

Equality Analysis (EA) Record Form
Formerly Equality Impact Assessment



Revised February 2015

Department: **Places Directorate**

Team or Service Area Leading Assessment: **Housing Options/Housing Strategy**

Title of Policy/ Service or Function: **Consistent Assessment Policy – My HomeChoiceFyldeCoast**

Proposals to introduce/ alter/ delete policy, service, expenditure etc:

Date of proposals: _____ Committee/Team: **Housing**

Lead Officer: **Andrew Foot, Head of Housing**

STEP 1 - IDENTIFYING THE PURPOSE OR AIMS

1. What type of policy, service or function is this?

Existing New/ proposed Changing/ updated

2. What is the aim and purpose of the policy, service or function?

There is a statutory requirement for Local Authorities to have an allocations scheme in place detailing how social housing stock is allocated. 'MyHomeChoiceFyldeCoast' is a Choice Based Letting (CBL) scheme operating across the Fylde Coast Local Authorities (Blackpool, Fylde & Wyre).

The Consistent Allocations Policy (CAP) underpins the scheme to unify the way Local Authorities within the Fylde Coast Region allocate social housing stock enabling residents a wider choice of housing. In drafting of this Policy, the legal provisions of the Housing Act 1996 as amended by the Homelessness Act (2002) and the Localism Act (2011), together with the related Code of Guidance issued by the Government have been taken into consideration.

The CBL scheme has been adopted by the relevant elected members of each of the three Fylde Coast Local Authorities and key Registered Providers:

Blackpool Coastal Housing
Great Places Housing Group
Muir Group Housing Ltd
Progress Housing Group
Places for People
Regenda Group

All participating partners will advertise at least 50% of their empty properties via the CBL scheme. Applicants can apply for a property of their choice provided they meet the criteria.

3. Please outline any proposals being considered.

The CAP details how applicants for social housing are assessed and awarded priority, thus, supporting the operations of the MyHomeChoiceFyldeCoast letting scheme.

All homes will be advertised through the CBL scheme allowing 20% of empty properties to be prioritised to households who meet the working households and community contributions criteria.

The policy reflects changes within the local housing market and addresses the demand for social housing across the Fylde Coast Region. It promotes a fair and efficient mechanism for the allocations of social housing providing a greater choice for applicants.

4. What outcomes do we want to achieve?

The schemes key objectives are to:

- Create a customer led Choice Based Lettings scheme
- Widen the choice of housing
- Ensure the scheme is open, fair and accountable
- Increase understanding and satisfaction of the letting system
- Give new tenants a feeling of ownership of their property and community
- Help create sustainable communities
- Make more efficient use of the available housing stock
- Help tackle low demand and reduce void turn around times
- Create a single point of access to all social housing on the Fylde Coast
- Meet the legal requirements for the allocation of social housing as set out in Part VI of the Housing Act (1996) as amended by the Homelessness Act (2002) and the Localism Act (2011).

5. Who is the policy, service or function intended to help/ benefit?

The policy enables Blackpool Council to work collaboratively with other local authorities and key Registered Providers within the Fylde Coast Region providing a greater choice of housing for applicants.

This policy seeks to ensure that i) applicants housing needs are met, ii) social

housing properties are utilised and allocated to those in most need and iii) to build strong stable communities.

The process has been simplified and household with a higher statutory need will be rehoused quicker.

6. Who are the main stakeholders/ customers/ communities of interest?

Residents looking to be rehoused within the Fylde Coast Region
Blackpool Coastal Housing
Great Places Housing Group
Muir Group Housing Ltd
Progress Housing Group
Places for People
Regenda Group
Blackpool Council – Housing Options
Fylde Council
Wyre Council

7. Does the policy, service or function have any existing aims in relation to Equality/ Diversity or community cohesion?

The policy aims to develop a fair and efficient rehousing lettings system within the social housing sector, ensuring properties are allocated to those in greater housing need.

Property Information will be available enabling applicants to make informed decisions on the suitability of the home, thus, benefitting local communities as tenants will have chosen to live in the area.

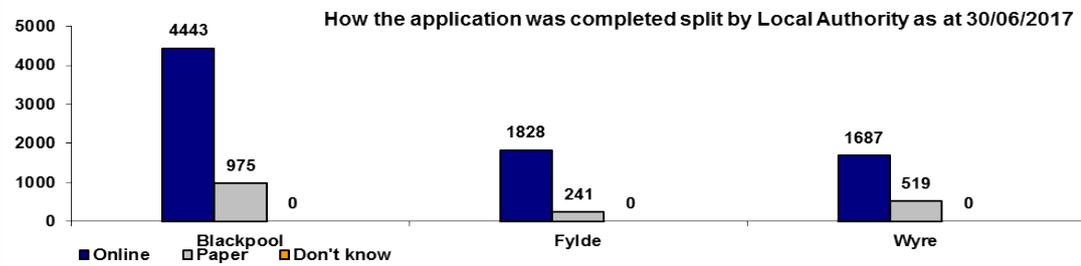
STEP 2 - CONSIDERING EXISTING INFORMATION AND WHAT THIS TELLS YOU

8. Please summarise the main data/ research and performance management information in the box below.

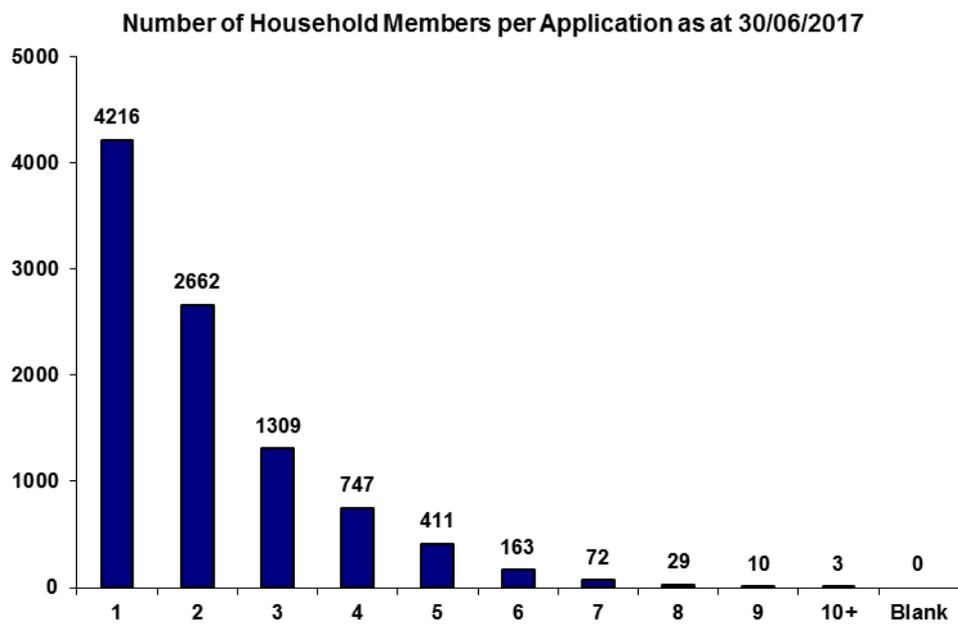
Data/ information

There are approximately 6400 active applicants on the current CBL system who may need to be reassessed as a result of the changes within the CAP policy.

82% of applications completed as at 30th June '17 were on-line, a breakdown by local authority is shown below:



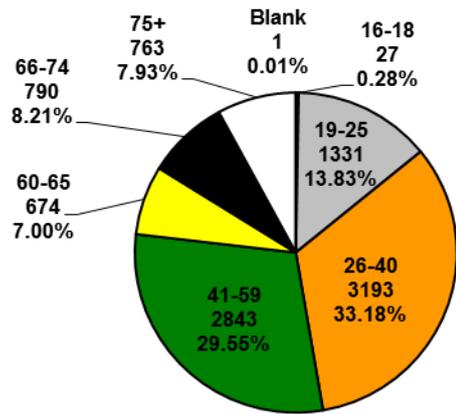
There are 4216 applicants with one person in the household, this equates to 65% of active applications requiring 1 bed properties (see below)



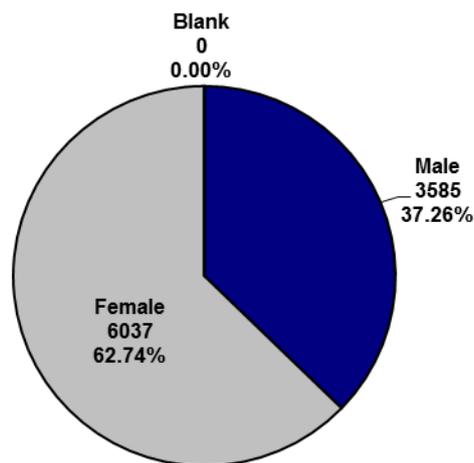
22% of active applicants are in employment. Fylde continues to have the greater percentage of employed applicants with Blackpool continuing to have the lowest.

A third of rehousing applicants are aged between 26-40. 62% of main applicants are female (see below)

Age Group of Main Applicant at 30/06/2017



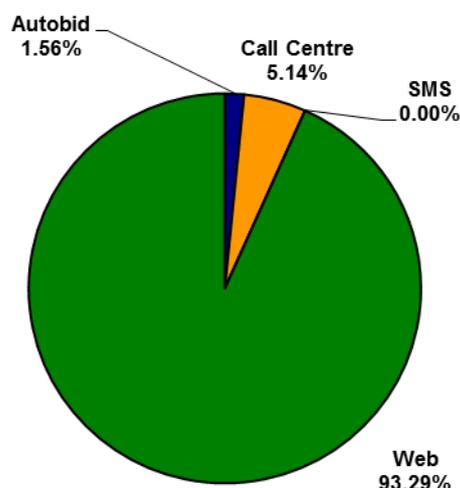
Gender of Main Applicant at 30/06/2017



Research or comparative information

Analysis of the current my home choice system shows that majority of applicants express their interests for a property on-line.

Source of Bids at 30/06/2017



The tables below provide an overview of the number of applicants placing bids:

Short Term Trend (Quarter on Quarter)

Local Authority	Q4	Q1	Trend
Blackpool	1281	1094	↓
Fylde	251	216	↓
Wyre	442	437	↓

Long Term Trend (Against Same Time Last Year)

Local Authority	2016-17	2017-18	Trend
Blackpool	1126	1094	↓
Fylde	212	216	↑
Wyre	405	437	↑

27% of active applicants have placed bids. By quickening up the application process applicants will be able to complete an online application and be able to place bids immediately rather than having to wait for their application to be processed. Properties will also be advertised on a daily basis encouraging applicants to become more proactive when requiring housing.

Key findings of consultation and feedback

Consultation on the proposed changes to the MyHomeChoiceFyldeCoast policy took place between 8th November '17 – 18th December '17. 258 questionnaires in total were completed

(5.6% response rate). The headline results of the survey:

- 68% of respondents agree with the revised local connection requirements with 9% in disagreement.
- Just over half (51%) agree with the introduction of two ways of letting, 38% have no opinion or didn't know.
- 47% of respondents agree with how applicants are awarded a priority band with 33% not in agreement.
- 45% agree with the restrictions on the use of the system by existing social housing tenants. 23% disagreed, 26% neither agreed nor disagreed.
- Half of the respondents agree with the proposed priority for working applicants for some homes. 27% are in disagreement.
- More than ¾ of respondents (83%) agree with giving more flexibility in the size of properties that applicants can bid for.
- 66% of respondents felt the proposed new arrangements will enable the local authority to make best use of the social housing stock in the area. 11% are in disagreement.
- 47% agree with the current income and savings threshold are correct. 27% of applicants neither agree nor disagree.

Whilst the majority of respondents are in agreement with the proposed changes, feedback from the consultation raised concerns regarding the banding and eligibility criteria. Some respondents felt the proposed changes would disadvantage applicants who are most in need and identified areas where the process can be simplified.

9. What are the impacts or effects for Key Protected Characteristics?

Age

The CAP sets out how applicants to the CBL scheme will be assessed. The assessment criterion takes applicants vulnerabilities into consideration and awards priority accordingly.

Monitoring data for the existing CBL scheme indicates that residents of all groups are using the system. Existing data shows the majority of CBL applications have been completed on-line (between October '16 - June '17) with 24% of main applicants aged 60+

<p>The new policy operates in a similar way thus not disadvantaging residents due to their age. The partnership will continue using the same good practises and will be put procedures and safeguards in place to ensure support and assistance is available.</p> <p>With the exception of supported housing (sheltered/extra care), the CBL scheme does not restrict the type of housing applicants can apply for based on their age.</p> <p>Applicants aged 16 + are eligible to apply for re-housing and will be offered a tenancy at the age of 18 unless there is a statutory duty to house them earlier.</p>
<p><i>Disability</i></p> <p>The policy enables adapted homes and ground floor accommodation to be allocated to applicants with a medical need. Applicants will be assessed and registered for suitably adapted accommodation, including ground floor accommodation, in accordance with identified need and placed in the appropriate band.</p> <p>All partnership organisations will continue to offer residents support and assistance with completing application forms. Residents will have the option to set up proxy bidding to allow relatives, friends, support workers or housing staff to bid on their behalf.</p> <p>The simpler banding system may help to make the allocation process easier to understand for people with learning disabilities.</p>
<p><i>Gender Reassignment</i></p> <p>There is no evidence to suggest this policy will have a particular impact on this group.</p>
<p><i>Marriage and Civil partnership</i></p> <p>There is no distinction made in the policy between people who are married or in civil partnership thus having no particular impact on this group.</p>
<p><i>Pregnancy and Maternity</i></p> <p>Consideration will be given for unborn children in terms of bedroom entitlement.</p>
<p><i>Race</i></p> <p>Ethnic minorities make up a very small proportion of residents on the Fylde Coast. 85% of applicants on the Housing Register are White British.</p> <p>There is no evidence to suggest this policy will have a particular impact on this group.</p>

<i>Religion and Belief</i>
The policy does not discriminate on the basis of religion or belief. Applicants residing in mobile homes/caravans will be considered to have a local connection providing they live in the Fylde Coast area and meet other local connection criteria.
<i>Sex</i>
<p>The policy awards priority banding to applicants in immediate danger of physical violence of which victims are usually women. The CBL partnership will enable movement within the Fylde Coast area allowing an opportunity for victims to move away from the perpetrator.</p> <p>The policy has adopted a broader definition of ‘working households and community contributions’ enabling applicants an opportunity to demonstrate they inability to work due to disability, age or gender.</p>
<i>Sexual Orientation</i>
There is no evidence to suggest this policy will have a particular impact on this group.

10. What do you know about how the proposals could affect community cohesion?

The policy seeks to create a customer led choice based letting scheme, thus, promoting community cohesion. Properties will be advertised with adequate information enabling applicants to make informed decisions before expressing their interest.

11. What do you know about how the proposals could impact on levels of socio – economic inequality, in particular Poverty?

Properties advertised under the CBL scheme fall within the Affordable Housing category with rent levels at least 20% below the market rate.

STEP 3 - ANALYSING THE IMPACT

12. Is there any evidence of higher or lower take-up by any group or community, and if so, how is this explained?

There is no evidence of the policy significantly affecting any one group or community. The policy aims to deliver a fair and efficient mechanism for the allocation of social rented homes and awards priority to households who are most in need.

13. Do any rules or requirements prevent any groups or communities from using or accessing the service?

No, the CBL system is available to all residents looking for re-housing within the social housing sector. Assistance is available within all three local authority areas for residents who require support with applications and the bidding process.

14. Does the way a service is delivered/ or the policy create any additional barriers for any groups of disabled people?

See section 9

15. Are any of these limitations or differences “substantial” and likely to amount to unlawful discrimination?

Yes No

If yes, please explain (referring to relevant legislation) in the box below

16. If No, do they amount to a differential impact, which should be addressed?

Yes No

If yes, please give details below.

STEP 4 - DEALING WITH ADVERSE OR UNLAWFUL IMPACT

17. What can be done to improve the policy, service, function or any proposals in order to reduce or remove any adverse impact or effects identified?

n/a

18. What would be needed to be able to do this? Are the resources likely to be available?

n/a

19. What other support or changes would be necessary to carry out these actions?

n/a

STEP 5 - CONSULTING THOSE AFFECTED FOR THEIR VIEWS

20. What feedback or responses have you received to the findings and possible courses of action? Please give details below.

Consultation on the proposed changes to the MyHomeChoiceFyldeCoast policy took place between 8th November '17 – 18th December '17. See '**Key findings of consultation and feedback**' for results on key findings.

21. If you have not been able to carry out any consultation, please indicate below how you intend to test out your findings and recommended actions.

n/a

STEP 6 - ACTION PLANNING

Please outline your proposed action plan below.

Issues/ adverse impact identified	Proposed action/ objectives to deal with adverse impact	Targets/Measure	Timeframe	Responsibility	Indicate whether agreed
n/a					

STEP 7 - ARRANGEMENTS FOR MONITORING AND REVIEW

Please outline your arrangements for future monitoring and review below.

Agreed action	Monitoring arrangements	Timeframe	Responsibility	Added to Service Plan etc.
Review the allocation of social housing stock within the Fylde Coast Region		12 months	Fylde Coast Local Authorities	

Date completed:

Signed:

Name:

Position: