

Diversity impact assessment

TITLE Name / description of the issue being assessed	Medway Housing Allocations Policy 2019 – review of the Medway Housing Allocations Policy 2012
DATE Date the DIA is completed	25 July 2019
LEAD OFFICER Name, title and dept of person responsible for carrying out the DIA.	Tracy Chambers, Interim Temporary Accommodation and Homechoice Manager, Strategic Housing

1 Summary description of the proposed change

- What is the change to policy / service / new project that is being proposed?
- How does it compare with the current situation?

Allocations Policy

The Allocations Policy is a document used for the allocation of social housing accommodation in Medway and seeks to allocate accommodation based on legal requirements and the needs of Medway. Following a review, the proposed changes are below:

1. If a household owns their own home they can currently qualify. We are however proposing that they will not qualify in the new policy
2. Households that have been re-housed within the last year through Homechoice will not qualify to be registered. There is currently no exclusion for this.
3. Households that have been found guilty of serious anti-social behaviour that makes them unsuitable to be a tenant will be excluded until they can show a change in behaviour. These households are currently placed into a reduced priority band D.
4. Households that have not been bidding for a period of six months will be removed for a period of six months. These households are currently given a reduced priority band D.
5. Households that have refused two offers of suitable accommodation, will be removed for a period of six months. These households are currently given a reduced priority band D.
6. Additional priority will be awarded to households in social housing that have an accommodation with adaptations that are no longer required. No current provision in the policy.
7. If someone deliberately worsens their own circumstances and they fall into a reasonable preference group they will be placed into band D. They may have previously been on the inactive register.
8. Reduce those registered for seeking sheltered housing to band D, they are currently in band C and B. Registration for sheltered accommodation will now be for over 60 rather than over 55.
9. New band reason for Right to Move. Previously no provision.
10. Increased homeless quota from 20% to 30%.
11. Medway care leavers can apply for two bedroom accommodation with another care leaver. Currently no provision for this.

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12. Income limit removed for working households for local priority/community contribution.
13. Number of hours reduced for young people to qualify for local priority/community contribution.
14. Exemption for residency awarded for divorced, separated spouses or civil partners of Service Personnel that need to leave their military accommodation. Currently catered for under exceptional circumstances.

2 Summary of evidence used to support this assessment

- Eg: Feedback from consultation, performance information, service user records etc.
- Eg: Comparison of service user profile with Medway Community Profile

Allocations Policy

As of 25 July 2019 there were 3,912 households registered for re-housing and of those 1,850 households are able to express interest in accommodation advertised. Below are the reasons for the changes listed above.

1. Recommendation from MHCLG that homeowners are removed from being able to be allocated social housing. It currently causes an issue as the property will need to be sold and can cause issues with payment of rent during this period. As of 25 July 19 there were 42 owner occupiers or shared owners registered, 23 of these have a priority band.
2. Currently households are able to re-apply to Homechoice when re-housed and this causes additional void costs for landlords and does not contribute towards sustainable communities as households are moving on too quickly and not laying down roots in the area.
3. Households found guilty of anti-social behaviour are currently given a reduced priority band D; however due to the anti-social behaviour they are not being considered for properties and it therefore better to remove them from the register, rather than give them false hope. As of 25 July 2019 there were no households registered with this priority.
4. The scheme relies on households bidding on accommodation for households to be moved on and if they are not bidding without good reason they are currently placed in band D. It is proposed that they are removed for a period of time. This will ensure that those in most need to move, that are actively pursuing moving are re-housed. As of 25 July 19 there were 714 households that have not bid for accommodation in six months. Of the 714 households, 411 do not have a housing need, so are either registered for sheltered housing or as a transfer tenant.
5. There is a lot of administration time and time spent by housing providers to allow households to view accommodation that they then refuse. The proposed change will remove households that refuse two suitable properties. As of 25 July 19 there is no one registered with a reduced priority for that reason.
6. Adapted properties are in high demand and as of 25 July 2019 there were 206 households with a high or urgent medical need to move. If

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- households with adapted properties, that are no longer needed are prioritised then this may free up more adapted properties to meet need.
7. If a household worsens their own circumstances they are awarded the priority they were previously had, there is currently no provision for those in a reasonable preference, who by law need to be given an additional preference.
 8. Households registered for sheltered housing and extra care accommodation are registered in band C and also qualify for local priority band B. This means that if they bid on a property they may place above those households with a housing need and placing them into band D will ensure that this does not happen. As of 25 July 19 this was likely to affect 479 households. There is only one provider that offers accommodation to those between 55 and 59 and they rarely have properties available, this then gives those of this age bracket false hope that they will be accommodated and has caused many complaints for the Homechoice Team as they are unable to bid for accommodation advertised. As of 25 July 2019 this is likely to affect 58 households.
 9. There is no current provision for Right to Move, but this will enable households in social housing that need to move to take up or continue employment the ability to move to the required borough.
 10. The homeless quota has been increased to take account of the increase in homeless households and to ensure that the number of households in temporary accommodation is kept down. This also keeps down the time households have to stay in temporary accommodation. These households will already be registered on Homechoice and have a reasonable preference.
 11. Allowing two care leavers to apply for two bedroom accommodation we hope will assist them to sustain accommodation and also stop loneliness and isolation.
 12. The income limit has been removed for local priority/community contribution, as the policy already excludes those with a high income.
 13. The number of hours that young people need to be volunteering for local priority/community contribution, has been reduced to bring it in line with others that are volunteering, this was previously higher for young people.
 14. Following MHCLG guidance, an exemption for residency will be awarded for divorced, separated spouses or civil partners of Service Personnel that need to leave their military accommodation.

Consultation was completed face to face with partners and a web based consultation was sent to housing providers and available for the public. The feedback from face to face consultation was positive and there were no objections to the required changes. The online consultation responses included information that was not relevant to the questions asked; however on the whole the response was positive and the majority agreed with the changes requested, although there was a split decision on the change for sheltered households to band D and suspending households that have refused two

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offers of suitable accommodation.

3 What is the likely impact of the proposed change?

Is it likely to :

- Adversely impact on one or more of the protected characteristic groups?
- Advance equality of opportunity for one or more of the protected characteristic groups?
- Foster good relations between people who share a protected characteristic and those who don't?

(insert ✓ in one or more boxes)

Protected characteristic groups (Equality Act 2010)	Adverse impact	Advance equality	Foster good relations
Age	✓		✓
Disability	✓		✓
Gender reassignment			
Marriage/civil partnership			
Pregnancy/maternity			
Race			
Religion/belief			
Sex			
Sexual orientation			
Other (eg low income groups)			

4 Summary of the likely impacts

- Who will be affected?
- How will they be affected?

Housing Allocations Policy

Older people registered will be placed into band D, which is a reduced priority from band C and B that they are currently in. As of 25 July 2019 this is likely to affect 479 households and they will place lower on the shortlists for properties. Those that are between the ages of 55 and 59 will be re-assessed and likely to be placed on the inactive register, this is likely to affect 58 households.

Young people are likely to be advantaged, as care leavers will be able to apply for an additional bedroom with another care leaver. The number of

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hours for volunteering has also been decreased to bring this in line with the generic criterion for volunteering.

Households with a disability may not be able to bid for themselves and this could result in them being removed from the register. Disabled households will also be advantaged as there is likely to be more adapted properties advertised through Homechoice will the additional priority for adapted homes.

5 What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?

- What alternative ways can the Council provide the service?
- Are there alternative providers?
- Can demand for services be managed differently?

Older people registered for sheltered and extra care accommodation only, do not have a housing need and are only registered for this accommodation as it is in low demand and because they are old enough to qualify for this. They are therefore able to look at other options such as private rented and information on this is available as part of their housing options information, when they complete a pre-assessment for Homechoice.

There are not many sheltered schemes that will take households that are aged 55-59. However we can make households aware of these schemes when they apply, as the schemes also hold a waiting list. Again these households do not have a housing need and can therefore consider other options.

The Homechoice system now allows households to be set up for automatic bidding, so for the households that are unable to bid for themselves the system can be set up to do this for them, therefore avoiding them being removed from the register for not bidding.

6 Action plan

- Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence

Action	Lead	Deadline or review date
Information on sheltered services that households aged 55 to 59 can access made available to these households.	Tracy Chambers	31/10/19
Set up a Targeted Housing Option to all households to advise that they can be set up for auto bids if they wish to.	Tracy Chambers	31/10/19

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7 Recommendation

The recommendation by the lead officer should be stated below. This may be:

- to proceed with the change, implementing the Action Plan if appropriate
- consider alternatives
- gather further evidence

If the recommendation is to proceed with the change and there are no actions that can be taken to mitigate likely adverse impact, it is important to state why.

Allocations Policy

I recommend that the changes are implemented as there are interventions that can be put in place to alleviate or at least reduce the impact that the changes will have on the affected groups.

8 Authorisation

The authorising officer is consenting that:

- the recommendation can be implemented
- sufficient evidence has been obtained and appropriate mitigation is planned
- the Action Plan will be incorporated into the relevant Service Plan and monitored

Assistant Director

Date

Contact your Performance and Intelligence hub for advice on completing this assessment

RCC:	phone 2443	email: annamarie.lawrence@medway.gov.uk
C&A (Children's Social Care):	contact your usual P&I contact	
C&A (all other areas):	phone 4013	email: jackie.brown@medway.gov.uk
BSD:	phone 2472/1490	email: corppi@medway.gov.uk
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