

**Blackpool Council - Equality Impact Assessment Record Form from March 2007**

Department: Adult Social Care and Housing

Housing Allocation Policy

Proposal to alter policy

Date of proposals: 26<sup>th</sup> September 2007- Executive Committee

Lead Officer: Karen Smith

**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?

The aim of this policy is to ensure Blackpool Council provides affordable social housing, which meets a range of housing needs, advocates choice and prevents homelessness.

We will do this by: -

- Assessing all housing applications fairly and accurately, taking equality and choice into account.
- Working with other providers and agencies to make the best use of all affordable housing.
- Re-letting empty properties as quickly as possible to tenants most suited to the property.
- Helping to build and sustain diverse and balanced communities.
- Minimising the cost of homelessness to the Council and to tax payers, and eliminating the use of Bed and Breakfast hotels for homeless families.

3. Please outline any proposals being considered.

Proposed changes have been identified following comments from the mock inspection last year and consultation with the people that use the Policy namely staff, tenants, and partners including BCH.

Key areas of change are the introduction of a 'rota' and 'quota' system to improve fairness in housing allocation and the decision making process being undertaken by Senior Officers which will improve waiting times.

The banding criteria has also been revised and introduces a Band A+ 'Emergency'

band for those in the most housing need, and B+ 'Cumulative Need' where priority is given when an applicant meets more than one criteria in Band B.

4. Why are the proposals being made - for what reason?

The 'rota' system will ensure that applicants requesting a transfers or a general need rather than homelessness will be given the chance of housing allocation. The 'quota' system will ensure applicants have equal opportunities as a proportion of allocations will have to be made to each band, rather than the highest priority band first.

Senior Officer Decision Making should speed up time taken for an applicant to be able to bid for a property and ultimately be allocated a home. Currently, eligibility decisions are made by a Housing Register Access Panel which meets every four weeks. The intention is that Senior Officer decisions will be made 'ad hoc' when needed.

The banding criteria changes aim to ensure greater fairness in prioritising housing need.

5. What outcomes do we want to achieve

- Increased housing allocation for those requesting transfers or general needs
- Increased housing allocation for those in bands other than the highest priority band
- Reduction in time applicants are suspended on the Housing Register pending further decisions about their eligibility
- Greater fairness in prioritising housing need

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

The revised policy is intended to help:-

- The diverse range of needs of applicants by a fairer system of allocation
- The needs of Blackpool residents generally by helping to build and sustain diverse and balanced communities, whilst minimising the cost of homelessness to tax payers.
- Staff and Partners through an improved Policy document to apply

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

- Applicants
- Existing tenants
- Members
- Staff
- Partner Registered Social Landlords
- BCH (Blackpool Coastal Housing)

8. Does the policy, service or function have any existing aims in relation to equality, social inclusion or community cohesion?

Yes.

- Assessing all housing applications fairly and accurately, taking equality and choice into account.
- Helping to build and sustain diverse and balanced communities.
- The Council operates local lettings policies where it is beneficial for the community

9. How is the resulting service or function delivered/ administered?

The housing allocation function is administered by the Housing Allocation Team, managed by Pam Whitworth. It forms part of the 'Housing Options Section' of the 'Assessment, Prevention and Support' Directorate.

Housing Allocation is based around a banding system where applicants circumstances are assessed and they are placed in a priority 'band' according to their housing need.

In order to allow fairness the service operates a 'quota' system which enables those in lower housing need to have a chance of being housed rather than just the homeless. The service also operates a 'rota' system to enable those applying for transfers or general needs equal opportunity for allocation thereby creating more of a balanced community.

The service uses 'Choice-Based Letting' which allows applicants to express interest in properties they would choose to live in rather than just being offered a property that the Council considers appropriate.

**STEP 2 - CONSIDERING EXISTING INFORMATION AND WHAT THIS TELLS YOU**

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

<b><i>Date/ information</i></b>
Population Data is taken from the Office of National Statistics (Census Data 2001) and additional information from National Statistics reports.

Service User information is taken from query reports made from the Blackpool Housing Register Waiting List.

**Research or comparative information**

	% Blackpool Population	% Service Users
<b>Race</b>		
White	98.41	90.62
Mixed	0.56	0.66
Asian	0.50	0.20
Black or Black British	0.15	0.36
Other	0.60	0.56
Decline to answer		7.58
<b>Gender/Transgender</b>		
Male	48.32	46.48
Female	51.68	53.52
Transgender		NOT KNOWN
<b>Age (18 and over)</b>		
18-64	75	84.34
65+	25	15.41
<b>Disability</b>	10	4.7
<b>Religion/belief</b>	78.63 – Christian 1.20 – Other than Christian 20.17 – None	NOT KNOWN
<b>Lesbian/gay/bisexual Aged 16+ same sex couple in household</b>	0.46	NOT NOWN

**Race**

- Blackpool has a very low number/percentage of people from BME communities with 98.41% classifying themselves as white. The percentages are lower than the North West (94.4%) and England (90.9%).
- 96.59% of people living in Blackpool were born in the United Kingdom as oppose to 95% regionally and 91% nationally. Of those born outside of the UK, the highest percentages were born in Western Europe (0.85%) and Asia (0.79%). Those countries outside of the UK where Blackpool residents were born are Germany (586), Italy (191), Poland (127), South Africa (147), Hong Kong (195), and India (218).

## Gender

- Blackpool has a total population of 142,283, 48% men and 52% women (similar to national gender balance).

## Age

- Blackpool has an older population than in the North West and in England as a whole
  - 25% of the population is over 65 in Blackpool, as oppose to 16% in England and North West.
  - 16% of the population in Blackpool aged 16-74 are classed as economically inactive/retired, as oppose to 14% regionally and nationally.
  - There are more retired women than men.

## Disability

- Blackpool has more people in poorer health than regionally and countrywide
  - 14% of Blackpool population indicate they are not in good health, this is higher than in North West (11%) and within England (9%)
  - 25% believe they have a limiting long-term illness in Blackpool, this is higher than in North West (21%) and within England (18%).
  - 10% of people between 16-74 are permanently sick or disabled and economically inactive. Percentages are 8% for the NW and 5% for England. In Blackpool approximately a third more men than women are in this category.
  - 42.9% of households in Blackpool include one or more person with a limiting long-term illness, statistics in the North West are 38.4% and in England 33.6%.

## Religion

- 78.63% population describe themselves as Christian, and 20.17% state they have no religion or none was stated. The remaining 1.2% of the population describe their religion as 'other than Christian' of which the highest percentage (0.44%) describe themselves as Muslim. The percentage of 'other than Christian' population for the North West are 4.3% (of which 3% is Muslim) and in England the percentage is 6% (again 3.1% being Muslim and 1.1% Hindu).

## Sexuality

- The percentage of people indicating they live in a same sex relationship is higher in Blackpool at 0.5% than in the North West or England (0.2%).

## Marital Status

- 45.36% population aged 16 and over describe themselves as 'married' (35.77%) or 're-married' (9.59%). This is lower than the North West where 49.52% describe themselves as either married or re-married and in England where the figure is 50.85%.
- 28.50% population aged 16 and over in Blackpool describe themselves as 'single' whereas 26.14% state they are divorced/separated or widowed.

<b><i>Key findings of consultation and feedback</i></b>

11. What are the impacts or effects for communities?

<b><i>Race or ethnicity</i></b>
<p>The Housing Applications Team obtain information on service provision/take up by ethnicity but do not collate or use this information to effectively ensure that allocation of housing is in line with demonstrated need and that no racial group is benefiting unfairly. However, an Equality Impact Assessment was carried out on the existing Policy in 2004 which revealed that the percentage of applicants in an ethnic minority group reflected the percentage ethnic minority population in Blackpool suggesting that the service was accessible for these groups. This has been reviewed again for this Equality Impact Assessment and the same conclusions are made. As the reviewed policy is now more equitable, by virtue it should be less discriminatory as it is easier to apply.</p> <p>Whilst the Council has not had any specific complaints in this area, perception (fuelled by national media) is that a large number of homes are allocated to immigrants.</p> <p>The Council will monitor the new Policy against comments/complaints/compliments to ensure it does not discriminate.</p>
<b><i>Gender and transgender</i></b>
<p>Gender - Women are slightly over-represented in our service user profile. As this is a nominal difference, it does not suggest there is an issue.</p> <p>Transgender - currently we do not have data available to make a comment in this area. Given the sensitive nature of this we do not ask applicants to disclose this information and would only hold data if it was volunteered. The Council has a Faith, Equality and Diversity Team that has links with this specific community group. We will work with this Team to consult on the revised Policy and how it effects them. As yet, we have not had any issues with the administration of the service for this user group.</p>
<b><i>Age</i></b>
<p>There are fewer people aged 65 and over applying for social housing in Blackpool than the comparative population percentage for this age group. This may suggest that improved awareness of the service or support for applicants is needed for this age range.</p> <p>However, it should be noted that Blackpool has a higher number of residential placements for over 65's than the national average. This could account for fewer</p>

<p>over 65's applying as their housing needs would be met through this service.</p>
<p><b><i>Disability</i></b></p> <p>Currently, we do not have data on how many applicants are disabled within the meaning of the DDA. However, 4.7 % of applicants have indicated that they are one of the following:-</p> <p>Blind or visually impaired  Deaf or hearing impaired  Disabled  Wheelchair confined  Wheelchair user</p> <p>This compares with 25% of the Blackpool population who state they have a 'limiting long-term illness'. It is difficult to know if we are comparing 'like' with 'like' as this definition is open to interpretation.</p> <p>There has been some recent consultation with the disabled community and it has revealed that they think declaring their disability might slow down their application due to a limited number of adapted properties. There could be an awareness issue here if disabled people do not think adapted properties are available or that grants are available for adaptations to be made to non-adapted homes. Further work needs to be undertaken with local disability groups and support organisations to ensure that this imbalance is addressed.</p>
<p><b><i>Religion or belief/ faith communities</i></b></p> <p>We do not have any data about this from housing applicants however we have now included the question on the new housing application form. To date we have not received any complaints or comments relating to this area however we will work with the afore mentioned Faith, Equality and Diversity Team to consult with the already established 'Faith Forum.'</p>
<p><b><i>Lesbian, gay, bisexual people</i></b></p> <p>We do not have any data about this from housing applicants however we have now included the question on the new housing application form.</p> <p>The Council has a Faith, Equality and Diversity Team that has links with this specific community group. We will work with this Team to consult on the revised Policy and how it affects them. As yet, we have not had any issues with the administration of the service for this user group.</p>
<p><b><i>Other socially excluded communities or groups</i></b></p> <p>None known</p>
<p><b><i>Relationships between or within communities</i></b></p> <p>None apparent</p>

12. What do you know about how the proposals will impact on different communities?

The proposals should not negatively impact the different communities. By contrast, they should improve the service due to the increased fairness which is the ethos of the changes.

### STEP 3 - ASSESSING THE IMPACT

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

As detailed above:-

Lower take-up of people aged 65+ but could be due to high number of residential placements as mentioned above;

Lower take up of 'disabled' applicants although the definition of 'disabled' is open to interpretation. Further work needs to be undertaken with local disability groups and support organisations to ensure that this imbalance is addressed.

14. Does the geography or demography of service users reveal anything?

There are higher concentrations of people with long-term disabilities in deprived wards and there are wards where the overall population is ageing at a faster rate than others. This should be a consideration for the future.

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

Certain people cannot be included on Blackpool Council's Housing Register and will subsequently be excluded, removed or suspended. These include:-

- People guilty of unacceptable behaviour\*

\* 'Unacceptable behaviour' is defined as behaviour where, if the applicant had been a secure tenant of the Council at the time, the Council would have been entitled to a possession order. This includes behaviour likely to cause nuisance or annoyance and use of the property for immoral or illegal purposes. For example:-

- People who themselves, or members of whose households have been convicted of or have had legal action taken against them in connection with violence, harassment, racial harassment, threatening behaviour or any other forms of anti-social behaviour and are unsuitable to be council or other Housing Association tenants.

- People, who themselves or members of their households, have committed and been convicted of a serious criminal offence

- People under the age of 16.
- People from abroad who are subject to immigration control, under the Asylum and Immigration Act 1996, and whom the Secretary of State has not made exempt.
- People prescribed as ineligible by the Secretary of State.

The Policy also states that applicants without a 'local connection' to Blackpool can only be placed in Band C (lowest priority). The local connection rule (which applies to all applicants) states that 'Applicants will be seen to have a local connection if they can demonstrate local residency, local employment, previous local residency, or a close family in Blackpool. Whilst this may appear to disadvantage some applicants it will in fact have an advantage to those with a local connection. This practice is adopted by a number of other Authorities.

16. Does the way a service is delivered/ or the policy create any additional barriers for any groups of disabled people? (DDA duties arising out of DDA 1995)

No – We work in partnership with our Adaptations Section and Adapted properties are available.

17. Does the way a service is delivered/ or the policy create any additional barriers for any other groups or communities, for example, due to limited income or because of the time during the week or day when the service is available? E.g. women, cultural reasons.

Offenders - All 'High Risk' offenders will be referred for a decision as to their eligibility to access Housing Register.

Applicants for social housing are predominantly people who have limited income and the service signposts to the Housing Benefit Team to support applicants.

The service provides for applications to be made by different methods, e.g on-line, in person, over the telephone and application forms are available in different languages or large print/braille.

18. Do any of these limitations amount to unlawful discrimination?

Yes  No

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

N/A

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

Yes  No

If yes, please give details in the boxes below.

N/A
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20. If the impact or effects are adverse for any community or group, can they be defended in order to provide equality for another community under legislation or policy?

Yes  No

Please give details below.

N/A
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21. Do you have enough information to make a judgement?

Yes  No

If no, what information do you require, about which communities?

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22. Is it possible to get the information quickly and easily or is it recommended that the collection of such data be included as an action for the action plan that will be developed? Please detail below.

N/A
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#### **STEP 4 - DEALING WITH ADVERSE OR UNLAWFUL IMPACT**

23. 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?

There are no adverse implications at present however the implementation of the revised policy will continue to be monitored annually in line with Corporate Business Planning arrangements.
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24. What would be needed to be able to do this? Are the resources likely to be available?

No additional resources are required. Monitoring arrangements need to feed into existing Departmental monitoring arrangements.

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

Awareness training for Housing Application Team staff and Lettings Team staff will need to be devised and delivered.

## **STEP 5 - CONSULTING THOSE AFFECTED FOR THEIR VIEWS**

26. Please outline the steps taken to test out your findings and possible courses of action below.

The revised policy has been developed based on previous consultation with stakeholders and through banding criteria workshops. The revised policy has been to Adult Social Care and Housing Departmental Management Team and is due to go to the Chief Executives Liaison Group and the Executive Committee of Members.

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

None received at present although the impact of the policy will be continually monitored.

28. 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.

The Revised Policy has been devised based on consultation with key stakeholders and the draft has been circulated to key stakeholders. There will however be further consultation – see recommendations.

29. If you are impact assessing some proposals, what steps have been taken to ensure that stakeholders have been able to voice their opinions on the proposals or the need for change?

Stakeholder consultation as mentioned above.

## 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
No consultation with Transgender Group	Liaise with Faith, Equality and Diversity Group to consult with established specific community group	No set target – just need insight into any issues faced by this group	Oct/Nov 2007	Jo Hunt/Pam Whitworth	agreed
Don't know what disabled service users think of <u>revised</u> policy	Further consultation with sample of the service users from the disabled community	As above	Oct/Nov 2007	Jo Hunt/Pam Whitworth	agreed
No consultation with Lesbian, Gay and Bi-Sexual People	Liaise with Faith, Equality and Diversity Group to consult with established specific community group	As above	Oct/Nov 2007	Jo Hunt/Pam Whitworth	agreed

## 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.
Liaise with Faith, Equality and Diversity Group to consult with established specific community group	Supervision with relevant officer	Oct/Nov 2007	Jo Hunt/Pam Whitworth	
Further consultation with sample of the service users from the disabled community	Supervision with relevant officer	Oct/Nov 2007	Jo Hunt/Pam Whitworth	
Liaise with Faith, Equality and Diversity Group to consult with established specific community group	Supervision with relevant officer	Oct/Nov 2007	Jo Hunt/Pam Whitworth	

Date completed: 11<sup>th</sup> Sep 2007

Signed: *J Hunt*

Name: Joanne Hunt  
Officer

Position: Housing Needs Development