will be given priority over bids from other Applicants in their Band. This will provide such applicants with more opportunity to make a successful bid and to enable them to move on from temporary accommodation more quickly which will allow the Council to make more effective use of temporary accommodation.
3. Homeless applicants owed the main housing duty by MSDC under s.193 of the Housing Act 1996, will no longer be entitled to 12 weeks free bidding. They will be required to accept the first suitable offer. This will increase the opportunity of such applicants moving out of temporary accommodations as soon as possible.
4. It is proposed to add a time limit of 5 years for disqualification from joining the housing register for giving false information or withholding relevant information. This will provide greater clarity as the current time limit for disqualification is unspecified.
5. Extra Care Housing Schemes vacancies are currently allocated by a Multi-Agency Panel. A new approach is to be piloted. This will allow direct lettings via a process where an Extra Care Co-Ordinator employed by West Sussex County Council will enable the allocation of Extra Care vacancies in partnership with the Extra Care Housing providers to best meet the housing and care needs of frail older people.
6. Allow in exceptional cases, with the agreement of the housing association and the Council's Housing Needs Team Manager, some homes to be allocated through Direct Allocation. This will allow those who are in exceptional housing need and require a particular type of property which rarely becomes available to be made a direct allocation.

The revised scheme will be considered by the Scrutiny Committee for Community, Housing and Planning on 6th March and Full Council on 26th June 2019.

1.2 Who the service affects and the main customers (internal or external)

The people affected by the proposed changes are those in housing need who are currently on the Council's Housing Register, those who may seek to join it in the future and those on Clarion's HomeChoice Register. People affected are likely to be on low to modest incomes and disproportionately will be people who are vulnerable and have housing related support needs and will include homeless households.

Revisions to the schemes will have implications for Registered Providers that rely on the Council to provide nominations to their vacant tenancies and for organisations that provide supported housing, or who provide housing related support and/or housing advice to vulnerable people in housing need. Revisions will also affect those who are on Clarion's Housing Register.

1.3 What equality information is available, including any evidence from engagement and analysis of use of services?

The Register contains information about each applicant's ethnicity, gender, age, income, need for adapted accommodation and whether they have a support need. We are able to analyse bidding patterns by age and other vulnerability and to identify those who will be affected by the proposed changes to the scheme.

1.4 What does the information tell us about the equality issues associated with the service and implications for the protected groups?

An analysis has previously been undertaken of lettings in relation to the characteristics of those on the Register. This shows that lettings in relation to ethnicity are broadly consistent with the composition of those on the Register. Detailed information including factors such as disability and age are included in section 2.3.

1.5 Are contractors or partnerships used to deliver the service?

The Council is a member of the Sussex Homemove Scheme, which is a partnership of authorities in East and West Sussex that operates Choice-Based Letting. Administration of the Common Housing Register is contracted to Clarion and provided by their Homemove Team. The changes to the allocation scheme do not have any direct procurement implications.

2. ASSESSMENT OF IMPACT: ANALYSIS AND ACTION PLANNING

2.1 Current measures taken by the service to address issues of the protected groups

In assessing issues associated with the protected groups, people on the Housing Register are likely to be on low incomes and may be vulnerable. Around 20.7% of those on the Register, (1437 in total at February 2019) approximately 298 people are flagged as being vulnerable. The 298 vulnerable applicants broken down by vulnerability type are as follows:

- 31.8% mental health problems
- 21.8% older people
- 31.8% physical disabilities
- 10.4% learning difficulties
- 10% domestic violence

- 3% drug or alcohol problems
- 3.3% ex-offenders

The protected groups and other characteristics most affected by the proposed changes are:

- Disability
- Age

Current measures to provide for these groups include:

- Assisted bidding, where bids for properties are made on behalf of vulnerable applicants by the Clarion Homemove Team and Council Housing Needs Team.
- The existing allocation scheme and Choice-Based lettings process is designed to match suitably designed and adapted properties with people with mobility problems.
- Supported housing is allocated by multi-agency panels to ensure that vulnerable people are supported in finding accommodation that is right for them.

For the following remaining protected groups, no specific issues have been identified from the proposed changes to the Allocation Scheme:

- Ethnicity
- Low income or skill level
- Living in rural areas.
- The needs of faith groups and faith issues
- The needs of men and women
- The needs of gay men, lesbians, bisexual and heterosexual people
- The needs of transgender people
- Issues arising from pregnancy and maternity
- Issues arising from marriage and civil partnership.

2.2 Consultation on the proposed changes

The proposed changes to the allocation scheme will be subject to consultation with the Council's Registered Provider partners of the Common Housing Register. Also with supported housing providers and those organisations which provide advice to those in housing need.

2.3 Issues arising from the proposed changes to the Allocation Scheme and how they are to be addressed

The proposed changes that may have a differential impact on the protected groups are those relating to:

- Amendment 5: new arrangements for the allocation of Extra Care vacancies.
- Amendment 6: Direct allocations of some types of property.

Amendment 5 :new arrangements for the allocation of extra care vacancies

Extra Care Housing Schemes vacancies are currently allocated by a Multi-Agency Panel. The new approach to be piloted allows for direct lettings via an Extra Care Co-Ordinator employed by West Sussex County Council working in partnership Extra Care Housing providers. This will support more timely and efficient allocations of the vacant Extra Care properties and better meet the needs of frail older people in housing need.

This will be advantageous under the protected groups of age and disability and is expected to affect approximately 16 housing allocations to frail older people per year.

Amendment 6: Direct allocations of some types of property

This proposal will allow Direct Allocation to those who are in exceptional housing need and require a particular type of property which rarely becomes available. An example of those who will benefit from this proposal is a homeless applicant in unsuitable temporary accommodation provided by the Council who needs adapted accommodation.

This is expected to affect 2 to 3 applicants per year and in the example provided would be advantageous to the protected group of disability.

2.4 Action Plan

The Action Plan below is intended to demonstrate how the issues identified in this assessment are being addressed:

Action	Lead Officer	Timescale
Further review of the operation of the revised allocation scheme following a year of operation.	Emma Shuttleworth	April 2020

Date: 21.2.19

Emma Shuttleworth



Business Unit Leader for Housing Services

Date: 21.2.19

Judy Holmes



Assistant Chief Executive