

Appendix C - EQUALITY ANALYSIS FORM

1. Name of policy*, strategy or project: **Homefinder Somerset Allocations Policy**
** The word policy used throughout the form could refer to a strategy, policy, procedure, project, function, decision or service*
2. Name of person completing the analysis: **Homefinder Somerset Operational Group**
3. Date: **Ongoing during policy creation – finalised 31/7/13 based on draft allocations policy**
4. Who has been consulted in developing the policy?

Consultation has involved the following groups

Representatives from the following Local Authorities:

- Mendip District Council
- Sedgemoor District Council
- South Somerset District Council
- Taunton Deane Borough Council
- West Somerset Council

Registered Housing Providers via CBL Working group

Ongoing log of issues raised by applicants and other stakeholders

Occupational therapists and adult social care

Leaving care team

5. Sources of information used in this analysis
(E.g. demographic data, research from websites, results of consultations, results of equality monitoring data, complaints, customer feedback, etc)

Ongoing feedback from applicants and stakeholders

Ongoing discussions with registered housing providers

Consultation feedback from applicants and stakeholders

Customer complaints/comments

Government guidance

Localism Act

HB welfare changes

6. Identify the effect or potential effect of this policy on each of the diversity groups (Equality Act 2010) by considering the following questions (the list is not exhaustive but an indication of the sort of questions those involved should think about):

- Might some groups find it harder to access the service?
- Do some groups have particular needs that are not well met by the current policy?
- What evidence do you have for your judgement (e.g. monitoring data, information from consultation/research/feedback)?
- Have staff/residents raised concerns/complaints?

Is there local or national research to suggest there could be a problem?

Protected Group	Effect (+ive/-ive/ neutral	Comments/Evidence
Age	Negative	<p>We are proposing a change to the silver band reason – sharing facilities – where those applicants that do not have dependent children will be placed in bronze band rather than silver band. This may impact on younger applicants who could be less likely to have dependent children.</p> <p>As at 18.8.13 there were 2793 applicants banded in silver band for shared facilities – of these 66% (1385) are under 35 and single or in a relationship where there are no dependent children - and would be affected by our proposed change to reduce banding. However this change is being made to reflect government changes to entitlement to Housing benefit in the private rented sector (where shared room rate applies to those single applicants that are under 35). The change is also proposed in order to make entitlements clearer to applicants as many get confused if our allocations policy differs from housing benefit regulations regarding entitlements.</p> <p>The impact on under 35 applicants should be mitigated by the additional work all LA partners are undertaking to make private rented accommodation more available (in terms of shared rooms) and to provide clearer guidance to applicants on their housing options when they first present to an LA for housing advice.</p>

Protected Group	Effect (+ive/-ive/ neutral	Comments/Evidence
		In addition work is being done across Avon & Somerset to combat rough sleeping and provide pathways for rough sleepers back into settled accommodation.
Disability	Neutral	<p>Whilst not set out within the policy we are making some changes to the system that delivers choice based lettings that will enable adapted properties to be better classified by landlords and better matched with those applicants that require different adaptations. This should help applicants with disabilities to better find accommodation that has already been adapted for their needs.</p> <p>We don't believe that any other changes that we are proposing will impact on those applicants with disabilities. The existing policy prioritises those with significant medical/welfare issues and no further changes are deemed necessary.</p>
Gender Reassignment	Neutral	<p>Trans gendered people may be particularly at risk of housing crisis and homelessness arising from transphobic reactions, hate crime and harassment by family, neighbours and members of their local community.</p> <p>Trans gendered people may fear disclosing their identity to housing officers for fear that they will not be treated with dignity and respect. The result can be that they do not receive the housing services that they need or receive a service inappropriate to their needs.</p> <p>These issues are addressed to a degree in the Homelessness Strategy which the Common Housing Allocations Policy supports.</p> <p>Our proposed change to emergency/gold band harassment banding which would mean that any applicants would need to have placed a bid for a property within 3 months, however each case will be reviewed on its merits and applicants will not be prevented from bidding after the 3 months – cases will just be reviewed. Given this we don't believe this will have a negative impact on applicants within this protected criteria.</p>
Marriage and Civil	Neutral	There is little evidence at present that marriage/civil partnership impacts upon availability

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Partnership		<p>of or access to housing or that housing policy can affect marriage/civil partnership (though not comments in Sexual orientation section below regarding those entering civil partnerships.)</p> <p>Applicants are not disadvantaged by either being married/civilly partnered in a civil partnership or not when accessing affordable housing in terms of the housing register, mutual exchange or homelessness /homeless prevention services.</p> <p>Registered civil partners have the same rights as married heterosexual spouses in relation to property and tenancy rights and access to the housing register.</p> <p>Our proposed change to remove the silver banding for relationship breakdown may affect those that are married/in a civil partnership if their relationship breaks down. However these applicants could still apply as silver other homeless or silver shared facilities (unless they do not have dependent children – when the new bronze band shared facilities would apply).</p> <p>There are currently 427 applicants in silver relationship breakdown band, 209 of which do not have dependent children and would be rebanded in bronze for shared facilities if they were not eligible for silver band other homeless.</p>
Pregnancy and Maternity	Neutral	<p>Since 1 April 2004 it has been unlawful for local authorities to house families with children and pregnant women in bed and breakfast accommodation for more than six weeks, which has put increased pressure on the housing system. Applicants that are pregnant are prioritised depending on their housing needs and circumstances already within current policy. Vulnerable adults that are pregnant would be provided (depending on their needs) with support services via the various pathway commissioning projects (Pathway for adults and pathway to independence).</p> <p>However single pregnant applicants with no other housing need will now be bronze band if</p>

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		sharing facilities) rather than silver band. The band would be amended when the baby is born. Housing benefit would not be paid until the baby was born but it is possible that LA partners may use DHP to ease any hardship that this may cause.
Race	Neutral	<p>A review of the national evidence base on BME housing [Harrison and Phillips, ODPM, 2003] identified some general differences between the <i>average</i> positions of particular ethnic populations as follows.</p> <p>It found that the Indian populations when compared to the White population are:</p> <ul style="list-style-type: none"> • More likely to be owner occupiers; • Less likely to have lower incomes; • More likely to be over crowded; • More likely to live in poor housing and poor living conditions; • More dissatisfied with their home; and • More likely to want to move. <p>The report found that the Pakistani and Bangladeshi population are particularly disadvantaged and when compared to the White population are:</p> <ul style="list-style-type: none"> • Less likely to be owner occupiers; • More likely to have lower incomes; • Particularly likely to be overcrowded, live in poor housing and living conditions; and • Particularly dissatisfied with their home and to want to move. <p>The review found that the Black population are relatively disadvantaged compared with the White and Indian population, but less disadvantaged than the Pakistani or Bangladeshi population. Compared to Whites the Black population are:</p> <ul style="list-style-type: none"> • Least likely to be owner occupiers;

Protected Group	Effect (+ive/-ive/ neutral)	Comments/Evidence
		<ul style="list-style-type: none"> • Have lower average income than non BME; • More likely to be overcrowded, live in poor housing and poor living conditions; and • More likely to be dissatisfied with home and to want to move. <p>In their review Harrison and Phillips argue that “The separation of groups living in different localities in itself is not necessarily a bad thing. It is the continuing association between BME segregation and deprivation that is problematic”. The extent of this association is strongest in respect of the Pakistani and Bangladeshi population. For example, research of Muslim housing experiences [Sellick, Housing Corporation 2004] found that housing stress is much greater in these households, with 42% of all Muslim children (and 56% of Bangladeshi children) living in overcrowded homes compared to 12 % of all children. It is the association of segregation, deprivation and poor housing that can be seen as most likely to damage community cohesion.¹</p> <p>The cost of housing often prohibits multi-generational families from being able to access the type or size of accommodation required; given the larger size of families in some BME communities, overcrowding and poor housing conditions can be a particular problem. Some areas are experiencing population change due to migration (though this isn’t just limited to BME groups). Often these areas have higher fertility rates than the wider community. Both the wide range of planning needs associated with children and young adults, and the significant potential they offer in cultural and economic terms will need to be a key consideration when planning in areas undergoing these population changes.</p>

¹ Also see Trends in UK black and minority ethnic segregation and housing deprivation box 4 page 6

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		<p>Refugees and asylum seekers have differing housing needs and a range of dwelling sizes and types need to be provided in both the private and social sector. Many refugees and asylum seekers face challenges relating to low or lack of income; lack of capital for a deposit; few household possessions and the need to move to specific areas to be near others of the same ethnic grouping/language capability. This can make it difficult to establish a 'local connection' in terms of housing register applications. Our open housing register can help with these issues where applicants are eligible for housing.</p> <p>Some kinds of temporary accommodation currently used by authorities nationally to house refugees and asylum seekers are inappropriate – especially for women and children and young people, many of whom are traumatised by their experiences – and can place them at unacceptable levels of risk on arrival. With many immigrants choosing to share dwellings across generations for cultural or financial reasons, there may be a greater need for larger accommodation. However migration patterns also show that economic migrants are often single, placing yet more demands on limited supply of 1 and 2 bed accommodation in the social housing sector. Current economic migration from abroad from poorer countries is also likely to affect housing tenure by sustaining demand for cheaper, private sector rented accommodation.</p> <p>Gypsies and Travellers Romany Gypsies and Irish Travellers are legally recognised as ethnic groups, and protected from discrimination by the Race Relations Act (1976, amended 2000) and the Human Rights Act (1998). In terms of health and education, they are one of the most deprived groups in the Britain.</p> <ul style="list-style-type: none"> • Life expectancy for Gypsy and Traveller men and women is 10 years lower than the national average. • Gypsy and Traveller mothers are 20 times more likely than the rest of the population

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		<p>to have experienced the death of a child.</p> <ul style="list-style-type: none"> In 2003, less than a quarter of Gypsy and Traveller children obtained five GCSEs and A*-C grades, compared to a national average of over half.² <p>Gypsies and Travellers experience difficulties in gaining planning permission for caravan use on sites: Nationally 90 per cent of all Gypsy and Traveller planning permission applications are initially rejected compared to 20 per cent overall. As a result, some Gypsies and Travellers, certain that their applications will be initially turned down, set up sites before obtaining or even applying for planning permission. There is a clear need for the demand for permanent and transit site needs to be assessed in areas hosting Gypsy and Traveller communities and for sites to be made available. The lack of suitable, secure accommodation underpins many of the inequalities that Gypsy and Traveller communities experience</p> <p>There are several different races and ethnicities of Gypsy and Traveller Communities within Somerset and they cannot be grouped as one. Gypsy and Traveller Communities have their own culture and therefore careful consideration must be made when allocating sites as well as being mindful of their accommodation needs. Our Gypsy and Traveller Accommodation Assessment (GTAA) 2011 sets out great detail on the needs of this community and the pitch requirements that we have. This framework document supports the delivery of the requirements set out in the GTAA 2011.</p> <p>We are proposing the introduction of a requirement that all applicants must have a local connection to the Homefinder Somerset area in order to join the register. This may affect certain ethnic groups that don't have this local connection – we will still retain safeguards within the policy to aid those fleeing domestic abuse and gypsy and traveller communities,</p>

² <http://www.equalityhumanrights.com/key-projects/good-relations/gypsies-and-travellers-simple-solutions-for-living-together/>

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		<p>however the introduction of this change is seen as sensible given that all local authorities surrounding the Homefinder Somerset area are introducing a similar change.</p> <p>We will mitigate this change by offering targeted housing options advice to those applicants that do not qualify to join the housing register.</p>
Religion or Belief	Neutral	<p>Certain faith groups tend to have larger families³ and therefore require larger dwellings and increase pressure on social and community facilities. For this reason, areas with high birth rates (whether as a result of religious practices or not) need careful planning to ensure that housing demand is met by supply, and is of the right type and tenure. The needs of older people from different faith groups also need consideration. For other faith groups, it is important to live within a certain distance of their place of worship. This can have planning implications as communities expand and pressure for space develops within a restricted area.</p> <p>There is no evidence that this is an issue at present across the whole of Somerset there may be specific areas where certain problems may exist and these are kept under review via the Homefinder Somerset Monitoring Board. Although overall numbers in religions other than Christian are relatively small, there have been substantial increases in the number of Buddhist, Muslim and Hindu people in Somerset in the last decade.⁴</p> <p>We do not believe that any changes proposed in the new draft Allocations Policy will impact on these groups in a +ve or –ve way.</p>
Sex (Gender)	Positive	<p>In 2011, 7.7 million people in UK households lived alone, of which 4.3 million were aged 16 to 64. Of those in this age group, the majority (59 per cent) were male. One possible reason for this is that a higher proportion of men than women never marry by each age; 62 per</p>

³ www.sogc.org/jogc/abstracts/full/200802_WomensHealth_1.pdf Religion and attitudes to family planning

⁴ JSNA 2011 religion briefing note <http://www.sine.org.uk/easysiteweb/getresource.axd?assetid=54777&type=0&servicetype=1>

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		<p>cent of men aged 16 to 64 living alone have never married compared with 50 per cent of women living alone in the same age group.</p> <p>For those aged 65 or over, the pattern is reversed; at this age the majority of people living alone (69 per cent) were female. This is partly because there are more women than men in the total population aged 65 or over due to women’s higher life expectancy. There are 1.7 million widowed women aged 65 or over living alone in the UK, three times the number of men. By the age of 65 over 90 per cent of women have been married, and husbands are typically older than their wives⁵ Many women have to balance work and domestic responsibilities. To do this, they ideally need to be able to access employment and training opportunities close to home.</p> <p>Older women living alone are more likely to be living in poverty and provision of appropriate shared accommodation might be financially and socially beneficial for some groups.</p> <p>In 2011, women accounted for 92 per cent of lone parents with dependent children and men accounted for 8 per cent of lone parents with dependent children. These percentages have changed little since 2001. Women are more likely to take the main caring responsibilities for any children when relationships break down, and therefore become lone parents.⁶ There were nearly 2.0 million lone parents with dependent children in the UK in 2011, a figure which has grown significantly from 1.7 million in 2001. Lone parents with dependent children represented 26 per cent of all families with dependent children in 2011, an increase of two percentage points since 2001. Women-headed households tend to be more reliant on social housing – local authority and housing association accommodation. This applies in particular to lone parent</p>

⁵ Families and Households 2001 to 2011 ONS http://www.ons.gov.uk/ons/dcp171778_251357.pdf

⁶ Ibid

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		<p>households, 60 per cent of whom live in social housing, compared to 23 per cent of other households with dependent children. (Census data) For these households, larger size dwellings are more appropriate and can reduce the stress of living in overcrowded conditions. The vast majority of homeless and temporary accommodation households are headed by, or include, women. Since 1 April 2004 it has been unlawful for local authorities to house families with children and pregnant women in bed and breakfast accommodation for more than six weeks, which has put increased pressure on the housing system.</p> <p>Single men are overrepresented in the rough sleeper and non priority homeless categories both nationally and locally. ⁷ The reasons for this are varied but may be linked to the fact that 32% of rough sleepers are prison leavers and 6% have been in the armed forces at some point in their lives.⁸</p> <p>The Homeless strategy supports work to reduce single non priority homelessness which should have a positive impact on this gender group together with bolstering existing support for priority homeless applicants.</p> <p>The updated draft Common Allocations Policy does propose a change that will enable friends of the same or different sex to apply to join the register together as this may increasingly be the only way that younger applicants can access social housing given the shortage of 1 bedroom accommodation. We feel that this is a positive change for this protected group (albeit a small one).</p>

⁷ The truth about the hidden homeless – CRISIS http://www.crisis.org.uk/data/files/publications/HiddenTruthAboutHomelessness_web.pdf & CLG P1E Homelessness returns & <http://www.homeless.org.uk/sites/default/files/Rough%20Sleeping%20Mar%202011.pdf>

⁸ <http://www.homeless.org.uk/sites/default/files/Rough%20Sleeping%20Mar%202011.pdf> point 3

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Sexual Orientation	Neutral	<p>An assessment of need may be the most suitable way to determine what types of dwellings are required for Lesbian, Gay and Bisexual (LGB) communities. Advice should be sought from organisations that support LGB people such as Stonewall Housing or the Albert Kennedy Trust. Specialist accommodation may be considered for LGB communities, especially people at risk of also being discriminated against due to age or ethnicity. Provision for sheltered accommodation and emergency hostels should be considered for the more vulnerable members of the LGB community if thought necessary.</p> <p>We do not believe that detailed analysis is required at this stage given that the draft Common Allocations Policy does not make changes that we feel will impact on this group in either a +ve or –ve way.</p>
Poverty/Disadvantage /location (Not a protected characteristic)	Neutral	<p>Poverty Poverty can lead to overcrowded and poor quality housing conditions, placement in temporary accommodation, often in disadvantaged areas where there are insufficient social facilities or public transport levels.</p> <p>Gypsy & Traveller Issues The literature specific to the Gypsy and Traveller population indicates that, as a group, their health overall is poorer than that of the general population and also poorer than that of non- Travellers living in socially deprived areas. They have poor health expectations and make limited use of health care provision⁹. Others have identified a number of reasons why Gypsies and Travellers are reluctant to access mainstream services. This reluctance is due in part to practicalities, such as complex procedures for registering and accessing services. Most common problem for Travellers is difficulty in</p>

⁹ (Health care needs of Travellers – Van Cleemput, <http://adc.bmj.com/content/82/1/32.full>)

Protected Group	Effect (+ive/-ive/ neutral)	Comments/Evidence
		<p>accessing primary care through GPs because of their insistence in having a permanent address.</p> <p>Deprivation There are 327 Lower Super Output Areas (a way of dividing parish wards into smaller areas for monitoring and analysis purposes - LSOAs) within Somerset, 14 of which fall within the 20% most deprived nationally. These 14 LSOAs contain approximately 21,200 people and can be found in Taunton, Bridgwater, Highbridge, Williton, Shepton Mallet and Yeovil.</p> <p>Comparing the Index of Multiple Deprivation 2010 with the 2007 version shows that in some of the ‘most’ deprived areas of Somerset deprivation has increased:</p> <ul style="list-style-type: none"> • five of the 14 most deprived LSOAs also fall into the 10% most deprived nationally, three more than in 2007. Together, these five LSOAs represent around 7,700 people • two of the 14 most deprived LSOAs also fall within the 5% most deprived nationally; there were no LSOAs in this category in 2007. These LSOAs are in Bridgwater Sydenham (1,600 people) and in Taunton Halcon (1,700 people). <p>Barriers to housing and services are the most prevalent form of deprivation within Somerset. Eighty-seven out of 327 LSOAs in Somerset fall into the 20% most deprived nationally, affecting 147,900 people.</p> <p>The key changes that we believe could affect those in poverty/deprivation are around the restrictions on harassment banding to 3 months (and bidding in areas away from the area of harassment), together with suspending those applicants that refuse 4 reasonable offers on properties that they have placed bids on. The effects could be both –ve and +ve in terms of focussing applicants on what they are bidding for but also may be seen to restrict choice.</p>

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		<p>We have made provision in the new draft policy for foster carers to receive an additional bedroom if they are approved foster carers and need the bedroom for potential foster children. This may also impact those that are deprived and potentially vulnerable.</p> <p>With regard to the harassment policy changes – these have been implemented to combat specific case issues where applicants haven’t bid on properties despite being in gold/emergency for harassment – If the harassment is that severe applicants should be making efforts to move away from the issue if at all possible. The requirement to move away from the area where the harassment is being caused has also been introduced to combat specific issues raised by MARAC where applicants have moved but are still within close proximity to the cause of the harassment. We may however need to consider an exemption to this in the case of domestic abuse cases where support networks may be in place in the area where the abuse was occurring but other measures are now in place to protect the applicant.</p>

6. Does the policy in its current format promote equality of opportunity and foster good relations between people who share a protected characteristic and those who do not share it?

We do believe that the draft Common Allocations Policy does promote equality of opportunity and foster good relations between protected characteristics groups.

7. If positive effect has been identified in table 6, how can it be improve upon or maximised, either in this policy or others?

We believe that our proposal to allow friends (same sex or different sex) to apply jointly on the register will provide more flexibility for single applicants and is a positive change for the gender group. The impact of this could be maximised by publicising the change however the limited supply of accommodation may mean that we are raising expectations unrealistically.

8. **Recommendations and Opportunities**

Are there changes you could reasonably introduce which would make this policy work better?

None at present but we will keep this under review

Is further research or consultation required?

DETAIL THE ACTIONS PLANNED				
Consider target dates, resources implications, proportionality, risk, regular monitoring and reviewing and list what the positive outcome will be.				
Issue	Action Needed	Positive Outcome	Person Responsible	Timescale
Targeted Housing options advice for applicants affected by policy changes	Introduction of enhanced housing options system from Abrisas	Will provide specific advice to each applicant that completes the housing advice questionnaire giving them a written report that details the best housing options for their situation.	Homefinder Somerset LA Partners	Jan 2014

Review (Date or timeframe)	Review when policy next amended.
Name of person/s completing (and involved in completing) form	Homefinder Somerset Operational Group
Date analysis completed	Finalised on 31.7.13