

Customer Access Review Full Assessment

The main types of activities that impact on others are those that involve decision-making (choosing to do or not to do), communicating and providing assistance. Where possible, activities should be carried out free from bias, inequality, or discrimination i.e. **fair**. If it is not possible to be fair then there needs to be justifiable reasons for exceptional treatment i.e. **reasonable**. Often Council activities are governed by legislation but that should have been designed to be fair or reasonable and then the Council must apply it in a fair and reasonable manner.

If the assessment shows activities are not always fair or reasonable, then steps must be taken to address the issues.

Assessment Details		
Assessment Area	Dartford Borough Council Choice Based Lettings Service	
Date of Assessment	4/4/11	
Directorate & Service	Strategic- Housing Services	
Manager	Peter Dosad	
Lead Officer	Marie Gerald	
Step 1	Scoping the assessment	
	Key Questions	Answers/Notes
1.	What are you looking to achieve i.e. aims/outcomes?	<p>The aims of the Choice Based Lettings Policy are to:</p> <ul style="list-style-type: none"> ▪ Provide Home seekers (both existing and prospective tenants) with 'reasonable' choice and preference over where they live, giving access to good quality affordable housing for those in housing need ▪ Continue to offer applicants an active role in choosing accommodation, taking account of individual circumstances and waiting time. ▪ Continue to ensure applicants receive sufficient information to make informed choices about opportunities for re-housing and understand the criteria and processes adopted by the Council. ▪ Offer applicants open and fair access to housing, provide choice and recognise diverse needs
2.	Who will be affected?	Everyone seeking housing from the Council
3.	How do the activities/changes a) contribute to any national indicators? b) meet or hinder other policies, values or objectives of the Council?	<ul style="list-style-type: none"> ▪ This service contributes to the corporate aim of 'Housing and Stronger Communities' which aims to 'meet the housing needs of the Borough' and to 'promote self reliant communities'. ▪ Choice based lettings service also interacts with the homelessness service (and therefore is linked to the Homelessness Strategy 2008-2011).
4.	Which aspects of the activity are dictated by legislation / regulation and where do we	The Council's Choice Based Lettings service is dictated by the requirements of Part VI of the Housing Act 1996, as amended by the Homelessness Act 2002, and takes account of guidance issued by the Communities and

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	<p>have discretion in how they are delivered?</p>	<p>Local Government. This legislation does allow for discretion in the areas of:</p> <ol style="list-style-type: none"> 1. Placing applicants outside of the borough in a lower level of priority for housing. 2. Placing the following applicants in a higher priority for housing: <ul style="list-style-type: none"> ▪ Where the Council is carrying out repairs or improvements to the Council property or where, for reasons of demolition or development, tenants are required to move from their homes. ▪ Where the Council has a duty to re-house residential occupiers following a compulsory purchase and provides suitable alternative accommodation under the Land Compensation Act 1973, s39. ▪ Where the Council grants an introductory tenancy to a former owner occupier or statutory tenant of a defective dwelling house under the Housing Act 1985. ▪ Homeless households accommodated in the private sector through the Dartford Private Leasing Scheme (DPLS). ▪ Downsize for Cash Scheme: Qualifying tenants who occupy accommodation too large for their needs and who wish to downsize into smaller accommodation. <p>Some properties are allocated outside of the choice based lettings scheme, where protocols have been agreed, these are detailed in the Choice Based Lettings Policy and include:</p> <ol style="list-style-type: none"> 1. Joint Stock Agreement – Social services have nomination rights to 20 council properties a year 2. Probation - Probation have nomination rights to one council properties a year 3. YMCA – YMCA can nominate five 18+ year olds to council properties a year, likewise the Council can nominate five young people to YMCA accommodation each year. 4. Local lettings plans 5. Nominations from Housing Associations not taking part in CBL 6. Dartford Private Leasing Scheme applicants (when applicants circumstances change and they are no longer entitled to claim Housing Benefit, they will be given one direct offer into Council accommodation) 6. Accommodation following move-on from refuges and teenage mothers units 7. Reciprocal lettings 8. Adapted property moves 9. Management Transfers
Step 2	Consideration of data and information	
5.	<p>What do you know about the groups who will be affected e.g. demographic information</p>	<p>Number of lets Distribution within the bands (currently on the waiting list)</p>

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	etc?	Age Disability Gender Race
6.	What consultation has taken place with affected groups? Who was consulted and what were the key findings?	Kent Homechoice periodically asks home seekers questions, such as 'did you need help and support to bid?' Home seekers can also leave feedback. The Council uses this information to improve the service and individuals are contacted to resolve any problems. The Council conducted a housing needs survey in partnership with the Locality Learning Disability Team. The survey was sent to people who live in Dartford and are known to social services to have a learning disability. The survey found that 92% of people felt that their home was suitable for them. As a result of the survey, the Council decided to provide some easy to read leaflets explaining choice based lettings.
7.	What additional research is needed to ensure that all 'equality groups' needs are taken into account?	Service user feedback Survey Asian groups to explore understanding and awareness of housing.
8.	How do you propose to gather the additional information?	Complaints data is reviewed by Management Team and Quality Services and is recorded on COVALENT. The review of complaints data will identify whether the needs of all equality groups is being addressed. Service user feedback will continue to be collected from Kent Homechoice. As part of the monitoring process for the Vulnerable Persons Policy, surveys will be sent to 'vulnerable people' (including disabled people) on the housing register to ascertain how they have found the service and what improvements could be made.
Step 3	Assessing the equality impact	
9.	Based on information you already know, in relation to each of the following groups, consider: a) for existing activities, how they are actually working in practice for each group b) whether there is anything in any proposed activities/changes that could discriminate or put anyone at a disadvantage or assist in promoting equality of opportunity.	
	Equality groups	

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a.	Age	<p>There is ample housing provision for older people, with 14 supported schemes in Dartford. Because of this DBC reduced its qualifying age for supported accommodation from 60 to 55. On the other hand supported accommodation for young people is limited; the YMCA is the only provider of low level supported housing in Dartford and has an agreement with the Council to house five 18+ yr olds a year. The Council nominates the young person, however ultimate selection is down to the YMCA.</p> <p>Care leavers are prioritised under the Joint Stock Agreement.</p>
b.	Disability	<p>Fourteen people with learning disabilities are on the housing register (Jan 2011) (this is monitored by the Council's Housing Policy team).</p> <p>People with a learning disability and who are referred to housing services by social services (through the joint stock agreement) are offered the choice of receiving a direct let, or receiving a property through bidding on Kent Homechoice.</p> <p>For applicants with a physical disability and who need an adapted property, assessments are made by the occupational therapist team and suitable properties are offered direct (not through CBL) with support from the occupational therapist team and a housing surveyor.</p> <p>The Council records whether someone is vulnerable by placing a green triangle on their person record. The bidding history of people with a green triangle is reviewed each year, to check whether someone needs help placing a bid.</p> <p>The Council offers an advocacy service and will bid on behalf of someone if required. It promotes this service on the housing web site.</p>
c.	Gender	<p>Between Oct 2009 - Sep 2010, 160 of new tenancy lets were to lone female parent families. This represents 24.5% of all tenancy lets. Most new lead tenants are female (63.4%), this corresponds with applicants on the housing register- of which 61.8% of lead applicants are female. Statistics which look at the first and second named person on the housing register (rather than just the lead tenant, who is often the one completing the form) also reflect a high number of females: 1807 men and 2699 females, 15 are unknown.</p>
d.	Race	<p>Housing Services follow legislation set by the Housing Act 1996 sec 185 -187, which determines its duty to immigrants and asylum seekers.</p> <p>Compared to the number of Black Africans in Dartford the number of this group accessing the housing service is over represented. This is explained by the fact that most Black Africans using the service are women fleeing domestic abuse and have come from outside of the borough.</p> <p>Data shows that the number of Asians on the housing register and new tenancy lets is underrepresented of the total Asian population in Dartford.</p>
e.	Religion/Belief	<p>From the 4th October 2010, Housing Services will start to record this information only when it is related to the persons housing needs.</p>
f.	Sexual Orientation	<p>From the 4th October 2010, Housing Services will start to record this information only when it is related to the persons housing needs.</p>

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g.	General/Other	
10.	If the Local Authority works with partners to deliver activities/changes, please describe any that could give rise to inconsistent customer experiences?	The Council works with Kent Homechoice who have produced their own equality impact assessment.
Step 4	Reviewing and scrutinising the impact	
11.	Summarise any positive or adverse impact you have identified and who is affected.	Positive impact on homeless households placed in the private rented sector as they are placed in a relatively high band. The joint stock agreement in Dartford also has a positive impact on disabled people as the number of placements available for re-housing (20 spaces) exceeds other local authorities in Kent. No adverse impact
12.	What changes can be made to address any adverse impact?	None required
13.	If an adverse impact remains, how can this be fairly justified?	-
14.	Summarise the expected residual impact once steps have been taken to minimise adverse impact and identify who remains affected.	-

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Step 4 continued...	Actions to be inserted into Equality Action Plans			
Based on your answers in Step 5, please finalise your actions here. These actions will then be incorporated into our equality action plans.				
Identified impact (including who is affected)	Action	Monitoring (include expected outcomes, milestones and targets)	Date for Completion	Responsible Officer
If an adverse impact was found or unmet needs identified, which actions will you put in place to address this:				
If the impact is still unclear, list the actions you will put in place to gather the information you need:				
Asian community	Explore Asian communities understanding and knowledge of housing services.		December 2011	Ruth Scully
Disabled people	Improve reporting of disability	1. Raise awareness of the green triangle amongst staff, using team meetings 2. Explore the use of the vulnerability assessment and implement its use 3. Feed into discussions held by Kent Choice Based Lettings Partnership surrounding the common assessment form, in order to ensure that disability is correctly recorded.	1. June 2011 2. April 2012 3. April 2012	1. Ruth Scully 2. Marie Gerald 3. Marie Gerald
If you did not find any evidence of unmet needs or adverse impact, list the actions you will put in place to maintain good practice:				

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All groups	Improve monitoring of choice based lettings to identify equality and diversity issues.	Monitor service user feedback from Kent Homechoice		Marie Gerald (through David Scutt)
Black African group	Report to the domestic abuse forum the prevalence of Black African women fleeing domestic abuse Improve publicity of Domestic Abuse One Stop Shop to the Black African Community.	Issue featured on the Domestic Abuse Forum agenda.		

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Step 6	Decision making and future monitoring	
15.	Which decision making process do these changes need to go through i.e. who do they need to be approved by?	Peter Dosad and Sheri Green
16.	How will you continue to monitor the impact of the activity/service/ policy on diverse groups?	Continue to monitor the choice based lettings service, using actions in the action plan.
17.	When will you review this Customer Access Review?	An interim reality is check is needed in Nov 2011, after the introduction of the common assessment scheme. However the actual review should take place in April 2012.
Final steps		
<p>For an existing activity/service/policy: Send your assessment to the West Kent Equalities Officer .</p> <p>For a new activity/service/ policy: Summarise your findings in the committee report. Ensure planned consultations address the findings of this impact assessment.</p>		