

Equality Impact Assessment

APPENDIX B

This document is intended to act as a guide and point of reference. There is no requirement to use this document as part of the policy development or decision-making process; although it may help.

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What are you thinking of changing or implementing?

Fareham's draft Housing Allocations Policy (2019) will, once adopted, supersede Fareham Borough Council's previous Housing Allocations Policy that was introduced in 2014.

The Housing Act 1996 places a requirement on all housing authorities to determine local priorities and processes for the allocation of social housing. Since the adoption of Fareham Borough Council's latest Housing Allocations Policy, there have been a number of amendments and proposed revisions to 'Housing' legislation.

In particular, the Allocation of Housing (Qualification Criteria for Right to Move) (England) Regulations 2015 details the authorities' responsibility to accommodate social housing tenants who need to move as a result of work commitments. Improving Access to Social Housing for Victims of Domestic Abuse in Refuges or Other Types of Temporary Accommodation (November 2018) sets out statutory guidance around facilitating access to social housing for this specific vulnerable group. The Government is also currently working on proposals to legislate for the housing support required by the divorced or separated spouses of those serving in the military.

Fareham's draft Housing Allocations Policy (2019) responds to each of these developments, ensuring that current housing obligations are being met and future demands are incorporated.

In addition to responding to these changes in legislation and statutory guidance, the draft Housing Allocations Policy (2019) incorporates an approach that was identified through the Vanguard intervention as assisting in the prevention of homelessness. The 'Housing Options Method' promotes a comprehensive understanding of the customers' circumstances gained through individual appraisal. Through this process, it provides opportunities to support with tailored advice and considers the most appropriate housing option for the individual.

This is a significant change from the current Housing Allocations Policy, in which customers are required to submit an application form for entry onto the housing waiting list.

For those customers that are identified during this appraisal as eligible for social housing, the draft Housing Allocations Policy (2019) determines that accommodation is allocated using the 'Best Match Method'. This method offers available accommodation to the most suitable applicant at the greatest priority on the housing waiting list. Again, this is

different to the existing policy, through which customers use 'Choice-Based Letting' to 'bid' for properties, often resulting in a misunderstanding of the suitability of the property and its eventual allocation to those of lower priority on the housing waiting list.

The Housing Allocations Policy will be applied in conjunction with the Affordable Housing Strategy, in which guiding principles are set out for the sustainable provision of affordable housing in the Borough, around three key objectives;

1. To deliver more affordable homes through the planning system.
2. To ensure those homes are the right homes in the right places and that they are truly affordable to those that need them.
3. To directly deliver more affordable homes by Registered Providers and Fareham Housing, especially targeting those in greater need.

The draft Housing Allocations Policy and the Affordable Housing Strategy, together, aim to reduce numbers of individuals in the Borough waiting to be allocated social housing. At present, the housing waiting list for Fareham stands at 1104 'live' cases.

The draft Housing Allocations Policy has been developed and refined through extensive consultation both internally and with key stakeholders, including residents, community groups, Registered Providers, Two Saints Homeless Service, Friends of the Homeless, NHS England, MPs within the Borough, neighbouring Local Authorities and Hampshire County Council.

Once approved, the policy will be published on the Council website and copies will be made available at the Civic Offices.

What is the expected or anticipated impact of this change?

The changes that have been identified so far between the draft Housing Allocations Policy 2019 and the previous 2014 version are broadly focussed, offering the potential for a positive impact for all residents, through a supportive approach that considers the best fit solution to the individual's housing needs.

The draft Policy also contains within it some more specific criteria-based alterations which may impact on certain protected characteristics. These more specific amendments are;

- Medical priorities now include sensory and mental health conditions.
- An income threshold for applications has been removed, as each case will be assessed thoroughly and all income and outgoings considered to more effectively inform appropriate housing options.
- In requests for sheltered housing, three criteria will need to be met; the customer must be over 55 years and would benefit from the sheltered accommodation offered, their current home must be unsuitable for their needs, and they must have insignificant financial resources to meet their housing needs in the private market. At present, there is only a requirement to demonstrate that they have a need for the level of support linked with the scheme to which they are applying, which has been notoriously difficult to quantify.
- The priority band 'a person or household living in any moveable structure with or without formal tenancy arrangements' has been removed due to exceptionally low demand and confidence that these needs can be met through the remaining priorities.
- The priority band 'a tenant living in the Borough with dependent children living

above the ground' has been removed due to the limitations of available properties. Whilst each of these amendments will have an impact (either positive or negative) on a protected characteristic, the details of which will be considered below, the draft Housing Allocations Policy (2019) incorporates these changes pragmatically. In this way, the draft Policy focuses on allocating social housing to those in greatest need, while supporting all to determine the housing solution that best fits their needs.

The Housing Options Team uses an information management system that enables the analysis of housing allocation to those from particular priority bands. The criteria of 'sensory condition' will be added to the information collected in response to the draft Policy. The Team will assess the progress of those identified as having key protected characteristics (such as those speaking a foreign language, those identified with a sensory or mental health condition, or older residents) on a three monthly-basis, or when the Team identifies a rise in demand or waiting time for the allocation of housing from these groups.

Using this approach, the impact of the Housing Allocations Policy on protected characteristics can be monitored and any necessary amendments to the support they require modified as a result.

The potential positive impact that the draft Housing Allocations Policy (2019) offers is broad. It is, however, anticipated that it will be of particular benefit to individuals with certain protected characteristics due to prioritisation when allocating properties and the increased support it offers to guide them in identifying appropriate housing options.

Protected characteristic: Age (including children and young people)

Points to consider:

- How have you considered the potential impact on people with this protected characteristic?
- What, if any, is the expected impact on people with this protected characteristic?
- What steps or action is planned to mitigate any negative impact?

Fareham has a statistically high number of older residents when compared to both regional and national levels. In 2018, 23 percent of Fareham's population were over 65 years old and this figure is projected to rise to 31 percent by 2036.

Fareham Borough Council has 26 sheltered housing complexes, offering a variety of support for the increased needs posed by this ageing demographic. This equates to 28 two-bedroom properties, 582 single-bedroom properties, 2 studio flats and 38 bedsits. Although this appears to be a good number of sheltered housing properties, demand for these is high and all are at capacity.

The draft Housing Allocations Policy (2019) provides clear qualifying criteria on applications for sheltered housing, namely that the customer is over 55 years and would benefit from the sheltered accommodation offered, their current home must be unsuitable for their needs, and they must have insignificant financial resources to meet their housing needs in the private market.

This approach will ensure that this vital accommodation is accessed by those most

vulnerable and in need. Whilst it would initially appear that this would lead to a negative impact for wealthier or home-owning older residents, the draft Policy focusses on the provision of a thorough assessment of need for each customer. The subsequent support and advice aims to assist them in identifying the housing option that is most appropriate to them. The availability of this support ensures that the draft Housing Allocations Policy (2019) represents a positive impact for the older person demographic.

Although the draft Policy does not consider specifically the needs of young people, it does specify that from the age of 16 years, young people are able to secure a licence to occupy premises, which can convert to a full tenancy when they turn 18.

The support that will be on offer, through the proposed procedures, will assist young people to understand whether a licence to occupy is the most appropriate solution for them and enable them to consider all their options. This additional support ensures that the draft Housing Allocations Policy (2019) will not have an adverse impact for this demographic.

The draft Housing Allocations Policy contains a revision from the previous policy that represents a potential impact on children, namely that the priority band 'a tenant living in the Borough with dependent children living above the ground' has been removed due to the limitations of available properties.

This may be viewed initially as a negative impact for children by reducing their likelihood to live in accommodation with immediate access to a garden space that also affords their parent easy access to their property when encumbered with a pushchair. However, by prioritising factors that are better able to be accommodated, it increases the likelihood that the choice of housing meets their greater need and improves the stability of their housing situation by removing unrealistic expectations to move to a ground floor property.

The Borough of Fareham prides itself in containing a good distribution of open space and play areas, which ensures that all children in any accommodation type have good access to opportunities for outdoor play and recreation. This strong provision provides mitigation for this potential negative impact.

Protected characteristic: Disability (including physical and those with mental health conditions)

Points to consider:

- How have you considered the potential impact on people with this protected characteristic?
- What, if any, is the expected impact on people with this protected characteristic?
- What steps or action is planned to mitigate any negative impact?

Almost one in five people in the UK have a disability, with mobility being the most common impairment. The 2011 Census revealed that the proportion of Fareham residents whose day-to-day activities were 'limited a lot' due to disability is above the average for Hampshire.

Disability, of various forms, can restrict access to well-paid work (thereby increasing reliance on social housing) and make existing housing arrangements unfit for the

resident's needs. Fareham's Housing Allocations Policy 2014 currently considers the impact that medical conditions, including disabilities, can have on an individual's housing needs. It also identifies the positive impact that suitable accommodation can have on the health and welfare of those with medical conditions.

The draft Housing Allocations Policy (2019) builds on this ethos and extends the 'medical conditions' considered to include both mental health and sensory conditions. As with other health concerns that are currently included in the 'medical' priority band, the draft Policy demands the receipt of evidence from the applicant's GP or other Health Professional, to prevent misuse and ensure that only those most in need secure this increased priority.

Staff have regular access to training and 'webinar' courses on different vulnerabilities they may need to support during the housing allocation process. Regular review of the key protected characteristics will help to inform staff as to whether additional staff training is needed to better support customers with the extended 'medical' criteria of sensory and mental health conditions.

The current Housing Allocation process asks for the completion of a form to register a housing need which can be a daunting task for people with disabilities such as mental health difficulties. The draft amendments to the Policy promote a more sympathetic and accessible approach, though which tailored support from Housing Options staff ensure that applicants are guided to identify housing solutions that are most appropriate for them.

Through this supportive approach, Housing Options staff will also identify any vulnerabilities during the assessment process, enabling them to be flagged on the information system to ensure that future correspondence and housing opportunities reflect their needs. This is particularly relevant when one considers the proposal that the draft Housing Allocations Policy contains to remove applicants from the register if they do not respond to a letter detailing the review of their eligibility. Individuals with certain disabilities, such as mental health or sensory conditions, may struggle with communication or scheduling necessary actions in response to an eligibility review.

The flagging of vulnerabilities on the Housing Options information system mitigates against the potential of the negative impact of disabled customers to be disadvantaged through the proposed eligibility review process. As a result of this mitigation, the evidence indicates that the draft Housing Allocations Policy (2019) will have a positive impact for this protected characteristic.

Protected characteristic: Gender reassignment

Points to consider:

- How have you considered the potential impact on people with this protected characteristic?
- What, if any, is the expected impact on people with this protected characteristic?
- What steps or action is planned to mitigate any negative impact?

No impact identified.

Protected characteristic: Marriage and civil partnership

Points to consider:

- How have you considered the potential impact on people with this protected characteristic?
- What, if any, is the expected impact on people with this protected characteristic?
- What steps or action is planned to mitigate any negative impact?

No impact identified.

Protected characteristic: Pregnancy and maternity

Points to consider:

- How have you considered the potential impact on people with this protected characteristic?
- What, if any, is the expected impact on people with this protected characteristic?
- What steps or action is planned to mitigate any negative impact?

No impact identified.

Protected characteristic: Race

Points to consider:

- How have you considered the potential impact on people with this protected characteristic?
- What, if any, is the expected impact on people with this protected characteristic?
- What steps or action is planned to mitigate any negative impact?

The Borough's population has a considerably higher proportion of the 'White British' ethnic group compared to regional and national figures, and a correspondingly lower proportion of other ethnicities.

The Housing Allocations Policy is intended to be socially inclusive and will be made available in alternative languages upon request. Council tenants who face language barriers in accessing information of the services available to them are able to request the support of a translator, through the Council.

The draft Policy does contain within it one amendment that could have a potential negative impact on this protected characteristic, namely the removal of the priority band 'a person or household living in any moveable structure with or without formal tenancy arrangements'. This revision would seem to disadvantage the travelling community. However, the amendment was made as a result of exceptionally low demand from this group and confidence that their needs can be met through the remaining priorities.

There is no evidence to suggest that the draft Housing Allocations Strategy will have an adverse impact on this protected characteristic group.

Protected characteristic: Religion or belief

Points to consider:

- How have you considered the potential impact on people with this protected characteristic?
- What, if any, is the expected impact on people with this protected characteristic?
- What steps or action is planned to mitigate any negative impact?

No impact identified.

Protected characteristic: Sex

Points to consider:

- How have you considered the potential impact on people with this protected characteristic?
- What, if any, is the expected impact on people with this protected characteristic?
- What steps or action is planned to mitigate any negative impact?

No impact identified.

Protected characteristic: Sexual orientation

Points to consider:

- How have you considered the potential impact on people with this protected characteristic?
- What, if any, is the expected impact on people with this protected characteristic?
- What steps or action is planned to mitigate any negative impact?

No impact identified.

Socio-economic status

The draft Affordable Housing Policy (2019) aims to prioritise those in greatest need. Rather than relying on the artificial ‘income threshold’ to establish an individual’s financial need, this has instead been replaced by the assessment of the customer’s disposable income using the enquiry and tailored support offered by the Housing Options Method. This change ensures that considerable outgoings such as Child Support Agency payments are able to be considered, offering a far more realistic understanding of the affordability of housing for the customer.

People with lower incomes often find it particularly challenging to find housing that is affordable for them. The national programme of welfare reform has, for many in receipt of benefits or on a low income, added to these difficulties that they face. During the Housing Options process, the Council will work in partnership with specialist organisations, such as the Department of Works and Pensions and local charities, to support people with financial concerns, in addition to ensuring these individuals’ housing needs are met.

As a result of the additional support that is offered through the Housing Options Method, the evidence indicates that the Draft Affordable Housing Strategy is likely to have a positive impact on this group.