

## Equality Impact Assessment Corporate Assessment Template

**Policy/Strategy/Project/Procedure/Service/Function Title:**

Cardiff Housing Allocation Scheme

**New/Existing/Updating/Amending:** Updating

**Who is responsible for developing and implementing the Policy?**

Name: Sarah McGill

Job Title: Director for Communities, Housing  
& Customer Services

Service Team: Policy & Development

Service Area: Communities - HANR

Assessment Date: 13<sup>th</sup> October 2015

### 1. What are the objectives of the Policy?

The Cardiff Housing Allocation Scheme sets the framework under which the City of Cardiff Council and Partner Housing Associations accept applications for, and let social housing accommodation. The Scheme aims to ensure that:

- Applicants are offered good quality advice & information about their individual housing situation & options
- Applicants with a local connection to Cardiff are given a higher priority for housing than those from elsewhere
- Applicants with the greatest housing need are given priority for available social housing in the city, in line with legislative requirements
- An applicant's level of housing need influences their position on the overall waiting list
- The best use is made of available social rented stock
- Applications are treated fairly and confidentially

The associated application processes include measures to help prevent fraud in Council stock. Proof of identity is required for each applicant / joint applicant, and proof of residence for all household members included on applications, together with evidence of all elements / situations which influence the applicant's position on the Housing Waiting List.

### 2. Please provide background information on the Policy / Strategy / Project / Procedure / Service / Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]

Local authorities are required under s167 of the Housing Act 1996 to have a Housing Allocation Scheme. The Scheme sets the criteria for determining priorities in allocating housing accommodation, and the procedures to be followed. It forms the framework to ensure that a balance is achieved between: the individual housing needs of applicants; the legislative duty to offer applicants the opportunity to express choice or preference; the need to maintain balanced, sustainable communities; and the requirement to make best use of a publicly funded resource.

Following extensive consultation, and legal advice, a revised Allocation Scheme was approved by Cabinet in December 2014 and implemented in January 2015. The Scheme was designed to ensure that those in greatest housing need (and with a local connection to Cardiff) are prioritised for rehousing.

Subsequent operational experience and the implementation of new legislation (most notably the

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Housing (Wales) Act 2014) resulted in the need to make some amendments to the Scheme to ensure that it is legally compliant and adequately recognises the relative housing needs of applicants. The changes were proposed following ongoing monitoring of the operation of the Scheme both internally and at regular meetings with Partners at the RSL Allocations and Housing Management Meetings, where Waiting List statistics (including performance against targets and offer / letting figures) are considered.

The main changes are as follows :

- Re-examination of banding arrangements for homeless applicants in light of the duties outlined in the Housing (Wales) Act: Band A – urgent full/final duty homeless; Band Bi – non-urgent full/final duty cases and Resettlement Strategy cases; Band Bii – all other homeless cases including those in hostels, supported housing and temporary accommodation, and those threatened with homelessness.
- Revisiting area choice arrangements for applicants joining the homeless sub-list: Free and full choice of areas for social housing offered, with a requirement to include 2 'higher availability' areas from date of application.
- In line with other Local Authorities amending the definition of 'local connection' for applicants other than those on the Homeless sub-list to continuous residence of 2 years at the date of application.
- Recognising the impact of the most severe overcrowding situations faced by families in bedsits/with no bedrooms available for their sole use; families of 4 persons+ in 1 bedroom accommodation; families of 6 persons+ in 2 bedroom accommodation; families of 9 persons+ in 3 bedroom accommodation, by awarding higher priority for rehousing (Band Bi).
- Recognising that, due to the nature and availability of stock, households needing more than 4 bedrooms cannot generally be assisted under the Scheme. All alternative options for these households will be explored (including assisting access to the private rented sector, and considering opportunities for separately rehousing discrete family units within the household).
- Ensuring that best use is made of housing stock by offering applicants properties that are a suitable size for their household (rather than promoting under-occupation).
- Improving arrangements for letting older persons' accommodation to ensure best use of stock and suitability of accommodation. This will include re-categorisation of existing stock following a 'fit for purpose' review; clarification of letting criteria for each property type; improved information about older applicants' needs and choices; recognition of the importance of community. In addition to this ground floor 1 bed flats will be reserved for applicants with assessed medical needs.
- Recognising the urgency of housing need of applicants leaving the Armed Forces & leaving Local Authority Care (Band A).
- Assisting applicants whose discharge from hospital is imminent who have no suitable accommodation available to them (i.e. they are 'bed-blocking') by awarding Immediate Priority.
- Requiring applicants granted Immediate Priority / 'Left in Occupation' of Council properties to include 2 higher availability areas in their area choices.

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### 3 Assess Impact on the Protected Characteristics

#### 3.1 Age

Will this Policy / Strategy / Project / Procedure / Service / Function have a **differential impact [positive / negative]** on younger / older people?

	Yes	No	N/A
Up to 18 years	✓		
18 - 65 years		✓	
Over 65 years	✓		

#### **Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Applications for housing are considered from any person aged 16 or over. The vast majority of applicants on the Waiting List are aged between 20 and 60 (85%) with only 3% aged under 20, and 12% aged over 60. The application methods for all ages are the same. Any person requiring support or assistance with their application, such as a home visit, can request this.

Under the Allocation Scheme agreed by Cabinet in December 2014, available properties are offered to the person who is highest on the Waiting List for whom it is suitable (based primarily on their household size and area choices). The age of the applicant is only relevant for the allocation of older person's accommodation for which age criteria apply. Individual Local Letting Initiatives and Sensitive Lets may also specify age criteria in order to address issues in a particular area and to achieve balanced, sustainable communities. These arrangements are area specific and time limited.

Applicants aged 16 or 17 years olds are expected to have an appropriate party to act as a Trustee until they reach the age of 18.

None of these arrangements have been changed under the proposed amendments to the Scheme. However :

- Applications from young people who are leaving care will be awarded additional priority (urgent housing need) to recognise their particular circumstances.
- A review and re-categorisation of older person's accommodation is being undertaken.

#### **What action(s) can you take to address the differential impact?**

The requirement for 16/17 year olds to have an appropriate party is a legal requirement but arrangements have been made whereby the Council (for Children's Services cases) and young people's supported housing providers can act in this capacity. These requirements will change with the implementation of the Renting Homes Act in 2016.

Improved understanding of the individual housing needs of older people (aged 50+) will be gained by gathering additional information via a screening exercise for existing applicants and ongoing at application stage. Matching applicants with suitable properties will be enhanced by the introduction of additional property categories with clear access criteria. These will be explained as part of a re-branding and publicity exercise.

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**3.2 Disability**

Will this Policy / Strategy / Project / Procedure / Service / Function have a **differential impact [negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment		✓	
Physical Impairment		✓	
Visual Impairment		✓	
Learning Disability		✓	
Long-Standing Illness or Health Condition		✓	
Mental Health		✓	
Substance Misuse		✓	
Other			

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

The introduction of face to face application interviews (and telephone interviews where necessary) offers some people, including those with literacy problems or some physical disabilities, a method of application which may be more suitable for their needs. However, it is recognised that some applicants may have difficulty in making an application via these means for a variety of health or disability-related reasons

Some applicants may need a property which is specifically adapted to meet their needs due to disability or health issues, or which meets other requirements such as the need for ground floor accommodation / level access. The provision of effective housing options advice at the first point of contact will ensure that applicants with specific needs are registered appropriately (including registration with the Cardiff Accessible Homes Scheme for adapted accommodation if appropriate).

**What action(s) can you take to address the differential impact?**

The changes to the application methods under the current Scheme have been widely publicised within the Council, via statutory partners, public access points in the city and specialist voluntary organisations. This ensures that there is as much awareness as possible of the ways in which people can apply for social housing and that information reaches hard to reach groups.

Assistance to complete an application is offered to any applicant who has specific needs due to disability. This includes home visits for people who are unable to attend a Partner office, provision of documents in Braille, and BSL interpretation etc. if required. Support Workers and other professionals are involved in the application and allocation process as appropriate / necessary – the application form has been amended to reflect where a third party has completed the application on behalf of the applicant.

Under the current Scheme available properties are offered to the person who is highest on the relevant sub-list for whom it is suitable (based on their household size, area choices and any specific needs identified). Adapted properties are let under the separate Cardiff Accessible Homes Scheme. Gathering accurate and complete information at the first point of contact, (and via regular screening) helps to ensure that applicants are listed appropriately and that

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offers are suitable. The Scheme includes the provision for awarding a higher priority for certain medical grounds or where a request is received from the Council's Adults or Children's Services to assist with exceptional accommodation needs of their clients.

The changes to the Scheme recognise the urgency of needs of applicants whose discharge from hospital is imminent and who have no suitable accommodation available to them. They are awarded Immediate Priority for rehousing. In addition to this the needs of applicants requiring ground floor accommodation due to assessed medical needs have been recognised - ground floor 1 bed flats are reserved for such applicants.

#### 3.3 Gender Reassignment

Will this Policy / Strategy / Project / Procedure / Service / Function have a **differential impact [positive]** on transgender people?

	Yes	No	N/A
<b>Transgender People</b> (People who are proposing to undergo, are undergoing, or have undergone a process [or part of a process] to reassign their sex by changing physiological or other attributes of sex)	✓		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Information regarding gender re-assignment is collected via the Equal Opportunities Monitoring section of the Housing Application Form. This section is not obligatory and the information gathered is not generally used to inform the individual applicant's registration on the Housing Waiting List or offers of accommodation.

**What action(s) can you take to address the differential impact?**

Although the information gathered via the Equal Opportunities Monitoring section of the Housing Application Form is not routinely used to inform offers of accommodation, the opportunity to make a 'sensitive let' is included in the Allocation Scheme. Should this type of let be required / requested by a transgender applicant the requirement will be noted and taken into account in the allocation process.

#### 3.4. Marriage and Civil Partnership

Will this Policy / Strategy / Project / Procedure / Service / Function have a **differential impact [positive / negative]** on marriage and civil partnership?

	Yes	No	N/A
Marriage		✓	
Civil Partnership		✓	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Information regarding marital status / civil partnership is collected via the Equal Opportunities Monitoring section of the Housing Application Form. This section is not obligatory and the information gathered is not generally used to inform the individual applicant's registration on

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the Housing Waiting List or offers of accommodation. Only 17% of applicants currently on the Waiting List have declared their marital status.

**What action(s) can you take to address the differential impact?**

Applications to join the Waiting List are not influenced by marital / civil partnership status. Similarly, properties are allocated based on the number of couples, other adults and children in the household, not on their marital / civil partnership status.

#### 3.5 Pregnancy and Maternity

Will this Policy / Strategy / Project / Procedure / Service / Function have a **differential impact [positive / negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy	✓		
Maternity	✓		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Where an applicant or their partner is expecting a child, that child will be considered in their household make-up for the purpose of establishing the size of property they need.

**What action(s) can you take to address the differential impact?**

When registering applicants on the Waiting List, the size of property they need is assessed. If an applicant or their partner is expecting a child, that child is included as a member of the household, to ensure that a suitably sized property is offered.

#### 3.6 Race

Will this Policy / Strategy / Project / Procedure / Service / Function have a **differential impact [positive / negative]** on the following groups?

	Yes	No	N/A
White		✓	
Mixed / Multiple Ethnic Groups		✓	
Asian / Asian British		✓	
Black / African / Caribbean / Black British		✓	
Other Ethnic Groups		✓	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Under current legislation some groups of people from abroad are not eligible to apply for social housing in the UK. The Allocation Scheme reflects these restrictions.

In addition to this information regarding race is collected via the Equal Opportunities Monitoring section of the Housing Application Form. This section is not obligatory, but approximately 71% of current applicants declared their racial background. However, this information does not generally influence registration on the Housing Waiting List or offers of accommodation.

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Available properties are offered to the applicant who is highest on the Waiting List for whom it is suitable (based on their household size, area choices and any specific needs identified).

Pitches on the 2 Council-run Gypsy & Traveller sites in Cardiff are allocated under a separate Allocation Scheme. Gypsies & Travellers may also apply for mainstream housing under the proposed Housing Allocation Scheme and will be treated equally with other applicants.

#### **What action(s) can you take to address the differential impact?**

Although the information gathered via the Equal Opportunities Monitoring section of the Housing Application Form is not routinely used inform offers of accommodation, the opportunity to make a 'sensitive let' is included in the Allocation Scheme. Should this type of let be required / requested by an applicant (for instance due to previous harassment) the requirement will be noted and taken into account in the allocation process.

Applicants can express preferences about the areas of the city in which they want to live which may be because they wish to be close to extended family or communities. Advice about potential housing options will be offered to any person approaching the Council or their partners in the Common Waiting List for help. Comprehensive training will be given to all staff to ensure that advice is consistent regardless of the point of contact.

Translation and interpretation will be arranged as necessary for any applicant requiring these services. Information about the changes to application methods will be circulated widely including to specialist agencies offering advice and support to BME people.

### **3.7 Religion, Belief or Non-Belief**

Will this Policy / Strategy / Project / Procedure / Service / Function have a **differential impact [negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist		✓	
Christian		✓	
Hindu		✓	
Humanist		✓	
Jewish		✓	
Muslim		✓	
Sikh		✓	
Other		✓	

#### **Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

This information is collected via the Equal Opportunities Monitoring section of the Housing Application Form – approximately 50% of current applicants have indicated their religion. However, this section of the Form is not obligatory and the information gathered is not generally used to inform the individual applicant's registration on the Housing Waiting List or offers of accommodation.

#### **What action(s) can you take to address the differential impact?**

Applicants can express preferences about the areas of the city in which they want to live. Their

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choices may reflect their wish to be close to places of worship. Advice about potential housing options is offered to any person approaching the Council or their partners in the Common Waiting List for help. Comprehensive training has been given to all staff to ensure that advice is consistent regardless of the point of contact.

#### 3.8 Sex

Will this Policy / Strategy / Project / Procedure / Service / Function have a **differential impact [positive / negative]** on men and/or women?

	Yes	No	N/A
Men		✓	
Women		✓	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Housing applications are assessed on the basis of housing need, regardless of gender. Similarly gender does not influence the allocation of properties. Properties are allocated based on the number of couples, other adults and children in the household.

**What action(s) can you take to address the differential impact?**

However under Housing Benefit Size Criteria rules any 2 children under the age of 10 would be expected to share a bedroom, as would any 2 children of the same sex under the age of 16. This forms part of the matching criteria for properties being allocated to households under this Scheme.

#### 3.9 Sexual Orientation

Will this Policy / Strategy / Project / Procedure / Service / Function have a **differential impact [positive]** on the following groups?

	Yes	No	N/A
Bisexual		✓	
Gay Men		✓	
Gay Women/Lesbians		✓	
Heterosexual/Straight		✓	

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

Information regarding sexual orientation is collected via the Equal Opportunities Monitoring section of the Housing Application Form. This section is not obligatory and the information gathered is not generally used to inform the individual applicant's registration on the Housing Waiting List or offers of accommodation.

**What action(s) can you take to address the differential impact?**

Although the information gathered via the Equal Opportunities Monitoring section of the Housing Application Form is not routinely used inform offers of accommodation, the opportunity to make a 'sensitive let' is included in the Allocation Scheme. Should this type of let be required / requested by an applicant (for instance due to previous harassment) the



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requirement will be noted and taken into account in the allocation process.

#### 3.10 Welsh Language

Will this Policy / Strategy / Project / Procedure / Service / Function have a **differential impact [positive / negative]** on Welsh Language?

	Yes	No	N/A
Welsh Language	✓		

**Please give details/consequences of the differential impact, and provide supporting evidence, if any.**

In accordance with the Welsh Language Measure 2011, some people will prefer to make their application in the Welsh language, and to receive subsequent communication in Welsh, especially those from other areas who wish to apply by telephone.

**What action(s) can you take to address the differential impact?**

The changes to the Allocation Scheme, including application methods, will again be widely publicised within the Council, via statutory partners, public access points in the city and specialist voluntary organisations. This includes arrangements for applying / communicating in Welsh.

#### 4. Consultation and Engagement

What arrangements have been made to consult/engage with the various Equalities Groups?

A draft version of the original Allocation Scheme was circulated for consultation between August and October 2013. This included seeking views from a number of key stakeholders including Councillors, other Service Areas, statutory partners and supported housing providers.

The views of Cardiff Tenants & Residents Federation members were sought, along with those of a random sample of 3400 current applicants taken from the Common Waiting List. A total of 365 applicants responded with two-thirds of respondents (69.7%) agreeing with the idea of a "banded scheme". Almost all respondents (92.7%) stated it would have been useful to talk to an advisor about housing choices and waiting times at the point of application and the most popular method preferred for making an application was face-to-face, with over half of respondents (51.5%) selecting this option.

The results of the consultation exercise were taken into account finalising the Allocation Scheme implemented in January 2014.

Subsequent proposed changes to the Scheme have been made to address operational issues, to better reflect the nuances of identifying need and to comply with changes to legislation.

#### 5. Summary of Actions [Listed in the Sections above]

Groups	Actions
Age	The requirement for 16/17 year olds to have an appropriate party is a legal requirement but arrangements have been made whereby the Council (for Children's Services cases) and young

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	<p>people's supported housing providers can act in this capacity. These requirements will change with the implementation of the Renting Homes Act in 2016.</p> <p>Improved understanding of the individual housing needs of older people (aged 50+) will be gained by gathering additional information via a screening exercise for existing applicants and ongoing at application stage. Matching applicants with suitable properties will be enhanced by the introduction of additional property categories with clear access criteria. These will be explained as part of a re-branding and publicity exercise.</p>
Disability	None – Action has already been taken.
Gender Reassignment	Although the information gathered via the Equal Opportunities Monitoring section of the Housing Application Form is not routinely used to inform offers of accommodation, the opportunity to make a 'sensitive let' is included in the Allocation Scheme. Should this type of let be required / requested by a transgender applicant the requirement will be noted and taken into account in the allocation process.
Marriage & Civil Partnership	None
Pregnancy & Maternity	When registering applicants on the Waiting List, the size of property they need is assessed. If an applicant or their partner is expecting a child, that child is included as a member of the household, to ensure that a suitably sized property is offered.
Race	None – Action has already been taken.
Religion/Belief	None – Action has already been taken.
Sex	None – Action has already been taken.
Sexual Orientation	None – Action has already been taken.
Welsh Language	The changes to the Allocation Scheme, including application methods, will again be widely publicised within the Council, via statutory partners, public access points in the city and specialist voluntary organisations. This includes arrangements for applying / communicating in Welsh.
Generic Over-Arching [applicable to all the above groups]	<p>Advice about potential housing options is offered to any person approaching the Council or their partners in the Common Waiting List for help. Comprehensive training has been given to all staff to ensure that advice is consistent regardless of the point of contact. The need to maintain high standards and to monitor the quality of the advice provided is recognised.</p> <p>Appropriate assistance to complete an application is offered to any applicant who has specific needs. This may include home visits for people who are unable to visit an office, provision of documents in Braille, and BSL interpretation etc if required. Support Workers and other professionals can be involved in the application and allocation process as appropriate / necessary.</p> <p>The changes to the application methods have been widely</p>

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	publicised within the Council, via statutory partners, public access points in the city and specialist voluntary organisations. This ensures that there is as much awareness as possible of the ways in which people can apply for social housing and that information reaches hard to reach groups.
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#### 6. Further Action

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

#### 7. Authorisation

The Template should be completed by the Lead Officer of the identified Policy/Strategy/Project/Function and approved by the appropriate Manager in each Service Area.

Completed By : Natalie Southgate	Date: 13/10/15
Designation: Policy & Development Manager	
Approved By: Sarah McGill	
Designation: Director of Communities, Housing and Customer Services	
Service Area: Communities	

- 7.1 On completion of this Assessment, please ensure that the Form is posted on your Directorate's Page on CIS - *Council Wide/Management Systems/Equality Impact Assessments* - so that there is a record of all assessments undertaken in the Council.

For further information or assistance, please contact the Citizen Focus Team on 029 2087 3059 or email [citizenfocus@cardiff.gov.uk](mailto:citizenfocus@cardiff.gov.uk)