

## MID SUSSEX DISTRICT COUNCIL

### Equality Impact Assessment

**Title of Policy/Service/Contract:** Housing Services

**Division:** Housing, Environmental Health and Building Control

**Lead Officer:** BULs are Julian Till for Housing Needs and Emma Shuttleworth for Housing Enabling. Completed by Neal Barton

**Date Assessment completed:** December 2013

#### 1. SCOPING

##### 1.1 What are the aims of the policy, service/service change or contract?

1. Preventing homelessness through Housing Advice and Housing Options work.
2. Discharging the Council's functions and duties under the Homelessness legislation by assessing applications and arranging temporary accommodation where appropriate.
3. Where temporary accommodation is appropriate, to arrange/secure accommodation at a reasonable cost and within Government targets.
4. Developing affordable housing for those in housing need in the District across a range of tenures, including rented and shared ownership
5. To ensure those with supported housing needs are able to access both the housing and the housing related support that they need in order to sustain independent living.
6. To provide a fair and transparent way of allocating affordable housing to those in housing need, through the operation of the Common Housing Register and Choice-Based Lettings (CBL).

##### 1.2 Who does the service/policy/contract affect? Who are the main customers (internal or external)?

People who are homeless or threatened with homelessness. Those seeking housing advice and people in housing need. This affects in the main people on low to modest incomes. It will also disproportionately affect people who are vulnerable due to physical or mental disability, learning disabilities, those suffering domestic violence, young people, older people, ex-offenders and substance misusers.

Housing Enabling's customers include Planning and Legal staff internally and developers and housing associations externally.

##### 1.3 What equality information is available, including any evidence from engagement and analysis of use of services?

Information is available from the Housing Register about people's age, gender, ethnicity, whether they have a disability or support needs. This information can also

be used to monitor lettings. We are able to analyse CBL registration and bidding. "About you" information is recorded when providing housing advice and making a homelessness application. Information on the overall need for affordable housing in the District is available from the Strategic Housing Market Assessment. The need for rural affordable housing is gauged through Housing Needs surveys undertaken with parish councils and Action in Rural Sussex.

**1.4 What does this information tell us about the equality issues associated with the service and implications for the protected groups?**

Ethnic monitoring of the Common Housing Register and allocation of properties against the 2011 Census data, suggests that this is broadly reflective of the Mid Sussex population (see analysis at appendix 1). The ethnicity of those on the register generally is largely consistent the pattern of allocations. This is also the case with approaches for housing advice.

Bidding patterns by age under Choice-Based Lettings suggests that there may be less bidding by the older age groups.

The number of households on the Common Housing Register continues to grow. Housing Needs surveys show an increasing need for rural affordable housing.

**1.5 Are contractors or partnerships used to deliver the service? Yes**

If No go to section 2.

If yes, please refer to the guidance notes, particularly Appendix One of the MSDC Guidance "Integrating Equality and Diversity into Procurement", and complete the next three questions.

**Identify the contractors/partnerships used to deliver the service.**

Affinity Sutton runs the Common Housing Register on behalf of the Council, which is covered by a Service Level Agreement. The Council is a member of the Sussex Homemove Choice-Based Lettings scheme with 11 other authorities in West and East Sussex.

**What is their contribution to equality in service delivery and the promotion of equality?**

The Affinity Sutton Homemove Team ensures that social housing is allocated in accordance with the Council's joint Housing Allocation Scheme with Affinity Sutton. The scheme is designed to ensure allocations are based on housing need and that all applicants are treated fairly.

**How are equality issues addressed through contractual arrangements and service level agreements?**

The SLA sets out equal opportunities expectations and requires the contractor to monitor its work and the outcomes, e.g. who gets housed.

## 2. Assessment of Impact; Analysis and Action Planning

Any gaps in information or provision, opportunities to promote equalities and good relations identified above need to be translated into SMART actions and recorded here. These actions need to be delivered and monitored through the service planning process.

Opportunity to promote equality, good relations and/or address barriers to service/differential impact	Current action taken to address these	Further actions required and timescales	Lead Officer	How will impact be measured
The needs of different ethnic groups including white minorities, but also established white communities				
<p>BME groups may be disadvantaged in terms of accessing housing services and bidding for properties under Choice-Based Lettings. There may be language barriers, Possible access problems for Gypsies and Travellers.</p>	<p>CBL scheme user guide has been made available in nine community languages in print and on the website. Assisted bidding is available. Analysis is undertaken of the ethnicity of those seeking housing advice, numbers on the Housing Register and of lettings. We work with support agencies that work with Gypsies and Travellers and Sussex County Council site management staff to provide them with housing advice. Accommodations Needs Assessment has been completed and sites sought for additional pitches in Mid Sussex.</p>	<p>Following identification of potential new Gypsy and Traveller sites, funding and site management arrangements will need to be put in place.</p>	<p>Lynne Standing</p>	<p>Provision of additional Gypsy and Traveller sites in Mid Sussex.</p>
The needs of men and women. Including taking account of pregnancy and maternity.				
<p>Women and men suffering domestic abuse may need to move home quickly. A number of services are provided but refuge accommodation is not available to men or if accompanied by a male child over 13. Young women with children may need additional support.</p>	<p>There are domestic abuse advice/information shops provided across West Sussex with services available to both men and women. The Worth IDVA provides independent advisors. The Safe at Home scheme assists people of either gender to sustain accommodation. Stonham provide a floating support outreach service that assists with sustaining accommodation and</p>	<p>Further promotion of the Worth and Stonham services to partner organisations, e.g. through the Housing Association Forum meeting on 25 November.</p>	<p>Emma Shuttleworth</p>	<p>Additional referrals of those suffering domestic abuse and needing assistance.</p>

	<p>considering their housing options. Access enabled to the Life House in Haywards Heath, which provides a shared house for young, single pregnant women. People who are assessed as homeless as a result of domestic violence are found suitable temporary accommodation. Account taken for women who are pregnant in the allocation scheme when considering size of accommodation required.</p>			
The needs of disabled people				
<p>Disabled people might find it difficult to participate in Choice-Based Letting. Providing temporary accommodation with wheelchair access is a problem. Not all of the supported housing schemes are accessible to those with physical disabilities. Opportunity to promote more wheelchair accessible homes.</p>	<p>Homemove CBL property advertisements include mobility codings based on levels of disability. New wheelchair units are advertised early for new residents and Occupational Therapists to have design input. Those unable to use the internet are provided with assisted bidding. People with physical or mental health needs in temporary accommodation are provided with floating support by the Mykey service. Target is to deliver a minimum of 2 wheelchair accessible homes per year and we work with partner RSLs to deliver homes to Lifetime Homes standard. Availability of Disabled Facilities Grants is advertised.</p>	<p>Continued target to deliver a minimum of 2 wheelchair accessible affordable homes per year.</p>	<p>Emma Shuttleworth</p>	<p>Number of wheelchair accessible affordable homes delivered.</p>
The needs of people with a religion or belief				
<p>People may need to know the location of places of worship when considering bids under Choice-Based Letting.</p>	<p>There are links on the Homemove CBL advertisements to “up my street” information on the locations of places of worship.</p>	<p>None identified.</p>		

Opportunity to promote equality and/or barriers to service/differential impact	Current action taken to address these	Further actions required and timescales	Lead Officer	How will impact be measured
The needs of gay men, lesbians, bisexuals and heterosexual people				
Opportunity to promote information about organisations in place to support the LGBT community.	Advice on the Council's website in relation to LGBT domestic violence from Broken Rainbow.	None identified.		
Issues from marriage and civil partnership				
None identified.	Same sex partnerships are considered the same as heterosexual ones in assessing housing need.	None identified.		
The needs of different age groups, for example older and younger people				
<p>Young people seeking housing advice may not want to access information from Council offices. Those in need of temporary accommodation, ideally need to be placed close to their support networks/education.</p> <p>Older people may find it difficult to cope with CBL and bidding for properties. Affordable housing needs to be physically accessible to older people and with appropriate levels of support. Much of the sheltered housing comprises older stock, which is not accessible.</p>	<p>County wide scheme in place for homeless 16/17 year olds, including mediation, emergency accommodation and longer-term housing support.</p> <p>Older people can be assisted with bidding by the Here to Help service, the Assist service for Affinity Sutton tenants and the Homemove team. There are a variety of bidding methods including postal coupons.</p> <p>Family Mosaic Here to Help Outreach service available for older people.</p> <p>Extra Care accommodation continues to be allocated by multi-agency panels to ensure that the frailest people are supported in finding accommodation that is right for them.</p> <p>New affordable housing developed for older people, e.g. Cherry Tree Court, Burgess Hill.</p>	<p>Long term development of further affordable housing schemes for older people such as Bellhammer in East Grinstead and Buxshalls in Lindfield.</p> <p>Continue to monitor and respond to best practice in housing older people.</p>	Emma Shuttleworth	Number of older person specific homes built.

Opportunity to promote equality and/or barriers to service/differential impact	Current action taken to address these	Further actions required and timescales	Lead Officer	How will impact be measured
The needs of transgender communities				
None identified.	None identified.			
The needs of people who are disadvantaged by socio-economic factors such as low incomes, skill or living in a deprived area				
<p>Homelessness applications and requests for housing advice are most common from people on low incomes. Difficulties with those on low incomes or with skills/literacy issues being able to access Choice-Based Lettings. The lack of affordable housing is particularly acute for people on low incomes. Government changes to Welfare, Universal Credit and Housing Benefit and a move to higher affordable rents has implications for access to social housing and housing advice.</p>	<p>Welfare reform- working with the Benefits Section on those affected by the Benefit Cap and removal of the Spare Room Subsidy. New Discretionary Housing Payments (DHP) policy in place. Provision of new affordable housing and access to shared ownership schemes. Housing Needs Team signpost to crisis support available from the Local Assistance Network and provide Food Bank tokens. Rent in advance and deposit guarantee scheme to assist people to access private rented sector. Also the Access PRS service that provides a route into the private rented sector. Providing access to financial advice and debt management, e.g. CAB, Credit Union. Access to Into Work initiatives such as the telephone helpline. Availability of DHP. Free access to computers at local libraries for CBL bidding. Housing Allocation Scheme and Tenancy Strategy in place designed to provide continued access to social housing for those in housing need.</p>	<p>Review of the Housing Allocation Scheme in February 2014 to ensure that social housing continues to be available to those in housing need.</p> <p>Work with affordable housing providers to ensure that the affordable housing provided is truly affordable, within Local Housing Allowance Rates. Also that no upfront costs are levied which make affordable housing inaccessible to those on the lowest incomes.</p>	Julian Till	<p>Number of people assisted with housing advice and homelessness preventions. Number of new affordable homes delivered.</p>

The needs of people who live in a rural area				
<p>There is a particular lack of affordable housing in rural areas. Housing to rent or buy is more expensive in rural areas. Those in rural areas may have difficulty in accessing the Oaklands office at Haywards Heath.</p>	<p>Working with Parish Councils on Housing Needs surveys, Rural Exception sites and neighbourhood planning. Work has begun on a Rural Exception site in Crawley Down. Preference is given to those with a local connection in the allocation scheme and first lets of new affordable housing. Housing Needs Team available at help-points and do home visits.</p>	<p>Delivery of further rural affordable housing through working with Parish Councils and Action in Rural Sussex. Work is underway to bring forward Rural Exception Sites at Bolney and Ashurst Wood. Target delivery of 20 affordable homes in rural areas per year.</p>	<p>Emma Shuttleworth</p>	<p>Number of new affordable homes provided in rural areas.</p>

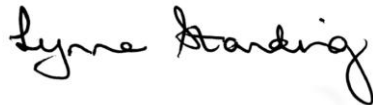
### 3. Mid Sussex District Council Equality Impact Assessment Summary

Key Findings	Future Actions
<ul style="list-style-type: none"> <li>• The ethnicity of those seeking housing advice, the composition of the Common Housing Register and lettings is monitored and suggests that this is largely reflective of the Mid Sussex population.</li> <li>• The service, in the main, deals with people on low to modest incomes. Also, people who are vulnerable due to physical or mental disability, learning difficulties, those suffering domestic abuse, young people, older people, ex-offenders and substance misusers.</li> <li>• Special arrangements are made for vulnerable people such as assisted bidding under Choice-Based Lettings and Countywide provision for homeless 17 and 18 year olds. Extra Care accommodation continues to be allocated by multi-agency panels.</li> <li>• Housing Allocation Scheme and Tenancy Strategy are in place and designed to ensure continued access to affordable housing under the new affordable rent funding regime.</li> <li>• Housing Advice surgeries are provided at help-points across the District and personal visits are available for those unable to come to the Council offices at Oaklands in Haywards Heath.</li> <li>• New affordable housing is being provided through working with development partners.</li> </ul>	<ul style="list-style-type: none"> <li>• Providing housing advice to those affected by Welfare changes such as the Benefit Cap and removal of the Spare Room Subsidy.</li> <li>• Continued provision of more affordable housing generally and specifically wheelchair accessible units and older person housing schemes. Also in rural areas through measures such as Rural Exception sites, including at Bolney and Ashurst Wood.</li> <li>• Review of Housing Allocation Scheme to ensure continued access to social housing for those in housing need.</li> <li>• Further promotion of the recently re-commissioned supporting people funded housing related services, such as “Here to help” for older people, Mykey and Stonham domestic abuse service.</li> </ul>

### 4. Signing off this assessment and action plan

Signature ...*Neal Barton*.....  
 Person undertaking the assessment

Date .....9 January 2014.....



Signature .....  
 Head of Service

Date .....9 January 2014.....

Please send your completed impact assessment to Neal Barton for publication on the website.



**Breakdown of those on the Common Housing Register @ 31/3/2013 and property lets by ethnicity in 2012/13.**

Ethnic Description	% on the Common Housing Register	% of property lets	% of Mid Sussex population from 2011 Census
White- British	87.6% (4,065)	87.5% (412)	90.3%
White- Irish	0.5% (23)	0.8% (4)	0.9%
White- Other	4.2% (194)	4.2% (20)	3.8%
Mixed- White & Black Caribbean	0.9% (42)	0.6% (3)	0.3%
Mixed- White & Black African	0.6% (26)	1.1% (5)	0.2%
Mixed- White & Asian	0.7% (33)	0% (0)	0.6%
Mixed- Other	0.6% (30)	0.8% (4)	0.4%
Asian or Asian British- Indian	0.5% (21)	0.2% (1)	1.0%
Asian or Asian British- Pakistani	0.0% (1)	0% (0)	0.1%
Asian or Asian British- Bangladeshi	0.7% (32)	0.6% (3)	0.3%
Asian or Asian British- Other	1.1% (49)	1.9% (9)	0.3%
Black or Black British- Caribbean	0.3% (16)	0% (0)	0.1%
Black or Black British- African	1.5% (69)	1.3% (6)	0.3%
Gypsy or Traveller	0.1% (3)	0% (0)	0.1%
Black or Black British- Other	0.3% (14)	0.2% (1)	0.1%
Chinese	0.1% (4)	0.2% (1)	0.4%
Other	0.3% (16)	0.4% (2)	0.3%
<b>Totals</b>	<b>100% (4,638)</b>	<b>100% (471)</b>	<b>99.5%</b>

The figures above disregard those who did not state their ethnicity. This constituted 218 on the register and 28 lettings.

### Analysis of those seeking Housing advice, homelessness applications and acceptances in 2012/13

Ethnic Description	Seeking housing advice	Of whom made homeless applications	Of whom accepted as homeless	% of Mid Sussex population from 2011 Census
White- British	834 (87.9%)	130 (89%)	48 (98.0%)	90.3%
White- Irish	6 (0.6%)	1 (0.7%)	-	0.9%
White- Other	41 (4.3%)	8 (5.5%)	-	3.8%
Mixed- White & Black Caribbean	2 (0.2%)	-	-	0.3%
Mixed- White & Black African	5 (0.5%)	-	-	0.2%
Mixed- White & Asian	1 (0.1%)	-	-	0.6%
Mixed- Other	5 (0.5%)	1 (0.7%)	1 (2.0%)	0.4%
Asian or Asian British- Indian	3 (0.3%)	-	-	1.0%
Asian or Asian British- Pakistani	1 (0.1%)	1 (0.7%)	-	0.1%
Asian or Asian British- Bangladeshi	5 (0.5%)	-	-	0.3%
Asian or Asian British- Other	11 (1.2%)	-	-	0.3%
Black or Black British- Caribbean	4 (0.4%)	3 (2.1%)	-	0.1%
Black or Black British- African	15 (1.6%)	2 (1.4%)	-	0.3%
Gypsy or Traveller	not collected	-	-	0.1%
Black or Black British- Other	5 (0.5%)	-	-	0.1%
Chinese	4 (0.4%)	-	-	0.4%
Other	7 (0.7%)	-	-	0.3%
<b>Totals</b>	<b>100% (1,103)</b>	<b>100% (146)</b>	<b>100% (49)</b>	<b>99.5%</b>

The figures above disregard those who did not state their ethnicity. This constitutes 154 cases.

Analysis of recent bidding activity shows the following breakdown of bidding methods:

- Coupon 0.43%
- Phone 0.09%
- SMS text 0.07%
- Staff 14.7%
- Web 84.62%

This shows that nearly 15% of bids were made on behalf of applicants (usually vulnerable people) through the Homemove Team and Mid Sussex District Council Housing Needs Team.