

Central Bedfordshire Equality Impact Assessment Template

Title of the Assessment:	Harmonisation of Housing Needs Efficiency	Date of Assessment:	29/07/2011
Responsible Officer	Name:	Joanne Bellamy	Extension Number:
	Title:	Policy and Performance Officer	
	Email:	Joanne.bellamy@centralbedfordshire.gov.uk	

Stage 1 – Aims and Objectives

1.1) What are the objectives of the strategy, policy or service being assessed?

Housing needs services in the legacy authorities were provided in-house by the former South Bedfordshire District Council, and in Mid-Bedfordshire had been externalised to Aragon Housing Association, under contract. These arrangements continued going forward into Central Bedfordshire Council, as the best way of maintaining stability during the transition period, with the expectation that service harmonisation would be a priority for the early years of the new council. The Strategic Housing mock inspection highlighted differences and inconsistencies in service and approach.

Since April 2009, the two services have worked closely together and have sought to harmonise their practices and procedures in order to achieve parity of service across Central Bedfordshire, achieving an efficiency saving of £95,000 during 2010-11. The services are similar in their functions and performance, and in the size of population they serve.

Nonetheless, there remain differences in the culture and practices of the two services, noted during the July 2010 mock service inspection, which arise from different operating contexts. The service operated by Aragon Housing Association could be described as taking a 'lettings' approach, in that the service responds to housing need by letting social rented property through Choice Based Lettings. There is currently a relatively strong supply of three bedroom properties in the north area, which is sufficient to meet pressing housing need. However, implementation of the new affordable rent regime may cause this supply to diminish over time.

The service operated by Central Bedfordshire Council is operating in an area of greater homelessness and housing needs pressure, and generally more complex needs. Also, the supply of re-lets in the South is predominantly two bedroom accommodation, which is a constraint on meeting local housing need. The Council has, in the South, developed an 'options' approach in response to this level of demand which places more emphasis on the role of the private rented sector to meet housing needs, and on homelessness prevention. The service has in recent years made lower use of temporary accommodation than Aragon's service, but as a general point both services have performed well in meeting housing need, though by different means.

It has become increasingly clear that achieving a consistent level of service will require housing need services in Central Bedfordshire to be brought together under one provider. Service harmonisation has emerged as an opportunity to achieve further efficiency savings. The Directorate's forward plan requires £200,000 efficiency to be achieved during 2012-13.

Furthermore the project to deliver these changes includes preparing the consolidated service for market testing by 2014.

The Housing Needs service provides two key functions; Home Choice and Housing Options.

Home Choice is the Council's service to allocate its properties to tenants. The service maintains a housing waiting list of customers interested in renting a Council property. Each applicant has their housing need assessed and they are allocated a band to represent their level of need. The team runs the Choice Based Lettings service where applicants bid for properties predominantly via the Home Choice website. Properties are then let to the bidder with the highest band and need subject to the applicant's satisfactory viewing of the property.

The Housing Options service provides services to prevent and respond to homelessness:

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Homelessness applications – the Council deals with applications for homelessness to assess whether the Council has a duty to house the customer.

Mortgage rescue – advice and information on mortgages to enable the customer to retain their home.
 Let's Rent – This allows families or individuals to have a choice of good quality, well managed, private sector accommodation but receive assistance to access and successfully sustain a tenancy in the private rental sector.

The Homelessness Strategy Equality Impact Assessment sets out the equality implications of the service. This EIA is focussed on the effect of the efficiency savings proposed.

1.2) What needs is it designed to meet?

The review needs to deliver efficiencies so that the Housing Service can contribute to the savings required by the Council. The review of the north and south service will also lead to a more efficient and consistent service. The review will also affect staff as there will be a restructure and TUPE of staff from Aragon Housing Association.

The Home Choice service is designed to meet the needs of those with the most housing need but to give customers choice and control over where they live via a bidding system.

The Housing Options service prevents homelessness through information, advice and access to housing suitable for their needs and provides accommodation for those that are assessed as homeless.

1.3) What outcomes will be delivered?

The review will ensure that there is a consistent service between the north and south of the Central Bedfordshire area, the service will also be delivered more efficiently at a lower cost. The staffing structure will be more flexible to meet the needs of the service.

The key outcomes for the delivery of the service are prevention of homelessness, early intervention leading to outcomes on safeguarding vulnerable children and adults, health, housing growth, stronger safer communities and sustainability.

1.4) Which other strategies or policies support this?

Homelessness Strategy
 Home Choice Allocations Policy

1.5) In which ways does this support Central Bedfordshire's intention to tackle inequalities and deliver services to vulnerable people?

At present the service is provided separately in the north and south areas of Central Bedfordshire. This review will seek to harmonise these two services so that resources can be allocated more effectively according to need as the southern area has more demand for homelessness services than the north.

Welfare reform and the recession is predicted to have an impact on housing needs services. A more effective housing needs service will be better able to meet this increase in demand.

Homelessness legislation sets out who has priority need, these groups include:

- A pregnant woman or a person with whom she resides or might reasonably be expected to reside
- A person with whom dependent children reside or might reasonably be expected to reside
- A person who is vulnerable as a result of old age, mental illness or handicap or physical

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disability or other special reason, or with whom such a person resides or might reasonably be expected to reside

- All 16 & 17 year olds, unless they are owed an accommodation duty by social services
- Care leavers under the age of 21, provided they were still being looked after, fostered or accommodated by social services on or after their 16th birthday
- Those with institutional backgrounds who are vulnerable as a result of having been looked after, fostered, or accommodated, having been a member of the regular armed forces, or having been in custody
- Those who are vulnerable as a result of ceasing to occupy accommodation because of violence or threats of violence.

The Housing Service operates an Accessible Housing Register to allocate adapted properties according to the needs of tenants.

Currently Aragon provides temporary accommodation for the homeless in the north of the area and this will not automatically be available once the service has been harmonised. So that homeless individuals and families in the north can remain near their family networks and places of work it is anticipated that temporary accommodation will be made available in the north through lease agreements with Aragon. The Council will also be investing in additional temporary accommodation in Leighton Buzzard to meet the demand.

Approximately 3.5FTE staff currently working for Aragon will be TUPE transferred to Central Bedfordshire Council. With the increase in direct service provision in the north with the provision of two or three drop-in centres there is the possibility that some staff may be transferred from the south to work in the north. This will impact on staff with child care or other caring responsibilities if they have to travel further to their place of work. To mitigate this there will be formal staff consultation and the offer of flexible working to deal with potential relocation issues.

Satellite locations are to be extended. The project will further explore the possibility of increasing home visits to customers unable to attend either the permanent or satellite locations.

Customers will continue to have access to the service via walk-in, online and telephone. Customers can walk into the Priory House or Dunstable offices and receive housing advice. The service can be accessed online via the CBC website for advice and signposting and via Aragon for signposting. Please refer to section 2.6 for further detail.

1.6) Is it possible that this could damage relations amongst different communities or contribute to inequality by treating some members of the community less favourably such as people from black and minority ethnic communities, disabled people, women, or lesbian, gay, bisexual and transgender communities?

Potential Impact on Service Users:

Housing needs services are currently delivered out of offices in Dunstable, Leighton Buzzard, Ampthill and Sandy. The harmonisation of the service will lead to new offices required for the north area. It is proposed that these offices are primarily in Chicksands with satellite offices in Biggleswade and possibly Sandy depending on the evidence of demand. The Chicksands office is in a rural area where a bus service stops every two hours. This is not ideal for people with no access to their own transport and due to the rural nature of the north of the area it will be difficult to sufficiently cover all areas of need with the satellite offices. Additionally a number of housing needs customers are socially excluded and/or isolated and may not be engaged with the Council's services. A visual presence such as a drop in service is therefore important for these groups.

Alternative options for accessing the service are by phone, home visits and through the Council's website. Although the website will not be a suitable option for some customers who do not have

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access to the internet or are not IT literate.

It is anticipated that with changes to the Local Housing Allowance, welfare benefits and the impact of the recession leading to job losses and an increased risk of homelessness there will be an increased demand in housing needs services. The harmonised service therefore needs the capacity to deal with the anticipated increase in demand effectively.

The service operated by Aragon Housing Association could be described as taking a 'lettings' approach, in that the service responds to housing need by letting social rented property through Choice Based Lettings.

The Council has, in the south, developed an 'options' approach in response to this level of demand which places more emphasis on the role of the private rented sector to meet housing needs, and on homelessness prevention

An Analysis of the existing allocation practices operated by Aragon and CBC and any differences in the characteristics of service users would assist in the identification of any potential implications of harmonising the service

Potential Impact on Employees:

Project A – The implementation of a consolidated Housing Options:-

The TUPE transfer of approximately 3.5 FTE Aragon Housing Association staff to CBC

- Staff will be provided hot desks within Private Sector Housing at Priory House; it will be preferable to have staff rotating around the permanent and satellite locations.

Project B – The implementation of a redesigned Lettings Service:-

- The TUPE transfer of a maximum of 6.7 FTE AHA staff to CBC; dependant on the lettings decision agreed with AHA.
- Staff will be provided permanent desks within the Housing service at Watling House.

Consultation will be undertaken with employees in relation to both projects. It will be important to establish whether there any implications for staff related to changes in their work locations or other working practices.

Stage 2 - Consideration of Relevant Data & Research

Equality checklist issues to be considered

Awareness	Appropriateness	Accessibility	Partnership - working
Take Up levels	Adverse Outcomes	Staff Training Needs	Contracts & monitoring

2) What sources of evidence and key facts will be used to inform the assessment?

Each item ticked below must be evidenced

Internal desktop research

	Place survey / Customer satisfaction data	*	Demographic Profiles – Census & ONS
	Local Needs Analysis	*	Service Monitoring / Performance Information
	Other local research		

Third party guidance and examples

*	National / Regional Research		Analysis of service outcomes for different groups
	Best Practice / Guidance		Benchmarking with other organisations
	Inspection Reports		

Public consultation related activities

	Consultation with Service Users		Consultation with Community / Voluntary Sector
	Consultation with Staff	*	Customer Feedback / Complaints
	Data about the physical environment e.g. housing market, employment, education and training		

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provision, transport, spatial planning and public spaces	
Consulting Members, stakeholders and specialists	
Elected Members	Expert views of stakeholders representing diverse groups
Specialist staff / service expertise	
2.1) Existing Data and Consultation Findings:	

- Age:

Service user

National research

- In 2007, for the first time in the UK there were more people over state pension age than children under 16. (Department for Work and Pensions) (DWP)
- The employment rate for men between the ages of 50 and State Pension Age was 72.8% and for women was 70.1%. (DWP)
- 37% of those aged 50 and over remain unemployed for more than 12 months, compared to 28% of those aged 25 to 49. (ONS)
- 2.1 million Pensioners live in poverty after housing costs are taken into account, while the figure rises to 2.5 million before housing costs. (DWP)
- In 2006, 45% of people aged 50 or over had used a computer in the previous three months compared to 87% of people aged 16 to 30. (ONS)
- 41% of people aged 65 to 74 and 20% of people aged 75 and over used the internet in 2007, compared to 71% of the overall population. (ONS)
- 42% of people aged 65 to 74 and 27% of people aged 75 and over had access to the internet at home, compared to 65% of the overall population. (Age Concern)
- Differing levels of access to practical and financial help, as well as sources of support and guidance, are key factors in understanding different housing outcomes. Access to this kind of support is affected by class background, and higher education appears to be increasing rather than reducing housing inequalities amongst younger generations (Joseph Rowntree Foundation).
- Young people moving out of care, people with disabilities, those from rural areas, and gay and lesbian young people often face particular challenges in moving to independent housing (Joseph Rowntree Foundation).

Housing Options

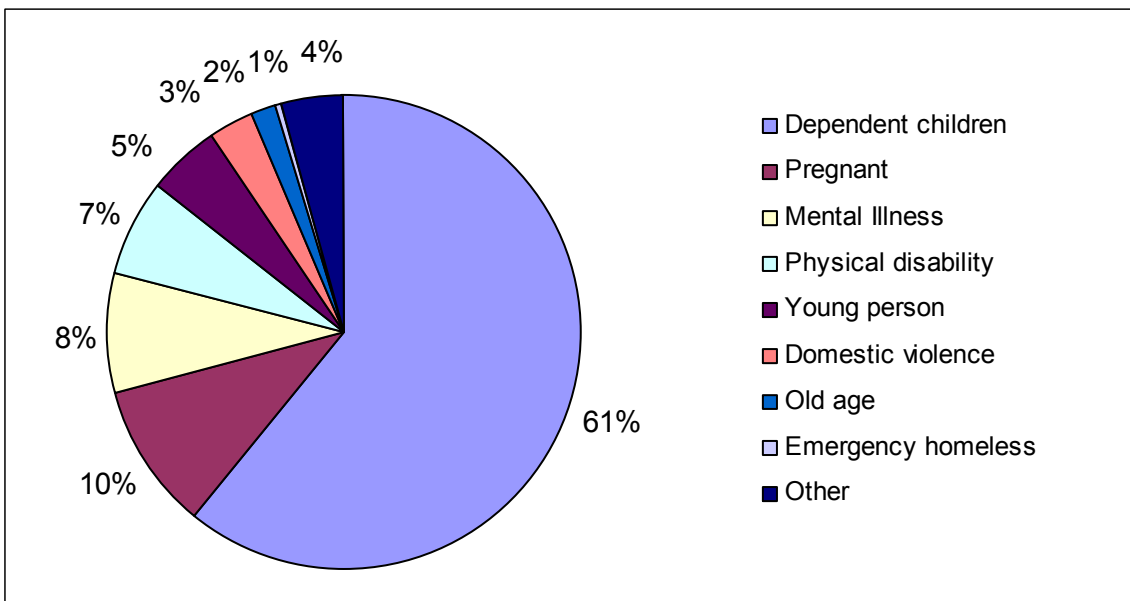
The Department of Communities and Local Government's Quarter 1, 2011 national statistics on statutory homelessness showed that between January and March 2011, in 61 per cent of acceptances the presence of dependent children in the household was the primary reason for priority need, this represents 6,920 households. This is an increase from 58 per cent in the same quarter last year.

5 per cent of acceptances were in priority need through being a young person (either 16 or 17 year olds, or 18 to 20 year olds formerly in care) (CLG).

1 per cent were in priority need due to old age (CLG).

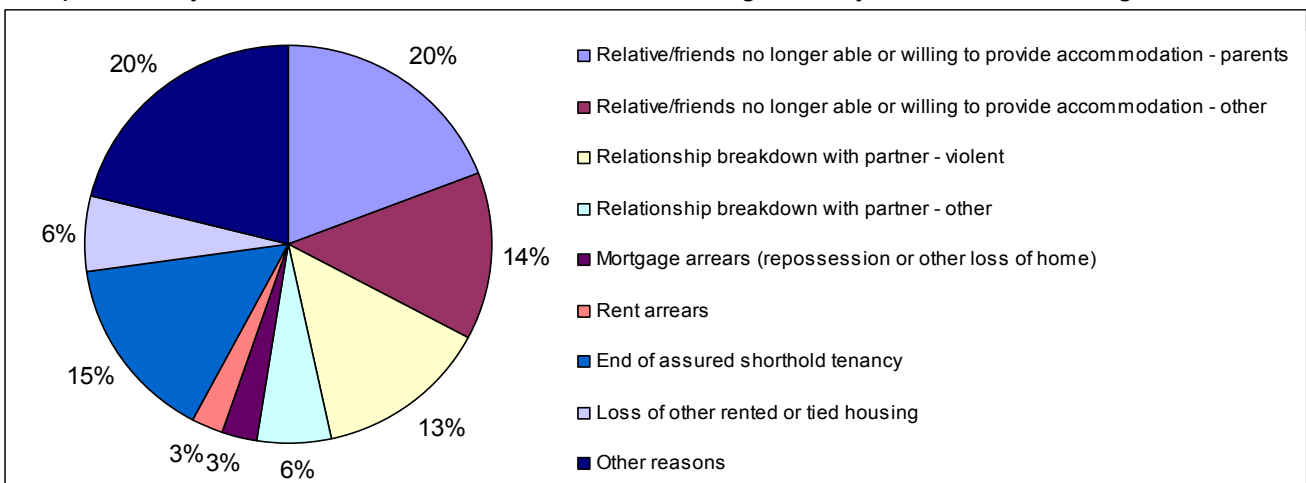
Acceptances by priority need category during January to March 2011, England

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Between January and March 2011, in 34 per cent of acceptances the reason for homelessness was because parents, relatives or friends (mostly parents) were no longer able, or willing, to accommodate applicants (CLG).

Acceptances by reason for loss of last settled home during January to March 2011, England



Between January and March 2011 in England, 86 per cent of all acceptances were applicants under 45 years old. 50 per cent were aged between 25 and 44, and 36 per cent between 16 and 24 (DCLG).

Of the 48,240 households in temporary accommodation on 31 March 2011 in England, 36,640 included dependent children and/or a pregnant woman (within which households there were 69,660 children or expected children). The number of children per household in temporary accommodation has remained stable since the data was first collected in 2007 at around 1.4.

Of these 36,640 households with children, 91 per cent were in self-contained accommodation. This has fallen slightly from 93 per cent at the end of the same quarter last year. 1,030 (3 per cent) were in bed and breakfast style accommodation, up from 630 at the end of the same quarter last year. Of these 1,030 households, 200 had been in bed and breakfast style accommodation for six or more weeks (10 of which pending review).

At the end of March 2011 in England, there were 160 households headed by 16 and 17 year old applicants in bed and breakfast style accommodation, of which 50 had been there for six or more weeks.

Local findings

Housing Options

Applicants' age when accepted as eligible, unintentionally homeless and in priority need 2010/11

	Count	%
16 - 24	30	38
25 - 44	39	49.4
45 - 59	8	10.1
60 - 64	1	1.3
65 - 74	1	1.3
75 & Over	0	0

Applicant households found to be eligible for assistance, unintentionally homeless and in priority need during 2010/11

	Count of applicants	% of total (79) applicants
Household included dependent children	57	72.2
Household included a pregnant woman with no other dependent children	10	12.7
Applicants aged 16 or 17	0	0
Applicant formerly "in care", and aged 18 to 20 years old	0	0

Applicant, or a member of their household is vulnerable as a result of the following:

	Count of applicants	% of total applicants
Old age	2	2.5
Physical disability	1	1.3
Mental illness or disability	5	6.3

None of the applicants eligible for assistance, unintentionally homeless and in priority need fled their home because of domestic violence in 2010/11.

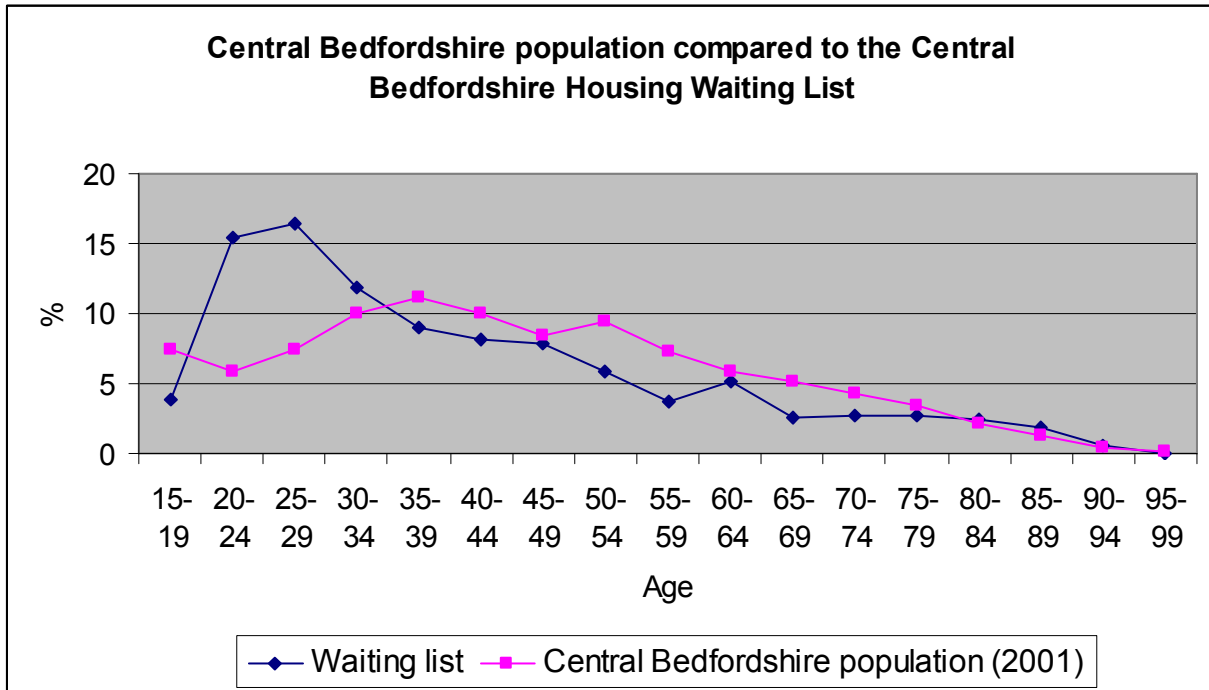
Home choice

Age of applicants on the waiting list as of June 2011

	Waiting list		Central Bedfordshire population (2001)
	Count	%	%
15-19	85	3.8	7.5
20-24	349	15.5	5.8
25-29	369	16.4	7.5
30-34	267	11.8	10.0
35-39	203	9.0	11.2
40-44	185	8.2	10.0
45-49	177	7.8	8.5
50-54	133	5.9	9.4
55-59	83	3.7	7.3
60-64	114	5.1	5.9
65-69	59	2.6	5.1
70-74	61	2.7	4.3

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75-79	60	2.7	3.5
80-84	53	2.4	2.2
85-89	42	1.9	1.3
90-94	14	0.6	0.4
95-99	1	0.0	0.1



Applicants on the waiting list requiring housing for older people

	Part-sheltered		Sheltered		Extra care	
	Count	%	Count	%	Count	%
19 and under	0	0.0	0	0.0	0	0.0
20-29 yrs	0	0.0	0	0.0	0	0.0
30-39 yrs	0	0.0	0	0.0	0	0.0
40-49 yrs	1	16.7	9	8.8	0	0.0
50-59 yrs	0	0.0	9	8.8	0	0.0
60-69 yrs	0	0.0	24	23.5	1	33.3
70-79 yrs	4	66.7	31	30.4	0	0.0
80-89 yrs	1	16.7	24	23.5	2	66.7
90+ yrs	0	0.0	5	4.9	0	0.0

Staff

National research

- Older workers can experience restricted access to the workplace by enforced or incentivised retirement. (Government Equalities Office (GEO))

Local findings

Central Bedfordshire Council staff working in the Housing Options service as of July 2011

Category	Number of staff	% of staff	Central Bedfordshire working age population
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			% 2001
Less than 20 yrs	0	0	6
20-29 yrs	5	23.8	16.7
30-39 yrs	6	28.6	25.6
40-49 yrs	4	19	23.8
50-59 yrs	5	23.8	21.2
More than 59 yrs	1	4.8	6.7

- Disability:

Service user

National research

- The income of disabled people is on average less than half that of non disabled people. (EFD)
- Disabled women are found to be twice as likely to experience domestic violence as non-disabled women. (EHRC)
- Women with learning disabilities are identified as being at risk, with levels of violence against women reported to be greater than against men with similar impairments. (EHRC))
- Much of the social housing stock is unsuitable for disabled people. Sub standard housing can make some conditions worse.
- Nine out of ten families which include a disabled child are likely to experience problems with their housing (Prime Minister's Strategy Unit, 2005)

Housing Options

The Department of Communities and Local Government's Quarter 1, 2011 national statistics on statutory homelessness showed that between January and March 2011 8 per cent were in priority need due to mental illness and 7 per cent due to a physical disability. (DCLG).

Home Choice

The inability to participate actively in choice-based lettings over a sustained period as a result of ongoing health problems or debilitating illnesses, particularly mental ill health. Is recognised as a barrier to CBL (CLG 2011).

Local findings

Housing Options

Applicant, or a member of their household is vulnerable as a result of the following:

	Count of applicants	% of total applicants
Old age	2	2.5
Physical disability	1	1.3
Mental illness or disability	5	6.3

Home Choice

Waiting list as of May 2011 where applicant has a vulnerability

	Count	%
Hidden disability	4	5
Learning disability	3	3
Mental disability	15	17
Other	5	5
Physical disability	54	63

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Physical/learning disability	2	2
Physical/mental disability	1	1
Physical/sensory disability	1	1
Sensory	1	1
Total	86	

Staff

National research

- Disabled people are more than twice as likely to be out of work as non disabled people. (Family Resources Survey - 2006/07)

Local findings

Zero staff have declared a disability.

- **Carers:**

Service user

National research

- Over 2 million people become carers every year.
- Over 1 million people experience ill health, poverty and discrimination at work and in society because they are carers.
- 18% of carers have left a job or been unable to take one due to caring responsibilities.
- Among those of working age, 36% of carers were 'struggling to make ends meet'. 38% said they were 'managing on the money coming in', while 26% were 'reasonably comfortable financially'.
- Carers who are struggling financially are more likely to be: in poor health (34%); unqualified (21%); caring for 20+ hours per week (88%).

Local findings

- There are approximately 25,210 carers in Central Bedfordshire
- 1,797 in Central Bedfordshire currently report that they are not in good health.
- There will be approximately 7,913 new carers each year in Central Bedfordshire, a total of 28,960 by 2021¹.

Staff

National research

- There are currently over three million working carers in the UK. Work is important for well-being, income and to keep social contacts.
- Less than half of 'longer-term' carers aged 16-64 were in paid employment: 45% of those caring for 1-19 hours per week; but only 21% of those with the heaviest caring roles.
- Only just over half (56%) felt their employer was carer-friendly and supportive

Local findings

No data available.

- **Gender:**

Service user

National research

¹ All statistics taken from Carers UK, *Review of Services For and Needs Of Bedfordshire Carers*, 2009

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- Lack of childcare often prevents women, and some men, from accessing both employment and services. (Equality Review (ER))
- There are 24 million households in Britain of these 1.6 million are run by a lone mother and 180,000 headed by a lone father. (Equal Opportunities Commission (EOC))
- Women still earn on average 22.6% less per hour than men. (Government Equalities Office (GEO))
- Violence against women includes rape, sexual assault, domestic violence, sexual harassment, stalking, trafficking, sexual exploitation, female genital mutilation, forced marriage and crimes in the name of honour. It is both a cause and consequence of women's inequality and can have a devastating impact on individual victims, affecting their mental and physical health, as well as employment and educational opportunities. (ER)
- 45% of women in England & Wales experience domestic violence, sexual assault or stalking during their lifetime. (British Crime Survey Home Office)
- For females, the majority of the violence experienced is in the home and the offender is known to them. (ER)
- In 2006, men were more likely than women to own their home, with women being more likely to rent their homes from the social sector and to be accepted as homeless (National Statistics 2008).

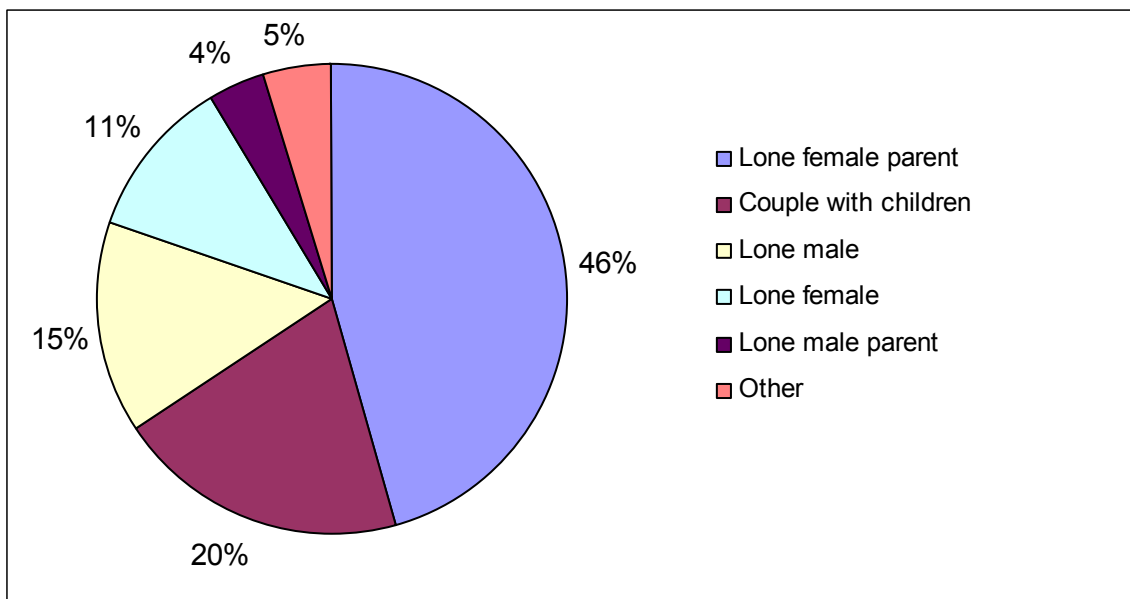
Housing Options

The Department of Communities and Local Government's Quarter 1, 2011 national statistics on statutory homelessness showed that between January and March 2011 10 per cent of households were in priority need because they included a pregnant woman, this represents 1,130 households. (CLG).

2% were in priority need due to domestic violence (DCLG).

Between January and March 2011, 19 per cent of homelessness acceptances were due to the breakdown of a relationship with a partner, 70 per cent of these cases involving violence (CLG).

Of the 11,350 acceptances between January and March 2011 in England, 49 per cent were lone parents (4 per cent male, 46 per cent female), and 20 per cent were couples with dependent children. One person households accounted for 26 per cent of acceptances, with a higher proportion male than female (CLG).

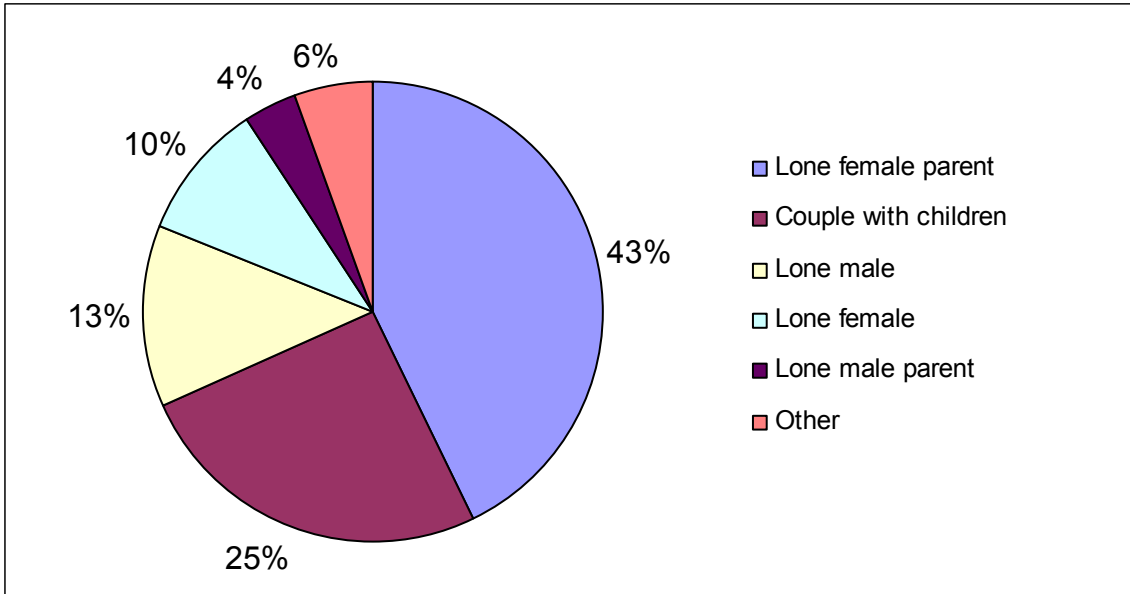


Of the 48,240 households in temporary accommodation on 31 March 2011 in England, the biggest group (43 per cent) were female lone parent households with dependent children.

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Single person households (with no dependent children) accounted for 23 per cent of households, with a higher proportion of males than females.

Households in temporary accommodation by household type: 31 March 2011, England



Local findings

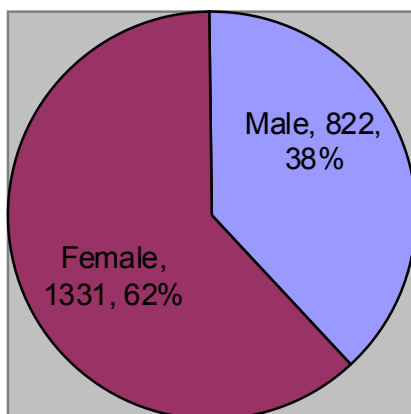
Housing Options

Applicant households found to be eligible for assistance, unintentionally homeless and in priority need during 2010/11

Lone parent household with dependent children		One person household	
Male Applicant	Female Applicant	Male Applicant	Female Applicant
6	44	7	3

Home choice

Gender of those on waiting list



Those registered as of May 2011

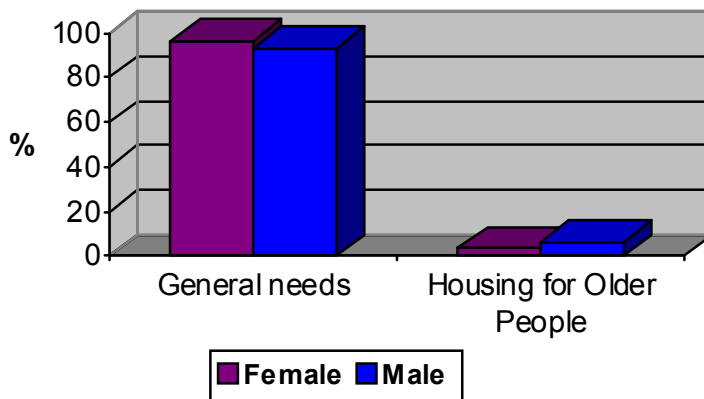
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App Type	Female		Male	
	Count	%	Count	%
Housing Register	1025	61.2	651	38.8
Homelessness Acceptance	27	77.1	8	22.9

Gender and the type of housing required

	Female		Male	
	Count	%	Count	%
General needs	1283	96.4	768	93.4
Housing for older people	48	3.6	54	6.6

Gender and type of housing required



Staff

National research

- Women still earn on average 22.6% less per hour than men. (Government Equalities Office (GEO))
- The vast majority of people employed in local government are women (70%) but most are concentrated in lower paid and part-time jobs. (EOC)
- The part-time gender pay gap in April 2007 was 39.1%. (GEO)
- Occupation segregation is one of the main causes of the gender pay gap. Women's employment is highly concentrated in certain occupations and those occupations which are female-dominated are often the lowest paid. (GEO)
- Women are still under-represented in the higher paid jobs within occupations – the "glass ceiling" effect. (GEO)
- Many women bear the majority of the responsibility for childcare with the result that 44% of women work part time compared to 10% of men. Part-time work can limit career progression; lead to lower pay and reduced pensions. (EOC)

Local findings

5 members of staff are male, 16 are female.

The average pay for the male members of staff was £38,971.40, the average pay for female members of staff was £25,199.19. The substantial difference in pay is due to female employees more likely to

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work in officer and assistant roles whereas the majority of men work in managerial roles. All male employees work full time whereas as a third of the female employees work part time.

- Trans Gender / Gender Reassignment:

Service user

National research

- 1 in 10,000 people suffer from the recognised medical condition known as gender dysphoria, generally referred to as being transgender or transsexual.
- Upon revealing their gender issues people are at high risk of being shunned by family and friends.
- Trans people may be particularly at risk of housing crisis and homelessness arising from transphobic reactions and harassment by family, neighbours and members of their local community.
- Trans people fear disclosing their identity to housing officers for fear that they will not be treated with dignity and respect. The result can be that they do not receive the housing services that they need or receive a service inappropriate to their needs.

- Race:

Service user

National research

- Gypsies and Irish Travellers can face barriers to employment due to low literacy levels. (Commission for Race Equality)
- People from an ethnic minority community are 13% less likely to find work than a white person. (Labour Force Survey 2008)
- Nationally, in 2005 the police recorded 50,000 racially or religiously motivated hate crimes. (Home Office (HO))
- The Police estimate that most racial hate crime is not reported because victims are too frightened or embarrassed. (HO)
- Currently, 67 per cent of the nearly five million people from minority ethnic backgrounds live in the 88 most deprived wards in England. BME people are more likely to live in social housing. Whatever their tenure, they are also more likely to suffer bad housing conditions such as overcrowding (Cabinet Office 2001).
- The inability to understand written material (due to language difficulties) is a recognised barrier to CBL (CLG 2011).

Between January and March 2011 in England, 66 per cent of applicants accepted were White and 29 per cent were from an ethnic minority group – 15 per cent Black, 7 per cent Asian, 3 per cent mixed and 4 per cent another ethnic group. The remainder did not state their ethnic origin. Compared to the population as a whole, there is a higher incidence of acceptances amongst ethnic minority groups than amongst the White population.

Over half of all households in temporary accommodation in March 2011 in England were headed by ethnic minority applicants. Outside of London, ethnic minority applicants accounted for 16 per cent of households in temporary accommodation.

	White		Black/Black British		Asian/Asian British		Mixed		Chinese/ other	
	Count	%	Count	%	Count	%	Count	%	Count	%
Central Beds	38	90.5	0	0	1	2.4	1	2.4	2	4.8
England	7550	69.8	1660	15.3	770	3.2	350	4.5	490	5

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Local findings

Ethnicity

App Type	White		Black/Black British		Asian/Asian British		Mixed		Chinese/ other	
	Count	%	Count	%	Count	%	Count	%	Count	%
Housing register application	1421	90.1	91	5.8	34	2.2	2	0.1	30	1.9
Homeless application	27	90	0	0.0	2	6.7	0	0	1	3.3

Households dealt with under the homelessness provisions of the 1996 Housing Act during 2010/11

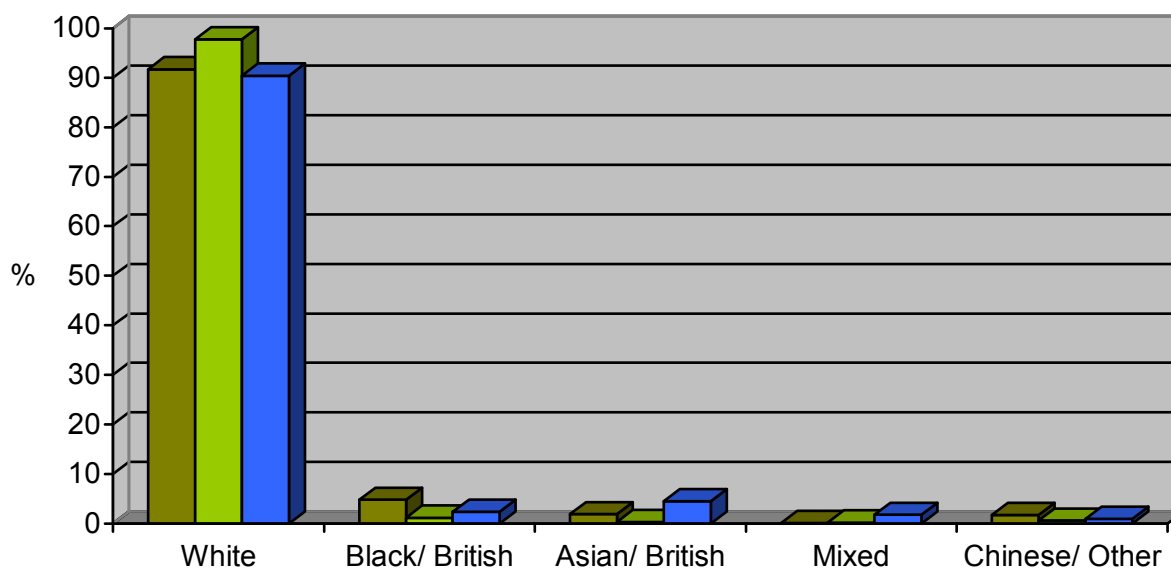
	White		Black/ British		Asian/ British		Mixed		Chinese/ Other	
	Count	%	Count	%	Count	%	Count	%	Count	%
1. Eligible, unintentionally homeless and in priority need	74	94.9	2	2.6	0	0	1	1.3	1	1.3
2. Eligible, homeless and in priority need, but intentionally so	8	100	0	0	0	0	0	0	0	0
3. Eligible, homeless but not in priority need	11	84.6	1	7.7	0	0	0	0	1	7.7
4. Eligible, but not homeless	10	83.3	1	8.3	0	0	0	0	1	8.3
5. Ineligible	1	50	0	0	0	0	0	0	1	50
6. Total decisions	104	90	4	3.5	0	0	1	0.9	4	3.5

	White	Black/ British	Asian/ British	Mixed	Chinese/ Other
CBC housing register %	91.7	4.8	1.9	0.1	1.7
CBC tenants %	97.7	1.2	0.3	0.2	0.6
Former South Bedfordshire area %	90.4	2.4	4.5	1.8	1

	White British		BME	
	Count	%	Count	%
General needs	1758	95.0	289	97.3
Part-sheltered	4	0.2	1	0.3
Sheltered	86	4.6	7	2.4
Extra Care	2	0.1	0	0.0



Ethnicity of housing waiting list



■ CBC housing register (2011) ■ CBC tenants (2011) ■ Former South Bedfordshire area (2001)

Staff

National research

- Overall black and minority ethnic people are more likely to be unemployed, irrespective of their qualifications, place of residence, sex or age. They are less likely to hold senior management positions. (Equality Review (ER))

Local findings

Category	Number of staff	% of staff	% Central Bedfordshire population 2009 estimate
White British	12	60	91.4
Black or Black British	4	20	1.9
Asian or Asian British	3	15	3.9
Mixed	1	5	1.6
Chinese	0	0	1.2

- Religion or Belief:

Service user

National research

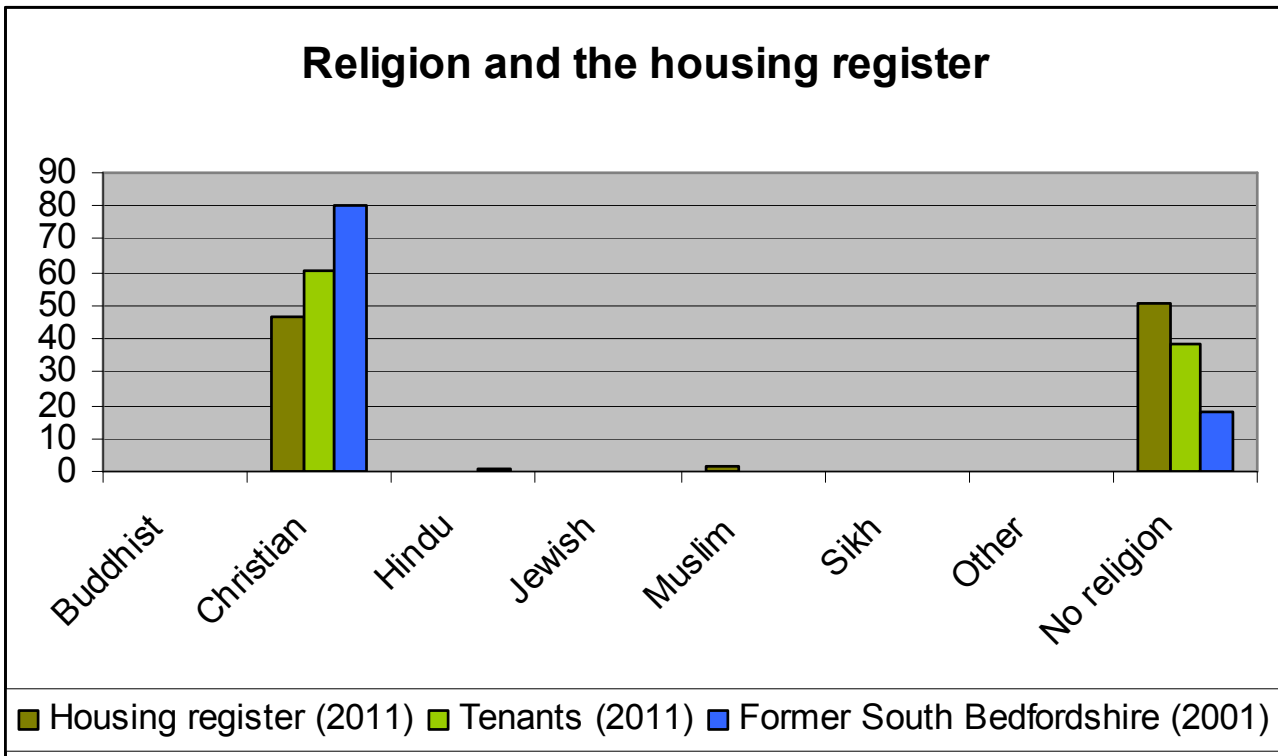
- Only 61% of Muslim men have jobs compared to 80% of Christian men and 82% of Hindu men. (Government Equalities Office)
- There is emerging evidence that Indian and White Muslims experience employment disadvantage when compared to Indian and White Christians. (Equality Review)
- Women from nearly all ethnic / religious backgrounds have pay between a quarter and a third less than a White British Christian man with the same qualifications, age and occupation. (National Equality Panel)

Local findings

Central Bedfordshire Equality Impact Assessment Template

App Type	Buddhist	Christian	Hindu	Jewish	Muslim	Sikh	Taoist	Rastafarian	No religion
Housing register	2	536	5	1	23	1		1	577
Homelessness Accepted		5	1			1			18

	Housing register (2011)		Tenants (2011)	Former South Bedfordshire (2001)
	Count	%	%	%
Buddhist	2	0.1	0.2	0.1
Christian	708	46.7	60.6	80
Hindu	6	0.4	0.2	0.6
Jewish	1	0.1	0.1	0.2
Muslim	29	1.9	0.3	0.3
Sikh	2	0.1	0.0	0.2
Other	2	0.1	0	0.2
No religion	765	50.5	38.5	18.4



- Sexual Orientation:

Service user

National research

- When parents are very hostile to young lesbian and gay people, some feel forced to leave home even though they may become homeless as a result.
- One in five lesbian and gay people expect to be treated worse than heterosexuals when applying

for social housing.

- LGB people may experience homophobic harassment or 'hate crime' from their neighbours which may motivate them to request a transfer or not to want to live in certain neighbourhoods.
- Studies indicate that domestic abuse is a concern in the LGBT community, with similar prevalence noted to the incidence of domestic abuse in heterosexual relationships. In one study of over 3,000 lesbians and gay men (Sigma, 2003) , 22% of women respondents reported experiences of physical, sexual and mental abuse or violence from a regular sexual partner.

Staff

National research

- Nearly one in five lesbian and gay people (almost 350,000 employees in Britain) have experienced homophobic bullying in the workplace during the last five years.

- **Other:** e.g. *Poverty / Social Class / Deprivation, Looked After Children, Offenders, Cohesion*

Service user

National research

- Inequalities in earnings and incomes are high in Britain, both compared with other industrialised countries, and compared with thirty years ago.
- Despite the elimination and even reversal of the differences in educational qualifications that often explain employment rates and relative pay, significant differences remain between men and women and between ethnic groups.
- Disabled adults are twice as likely to live in low income households.
- Half of all lone parents are in low income households, the overwhelming majority are women.
- The inability to understand written material (due to literacy difficulties) is recognised as a barrier to accessing CBL (CLG 2011).

2.2) To what extent are vulnerable groups experiencing poorer outcomes compared to the population or workforce as a whole?

Service users:

According to Shelter a person is more likely to be homeless if they have some of the following factors or life events:

- drug and alcohol misuse or having parents with drug or alcohol problems,
- lack of qualifications,
- lack of social support,
- debts - especially mortgage or rent arrears,
- poor physical and mental health,
- relationship breakdown,
- getting involved in crime at an early age
- sexual and physical abuse in childhood or adolescence,
- previous experience of family homelessness
- experience of being in care, the armed forces, or in prison
- unemployment
- poverty

In Central Bedfordshire, children are disproportionately affected by homelessness as in 2010/11 85% of homelessness acceptances were families with dependent children or a household including a pregnant woman. Also nationally the highest proportion of reasons for homelessness are that the parent is no longer willing to provide accommodation which is reflected in the age profile of homelessness acceptances in Central Bedfordshire as 38% were between 16 and 24 years of age in 2010/11.

Central Bedfordshire Equality Impact Assessment Template

Mental health is the most prevalent disability of the statutory homeless nationally and locally.

Women are disproportionately affected by domestic violence and nationally in the first quarter of 2011 2% of homelessness acceptances were due to domestic violence. However in 2010/11 in Central Bedfordshire there were no DV related homelessness acceptances recorded. Women are also over represented as lone parents with 46% of acceptances being lone female parents nationally in the first quarter of 2011. In 2010/11 there was more than double the number of one person male households than one person female households.

Asian and Asian British and Chinese/other are over represented as homeless applicants compared to the population of Central Bedfordshire. Black and Black British and Chinese/other are over represented as housing register applicants.

Drop in services in the north will be changing so that the Ampthill provision is moved to the Council offices in Chicksands. The Chicksands office is in a rural area where a bus service stops every two hours. As many housing needs customers are at higher risk of poverty and social exclusion these offices will be difficult to access.

The service operated by Aragon Housing Association could be described as taking a 'lettings' approach, in that the service responds to housing need by letting social rented property through Choice Based Lettings.

The Council has, in the south, developed an 'options' approach in response to this level of demand which places more emphasis on the role of the private rented sector to meet housing needs, and on homelessness prevention

Employees:

In July 2011 76% of the CBC Housing Options and Home Choice staff were female. The average pay for the male members of staff was £38,971.40, the average pay for female members of staff was £25,199.19. The substantial difference in pay is due to female employees more likely to work in officer and assistant roles whereas the majority of men work in managerial roles. All male employees work full time whereas as a third of the female employees work part time.

Project A – The implementation of a consolidated Housing Options:-

There will be a TUPE transfer of approximately 3.5 FTE Aragon Housing Association staff to CBC for the Housing Options service. Aragon staff currently based in Ampthill will be relocated to Chicksands which is approximately a 7 mile (15 minute) journey.

Project B – The implementation of a redesigned Lettings Service:-

There will be a TUPE transfer of a maximum of 6.7 FTE AHA staff to CBC for the lettings service; dependant on the lettings decision agreed with AHA. These staff will be provided permanent desks within the Housing service at Watling House, Dunstable which is approximately 11 miles (26 minutes) from Ampthill.

Dunstable in particular could be beyond a commuting distance for Aragon staff and as a result to transfer the staff would have to relocate their home. This could disproportionately affect staff that are secondary earners in the household or a carer as it is less likely that they will be able to move to the new base. Consultation will confirm whether this is a particular issue for staff that may have to relocate.

2.3) Are there areas where more information may be needed?

- Diversity profile of Aragon staff.
- Service user profile split between the north and south to show the difference between the

Central Bedfordshire Equality Impact Assessment Template

Aragon and CBC services.

- Updated diversity profile of CBC staff.
- Geographical map of service users in relation to current and proposed drop-in services.
- Customer profile of service users split between the north and south.
- A better understanding of reasons for accessing the services in the north and south through improved data collection.

2.4) Are there any gaps in data or consultation findings?

This EIA will be updated the information listed in 2.3 and consultation findings in February 2012 following staff consultation.

2.5) What action will be taken to obtain this information?

The information regarding Aragon staff profile will be sought from Aragon and the Housing Needs team will be contacted for a CBC/Aragon split of service users information. CBC HR records will be used to update the CBC diversity profile.

2.6) To what extent do current procedures and working practices address the above issues and help to promote equality of opportunity?

To ensure the timely delivery of the required outcomes the project will run as two mini projects:-

Project A – The implementation of a consolidated Housing Options:-

- CBC receives and handles all service requests across Central Bedfordshire.
- The TUPE transfer of approximately 3.5 FTE Aragon Housing Association staff to CBC.
- The creation of one CBC team with staff working from two permanent sites (Watling House and Priory House).
- Satellite locations are to be extended. The service currently offered from the Leighton Buzzard Customer Service Centre every Monday will be supplemented by a new presence at the Biggleswade Customer Service Centre from the 1st April 2012. Customers will be able to attend the Satellite offices by appointment or drop in.
- The project will explore the possibility of a satellite location in Sandy where service demand is understood to be high.
- The project will further explore the possibility of increasing home visits to customers unable to attend either the permanent or satellite locations.
- Customers will continue to have access to the service via walk-in, online and telephone. Customers can walk into the Priory House or Dunstable offices and receive housing advice. The service can be accessed online via the CBC website for advice and signposting and via Aragon for signposting.
- Facilities requirements are to be established. A waiting area and an interview room (with access to QL, Internet and printing) at both Watling House and Priory House are essential.
- Staff will be provided hot desks within Private Sector Housing at Priory House; it will be preferable to have staff rotating around the permanent and satellite locations.
- Health and Safety assessments will determine the safety requirements for offering the service from Watling House and Priory House (e.g. panic buttons and security guards).
- The completion of an Equalities Impact Assessment (EIA) and the appropriate consultation with staff.
- ICT requirements at all locations are to be established, sourced and implemented.
- All internal and external stakeholder communications.
- The necessary updates to written and web documents both internally and externally (e.g. partner

organisations).

Project B – The implementation of a redesigned Lettings Service:-

- CBC is entirely responsible for the lettings register with application forms handed in to any CBC location before being processed at Watling House.
- The project will, with Aragon Housing Association determine the lettings service, as either:-
 - CBC being responsible for 100% of allocations.
 - CBC being responsible for 75% of allocations and AHA responsible for 25% of allocations.
- The viewing and sign up processes are unaffected with CBC responsible for CBC properties and AHA responsible for AHA properties.
- The TUPE transfer of a maximum of 6.7 FTE AHA staff to CBC; dependant on the lettings decision agreed with AHA.
- The creation of one CBC team with staff working from Watling House.
- Facilities requirements are to be established, sourced and implemented. It is already know that CBC will need to create additional work stations and storage capacity.
- Staff will be provided permanent desks within Housing Services in Watling House.
- Health and Safety assessments will determine the safety requirements for offering the service from Watling House and Priory House (e.g. panic buttons and security guards).
- The completion of an Equalities Impact Assessment (EIA) and the appropriate consultation with staff.
- ICT and data requirements are to be established, sourced and implemented.
- All internal and external stakeholder communications
- The necessary updates to written and web documents both internally and externally (e.g. partner organisations).
- The project will explore the opportunities to introduce self serve/triage (e.g. online assessment) capability at the start of the process to reduce customer contact with staff.
- The negotiation of nomination rights with Aragon Housing Association and other RSL's

Stage 3 – Assessing Positive & Negative Impacts			
Equality checklist issues to be considered			
Awareness	Appropriateness	Accessibility	Partnership - working
Take Up levels	Adverse Outcomes	Staff Training Needs	Contracts & monitoring
Analysis of Impacts	Impact?	Summary of impacts and reasons for this	
3.1) Age	Yes	Young people and older people without access to their own transport may find access to drop-In services in the north more difficult with relocation from Ampthill to Chicksands. Satellite offices, increased provision of telephone and face to face services should however mitigate this.	
3.2) Disability	Yes	Access to drop-In services in the north may become more difficult with relocation from Ampthill to Chicksands. Satellite offices, increased provision of telephone and face to face services should however mitigate this.	
3.3) Carers	No		
3.4) Gender	Yes	Lone female parents that access the Housing Needs service tend to have low incomes and therefore less likely to have access to a car. Access to drop-In services in the north may become more difficult with relocation from Ampthill to Chicksands. Satellite offices, increased provision of telephone and face to face services should however mitigate this.	

Central Bedfordshire Equality Impact Assessment Template

		Women who are more likely to be secondary earners may be unable to move home if their new work location is not in commuting distance. Additionally an increase in commuting distance may disproportionately affect staff with child care responsibilities who tend to be women.
3.5) Transgender	No	
3.6) Race	No	
3.7) Religion / Belief	No	
3.8) Sexual Orientation	No	
3.9) Other <i>e.g. Poverty / Social Class / Deprivation, Looked After Children, Offenders, Cohesion</i>	Yes	Housing options customers tend have low incomes and are therefore at higher risk of poverty including fuel poverty. Access to drop-in services in the north may become more difficult with relocation from Ampthill to Chicksands. Satellite offices, increased provision of telephone and face to face services should however mitigate this.

Stage 4 – Conclusions, Recommendations and Action Planning		
4.1) What are the main conclusions from the assessment?		
<p>The equality issues that arise from the harmonisation of housing needs projects relate to access; service users' access to easy to reach services and staff access to a place of work in commuter distance to their current home.</p>		
4.2) What are the priority recommendations and actions?		
<p>The project team is aware of these issues and is designing a range of services that can meet the range of service users' needs including an increased provision of satellite offices, face to face meetings and an increase in phone and internet based services.</p> <p>Consultation has been planned to understand the impact of the project on staff. Flexible working and relocation assistance are being considered as options to mitigate the inconvenience of the office relocation.</p> <p>As the models of service are developed this Equality Impact Assessment will be updated. Information on the different service models currently offered in the north and south will be considered in the next version of the EIA which will be produced in February 2012 to understand the equality implications of the new service model.</p>		
4.3) What changes will be made to address any adverse impacts that have been identified?		
<p>The project has very recently been initiated and so these changes will be addressed as part of the project plan and built in to the final service model that will be implemented from April 2012.</p>		
4.4) Are there any budgetary implications?		
<p>These will be considered as part of the project plan.</p>		
4.5) Actions to be Taken:		
Action	Date	Priority
Obtain diversity profile of Aragon staff.	December 2012	H
Obtain service user profile split between the north and south to show the difference between the Aragon and CBC services.	January 2012	H

Central Bedfordshire Equality Impact Assessment Template

Review Equality Impact Assessment in light of the above findings, staff consultation and development of the new model of service	February 2012	H
Geographical map of service users in relation to current and proposed drop-in services.	January 2012	H
Customer profile of service users split between the north and south.	January 2012	M
Improve collection of data around reasons for accessing the services in the north and south.	January 2012	M

Stage 5 - Quality Assurance & Scrutiny:		
Checking that all the relevant issues have been identified		
5.1) What methods have been used to gain feedback on the main issues raised in the assessment?		
Step 1:		
<input type="checkbox"/>	The Corporate Policy Advisor (Equality & Diversity) for comment & decision re further scrutiny	
Step 2:		
<input type="checkbox"/>	The Equalities Working Group	<input type="checkbox"/> The Equalities Forum – due in January 2012
Other:		
5.2) Were any additional actions / amendments identified?		
Step 3:		
5.1) Has a member of the senior management team been notified of the outcome of the assessment?		

Stage 6 – Monitoring Future Impact
6.1) How will implementation of the actions be monitored?
This is a preliminary EIA which will be reviewed in February 2012. This section will be completed in the February version.
6.2) What sort of data will be collected and how often will it be analysed?
6.3) How often will the policy be reviewed?
6.4) Who will be responsible for this?
6.5) Have the actions been incorporated in the service / business plan or team targets?

The results of all equality impact assessments will be made accessible to the public.