

Equality and Safety Impact Assessment

The **Public Sector Equality Duty** (Section 149 of the Equality Act) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people carrying out their activities.

The Equality Duty supports good decision making – it encourages public bodies to be more efficient and effective by understanding how different people will be affected by their activities, so that their policies and services are appropriate and accessible to all and meet different people’s needs. The Council’s Equality and Safety Impact Assessment (ESIA) includes an assessment of the community safety impact assessment to comply with Section 17 of the Crime and Disorder Act and will enable the Council to better understand the potential impact of proposals and consider mitigating action.

Name or Brief Description of Proposal	New Housing Allocations Policy
Brief Service Profile (including number of customers)	
<p>The council in its role as a housing authority is required to publish its Allocations scheme detailing how it will allocate social housing in the city, in line with the requirements of S.166A of the Housing Act 1996. The Allocations policy details how applicants are prioritised. The current allocations scheme allocates points to applicants based on their circumstances. Applicants receive one point per month for waiting in addition to the other points which relate to their particular circumstances. The points based system has existed in some form for at least 15 years.</p> <p>To date there are just over 8,000 live applications on the Housing Needs Register in Southampton. However only 768 lets were made via the Homebid choice based lettings scheme in 2022/23. This is down from 1447 lets made in 2014/15.</p>	
Summary of Impact and Issues	
<p>Demand for affordable housing is increasing and yet the council is receiving fewer properties to let.</p> <p>Applications which were made a long time ago have accrued many hundreds of points simply by virtue of waiting a long time. They are often in a position to be successful in bidding for ever more scarcely available properties to the detriment of those who applied later but are in more acute need. Due to the diminishing supply of properties (particularly larger homes), there has been an increase in the level of stage 1 and stage 2 complaints against the council which in the main originate from an ever-growing number of households seeking a dwindling supply of homes. The</p>	

current policy, as designed, sometimes requires officers to seek exceptions to policy in order to meet this unmet acute need which risks undermining confidence in the policy and the council's ability to be equitable in its treatment of all applicants.

Additionally, a points based system is used less widely by other authorities; most housing authorities use a banding system which is often considered to be simpler to understand. For example, in the current policy there are 18 different points categories available and three different applicant categories who may be entitled to those points categories.

The new policy is designed to have only four bands in order of priority, and no distinct applicant categories. It is designed to give the greatest priority (i.e. the greatest chance of being housed) to those applicants who are in the highest need. The length of time waiting for housing will be less of a determining factor; in most cases the tiebreaker for separating two applicants with the same priority will be the date they were awarded that priority rather than the length of time waiting as a whole.

The new policy also introduces a penalty for repeatedly refusing offers of accommodation, to ensure that bids placed for properties are to those who genuinely want a need to take up the offer of a new home.

The consultation feedback showed that 61% of respondents agreed with the proposal to change the number of offers an applicant can refuse. 56% of those currently on the Southampton Housing register also agreed with this proposal, while 29% disagreed.

Applicants will be required to re-register their application under the new policy. This means all existing applications will be closed. There is very little change to the overall eligibility rules to join the housing needs register so the vast majority of applicants will still qualify for rehousing. However, not all will receive the same level of overall priority. Of those who wish to reapply, the applicants most impacted will be those who have waited a long time and accrued significant points simply by virtue of waiting- but as long as their circumstances have not changed, they are likely to still be permitted to remain on the housing needs register.

Since the policy was last considered for amendment by Cabinet (September 2019), over 3,400 applicants have not placed any bids for a property and over 2,600 have not even logged into the Homebid website to view properties available. A significant proportion of the 8,000 applicants on the register are likely to be, either no longer interested in being rehoused or have moved and not updated their details. Because they remain on the register, this gives a misleading impression of the true level of housing need in the city. With all applicants requiring to re-register onto an upgraded I.T system, the council will gain better intelligence as to housing need trends enabling it to support those who are in housing need.

The council will assist those who may struggle or be unable to re-register. It will do this initially by contacting all applicants either digitally- or by letter where necessary- to inform them of the proposed changes and invite them to participate in the consultation process.

Once the new policy is adopted, there will likely be a transition period where applicants will need to re-register on a new customer platform by a certain date. Providing applicants do this and still qualify, they will retain their original qualifying date.

The council will identify vulnerable applicants already on the Housing Needs Register- such as those who need to move due to a serious medical need or those fleeing violence- and manually convert those applications into a new application compliant with the new policy. It will consider doing similar for existing applicants who are elderly or need to move due to a disability. Consideration will also be given to migrating all existing applications into the new policy and customer platform, to save applicants having to reapply themselves at the point the new policy is adopted. However, this will depend on the feasibility of this including whether existing/new I.T. partners can offer this functionality. If this is not feasible, the council will use its staffing resources- such as colleagues in our customer service centre, Local Housing Offices and Supported Housing Services to offer practical assistance to re-register for those who require it.

The consultation response showed that 48% of respondents agreed with the requirement for applicants to re-register on an annual basis. 38% felt it would have a negative impact. The main concerns raised by respondents were that it would cause them stress and concern. We will aim to make the process as simple as possible with assistance provided to applicants that need support.

If the policy is approved by Cabinet, all applicants will be written to informing them of the changes and the transitional period during which they will be required to re-register. Staff within Housing Needs, Supported Housing and Local Housing Offices will be trained to offer practical assistance to re-register onto the new system to those who may be less able to do so without support. In most cases this will involve staff members taking an application over the telephone but will, where required, be conducted in person. A programme of communications including team briefings with relevant Adult Social Care, Childrens' Service, Supported Housing and Housing Management teams will be conducted alongside the usual customer portal and social media messaging which accompanied the public consultation. The Allocations service will also take all practical steps available to identify from existing case management systems applicants whose protected characteristics may indicate a need for support- including but not exclusively- care leavers, those fleeing abuse and those who may be vulnerable by reasons of age or disability.

If any applicant does not re-register within 12 months of the first communication to them about re-registering but contacts the council later, the council will consider whether to use its discretion to accept a late re-registration taking into account the circumstances and needs of the individual and the council's duties under the Public Sector Equalities Duty.

Following the public consultation we received 428 responses. The responses were made of 241 current housing register applicants, 19 responses who wanted to apply for the housing register, 118 council tenants, 3 social housing providers, 238 residents in Southampton, 5 non- Southampton residents, 87 that was somebody that works, live or studies in Southampton, 4 responses from businesses, 5 responses from Public Sector Organisations, 5 responses from third sector organisations and 41 responses from Southampton City Council Staff and 4 Political members and 17 responses from other.

Under half of the respondents agreed with the proposal to replace a point-based scheme with a banding scheme (46%). Those on the Southampton Housing register had the highest level of disagreement with 47%. Those aged 65+ had the highest level of agreement with 63%.

Potential Positive Impacts

<ul style="list-style-type: none"> • The policy will replace 18 points categories and 3 applicant categories with 4 bands of priority so will be simpler to understand for the applicant. • Households in the greatest need will be allocated homes above those who have simply waited a long time. • The council will require every applicant to re-register under the new allocations system and require everyone to re-register annually. This will give a better indicator of the true level of housing need in the city. • Refusal penalties will discourage bids from applicants who do not need to move; reduce staff processing times and contribute to reducing void rent loss. This provides an overall benefit to the Housing service and its customers. 	
Responsible Service Manager	Katie Evans, Allocations & Advice Manager
Date	January 2024
Approved by Senior Manager	Maria Byrne, Service Lead, Housing Needs & Welfare
Date	January 2024

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	<ul style="list-style-type: none"> • Young people- care leavers are assigned priority within the policy. There are currently 538 Looked After Children aged 16-25 years old in the council's care. They will be assigned priority in this policy for social housing under the new scheme. If they are ready for independent living, they will receive the second-highest priority band. • Young people- aged over 16 receive entitlement to their own bedroom. • Older people- a small number of applicants aged 60+ who currently receive 200 downsizing points for giving up general needs, 2-bedroom housing to move to 60+ accommodation will be placed into Band B, rather than continuing to receive the highest priority. Those applicants aged 60+ who are in general need with 2 bedrooms. They will be placed into Band B. 	<p>Young people- care leavers: The policy for the first time includes care leavers a specified group entitled to priority within the bidding process. Those ready to move into independent living receive the second-highest band. This is contingent on an assessment conducted by Children's Services and a quota of total lets per year. Previously, care leavers did not receive a specified priority and had to spend a long time waiting. The 'ready to move' and quota requirements seek to ensure an allocation to a care leaver is sustainable and provides positive outcomes for some of the city's most vulnerable clients. The quota and assessment process will be regularly reviewed with Children's Services colleagues.</p> <p>Young people- aged over 16 For the first time, younger adults will not be expected to share a bedroom with a</p>

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	<ul style="list-style-type: none"> 46% of respondents said the proposed changes would have a negative impact. Those under the age of 35 found this proposal to have the most negative impact (54%) compared to other age groups. 	<p>sibling of the same sex. This will increase some applicants' bedroom entitlement, meaning it could be harder for some households with children to be rehoused into large properties. To mitigate this, the council has inserted a paragraph in the main body of the policy explaining that applicants can still move to a smaller property if it will represent an improvement to their housing situation. This provision means there is no adverse impact on this group arising from the change in policy.</p> <p>Older people aged 60+ This group of people will still receive the second highest band. Due to the nature of the accommodation, they may bid for (it is a requirement to be 60+ to access the new housing) they receive an adjustment which other, younger applicants do not benefit from. Therefore, compete against a much smaller pool of applicants.</p> <p>Age is not a consideration when assessing an applicants housing need unless it is for age designated accommodation.</p>
Disability	<ul style="list-style-type: none"> Applicants who require wheelchair property. Applicants with acute medical/welfare need. Applicants who need to move on medical grounds including grounds relating to a disabili 	<p>Applicants who require wheelchair property These applicants are not able to bid but instead direct offers are made. This is due to the specialist nature of the property required and the risk that if wheelchair properties, which are very scarce, were</p>

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	<ul style="list-style-type: none"> 48% of respondents who identified as having a disability were concerned about the impact the changes would have on them. 	<p>advertised, they could be allocated to people who may not make full use of the home. The direct letting procedure provides a more tailored approach to allocating homes to people with significant disabilities and as such is considered preferable. Applicants are still able to express choice of property and area, in much the same way as those who bid for available vacancies. Additionally, there is no refusal penalty unlike those who are required to bid, thus providing a further adjustment to help meet need.</p> <p>Applicants with acute medical/welfare need As above these applicants are directly offered properties on occasion (e.g if they have not accepted an offer through the usual bidding process). Choice will still be considered by officers making decisions but will not be the determining factor. Applicants in this situation will benefit over and above all other applicants in that they will be offered properties before they are advertised, mitigating the risk of the policy restricting their access to housing</p> <p>Applicants who need to move on medical grounds including grounds relating to a disability</p> <p>Applicants whose only identified housing need is</p>

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		<p>physical or mental disability will be placed into band C3, a lower band. In the case of those who need to move due to a physical disability, e.g. to ground floor accommodation, property adverts will continue to be designed to give them priority over those in higher bands who do not require this adjustment. It is therefore not anticipated there will be any lengthening in rehousing times for those who need to move on mobility grounds.</p> <p>Applicants who need to move on medical/welfare grounds but who do not require a specific property type</p> <p>These applicants will in the main be placed into band C(3). The council will consider in each case whether the threshold for Band A1 is met, taking into account the likely waiting time if no further priority was given.</p> <p>A benefit of introducing this new policy and accompanying IT system is that it will enable better intelligence and business reporting, assisting with examining trends relating to different applicants' rehousing prospects, helping to inform policy development in the future.</p> <p>If an applicant's need changes due to a change in their health any additional information provided would be</p>

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		reassessed and their banding will be updated if this resulted in a band change.
Gender Reassignment	Children who identify as a different gender to the one assigned at birth	This may indicate an increase in bedroom need which in turn may increase the length of time to be rehoused. The council will consider on a case-by case basis whether these cases should result in an award of a medical/welfare priority. An award may result in the applicant either qualifying for housing where previously they did not, or increase their existing priority.
Care Experienced	Addressed in Age	N/A
Marriage and Civil Partnership	None identified	N/A
Pregnancy and Maternity	None identified	N/A
Race	There must be a need to live together in order for people to be included in applications. This may impact people who live in extended families which is common in some communities.	Where an applicant wants to include extended family members in an application but there is no 'need' to live together as defined by the policy, the council will offer advice on housing arrangements and other housing options which will allow families to remain living together in the home or close by. This could include considering whether to offer an applicant a property with fewer bedrooms if it were to result in an overall improvement to the housing situation- as identified in paragraph 90 of the policy- or considering on a case-by-case basis whether to make an exception to policy- e.g. where there has been a long-established extended family living arrangement within the household.
Religion or Belief	None identified	N/A
Sex	Local connection criteria may impact survivors of domestic abuse (DA) who	The council will comply with its duties under Domestic

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	have fled to Southampton, and are statistically much more likely to be women	Abuse and Homelessness legislation and not apply residency criteria where there is unmet housing need and DA is the reason for having moved to the city.
Sexual Orientation	None identified	N/A
Community Safety	Housing of offenders	The policy details that the council will not house those who are considered unsuitable to be a tenant. In making a decision to rehouse an offender or applicants considered to pose a risk to the community, the council will consult with relevant agencies (e.g. Policy, Probation service) and its housing colleagues. Risk assessments are carried out when, during the application process, a history of offending or prison time is identified. Risk assessments place restrictions upon or void the application.
Poverty	The council is not able to rehouse most applicants in housing need quickly; the council will place some applicants in band D where they have unpaid debt	<ul style="list-style-type: none"> - Officers involved in processing applications to the housing needs register will offer advice on housing options and be trained to identify indicators of acute need, e.g. DA or risk of homelessness. - Where the council places people in band D for unpaid housing debt, it will only be where the applicant is, despite the best efforts of the council, avoiding engaging with the council. We expect the numbers of people placed into this band for this reason to be very small and only reserved to those who have demonstrated

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		<p>consistent non-compliance and non-engagement.</p>
<p>Health & Wellbeing</p>	<p>The 'cost of living' crisis may squeeze household budgets, and therefore, affect the health and wellbeing of families and individuals.</p>	<p>Paragraph 44 of the policy details that the council will in exceptional cases make direct offers of accommodation to people in the most need. This may include those who, for example, are living in insanitary accommodation impacting health and wellbeing.</p> <p>Other categories of applicant in urgent housing need will be placed into band A and in effect, are guaranteed an offer after they have been in the band for 3 months. People with less acute health/wellbeing needs will often be in band B or C, which means they will have a realistic prospect of rehousing.</p> <p>The council will update its letting plan to take into account health and wellbeing issues as time develops, this may result in adverts for properties on occasion being restricted to certain categories of applicant (giving them preference over applicants with no health/wellbeing considerations)</p>
<p>Other Significant Impacts</p>	<p>Community safety</p>	<p>The policy will allow the council to determine someone is unsuitable to be a tenant for example if they have caused anti-social behaviour or committed violent/hate crimes. For potentially risky applicants who are accepted onto the register the council</p>

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		will liaise with the Police, Probation service and other agencies to ensure the applicant is housed in the most appropriate area and type of home