

APPENDIX 4- EQUALITIES IMPACT ASSESSMENT- HOUSING ALLOCATIONS SCHEME AND PLACEMENTS POLICY

1. Introduction

The Council has proposed some amendments to the housing allocations scheme. This is the set of rules used to decide who gets priority for housing in the borough.

The proposed amendments include:

- Making only one offer of a suitable property rather than the current position where some applicants have up to two offers

In addition, the provision of accommodation for homeless applicants will be clarified by

- The introduction of placements policy. This will consider the suitability of offers of private rented sector homes in terms of housing condition, distance from work or support networks and also affordability of the rent. This may see some households moving into more affordable areas outside of the borough.

These proposals build upon the scheme that was first introduced in April 2011. This saw a series of major reforms, including closing an open housing waiting list and recognising the community contributions of applicants also in housing need (for example: workers, volunteers, people in training or education and former members of the armed forces).

Under the Equality Act 2010, the Council must have due regard to the need to: a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; b) advance equality of opportunity between those with a protected characteristic and those without; c) promote good relations between those with a protected characteristic and those without. The 'protected characteristics' referred to are: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation. It also covers marriage and civil partnership with regard to eliminating discrimination.

This equalities impact assessment assesses the impact of the proposed changes on protected groups and suggests appropriate mitigation actions.

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2. One offer only policy

What happens now	Applicants can refuse the first offer of a property regardless of whether they appeal successfully against it. Applicants refusing a second offer are removed from the banding system for 12 months, unless there are changes to their household's circumstances that merit a full review.
What is proposed	Applicants will only receive the one offer and be expected to accept this, unless there is a review of the offer and it is found to be unreasonable. Applicants who refuse the first offer and/or are not successful in challenging the reasonableness of the offer will be removed from the banding system and will not be eligible to be rehoused by the council for 12 months.
Rationale	22% of applicants banded in 2012/13 refused their first offer causing a delay in the properties being let successfully. The number of housing applications has increased by 25% in 1 year and the number of banded applicants increased by 29%. Supply is not keeping up with demand and it is difficult to procure affordable private sector accommodation meaning the council has to be realistic about the number of offers that it can reasonably give.

Equalities question	Issues/risks	Mitigations/comments
Are there differential service outcomes for the different communities using our services?	<p>Analysis of data on housing applicants who were banded in the year 1st April 2012 to 31st March 2013 indicates the following:</p> <ul style="list-style-type: none"> • Older people aged over 55 are more likely to refuse an offer of accommodation than all households • People aged 16 to 44 are less likely to refuse an offer of accommodation than all 	<p>Housing Revenue Account self-financing is being used to increase the number of housing units for specific customers, including older people and people with needs for wheelchair accessible homes. This will improve the offer of housing to these groups</p> <p>Applicants with an assessed need for level access accommodation will be offered level access accommodation</p>

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	<p>households</p> <ul style="list-style-type: none"> • Some ethnic groups are more likely to refuse an offer of accommodation than all households (particularly Black African, Black Other), other groups less likely (Asian British/Other, White Other) • There is very little information available on disability but from the data that is available disabled applicants appear to be no more likely to refuse an offer than non-disabled applicants. <p>There is a risk that that these communities will be adversely affected by the enforcement of a one-offer only policy and that they will be removed from the banding system and not have their housing needs met because they refused a further offer of accommodation.</p>	<p>under the proposals whereas at present these properties are not reserved for this group.</p> <p>Young people may be offered shared accommodation where this means that the accommodation is affordable and will help the young person to obtain skills in managing a tenancy.</p> <p>Access to different community facilities, including faith, will be important in assessing the suitability of offers of accommodation under the proposed Placements Policy.</p> <p>Regular analysis of the applicants removed from the banding system because they refused an offer will be needed to ensure that specific groups are not being adversely affected.</p>
<p>Will the delivery of any proposed new services or functions increase satisfaction ratings amongst different groups of residents'?</p>	<p>Applicants may be less satisfied with their offer if they feel that they have been forced into a property that they feel does not meet their needs.</p>	<p>It will be important to clearly communicate the suitability of a property to enable them to understand that the property meets their assessed needs. Applicants will have the right of a review of their offer if they feel that it is unsuitable and if the review</p>

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	<p>Barnet Homes currently monitors new tenant satisfaction with their homes and will be able to assess whether satisfaction increases or declines as a result of the one-offer only policy.</p> <p>Applicants may be less satisfied if their one offer is to a property outside of the borough in a place where they do not have support networks.</p>	<p>finds that an offer was not suitable will be given a second offer.</p> <p>Regular analysis of the applicants who are successful in a review of offer will be needed to ensure that specific groups are not being adversely affected.</p> <p>Monitoring of suitability of the offers made by officers is required to ensure consistency of approach.</p> <p>Property satisfaction monitoring could be extended to include private rented sector offers when they are used to discharge duty.</p> <p>The Placements Policy will ensure that consideration is given to access to support networks when assessing the suitability of an offer of accommodation.</p>
<p>Does the proposal enhance Barnet's reputation as a good place to work and live?</p>	<p>Barnet is a popular place in which to live and work and there is high demand for housing. The allocations scheme has to reflect the fact that there are limited properties available that are affordable,</p>	<p>Barnet will continue to be a good place in which to live and work. The Allocations Scheme is reviewed on a regular basis to ensure that it meets housing needs and reflects the reality of the housing market.</p>

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	particularly for households affected by welfare reforms.	
Will members of Barnet's diverse communities feel more confident about the council and the manner in which it conducts its business?	Communication of the one offer only policy is essential to ensure that applicants understand that their needs have been assessed and that the offer of a property is reasonable and fair.	<p>The re-housing process will be more efficient with the use of the one-offer only policy as it will reduce the amount of time properties are left empty and reduce void costs. Applicants will have their housing needs met quickly.</p> <p>Regular updates on the Barnet Homes website on housing supply and demand will help reinforce the message to housing applicants that it is reasonable for one offer to be made.</p>
How will the new proposals enable the council to promote good relations between different communities?	<p>There is a risk that a vulnerable applicant moves into a property and does not have access to or engage with local services or does not get on with their neighbours.</p> <p>Vulnerable applicants placed into the private sector may not sustain their tenancy,</p>	<p>The allocation of housing is used to ensure that housing need is met in a sustainable and affordable way which helps to promote good relations between different communities.</p> <p>Barnet Homes will offer support and tenancy training to applicants placed into the private sector</p>
How have residents with different needs been consulted on the anticipated impact of this proposal? How have any comments influenced the final proposal?	<p>The Council has consulted with residents with different needs in a number of ways, including:</p> <ul style="list-style-type: none"> • Through a citizens panel event • Focus group of housing applicants 	<p>Residents were concerned about being forced to accept an unsuitable offer and how they will be informed about this.</p> <p>The holistic assessment process has</p>

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	<ul style="list-style-type: none"> <li data-bbox="869 288 1115 320">• Online survey. 	<p data-bbox="1447 288 2040 389">been reviewed to ensure that it adequately captures housing and support requirements of applicants.</p> <p data-bbox="1447 432 2029 576">Where an applicant successfully appeals against being offered an unsuitable property they will be offered another property.</p>

3. Placements policy

What happens now	The council can not currently enforce placements into the private sector in discharging homelessness duty. Temporary accommodation used for housing homeless applicants is often in the private rented sector and subject to market rents.
What is proposed	The proposed placements policy sets out key tests, including affordability, for using the private sector for temporary accommodation and also for discharging homeless duty into the private sector. Properties may be located in affordable locations outside of the borough.
Rationale	Private rented sector homes in Barnet will no longer be affordable for larger households affected by the Overall Benefit Cap and consideration will have to be given to properties located in more affordable areas. £1m was spent on temporary accommodation units above the subsidy limit in 2012/13 and this is unsustainable in the long term

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<p>Are there differential service outcomes for the different communities using our services?</p>	<p>Analysis of equalities data of households placed into temporary accommodation inside and outside of the borough in the year 1st April 2012 to 31st March 2013 indicates the following:</p> <ul style="list-style-type: none"> • More 16 to 24 year olds were placed inside of the borough than outside • More 25 to 44 year olds were placed outside of the borough than inside • More 45 to 64 year olds were placed inside the borough than outside • More 65 plus year olds were placed outside the borough than inside but the overall numbers were small • More White British households were placed in borough than out and more Asian Other and Black African households were placed outside the borough than inside • There are almost twice as many females in the sample than male, probably because females are more likely to make the application for housing on behalf of their families but the data shows that 	<p>The Placements Policy will take a number of issues into consideration in deciding the suitability of a property, including the location. Each applicant will have their own circumstances considered on their merits. An older person, for example, may need to be placed in a property that enables them to continue to receive critical treatment for an ongoing condition. An applicant who is fleeing domestic violence will be considered for a safe property away from the perpetrator.</p> <p>The aim is to secure a property that meets their needs, that is in a good condition, is affordable and provides access to any essential services.</p> <p>Applicants who disagree with a placement decision will be able to have a review of that decision.</p> <p>Regular analysis of the results of the Placements Policy will be needed to ensure that specific groups are not being adversely affected.</p> <p>Regular analysis of the placement decisions successfully appealed will</p>

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	<p>proportionally more females are placed in borough and more males placed out of borough.</p> <p>There is a risk that applicants are placed in a property that does not meet their needs. Without consideration of affordability applicants may face financial difficulties that results in them losing their home.</p>	<p>be needed to ensure that specific groups are not being adversely affected.</p>
<p>Will the delivery of any proposed new services or functions increase satisfaction ratings amongst different groups of residents'?</p>	<p>Applicants may be reluctant to move outside of the borough and be dissatisfied with such a decision.</p> <p>Some applicants may be reluctant to move into the private rented sector even though this meets their assessed needs and is affordable. Where they are placed into a private sector property and are made homeless within the next 2 years they will be able to come back to the Council to be re-housed again.</p>	<p>Communication of the aims of the policy will be needed when assessing an applicant's needs and talking to them about the options for meeting their housing situation in an affordable way.</p> <p>The Council and Barnet Homes will be able to enforce private sector offers that it makes under the Localism Act.</p> <p>It will be important to promote good tenancy relations through services such pre-tenancy training for tenants and in continuing to subsidise landlord accreditation to increase the sustainability of private sector placements.</p>

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	<p>Applicants may require further support or information to relocate to an area outside of the borough.</p>	<p>In making an offer outside of the borough it will be useful for the applicant to receive details of how to access local services.</p> <p>According to the regulations, Barnet Homes will be required to notify the receiving local authority within 14 days. This notice will be used to highlight support needs for applicants placed outside of Barnet.</p>
<p>Does the proposal enhance Barnet's reputation as a good place to work and live?</p>	<p>The reality of the housing market in Barnet means that it is unaffordable for some families to live in the borough and it is therefore in their interests to move outside of the borough.</p>	<p>Barnet Homes will continue to procure accommodation in the borough that is affordable as well as offer affordable options outside of the borough for applicants that cannot afford to live in the borough.</p>
<p>Will members of Barnet's diverse communities feel more confident about the council and the manner in which it conducts its business?</p>	<p>Applicants may feel less confident about the council if they have been moved outside of the borough.</p>	<p>If the placements policy is communicated to the applicant and they understand that the property being offered to them meets their needs and is at a price they can afford then they can feel confident that the Council is meeting their housing need in a sustainable way.</p>
<p>How will the new proposals enable the council to promote good relations</p>	<p>Applicants who are placed outside of the borough in a location away from family</p>	<p>The Placements Policy will ensure that circumstances have been considered in</p>

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between different communities?	and support networks may require the services of another council, adding to the pressure on its local services.	<p>terms of location, for example, access to work, health or support facilities.</p> <p>Applicants may need additional signposting to access support services in the new location.</p>
How have residents with different needs been consulted on the anticipated impact of this proposal? How have any comments influenced the final proposal?	<p>The Council has consulted with residents with different needs in a number of ways, including:</p> <ul style="list-style-type: none"> • Through a citizens panel event • Focus group of housing applicants • Online survey. 	<p>Residents were concerned about accessing services when being placed into a property outside of the borough.</p> <p>The placements policy will consider access to essential services as well as property condition and affordability.</p>

4. Other issues

Proposal	Comments
Houses with gardens will not be reserved for households with children under 10	Given the shortage of housing available this will ensure that larger properties are available to all families, irrespective of the age of the children and will help reduce void times which can result when waiting to allocate to families with younger children.
Applicants assessed as requiring ground-floor level access	This will ensure that applicants with an assessed need for

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<p>accommodation will be given priority for ground floor level access properties</p>	<p>ground-floor level access accommodation can be suitably housed in appropriate properties.</p>
<p>Applicants requiring adaptations and currently under-occupying will be expected to move to a smaller property and then have the adaptations done</p>	<p>It is reasonable given the shortage of accommodation that households are required to move into suitably sized accommodation before adaptations are made, especially if the household is working age and affected by the under-occupancy charge.</p>
<p>Young people leaving care may be allocated shared accommodation</p>	<p>In some cases it will be appropriate for a young person to live in a shared house and Barnet Homes has established a supported housing project for young people. Given that young people under the age of 35 only receive a shared room rate under housing benefit regulations this may be a more affordable and sustainable option and enable the young person to undertake training or obtain employment.</p>
<p>Single adults may be allocated a single bedroom</p>	<p>There is a shortage of accommodation and a single bedroom meets the size requirement for a single person.</p>
<p>Adult sharers may be allocated a double bedroom</p>	<p>Given the shortage of accommodation this may be appropriate for some adult sharers, e.g.: brothers to be allocated a double bedroom.</p>