To: Communities and Partnership Scrutiny Committee
City Executive Board
Council

Date: 22nd January 2009 (Scrutiny)   **Item No**:
28th January 2009 (CEB)
16th February 2009 (Council)

Report of: Head of Service, Community Housing & Community Development

Title of Report: Sub-Regional Choice Based Lettings and new Allocation
Scheme

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Summary and Recommendations

Purpose of report: To seek approval to adopt a new Allocation Scheme and
to enter into the Sub-Regional Choice Based Lettings Framework

Key decision? No

Executive lead member: Councillor Ed Turner

Ward(s) affected: All

Report Approved by
Board Member: Councillor Ed Turner
Legal: Jeremy Thomas
Finance: Sarah Fogden

Policy Framework: This report supports the Council's objectives relating to
housing and social inclusion

Recommendation(s): Members are asked to note the report and to make
the following recommendations to full Council:

(1) To approve the adoption of the revised Allocation Scheme at Appendix
One, effective from 25th May 2009
(2) To delegate to the Head of Service, Community Housing & Community
Development, the authority to amend this effective date, if required, by
a period of up to three months

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Introduction & Background

1. This report proposes changes to Oxford's Allocation Scheme, principally to implement Sub-Regional Choice Based Lettings, and integrate a commonly agreed assessment arrangement within our policy

2. A Choice Based Lettings Scheme was introduced in Oxford, in January 2008, and has now been operating for a year. In July 2008, a user satisfaction survey was undertaken to review it's operation, and this report provides the results from this exercise

3. Oxford City Council has also entered into a partnership with Cherwell District Council, South Oxfordshire District Council, and Vale of White Horse District Council to implement a Sub-Regional Choice Based Lettings Arrangement. This will provide more choice and an increased ability for applicants to move across district boundaries within the sub-region. This was the subject of a report to Executive Board on 5th November 2007. It was originally proposed to launch this initiative in April 2008, but the approach taken has now been fundamentally reviewed and re-negotiated. It is now proposed to launch the sub-regional scheme, as set out in this report, in the week commencing 25th May 2009

Progress on Sub-Regional Choice Based Lettings

4. In December 2006, the 'Oxfordshire Choice Based Lettings Partnership' comprising of Cherwell, South Oxfordshire, and Vale of White Horse District Councils, and Oxford City Council as the lead authority, were awarded £101,085 by the Government to develop a sub-regional framework. Since that time, the project has been overseen by a Steering Group and Project Group, comprising of officers from each authority and other stakeholders

5. Vale of White Horse District Council was, at that time, already operating a Choice Based Lettings Scheme. Oxford City and Cherwell District launched schemes in January 2008, and South Oxfordshire in July 2008. All four authorities have selected the same ICT provider to support this work

6. In March 2008, a 'Heads of Terms' partnership agreement was signed between all four authorities. A co-operation agreement has also been agreed, covering the operation of the sub-regional framework, subject only to confirmation from each district that their new Allocation Schemes are approved

7. Throughout 2008, the project has focused on agreeing a joint banding assessment scheme between all four districts. This has necessitated some detailed consideration and negotiation on aspects of Allocations Policy. Specialist Counsel opinion has been sought on three occasions

in relation to this, to ensure that the scheme agreed between all four districts is as robust as possible. An 'Oxfordshire Housing Allocations Policy' has now been agreed by officers of all four districts covering those aspects of Allocation policy that are agreed as common to all authorities and their RSL partners. These common elements are now being incorporated into the Allocation Scheme of each of the four authorities. Other aspects of policy, that are not commonly agreed, will also be set out in each authority's Allocation Scheme. Based on this, computer specifications have jointly been signed off with the CBL ICT supplier, and detailed work on mapping current assessment priorities, and aligning assessment procedures has begun

Key Features of the Sub-Regional Choice Based Lettings Scheme

8   The key change to the previous sub-regional scheme that was proposed to Executive Board, is that the new arrangement will be fully integrated into the policy of each of the four councils, and there will, in effect, only be one assessment criteria. Previously it was proposed that an additional sub-regional banding scheme would be created, to sit alongside each council's own banding scheme. The sub-regional scheme would only be used to prioritise applicants should they bid for a property from the sub-regional 'property pool'. Now applicants will only have one common assessment, and only one set of prioritisation criteria will apply. This is a far easier to understand system for customers. It is a more aligned arrangement than officers originally expected to achieve at the beginning of the project, and has only been agreed on the basis of extensive negotiations and compromise for all partners

Sub-Regional Properties

9   The original intention relating to the properties available for sub-regional bidding remains the same, in that generally each council will make available the following proportion of properties to applicants across the sub-region to bid for:
- 10% of general needs property (four beds or larger and some rural schemes will be excluded)
- 100% of sheltered accommodation for the elderly
- 100% of disabled adapted accommodation (Wheelchair Standard or properties with major adaptations, such as a stair-lift)

10   The agreement is that the number of properties put into this 'sub-regional pool' must also be reciprocal and neutral for each authority, in that the number of Oxford applicants accepting properties in the other three districts, should equal the number of district applicants accepting property in Oxford. This will be achieved by advert labelling, if and when required, to determine who can bid for particular properties. Performance of each authority in relation to this, and the mix of stock made available to the 'pool' will be monitored and managed through

joint arrangements between all four districts

11   The proportion of general needs properties included in the scheme is thought to be a reasonable amount to 'pilot' this new approach and to gauge interest in inter-district moves. It should give a reasonable amount of vacancies to make the scheme of interest to applicants, whilst allowing all four authorities to ensure the scheme is working for them. The new priority arrangement is easily 'scaleable' in that the percentage of properties allocated to the sub-region could be increased without amendment of the scheme itself. It is proposed that Council are asked to approve the new percentages on an annual basis, when setting the years Allocation Percentage Targets

Banding Scheme

12   All councils have now agreed to move to a 5 band priority scheme. This is detailed in the Allocation Scheme at Appendix 1 to this report. The differences from the 6 band scheme currently operated in Oxford City, are set out in Appendix 2

13   It is proposed to operate the current banding scheme for new assessments up to Friday 22nd May 2009. From Monday 25th May 2009, any new assessments will be made under the new Allocation Scheme, although new applicants will not be able to bid under the Choice Based Lettings Scheme until the start of the new bid cycle on Wednesday 27th May 2009. Shortlisting for the bid cycle closing on 27th May will continue to be based on the old priority scheme, and the new scheme used to assess any bids made from 27th May onwards

14   It is proposed that no transitional arrangements are put in place as part of this change. The re-prioritisation of applicants will inevitably have some 'winners and losers' but all authorities have agreed that a easily understandable and transparent approach to the new priority scheme is essential, and trying to incorporate any transitional arrangements put forward by each of the four current schemes, would not meet this objective, and would prove impracticable

Bidding

15   The new sub-regional CBL arrangement (from 27th May 2009) will operate in much the same way for applicants, in that applicants can continue to make up to three bids, per cycle, on property they are eligible for. However, as well as bidding for property in the applicants 'own' district, they may now be able to make bids for properties that they are eligible for in the wider sub-region

16   The fortnightly bidding cycle will continue, although this will be changed, from 27th May, to an arrangement whereby applicants can only bid during the first 13 days of the 14 day cycle. The 14th day will be closed for bidding, and will allow allocations officers in each district time to

contact applicants (especially concerning their preferences if they are on the top of more than one shortlist) and to allocate property. It is expected that this will better identify any properties that may need to be re-advertised, and as such, should further improve performance in relation to voids

17   The bid cycle length will be included in a review of the sub-regional arrangement, in 2009, at least three months after the sub-regional scheme launch, to see whether to retain the fortnightly cycle, change to a weekly cycle, or adopt some other approach

Consultation

18   In May 2008, RSLs were consulted in relation to the operation of the new CBL scheme. The results are summarised at Appendix 3. RSLs are happy with the current policy and would prefer to have a common scheme agreed with the districts, as is being proposed here. Some expressed a preference to move to a weekly lettings cycle, instead of a fortnightly one

19   Other stakeholders were consulted, in June 2008, mainly through a review meeting convened with various agencies. The results are also summarised at Appendix 3. Agencies remain concerned to ensure that CBL schemes are as easy to use as possible, so as not to exclude vulnerable applicants, but broadly welcomed moves to develop a common scheme with partner districts

20   In July 2008, applicants on the housing register were consulted by way of a postal customer survey. We sought to attract a higher number of returns with the offer of entry into a prize draw. The response rate was about 4%. Whilst this is low, such a response rate is not uncommon for this type of survey. Officers would consider a 10% response rate to be good. The number of respondents (179) was high enough for us to draw conclusions from the survey with regard to users views. The profile of respondents is was broadly representative, although there was an over-representation from existing social housing tenants. The results are summarised at Appendix 3. 64% of respondents had made a bid through the CBL scheme.

Overall, 59% of respondents were satisfied or very satisfied with the information provided about their housing options (9.5% dissatisfied), up from 39% in April 2006 (before CBL). 52.5% were satisfied or very satisfied with the ease of use of the system (14.5% dissatisfied) up from 30% in 2006. 68% said they found it easy to understand the band they were in, and 85.5% found CBL property adverts 'Easy' or 'OK' to understand. The percentage of respondents that were satisfied or very satisfied with the helpfulness of Council staff fell to 49% (10% dissatisfied) from 52% in 2006, although 41% were satisfied or very satisfied with communication from the Council (up from 15%). This will

need more analysis, but may be explained by the shift to a more customer-based system, that requires pro-active customer engagement, where council staff can advise and assist people, but not make bids on their behalf

21   In addition to this, RSLs and other stakeholders have been represented on both the Steering Group and Project Group of the Sub-Regional project, and a specific sub-regional RSL event was held in December 2008. RSLs in Oxford have been consulted further through the ORAH (Oxford Register for Affordable Housing) Partnership Board

22   It is proposed that further consultation is undertaken in 2009, with specific regard to the sub-regional CBL scheme

Financial Issues

23   The implementation costs of sub-regional CBL are being largely met from the Government's grant allocation, and some efficiency savings have been made by all four authorities contracting with the same ICT supplier to develop the system. There are no additional budgetary requirements, other than those already budgeted for in 2009/10, as a result of this report

24   The operational costs of sub-regional CBL will be the same as for the present CBL system, and will be met within current budget provision. There are no additional staffing requirements

Risk Implications

25   There are no identified risks associated with the recommendations of this report. Any such risks of entering into a partnership with the four other authorities have been dealt with previously and are mitigated through detailed partnership and co-operation agreements

26   Should the recommendations set out in this report not be acceptable, there are potential risks however. It will not be possible to re-negotiate an agreement within the timescale available, and any sub-regional CBL launch would need to be delayed, or would exclude Oxford City. This would present a reputational risk, and could incur additional ICT costs, should ICT specifications need to be changed, or should the work for all four districts not be implemented together

Equalities Impact

27   A full Equalities Impact Assessment relating to Allocations and Choice Based Lettings has been carried out, and this is attached at Appendix 4

Legal Implications

28   Any legal issues relating to the adoption of the new Allocation Scheme, as proposed, are detailed in (confidential) Appendix 5

Recommendations

29   To approve the adoption of the revised Allocation Scheme as set out in Appendix One, effective from 25th May 2009

30   To delegate to the Head of Service, Community Housing & Community Development, the authority to amend this effective date, if required, by a period of up to three months

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Background papers[x2]:
None

Appendices:
Appendix 1 – Allocation Scheme *(circulated separately, but available on the website and one copy in the members room, with further copies available on request)*
Appendix 2 – Comparison of New and Old Banding Schemes
Appendix 3 – Summary of Consultation
Appendix 4 – Equalities Impact Assessment for Allocations and Choice Based Lettings
Appendix 5 – *Confidential Paper* – Legal Issues relating to the Allocation Scheme

Appendix 1

ALLOCATIONS SCHEME

This document has been circulated separately. It will be available to view on the Council's website and copies will be placed in the Members' Room and Group rooms.

Copies are available from the Committee Secretary on request.

Appendix 2 - Comparison of New and Old Banding Schemes

Summary – New (sub-regional) Scheme	Old Oxford City Scheme (to be replaced)
Five Band Scheme	Six Band Scheme
Priority by Band 1 (highest) to 5 (lowest)	Same - Priority by Band A (highest) to F (lowest)
Priority within Band 1 is by Effective Date (i.e. date placed in that band)	Same
Priority within Bands 2 to 5 is by Registration Date	All OCC Bands ordered by Effective Date – although in many cases this is the same as the Registration Date

Band 1		Band A (Exceptional Priority)
Exceptional Circumstances	Where there is an immediate risk to health and safety; complex needs cases, 'place of safety' cases and other exceptional or emergency needs – awarded by ECP	Same (ECP Band A)
Statutory Overcrowding	Any application from a household that has been declared Statutorily Overcrowded in their current accommodation	Same
Prohibition or Demolition Notices	Any application from a household where a statutory notice such as Prohibition Order or Demolition Order has been made by Environmental Health department and where no remedial action is possible to remedy the defects in a reasonable period of time	Same
Under Occupying by 2 or more Bedrooms	Council or RSL tenants in the sub-region, with an assured or secure tenancy, who will be giving up permanent accommodation with at least two bedrooms more than they require	Same
Decants and other Housing Management Moves	Any social housing tenant of the partners or their partner RSLs, who have been awarded a decant status by the manager responsible for allocations, where refurbishment or repair is to be carried out and it cannot be done with the tenant in residence or where a property is to be disposed of or redeveloped	Same
Successor Tenants	(1) Legal successors other than spouses or civil partners (2) Policy successors – i.e. Applicants who	Same

	would have been entitled to succeed to the tenancy but for the fact that one succession to the tenancy has already taken place and in both cases where: o they are occupying a property with adaptations for a disabled person which they do not need, *or* o they are occupying a property larger than they would qualify for under the allocation scheme, or o where occupying the property gives the benefit of facilities and or services which they would otherwise not qualify for	
Overall, the new Band 1 is the same as the old Band A		

Band 2		Band B (Urgent Priority)
Urgent Social or Welfare Needs	Any applicant assessed as having an urgent need to move on social or welfare grounds (serious harassment cases, multiple needs cases not otherwise addressed through the banding system and any other urgent cases) – awarded by ECP	Same (ECP Band B) .
Urgent Health or Disability Needs	Applicants assessed as having an urgent need to move because of a health problem or disability – awarded by the HAHA Panel	Same (HAHA Band B)
Overcrowded 2 or more bedrooms short	Applicants assessed as being two or more bedrooms short of their needs	Same – but the overcrowding formula has changed, see 'Overcrowding Rules/ Bedroom Requirements' section below for more details
Priority Statutory Homeless	Applicants found to be homeless, in a priority need group and where a duty to offer housing has been accepted by one of the district councils under sections 193 or 195 of Part 7 of the Housing Act 1996	Moved up from Band C, and expanded to include households to whom the Council has accepted a s195 duty and assisted into the private rented sector
Move-ons	Any application from a person awarded a move-on category which meets the requirements of the move on protocols: • Single homeless projects: applicants from voluntary sector hostels, foyers and supported	Same

	lodgings who are ready to move on to independent, permanent accommodation • Care leavers: applicants who are former "relevant children" as defined by the Children (Leaving Care) Act 2002	
Under Occupation by 1 Bedroom	Council or housing association tenants in the sub-region with an assured or secure tenancy, who will be giving up permanent general needs accommodation with one bedroom more than they require	Same
Compound Needs	Any applicant who meets 2 or more categories in Band 3	Same

Overall, the new Band 2 is the same as the old Band B, but with the addition of statutory homeless households (who have moved up from Band C), and homeless households to whom a s195 duty is accepted. The overall allocation to the different re-housing lists will continue to be managed by CBL property adverts labels, as required, in order to meet allocation percentage targets, so there is not expected to be any significant impact in moving statutory homeless households up a band, although the inclusion of s195 cases will result in some more applicants meeting this criteria than would otherwise have been the case. This is set against significantly declining homeless acceptances however. The Commitment to Re-house category has been removed, but is included in the ECP category.

Band 3		Bands C & D (High Priority & Significant Housing Need)
Significant Social or Welfare Needs	Applicants assessed as having a 'significant' priority on social or welfare grounds – awarded by ECP	Same (ECP Band C or D)
Significant Health or Disability Needs	Applicants assessed as having a significant level of housing need as a result of health problems or a disability – awarded by the HAHA Panel	Same (HAHA Band D)
Overcrowded 1 Bedroom short	Applicants assessed as being one bedroom short of their needs	Same (Band D) – but the overcrowding formula has changed, see 'Overcrowding Rules/ Bedroom Requirements' section below for more details
Unsatisfactory Housing 1	Applicants living in sub-standard accommodation that a qualified officer has assessed as a category 1 hazard, where repair is not possible or it is not practical in a reasonable timescale Applicants living in homes lacking the use	Same (Band C)

	of one or more of: A kitchen (or cooking facilities), a bathroom, an inside WC, running water, or electricity will usually be deemed to meet this criteria	
Insecure Private Rented Accommodation	Tenants of private landlords where the landlord is taking action to recover possession of the property and has demonstrated a real intention to proceed to eviction	Moved up from Band E, and new definition does not always require court possession proceedings to have commenced
Homeless and Not in a Priority Group	• Applicants who have been accepted as of No Fixed Abode (NFA) • Applicants who are Homeless but have been given a decision that they are not in Priority Need • Applicants who could otherwise access the Move-on scheme (from Homeless Projects) *This category is not compoundable*	Same (Band D)
Insecure Tied Accommodation	Applicants who are living in accommodation tied to their employment and who have received a formal notice to quit from their employer and where the loss of employment is through no fault of the applicant	New Criteria
Compound needs	Any applicant who meets 2 or more categories from Band 4	Previously the policy only allowed compounding from Band D to Band C, not from Band E to Band D

Overall, the new Band 3 is the same as the old Bands C and D combined, but with Insecure Tenancies (from Band E), and Tied Accommodation (new criteria) added, and Gender Overcrowding (from Band D) removed.

Due to combining these two bands – the differential priority previously enjoyed by applicants in Band C has been lost. However, this only affects a small number of cases. The differential relating to older children of opposite genders sharing, and other families with two children sharing, is now assured through changes to the overcrowding formula used in the Allocation Scheme.

Band 4		Band E (Identified Housing Need)
Moderate Social or Welfare Needs	Applicants assessed as having a moderate level of social or welfare need arising from their housing situation – awarded by ECP	Same (ECP Band E)
Moderate Health or Disability Needs	Applicants assessed as having a moderate level of housing need as a result of health	Same (HAHA Band E)

	problems or a disability – awarded by the HAHA Panel	
Unsatisfactory Housing 2	Applicants living in sub-standard accommodation that is deemed to have a category 2 hazard and where repair is not possible or it is not practical in a reasonable timescale. Applicants living in homes lacking a fixed heating system will usually be deemed to meet this criteria	Moved down from Band D and now persons lacking a kitchen (but with cooking facilities), or lacking a living room, will only be included in this category if a HHSRS category 2 Hazard is declared

Overall, the new Band 4 is similar to the old Band E, but no provision is made for Children at Height (Band E). Insecure Tenancies has been dealt with in a higher new band.

Band 5		Band F (No Priority)
Adequately housed	Applicants who are adequately housed and do not fall into the above bands	Same
Sufficient financial resources	Applicants who have sufficient financial resources to secure alternative accommodation	Same (over-rides any higher band award if considered to have sufficient resources based on the current property market to meet their own housing need)
Nil priority	Applicants who have been given a "nil priority" award	Same

Overall, the approach used for the new Band 5 is the same as OCC Band F – i.e. Nil Priority or not falling into a higher band – albeit the other bands being calculated differently in the new scheme

Additional Guidance	New Policy	Change from old policy
Transfer Applicants	The new policy assesses transfer applicants in the same way, but will acknowledge sub-regional transfer applicants (and any priority awarded to them, for example, under-occupation, permanent decant, or succession cases) should they successfully bid for an advertised 'sub-regional' property	That sub-regional transfer tenants can bid with a potentially enhanced priority – but only for the percentage of properties advertised sub-regionally
Compounding	Where applicants in Bands 3 or 4 have compound needs (that is, they fulfil more than one of the requirements for eligibility for a band) they will usually progress to	An award based on social and welfare grounds can now be compounded into a higher priority band - except Band 1. No applicants can compound into Band 1 (the same as the current scheme).

	the next band. Compounding is not possible into Band 1 or Band 4.

It is not possible to use the 'Homeless and Not in a Priority Group' category award for the purposes of compound need to move to the next band. | ECP will need to take account of this in their decisions (i.e. the ECP (Social & Welfare) awards themselves should not now seek to reflect the applicants holistic housing need) and some cases may need to be re-assessed by the panel prior to the adoption of the new scheme |
| Priority Order | Once accepted as eligible by the Council to join the Housing Register, applicants will be placed in one of five bands, which have been designed to reflect broad categories of need and to enable the Council to meet it's responsibilities to applicants in reasonable preference groups. The bands cover all categories of housing need, from very high to very low.

Some applicant's circumstances may make them eligible to be placed in more than one band. In this case, they will be placed in the highest band for which they are eligible

The successful applicant for each property will be the one who is eligible and in the highest band. Where there is more than one applicant in that band, priority will be by date | Same as current OCC Allocation Scheme, but amended from a six to a five band scheme, and the priority order for shortlisting, has been made more detailed and transparent. As part of Sub-Regional CBL, a new local connection assessment has also been introduced – see below. |
| Local Connection | A new definition of local connection to the District has been agreed that mirrors the definition used for homelessness decisions. In addition, a new category has been created of Sub-Regional connection. This will apply to any applicant deemed to have a District Connection in one or more of the four partner districts. | The local connection to the district has been expressed in more detailed and exact terms, but is not a significant change from existing policy.

The introduction of the sub-regional connection, and use of the district connection, in determining some allocations will be used to manage the sub-regional process, in part, to ensure parity of allocations between districts, and also to ensure that some priority is given to applicants with a connection to the sub-region, above those with no local connection to it.

A Parish connection is also defined, but this will only be used for specific rural |

		schemes, and will not be used for properties in Oxford City.
Overcrowding Rules/ Bedroom Requirements	Children of opposite sexes are assessed as needing their own bedroom when the oldest reaches 7 years of age. Children of the same sex are assessed as needing their own bedroom when the oldest is between 10 and 15 and the age gap is 10 years or more, *or* where the oldest is 16 or 17 and the age gap is 5 years of more.	The current scheme recognises that children require their own bedroom when the oldest reaches 5 years of age (if opposite sexes), or where the age gap is more than 15 years (if same sex). Additional priority is given to applicants if opposite sex children are still sharing a room when the eldest reaches 10. This is now removed. The new policy differs from this in that it only gives additional priority to an applicant when the oldest (of opposite sex children) reaches 7 (instead of 5). It does, however, give more detailed consideration to the generation gap for same sex children reducing it from 15 years to 10 or 5 years depending on the age of the oldest child. The impact of this is that households previously compounded up into Band C due to gender overcrowding lose their differential priority from other applicants overcrowded by one bedroom. (In exceptional circumstances social & welfare awards can be awarded to ensure reasonable priority is given to households with more complex needs where necessary). However, the new policy gives greater priority to overcrowded households, and it also gives greater flexibility on the size of property that an applicant is eligible to bid for (see the Property Size Eligibility Guide – Appendix IV of the Allocations Scheme).
Assessment	Should a sub-regional applicant bid for a sub-regionally advertised property, in a district where they are not registered, then at the point of the bid being made, they will be deemed to have also applied to the authority in which that property is located. An assessment by any one of the four other local authority partners will, be used to determine the assessment for shortlisting any such applicant. Allocations Officers of that authority will	This is a new method of working, as part of the Oxfordshire Sub-Regional CBL Partnership. Agreements and protocols between the four authorities have been agreed to cover this, including information sharing protocols.

	ensure that the previous assessment accords to, and is consistent with, assessments made in that authority.	

Appendix Three – Consultation Summary

RSL consultation on Sub Regional Choice Based Lettings (May 2008)

All RSLs in the sub-region were consulted. They were sent a copy of the proposed banding scheme.

Nine replies were received, of which four were general emails to express their general support for the scheme. The RSL representative of the sub regional project group considers that the low response rate is due to the fact that RSLs have all been consulted, by each district, when they introduced their own CBL schemes. The RSLs are generally happy with CBL and would prefer to have a single sub-regional scheme as it is easier for them.

The following are some specific responses received:

Sheltered/elderly/ vulnerable applicants
- Need to ensure that facilities are in place to support these applicants
- There is some low demand
- Some RSLs who only deal with elderly properties don't want to participate in CBL

Letting Cycle
- Four respondents wanted to move to a weekly letting cycle to reduce void times and to speed up re-housing

Costs
- Three of the RSLs asked about the costs to themselves and whether fees were to be introduced (issue over whether these would be sustainable to the RSL)

West Oxfordshire
- A number of RSL operating throughout the county expressed a desire for West Oxfordshire District Council to be lobbied to join the scheme

Common Banding Scheme
- Promote further mobility through cash incentives for under-occupiers
- Give additional priority to overcrowded households
- The five bands should be clear, transparent and fair to the three main routes of letting: Homeless, Waiting and Transfer lists
- Under-occupation/ Succession in highest band - surprised that they have such a high reasonable preference
- There is silence on part-time access to children/home working in bed size Matrix
- Children in flats without private play space have the same priority as a family house?

Other Issues

- Any prospect of making multiple nominations and operating a multiple viewing approach at the offer stage?
- What are the proposed costs to RSLs with the sub regional scheme?
- What reporting facilities will be available to RSLs to monitor performance?
- We understood that a firmer timeline would be available for the introduction of shared ownership and mutual exchanges, as a popular way for our customers to improve their quality of home/neighbourhood
- What are agreed protocols for panel decisions?

Consultation with Statutory and Voluntary Agencies (June 2008)

All partners were asked for a list of the statutory and voluntary agencies with whom they worked. These were all sent a letter outlining the proposed sub regional scheme (including the proposed banding scheme). They were then invited to a meeting in June.

The following issues were identified from that meeting:

- Agencies were concerned about the impact on vulnerable applicants, but agreed that thee system was generally easy to use.

- Agencies favoured a common system across the sub region, especially those agencies who operate across the county.

- It would be helpful if forms and processes were as simple as possible and if help was advertised and accessible. Suggested briefing sessions for support workers.

- Agencies would like further consultation, especially when it comes to designing application forms and similar.

Customer Survey - Six month review of CBL (July 2008)

Questionnaires were sent out with a Housing Needs Newsletter to all applicants (general, homeless and transfer) on Oxford City Council's Housing Register. This was approximately 4,600 households.

There was a response rate of 179, which is in the region of 4%. This was a low response rate, but the numbers of respondents are high enough to give us an indication of how applicants feel about CBL, especially given the wide demographic spread of respondents.

Ethnic Origin of Respondents

White British	57%
Other white	8.4%
Mixed white and other background	5.6%
Asian background	10.6
Black background	14.5%
Chinese	0.6
Other ethnic origin	1.1%

It should be noted that this question was asked in more detail, using a full list of ethnicity categories, but responses have been amalgamated to give a broad sense of respondent diversity.

Gender of Respondents

Male	34%
Female	62%

Age of Respondents

25 or under	11.2%
26 – 40	33.5%
41 – 55	29.1%
56 – 65	12.3%
Over 65	12.8%

Length of time waiting to move

1 – 6 months	16.2%
6 – 12 months	15.6%
1 – 2 years	20.7%
3 – 5 years	20.7%
5 years or more	11.7%

Respondents are tenants of

Housing Association	17.3%
Council	27.4%
Private Landlord	39.7%
None of these	15.6%

Currently trying to move home?

Yes	82.1%
No	14%

Reasons for wanting to move (offered by survey)

Overcrowding	27.9%
Wanting a smaller home	10.1%
Neighbour problems	16.8%
Nearer work or school	9.5%
Nearer family or friends	17.3%
Change of area	11.7%
Other	33.5%

Reasons for wanting to move (supplied by respondents, not by survey)

Reason	Number
Elderly/ poor health	13
Rent to expensive	6
Homeless/ temporary	14
Better facilities wanted	9
Wants "own place"	5
Living with family friends (includes parental evictions)	7
Harrassment/ violence	4

How many miles are you prepared to move to get the size of property preferred?

0 – 1 mile	12.8%
2 – 3 miles	30.7%
4 – 5 miles	21.2%
6 – 10 miles	10.1%
Over 10 miles	23.5%

Consider moving to another council's area?

Definitely consider	28.5%
Possibly consider	35.2%
Would not consider	33.5%

Have you made a CBL bid yet?

Yes	63.7%
No	35.8%

What bid methods have you used?

Automated phone system	14%
Web	45.8%
SMS text	2.2%
In person	8.4%
Through agency/ support worker	2.2%
No bid/ no reply	35.2%

Have you had help using CBL?

Floating support agency	2.8%
CAB	5.6%
Social & Community Services	4.5%
Community Group	0.6%
Faith Group	1.1%

Levels of satisfaction with the current housing allocations scheme

Categories given for answers were: Very satisfied; Quite satisfied; Neither satisfied nor dissatisfied; Dissatisfied; or Does not apply to me. In all cases, "does not apply to me" was less than 7.5%, unless otherwise commented on.

Significant findings from the survey include:

Information provided by the Council about housing options:

	July 08 (post CBL) survey	April 06 (pre CBL survey)
Satisfied or Very Satisfied	58.7	39%
Dissatisfied	9.5%	

Consideration given to specific needs:

	July 08 (post CBL) survey	April 06 pre CBL survey
Satisfied or Very Satisfied	23.5%	20.5%
Dissatisfied	29.6%	
Not Applicable	7.3%	39%

Satisfied with ease of using the system

	July 08 (post CBL) survey	April 06 pre CBL survey
Satisfied or Very Satisfied	52.5%	30%
Dissatisfied	14.5%	16%

Helpfulness of council housing staff (communication with council staff - figures in brackets)

	July 08 (post CBL) survey	April 06 pre CBL survey
Satisfied or Very Satisfied	49.2% (41.3%)	52% (15.1%)
Dissatisfied	10.1%	7%

Helpfulness and friendliness of RSL staff

	July 08 (post CBL) survey	April 06 pre CBL survey
Satisfied or Very Satisfied	28.7%	34%
Dissatisfied	12.3%	7/7%
Not Applicable	24.6%	

Waiting time to be housed

	July 08 (post CBL) survey	April 06 pre CBL survey
Satisfied or Very Satisfied	12.9%	26%
Dissatisfied	43% (fig only inc dissatisfied)	37% (fig inc neither satisfied nor dissatisfied)
Not Applicable		

Satisfied with the suitability of offers

	July 08 (post CBL) survey	April 06 pre CBL survey
Satisfied or Very Satisfied	34.7%	16%
Dissatisfied	25.7%	20%
Not Applicable		40%

How easy are the adverts to understand?

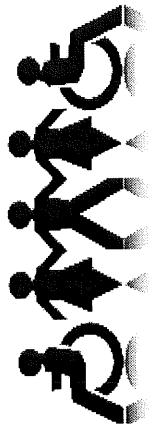| Easy	36.3%
OK	49.2%
Difficult	8.9%

Do you find it easy to understand which band you are in?

Yes	68.2%
No	26.8%

If not, why? (Open question, answers supplied by respondents, not suggested by survey)

Reason	Number
Just don't	4
Mental health problems	2
System is too complicated	1
Disagrees with band placed in	16
People in same band housed earlier/unsuccessful bidding	4
Haven't been allocated a band	5
Banding not adequately explained	6
Don't know which band they're in	2

Waiting time seems to be an issue from detailed responses. Applicants inclined to think that they should be in a higher band if they've been waiting for a long time.

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Appendix 4 - Full Equality Impact Assessment

Service Area: Housing Needs (Allocations and CBL)	Section: Community Housing & Development	Date of Partial assessment: 2008	Key Person responsible for assessment: Kate Winstanley / Dave Scholes	Date assessment commenced: June 2008
Name of Policy to be assessed:	Allocations and Choice Based Lettings (Housing Needs service)			
1. In what area are there concerns that the policy could have a differential impact	*Race - Yes*	*Disability - Yes*	*Age - Yes*	
	Gender - Yes	*Religious Belief - Yes*	*Sexual Orientation – Not Clear*	
2. Background: Give the background information to	Oxford City Council Housing Needs team manages the allocation of social housing in an area of high demand. A housing options service is offered to signpost applicants to other sources of housing including the private rented sector. Some applicants are placed in temporary accommodation, which is managed by City Council officers. The number of applicants placed in temporary accommodation is reducing and very few applicants are now placed in bed and breakfast accommodation.			

the policy and the perceived problems with the policy, which are the reason for the Impact Assessment.	Choice Based Lettings was introduced in January 2008. The possibility of differential impact was considered during the planning and introductory phases of this project. It was decided to conduct an EIA as part of the monitoring and review phase of the project and to incorporate the whole of the allocations process in order to make a full evaluation. Choice Based Lettings was introduced in order to improve the transparency of the service and to give improved choice to applicants. This was a long-term project and included a comprehensive review of existing Choice Based Lettings Schemes in other Local Authority areas.
	Race
	o Access to information in community languages
	o Housing requirements affected by cultural issues e.g. intergenerational housing
	o Availability of housing in areas preferred by ethnic minorities
	o Disproportionate numbers of BME applicants applying through the homeless route
	Disability
	o Suitable properties may not be available
	o Where disabled adapted properties are available the publicity may not reach the client group
	o Applicants may have difficulty accessing information (particularly CBL information) due to a disability
	Age
	o There is some concern that a web based CBL system will disadvantage older applicants
	o The suitability of some older person's accommodation is in doubt
	o Difficulty in obtaining suitable accommodation for young persons (16 –18)
	o Insufficient accommodation to meet the needs of 18 – 40 year olds
	Gender
	o Difficulty accessing CBL information from refuges
	o Female lone parents as a percentage of homeless allocations
	Religious Belief
	o Differential impacts may relate to race issues
	o Housing requirements may be affected by religious/ cultural issues e.g. need for showers or particular types of cooking facilities
	Sexual orientation
	o The housing needs team does not currently collect information on sexual orientation

3. Methodology and Sources of Data	Information and data has been collected from
The methods used to collect data and what sources of data	o The census and national statistics o Central government reports o Reports from the CBL system o Reports on homelessness acceptances o Quarterly lettings reports o Registered Social Landlord partners Data has been collected from the managers responsible for allocations, housing options and temporary accommodation and the Housing Needs Manager. This is has been collated through o Observations of service delivery o Feedback from users o Analysis of complaints o Feedback from stakeholders
6. Consultation This section should outline all the consultation that has taken place on the EIA. It should include the following. • Why you carried out the consultation. • Details about how you went about it. • A summary of the replies you received from people you consulted. • An assessment of your proposed policy (or policy options) in the light of the responses you received.	**The council has consulted on the housing needs service in the following ways** o Wide consultation was conducted on the introduction of the new allocation scheme including the way in which Choice Based Lettings would be developed o Applicants were consulted though a series of newsletters, a public meeting and focus group events. o Stakeholders such as statutory and voluntary agencies were consulted by letter and information events were held. Representatives from the agencies were members of the project planning groups. o Temporary accommodation tenants have been surveyed to assess the level of customer satisfaction. This exercise will reveal any areas where homeless applicants are aware of differential impact of the service

• A statement of what you plan to do next	

4. Assessment of Impact:
 	
Provide details of the assessment of the policy on the six equality strands. There may have been other groups or individuals that you considered.
	Race:
	Access to information in community languages
	    o A full range of leaflets is available and can be translated
	    o The Council subscribes to the language line service
	    o The Choice Based Lettings website is enabled for browsealoud. This means either a whole page or selected text can be read aloud, increasing access for applicants who have literacy difficulties and also for many ethnic minority applicants who may be able to understand spoken English better than written English. We have specifically ensured that the browsealoud service can be used in public libraries
	    o Officers offer appointments to applicants with literacy difficulties to interpret written decisions
	    o The housing management information system can carry flags to denote the need for translation services
	    o On the Choice Based Lettings website, picture icons are used to describe the properties for the benefit of people who have language difficulties
	    o The telephone bidding line is multi language
	    o Oxford City Council subscribes to a multi language video service on the website to explain the choice based lettings process
	
	Housing requirements affected by cultural issues e.g. intergenerational housing and availability of housing in areas preferred by ethnic minorities
	    o The rent deposit scheme officers work with landlords to increase understanding and ensure compliance with the CRE code of practice in rented housing as appropriate properties may be more easily obtained in the private sector
	    o Information is collected on size of property required and can be used by the enablement team
	    o Research is being conducted into the possible need for specialist BME elderly schemes
	    o Further research is needed into the disproportionate number of BME applicants accepted as homeless
	Additional items
	    o The proportion of homeless applicants are monitored by ethnic origin to facilitate the review process
	
	Disability:
	Suitable properties may not be available

o The Allocations team work closely with the Occupational Therapy team to identify opportunities to provide suitable accommodation for disabled people or to access adaptations which would allow them to stay in their own homes

o New methods of assessing levels of disability have been adopted to facilitate and improve matching applicants to properties. 4 levels of need/adaptation have been identified

Where disabled adapted properties are available the publicity may not reach the client group

o The Allocations and Options managers liaise with the Occupational Therapy team to develop better ways of promoting awareness

o Applicants may have difficulty accessing information (particularly CBL information) due to a Services can be delivered at the applicant's home where appropriate

o Hospital visits can be made where appropriate

o An outreach service has been offered to assist applicants who have difficulty accessing the Choice Based Lettings service

o Applicants can access a portable hearing loop in the St Aldate's reception

o The reception facilities at St Aldate's chambers are DDA compliant

o The housing management information system can carry flags to alert officers to vulnerable applicants

o On the Oxford City Council and Choice Based Lettings websites, text size can be altered by simply using a mouse

o The websites can be viewed as text only

o Background colours were selected for a clear view for people with visual impairment

o The Choice Based Lettings website is enabled for browsealoud. This means either a whole page or selected text can be read aloud, increasing access for applicants who have literacy difficulties We have specifically ensured that the browsealoud service can be used in public libraries. A similar facility can be found on the Oxford City Council website

o Picture icons are used to describe the properties for the benefit of people who have literacy difficulties

o The website video clips include British sign language

o The newsletter is available in a variety of well-publicised outlets all over the city

Age:

There is some concern that a web based CBL system will disadvantage older applicants

o Services can be delivered at the applicant's home where appropriate

o An outreach service has been offered to assist applicants who have difficulty accessing the Choice

Based Lettings service

- o The newsletter is available in a variety of well-publicised outlets all over the city
- o Bids can be made via a free phone telephone system

The suitability of some older person's accommodation is in doubt

- o Bedsit accommodation with shared facilities is being decanted
- o A full review of older people's accommodation has been commissioned. It will include a timetabled plan for any recommendations

Difficulty in obtaining suitable accommodation for young persons (16 – 18)

- o Younger applicants can access the out reach options service at the Youth offending team and the Gap project for young people
- o The Joint Housing team is developing and extending the supported lodging programme

Insufficient accommodation to meet the needs of 18 – 40 year olds

- o Research is being conducted into the feasibility of de-designating some older person's accommodation with a pilot project being conducted at Rose Hill.

Gender:

Difficulty accessing CBL information from refuges

- o The newsletter is available in a variety of well-publicised outlets all over the city
- o An outreach service has been offered to assist applicants who have difficulty accessing the Choice Based Lettings service

Female lone parents as a percentage of homeless allocations

- o Statistics may show that women are overrepresented, although this may be due to collecting information on the primary applicant only (rather than the household)

Religious Belief:

Differential impacts may relate to race issues

- o See race issues above

Housing requirements may be affected by religious/ cultural issues e.g. need for showers or particular types of cooking facilities

- o Choice Based Lettings allows applicants to select properties which are suitable on cultural/race grounds

Sexual Orientation:

It is not considered that there is any differential impact in terms of sexual orientation, however improved data collection may reveal unconsidered impact.

| **5. Consideration of Measures:**

This section should explain in detail all the consideration of alternative approaches/mitigation of adverse impact of the policy | **Additional steps taken to avoid differential impact**
o Staff training in equality awareness at induction (awaiting planned corporate training in 2009/10 for refresh)
o Customer service training (to start Jan / Feb 2009)
o Oxford City Council has purchased an On-line procedure guide to ensure all staff have access to consistent information at all times
o The Housing options service is offered from a city centre location which is easily accessible by many bus routes
o A duty service is offered Monday – Friday during office hours and an emergency duty service via a free phone telephone service
o Applicants can access outreach services at the night shelter
o Applicants can send email queries to the housing needs team
o Information is provided on the Council website and the dedicated CBL website
o Officers from the options team have specialisms in different areas of service delivery, and develop links with specialist groups serving applicants who may be disadvantaged by the procedure. Examples include the joint housing team for homeless young people and various forums to direct floating support to applicants in most need
o Diversity data is collected on the application form through voluntary questions – this informs BME monitoring of access to statutory housing services (general register / CBL and homelessness). Data shard wit ORAH Board. Informs development of housing sub-strategies (BME / Older Persons and planned Young Persons)
o Temporary accommodation officers work to support vulnerable applicants and make regular checks on the accommodation
o Applicants are referred to support agencies where appropriate
o All applicants were sent a plain English user guide set out according to good practice, with appropriate illustrations, when Choice Based Lettings was introduced
o The choice based lettings service has been set up to be as accessible as possible, see below
Website
o The site is written in plain English and users were consulted to ensure that pages are easy to understand |

- o ICT specialists at the Council were consulted on the design of the website, particularly the ease of navigation around the site
- o A kiosk version is available for applicants whose IT skills would not enable them to use a pc
- o Links to other websites (e.g. advice agencies) open in another window. This is considered to be best practice for people who are unfamiliar with using IT and the internet
- o There is a frequently asked questions section, which is also considered to be best practice
- o There is a link to the user guide from the front page for applicants who are having difficulty using the site
- o Picture icons are used to describe the properties for the benefit of people who have literacy or language difficulties

Newsletter
- o The newsletter is available in a variety of well-publicised outlets all over the city
- o It is available in pdf form from the website and all statutory and voluntary agencies have been advised of this so that they can print off versions for applicants
- o The newsletter includes a picture icon guide and a short user guide
- o The number of adverts has been kept to 6 per page to ensure legibility
- o A posting service is provided for applicants who cannot access the internet or newsletter outlets

Phone line
- o 24 hour free automated phone line
- o Multi language
- o Clear eligibility messages
- o Designed for use by people who may be unfamiliar with this type of service - clear messages and tolerant of mistakes
- o Gives information about queue position so it's a real alternative to the website
- o Capability to add and withdraw bids

Other Considerations:
- o The Council has opened a one-stop shop in Cowley in March 2008. This will provide an alternative venue for advice and is in an area with a high concentration of BME population. Research has shown that this is a group who have traditionally been reluctant to use Council

	services and it is anticipated that a shop front premise will be more inviting o The Housing Needs team need to conduct more investigation of customer satisfaction and need in order to inform future changes to the service

6. Monitoring Arrangements:
 	
Outline systems which will be put in place to monitor for adverse impact in the future and this should include all relevant timetables. In addition it could include a summary and assessment of your monitoring, making clear whether you found any evidence of discrimination.
	The Choice Based Lettings ICT systems have been set up to allow thorough monitoring and review of performance. We will examine lettings outcomes, customer satisfaction and levels of engagement with the service (bidding, non-bidding, application rates, sustainment of tenancies offered through CBL) Policies will be reviewed in a context of both equality impact assessment and the drive for continuous improvement of the service. The review will inform any future decisions on policy changes, communications or engagement with support services.
	
	The following have been identified as sources of data.
	Staff
	  o Staff group (staff from all Oxford Register for Affordable Housing partners)
	  o Allocations team
	  o Housing Needs team
	Users
	  o Oxford City Council has purchased a Survey tool on CBL system
	  o Survey of a random selection of bidders
	  o Statistics were collected from drop in sessions run immediately after the launch of CBL
	  o Tenant and leaseholder meetings
	Stakeholders
	  o Consult Registered Social Landlords (Housing Associations)
	  o Attending stat and voluntary agency meetings – informal feedback
	  o Reporting to Oxford Register for Affordable Housing meetings
	    o Number of properties advertised by landlord
	    o Number of properties withdrawn by landlord and property type
	    o Number of properties with no bidder by landlord and property type
	    o Number of suspended bidders
	    o Average number of bidders given to a landlord before property is let
	    o Successful bidders by type (GR, transfer, HA96)

- o Number of properties advertised more than once by property type
- o Other reports on the current situation
  - o Bids by bid type
  - o General comparative information e.g. are we housing applicants from higher or lower bands than under the nominations system
  - o Data from drop in session
- o Supported housing providers - An anonymous bid history for move on applicants will establish bidding patterns and methods and establish the most popular types and location of properties
- o Tenants' groups
- o Drop in session data
- o Survey

Reports which will be available in the long term:

- o Tenancy sustainment statistics can be analysed
- o Bidding methods reports will show which are most popular. Failed bids can also be analysed and support offered to individuals or groups
- o Bidding reports can be used to inform the Local Development Framework planning process by indicating which property types and areas are most popular

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7. Date reported and signed off by the Equalities Board:

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8. Conclusions:

What are your conclusions drawn from the results in terms of the policy impact

The main conclusions of the EIA are:

- ▪ Better access to information in community languages
- ▪ Housing requirements are affected by cultural issues e.g. intergenerational housing and availability of housing in areas preferred by ethnic minorities
- ▪ Lack of availability of suitable properties for disabled applicants
- ▪ When disabled adapted properties are available the publicity may not reach the client group
- ▪ There is some concern that a web based CBL system will disadvantage older applicants

- The suitability of some older person's accommodation is in doubt
- Difficulty in obtaining suitable accommodation for young persons (16 –18)
- Insufficient accommodation to meet the needs of 18 – 40 year olds
- Difficulty accessing CBL information from refuges
- Housing requirements may be affected by religious/ cultural issues e.g. need for showers or particular types of cooking facilities
- Lack of knowledge of any housing needs / issues for gay and lesbian people families.

9. Are there implications for the Service Plans?	YES	NO	10. Date the Service Plans will be updated	11. Date copy sent to Equalities Officer in Policy, Performance and Communication
			Jan / Feb 2009	
13. Date reported to Scrutiny and Executive Board:			14. Date reported to City Executive Board:	12. The date the report on EIA will be published

Signed (completing officer)

Signed (Lead Officer)

Please list the team members and service areas that were involved in this process:

Kate Winstanley (CBL Proect Oficer – lead)
Dave Scholes (Housing Needs Manager)
Jen Watson (Service Development Officer)

Appendix 4 - Full Equality Impact Assessment

Service Area: Housing Needs (Allocations and CBL)	Section: Community Housing & Development	Date of Partial assessment: 2008	Key Person responsible for assessment: Kate Winstanley / Dave Scholes	Date assessment commenced: June 2008
Name of Policy to be assessed:	Allocations and Choice Based Lettings (Housing Needs service)			
1. In what area are there concerns that the policy could have a differential impact	*Race - Yes*	*Disability - Yes*		*Age - Yes*
	Gender - Yes	*Religious Belief - Yes*	*Sexual Orientation – Not Clear*	
2. Background: Give the background information to	Oxford City Council Housing Needs team manages the allocation of social housing in an area of high demand. A housing options service is offered to signpost applicants to other sources of housing including the private rented sector. Some applicants are placed in temporary accommodation, which is managed by City Council officers. The number of applicants placed in temporary accommodation is reducing and very few applicants are now placed in bed and breakfast accommodation.			

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Race

- o Access to information in community languages
- o Housing requirements affected by cultural issues e.g. intergenerational housing
- o Availability of housing in areas preferred by ethnic minorities
- o Disproportionate numbers of BME applicants applying through the homeless route

Disability

- o Suitable properties may not be available
- o Where disabled adapted properties are available the publicity may not reach the client group
- o Applicants may have difficulty accessing information (particularly CBL information) due to a disability

Age

- o There is some concern that a web based CBL system will disadvantage older applicants
- o The suitability of some older person's accommodation is in doubt
- o Difficulty in obtaining suitable accommodation for young persons (16 –18)
- o Insufficient accommodation to meet the needs of 18 – 40 year olds

Gender

- o Difficulty accessing CBL information from refuges
- o Female lone parents as a percentage of homeless allocations

Religious Belief

- o Differential impacts may relate to race issues
- o Housing requirements may be affected by religious/ cultural issues e.g. need for showers or particular types of cooking facilities

Sexual orientation

- o The housing needs team does not currently collect information on sexual orientation

3. Methodology and Sources of Data: The methods used to collect data and what sources of data	Information and data has been collected from o The census and national statistics o Central government reports o Reports from the CBL system o Reports on homelessness acceptances o Quarterly lettings reports o Registered Social Landlord partners Data has been collected from the managers responsible for allocations, housing options and temporary accommodation and the Housing Needs Manager. This is has been collated through o Observations of service delivery o Feedback from users o Analysis of complaints o Feedback from stakeholders
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A statement of what you plan to do next

4. Assessment of Impact:

Provide details of the assessment of the policy on the six equality strands. There may have been other groups or individuals that you considered.

Race:

Access to information in community languages

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Housing requirements affected by cultural issues e.g. intergenerational housing and availability of housing in areas preferred by ethnic minorities

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- Information is collected on size of property required and can be used by the enablement team
- Research is being conducted into the possible need for specialist BME elderly schemes
- Further research is needed into the disproportionate number of BME applicants accepted as homeless

Additional items

- The proportion of homeless applicants are monitored by ethnic origin to facilitate the review process

Disability:

Suitable properties may not be available

- The Allocations team work closely with the Occupational Therapy team to identify opportunities to provide suitable accommodation for disabled people or to access adaptations which would allow them to stay in their own homes
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Where disabled adapted properties are available the publicity may not reach the client group

- The Allocations and Options managers liaise with the Occupational Therapy team to develop better ways of promoting awareness
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- Services can be delivered at the applicant's home where appropriate
- Hospital visits can be made where appropriate
- An outreach service has been offered to assist applicants who have difficulty accessing the Choice Based Lettings service
- Applicants can access a portable hearing loop in the St Aldate's reception
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- The website video clips include British sign language
- The newsletter is available in a variety of well-publicised outlets all over the city

Age:

There is some concern that a web based CBL system will disadvantage older applicants

- Services can be delivered at the applicant's home where appropriate
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Based Lettings service
- o The newsletter is available in a variety of well-publicised outlets all over the city
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- o The Joint Housing team is developing and extending the supported lodging programme

Insufficient accommodation to meet the needs of 18 – 40 year olds
- o Research is being conducted into the feasibility of de-designating some older person's accommodation with a pilot project being conducted at Rose Hill.

Gender:
Difficulty accessing CBL information from refuges
- o The newsletter is available in a variety of well-publicised outlets all over the city
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Female lone parents as a percentage of homeless allocations
- o Statistics may show that women are overrepresented, although this may be due to collecting information on the primary applicant only (rather than the household)

Religious Belief:
Differential impacts may relate to race issues
- o See race issues above

Housing requirements may be affected by religious/ cultural issues e.g. need for showers or particular types of cooking facilities
- o Choice Based Lettings allows applicants to select properties which are suitable on cultural/race grounds

Sexual Orientation:
It is not considered that there is any differential impact in terms of sexual orientation, however improved data collection may reveal unconsidered impact.

5. Consideration of Measures: This section should explain in detail all the consideration of alternative approaches/mitigation of adverse impact of the policy	**Additional steps taken to avoid differential impact** ○ Staff training in equality awareness at induction (awaiting planned corporate training in 2009/10 for refresh) ○ Customer service training (to start Jan / Feb 2009) ○ Oxford City Council has purchased an On-line procedure guide to ensure all staff have access to consistent information at all times ○ The Housing options service is offered from a city centre location which is easily accessible by many bus routes ○ A duty service is offered Monday – Friday during office hours and an emergency duty service via a free phone telephone service ○ Applicants can access outreach services at the night shelter ○ Applicants can send email queries to the housing needs team ○ Information is provided on the Council website and the dedicated CBL website ○ Officers from the options team have specialisms in different areas of service delivery, and develop links with specialist groups serving applicants who may be disadvantaged by the procedure. Examples include the joint housing team for homeless young people and various forums to direct floating support to applicants in most need ○ Diversity data is collected on the application form through voluntary questions – this informs BME monitoring of access to statutory housing services (general register / CBL and homelessness). Data shard wit ORAH Board. Informs development of housing sub-strategies (BME / Older Persons and planned Young Persons) ○ Temporary accommodation officers work to support vulnerable applicants and make regular checks on the accommodation ○ Applicants are referred to support agencies where appropriate ○ All applicants were sent a plain English user guide set out according to good practice, with appropriate illustrations, when Choice Based Lettings was introduced ○ The choice based lettings service has been set up to be as accessible as possible, see below **Website** ○ The site is written in plain English and users were consulted to ensure that pages are easy to understand

- o ICT specialists at the Council were consulted on the design of the website, particularly the ease of navigation around the site
- o A kiosk version is available for applicants whose IT skills would not enable them to use a pc
- o Links to other websites (e.g. advice agencies) open in another window. This is considered to be best practice for people who are unfamiliar with using IT and the internet
- o There is a frequently asked questions section, which is also considered to be best practice
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Newsletter
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- o It is available in pdf form from the website and all statutory and voluntary agencies have been advised of this so that they can print off versions for applicants
- o The newsletter includes a picture icon guide and a short user guide
- o The number of adverts has been kept to 6 per page to ensure legibility
- o A posting service is provided for applicants who cannot access the internet or newsletter outlets

Phone line
- o 24 hour free automated phone line
- o Multi language
- o Clear eligibility messages
- o Designed for use by people who may be unfamiliar with this type of service - clear messages and tolerant of mistakes
- o Gives information about queue position so it's a real alternative to the website
- o Capability to add and withdraw bids

Other Considerations:
- o The Council has opened a one-stop shop in Cowley in March 2008. This will provide an alternative venue for advice and is in an area with a high concentration of BME population. Research has shown that this is a group who have traditionally been reluctant to use Council

services and it is anticipated that a shop front premise will be more inviting
- The Housing Needs team need to conduct more investigation of customer satisfaction and need in order to inform future changes to the service

6. Monitoring Arrangements:
 	
Outline systems which will be put in place to monitor for adverse impact in the future and this should include all relevant timetables. In addition it could include a summary and assessment of your monitoring, making clear whether you found any evidence of discrimination.
	The Choice Based Lettings ICT systems have been set up to allow thorough monitoring and review of performance. We will examine lettings outcomes, customer satisfaction and levels of engagement with the service (bidding, non-bidding, application rates, sustainment of tenancies offered through CBL) Policies will be reviewed in a context of both equality impact assessment and the drive for continuous improvement of the service. The review will inform any future decisions on policy changes, communications or engagement with support services.
	
	The following have been identified as sources of data.
	Staff
	o Staff group (staff from all Oxford Register for Affordable Housing partners)
	o Allocations team
	o Housing Needs team
	Users
	o Oxford City Council has purchased a Survey tool on CBL system
	o Survey of a random selection of bidders
	o Statistics were collected from drop in sessions run immediately after the launch of CBL
	o Tenant and leaseholder meetings
	Stakeholders
	o Consult Registered Social Landlords (Housing Associations)
	o Attending stat and voluntary agency meetings – informal feedback
	o Reporting to Oxford Register for Affordable Housing meetings
	  o Number of properties advertised by landlord
	  o Number of properties withdrawn by landlord and property type
	  o Number of properties with no bidder by landlord and property type
	  o Number of suspended bidders
	  o Average number of bidders given to a landlord before property is let
	  o Successful bidders by type (GR, transfer, HA96)

- o Number of properties advertised more than once by property type
- o Other reports on the current situation
  - o Bids by bid type
  - o General comparative information e.g. are we housing applicants from higher or lower bands than under the nominations system
  - o Data from drop in session
- o Supported housing providers - An anonymous bid history for move on applicants will establish bidding patterns and methods and establish the most popular types and location of properties
- o Tenants' groups
- o Drop in session data
- o Survey

Reports which will be available in the long term:
- o Tenancy sustainment statistics can be analysed
- o Bidding methods reports will show which are most popular. Failed bids can also be analysed and support offered to individuals or groups
- o Bidding reports can be used to inform the Local Development Framework planning process by indicating which property types and areas are most popular

7. Date reported and signed off by the Equalities Board:

8. Conclusions:

What are your conclusions drawn from the results in terms of the policy impact

The main conclusions of the EIA are:
- ▪ Better access to information in community languages
- ▪ Housing requirements are affected by cultural issues e.g. intergenerational housing and availability of housing in areas preferred by ethnic minorities
- ▪ Lack of availability of suitable properties for disabled applicants
- ▪ When disabled adapted properties are available the publicity may not reach the client group
- ▪ There is some concern that a web based CBL system will disadvantage older applicants

- The suitability of some older person's accommodation is in doubt
- Difficulty in obtaining suitable accommodation for young persons (16 –18)
- Insufficient accommodation to meet the needs of 18 – 40 year olds
- Difficulty accessing CBL information from refuges
- Housing requirements may be affected by religious/ cultural issues e.g. need for showers or particular types of cooking facilities
- Lack of knowledge of any housing needs / issues for gay and lesbian people families.

	YES	NO
9. Are there implications for the Service Plans?		

10. Date the Service Plans will be updated	**11. Date copy sent to Equalities Officer in Policy, Performance and Communication**
Jan / Feb 2009	

13. Date reported to Scrutiny and Executive Board:	**14. Date reported to City Executive Board:**	**12. The date the report on EIA will be published**

Signed (completing officer)   Signed (Lead Officer)

Please list the team members and service areas that were involved in this process:

Kate Winstanley (CBL Proect Oficer – lead)
Dave Scholes (Housing Needs Manager)
Jen Watson (Service Development Officer)