

## **1. Introduction**

This report briefly summarises how the Equality Impact Assessment on the Bidding element of Hampshire Housing Choice - the Choice Based Lettings Scheme being developed for Winchester City Council, East Hampshire District Council and Havant Borough Council - was undertaken, its scope and the key findings.

The assessment was undertaken by the following officers:-

- Ian Barrett – WCC Equality & Diversity Consultant
- Olu Fajuyitan – Senior Housing Needs Officer, WCC
- Janette Palmer – Project Co-ordinator, Landlord Services, WCC
- Philip Godding – Housing Service Administrator, Housing Choices, WCC
- Steve Tong – Housing Services Manager, Landlord Services, WCC
- Amanda Grant – *Independent Consultant on Supported Housing*
- Caren Ransom – Equalities and Access Officer, Havant Borough Council
- Samantha Williams – Havant Borough Council
- Jo Gabell – Head of Legal Services, East Hants District Council
- Kerry Hoskins – Senior Housing Options Advice Officer, East Hants District Council
- Eleanor Hodge – Corporate Communications Manager, WCC
- Alan Rickman – Chair of WCC Evening TACT Group

Since this was a collaboration of different local government organisations, Ian Barrett, who facilitated the meeting, met with the equality officers from Havant and East Hants Council's prior to the meeting to reconcile the impact assessment schemes operated by the different organisations. The assessment was undertaken using the template developed for the scoping and screening stage of WCC's EIA process.

Since it is the first time such a collaboration has taken place in Hampshire the outcome of the meeting will be reported to the Hampshire Equality Group.

## **2. Process**

Initial discussions considered whether it was necessary to include within the impact assessment the process for determining the banding of customers under the scheme of allocations. It was concluded that since Counsel's opinion had been sought on this issue, and a detailed report submitted to the CBL project team it would not be necessary to discuss this further as it had already been thoroughly explored.

Initial discussions included the process once property had been offered. It was concluded that since this element of the process was determined by the landlord and in all 3 districts a number of different landlords were involved – most of who were large RSL's with their own equality policies and procedures – this could be excluded. In Winchester, which retains its own stock, this issue has been covered by the tenancy services impact assessment.

The group agreed that the scope of the impact assessment would therefore be limited to:-

- Access to property adverts
- Access to the bidding process

The group discussed the options available to customers to find out which properties were available each cycle for bidding and the options available to express an interest in a property. In summary, a cycle is a weekly operation which runs from midnight on a Wednesday when the properties on offer are advertised and closes at midnight on a Sunday of the same week. The system requires individuals to be proactive in finding out

which properties are on offer and indicating their interest. Once the cycle closes those who have submitted bids are ranked and the property offered to the customer with the highest level of housing need.

The group used the questions and table in Template 1 of WCC's EIA Guidance Manual to consider whether these elements of the CBL scheme had an impact on each customer group listed.

### **Access to property Adverts**

Properties on offer will be advertised using the following measures:-

- On line.
- Property Posters – displayed at key locations including Winchester City Council's Customer Service Centre, partner organisations housing offices.
- If necessary officers would also mail information to customers.

In addition to the above, for a trial period of a year, Winchester City Council will operate an automated telephone line, which will set out the details of the properties available. Local charges would apply for customers contacting this line and the service will be available 24 hours. The options available for customers interested in making a bid on any of the properties advertised, are listed below. Those wishing to do so using the automated telephone service would need to do so by making a second call to a separate number. *(Please note this is a change to the processes discussed as part of the EIA)*

### **Access to the bidding process**

Customers can make a bid on 3 properties per cycle, using a unique property reference and customer number in the following ways:-

- Online – the website has browse aloud and is triple A certified.
- Telephone – 24 hour automated service with locally charged 0845 number.
- Through a nominated advocate, who could be a professional, family friend or friend.
- By visiting the council offices and asking the Customer Service Centre operators or Housing Officers to bid on their behalf.

**In addition, if an individual has needs or is in circumstances that would make it difficult for them to use the the system themselves, there is the option of setting up an 'auto-bid', which ensures a bid is made on their behalf for any property on offer that meets their needs.**

However, 'auto-bidding' should only be considered as a last resort as it removes the choice element for the customer. N.B. Housing officers, including Housing Needs Officers will be pro-active in ensuring that customers that they know to be vulnerable and have a high housing need are bidding for suitable properties.

In deciding if a customer group would or might be disadvantaged by the options available, we based our conclusions on the expertise and experience of the various group members about the barriers which exist for the different customers groups. In addition, WCC's Senior Housing Needs Officer had undertaken some research into the systems used by a sample of other authorities.

When assessing the impact it was important to keep in mind that there will not be a large number of properties on offer at each cycle, it is unlikely to be as many as 20 for all three districts together each week.

In the case of groups, such as people escaping domestic abuse and young people leaving care, who are known to be vulnerable and disadvantaged, officers would offer appropriate additional help and support as required.

### **3. Findings**

The assessment team agreed that Choice Based Lettings was relevant to all the customer groups, except under 16 year olds who were not able to hold tenancies.

It was stated that for some vulnerable groups housing is the foundation block on which individuals develop independence. Therefore it was crucial that measures were taken to ensure disadvantage would be identified early on and sound relationships were built between all those with a role in the process.

Choice based letting schemes are reported as a positive development by customers in that:

- Customers can easily track the progress of their bids and the housing need of those competing for the same property.
- It's a very open system where individuals can see how frequently properties become available in their chosen area and helps customers to have practical expectations of the time it will take to meet their housing need in the areas of their choice.
- Some groups may find the scheme more accessible, for example Gypsy and Travellers who may not have a permanent address by which to be contacted may find it easier to manage their housing need through internet access channels.

It was acknowledged that some groups may be disadvantaged as a consequence of:-

- Unrecognised vulnerability in individuals resulting in inadequate support and restricting their ability to operate the bidding process.
- Support workers not being adequately resourced or briefed to be as proactive as the system requires to secure housing.

These potential weaknesses would be addressed through regular equality monitoring by all the partner organisations to identify individuals who are failing to make bids or groups of customers not fairly represented.

It was also acknowledged that, for some customers, the task of proactively checking what is on offer and making bids could be onerous.

Most groups were judged to benefit from the system and where there were uncertainties, monitoring would be put in place to identify and deal with any disadvantage. The EIA group will therefore meet again, after the system has been operating for 6 months, to consider the results of equality monitoring and review its decisions on the further options available should any customer groups appear to be disadvantaged.

The team concluded that a detailed assessment was not required, but a number of actions would form the improvement plan. The complete Improvement Plan is attached to this report.

### **4. Key Recommendations**

The action points set out in the improvement plan. The key action points are:

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- Each partner organisation to undertake equality monitoring across all 6 equality strands each month of those who make bids to identify gaps in terms of customer groups and individuals.
- To ensure those organisations with support worker responsibilities are proactively contacted and receive training/briefing on how the system operates in order that they have the skills to effectively support their clients.
- Provision for feedback from support organisations to Project team on what works and what doesn't – this to be reviewed by EIA group.
- To share the results of monitoring and information gained about the needs of customer groups and those supporting them.

### **5. Monitoring & Reporting**

- Each action point has a named lead service and a target date for completion
- The longer term actions will be included in Business or Service Plans or WCC's case the Equality Service Plan for Housing 2009-2012
- The Improvement Plan will be monitored on a quarterly basis and reported to senior officers within the council.
  - WCC will undertake this via the Housing Equality Group and its corporate Equality Working Group: reporting annually to the Strategic Equality Group which includes the portfolio holder for Equality & Community.
  - HBC will determine within its own team how to go about monitoring their elements of the improvement plan, however the EIA review group will monitor at its next meeting.
  - EHDC will determine within its own team how to go about monitoring their elements of the improvement plan, however the EIA review group will monitor at its next meeting.

### **6. Conclusions.**

#### **6.1 Detailed Assessment**

A detailed assessment is not required.

#### **6.2 Improvement Plan**

Key Actions were identified to address the issues that arose during the assessment. These are summarised in the table below.

WCC's Housing Equality Group (HEG) will review how these actions will be delivered for Winchester City Council actions.

***Note, HBC and EHDC will need to determine their own process for monitoring impact assessment actions and may wish to use their own style of improvement form.***

**Form 3. Improvement Plan**

Service or Policy to be improved	Responsibility	Priority	Performance Measure	Year	Min Std	Target
Choice Based Lettings						
Actions Required to Achieve Improvement	Responsibility	Target Date	Resource Implications			
1.0 Equality Monitoring						
<p><b>1.1 Equality Monitoring – Setting up reports</b></p> <p>Reports to be written and systems set up to enable the following equality monitoring reports to be delivered by each of the partner organisations.</p> <p>Monthly monitoring of:-</p> <ul style="list-style-type: none"> <li>▪ Those not making bids by detailed sub section of the 6 equality strands, especially in band 1 and 2.</li> <li>▪ Detail to enable monitoring to identify access problems down to the type of impairment under disability and further information around poor literacy and numeracy.</li> </ul>	<p>Each partner organisation:-</p> <p>WCC – PG &amp; OF</p> <p>EHDC – TH &amp; TBC</p> <p>HBC – DT &amp; TBC</p>	Sept 09				

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<p>Regular monitoring of:-</p> <ul style="list-style-type: none"> <li>▪ People with disabilities not receiving adequate details on which to assess whether properties are suitable.</li> <li>▪ The impact of rural location and low income on the accessing delivery points.</li> <li>▪ Monitoring of the length of calls and costs incurred.</li> </ul>			
<p><b>1.2 Feedback Process</b> Systematic monitoring of impact assessment actions and feed back of the results and emerging actions to appropriate stakeholders.</p> <ul style="list-style-type: none"> <li>▪ Winchester City Council results will feed into its Housing Equality Group → Corporate Equality Group/ Strategic Equality Group.</li> <li>▪ East Hants District Council results will be reported to Social Justice Board.</li> <li>▪ Havant BC process to be determined.</li> </ul>	<p>OF &amp; JP  ? &amp; JG  ? &amp; CR</p>	<p>March 09</p>	
<p>1.3 Results to be shared between partner organisations and at 6 monthly review of the EIA Group.</p>	<p>OF</p>	<p>Sept 09</p>	
<p><b>2.0 Follow Up of those customers not bidding.</b></p>			
<ul style="list-style-type: none"> <li>▪ Housing Needs Officers to take prompt action by contacting</li> </ul>	<p>Each partner</p>	<p>May 2009</p>	



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<p><b>Information Leaflets</b></p> <p>Ensure auto-bid option is explained in information Leaflets.</p> <p>Ensure the current 3 different information leaflets for each partner organisation are reconciled into one leaflet which meets the needs of all the partner organisations, in order that translation can be arranged once only.</p>	Project Team	March 09	
<p><b>5.0 Auto Bids</b></p> <p>Establish a formal procedure where all partner organisations understand that officers have to explore each option of the bidding hierarchy before resorting to auto-bidding.</p> <p><b>User Guide</b> to set out clear guidance on working through the hierarchy of options (1<sup>st</sup> – on line, 2<sup>nd</sup> – telephone, 3<sup>rd</sup> – office visit, 4<sup>th</sup> – advocate), to be offered to individuals before arrangements are made to set up auto-bid as the only option which can meet their needs.</p>	Project team	March 09	
<p><b>6.0 Property List</b></p> <p>Ensure the printing off of property list by partner housing organisations is built into the operational requirements of the system.</p>	Project team	March 09	
<p><b>7.0 Translations</b></p> <p>Partner organisations to check</p>	DT & CR	February	

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<p>arrangements and budgets are in place for meeting needs of those who request information in different languages.</p>	<p>Havant &amp; TH &amp; EHDC</p>	<p>09</p>	
<p><b>8.0 Easy Read</b></p> <p>Keep in mind Easy read as an option which would benefit several customer groups should monitoring suggest a disadvantage is being created by the current approach to written material. Groups are:-</p> <ul style="list-style-type: none"> <li>▪ Customers with learning difficulties</li> <li>▪ Those with poor literacy &amp; numeracy levels</li> <li>▪ Those whose first language is not English.</li> </ul>	<p>EIA Review Team</p>	<p>Sept 09</p>	
<p><b>9.0 System processes</b></p>			
<p><b>9.1 Automated Telephone Service</b></p> <p>Ensure the automated telephone system is set up with sufficient filters to allow individuals to quickly move on to the properties of their interest to avoid spending time and money on lengthy telephone calls.</p>	<p>Project Team</p>	<p>February 09</p>	
<p><b>9.2</b></p> <p> <b>Property Details Options Monitoring</b></p>			

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<p><b>&amp; Survey</b></p> <p>Ensure adequate systems are set up to determine:</p> <ul style="list-style-type: none"> <li>• Number of customers using each of the options to find out the details of properties available.</li> <li>• Breakdown by equality group.</li> <li>• Qualitative survey of users – what works well and how systems can be improved.</li> </ul> <p>The results should be fed back to the Project team and the EIA Review team to determine whether any groups are disadvantaged and whether changes to systems are required.</p> <p>The numbers of customers using the telephone system as a method of accessing the details for properties available will inform the Project Team as to whether this option should be rolled out to the other partner organisations.</p>	<p>Each partner organisation:-</p> <p>WCC – PG &amp; OF</p> <p>EHDC – TH &amp; TBC</p> <p>HBC – DT &amp; TBC</p> <p>Project Team &amp; EIA Review Team</p> <p>Project Team &amp; EIA Review Team</p>	<p>April 2009</p> <p>TBC</p> <p>Sept &amp; Jan 2010</p> <p>September 2009</p> <p>March 2010</p>	
<p><b>Extended Cycle</b></p> <p>Follow up with Sandwell MBC the outcome of adopting extended cycle periods to establish whether they worked.</p>	<p>OF</p>	<p>February 09</p>	