
**Perth and Kinross Council – Access to Housing (Via Common Housing Register and Home First response to homelessness)
 Equalities Impact Assessment
 Updated - May 2021 (Approved at Equalities Strategic Forum Meeting on 09th June 2021)**

Title of policy	Access to Housing (Via Common Housing Register and Home First response to homelessness)
Date of initial screening	16 October 2018
Date of Review	25 May 2021
Organisation wide/service specific	Service specific
New/existing policy	Development of existing policy
Lead officer	Elaine Ritchie
Name of officer (s) involved in review	<hr/> Elaine Ritchie, Senior Service Manager Housing <hr/> Martin Smith, Team Leader Specialist Services <hr/> Karen McNamara, Coordinator Housing Options and Support <hr/> Hazel McDonagh, Senior Housing Options Officer <hr/> David McPhee, Equalities Team Leader <hr/>
Who will be involved in delivering the policy?	Housing Options Officers Support Officers Private Sector Officers Housing Officers Partner agencies – Caledonia Housing Association, Hillcrest Housing Association, Fairfield Housing Association and Kingdom Housing Association
How they have been involved in EQIA?	Team meetings Delayed Office Opening Sessions BITE/Stakeholder event Equality and Diversity Training Common Allocations Policy Review Group

EQIA – Access to Housing (Via Common Housing Register and Home First response to homelessness)

Definitions

Common Housing Register – this is a single point of access, application pathway to social-rented housing provided by Perth and Kinross Council, Caledonia Housing Association, Hillcrest Housing Association, Fairfield Housing Association and Kingdom Housing Association.

Common Allocations Policy – this is a common, shared policy which underpins the Common Housing Register and is fully adopted by all member landlords.

Home First – this is Perth and Kinross Council’s model for responding to homelessness and is the basis of our Rapid Rehousing Transition Plan.

Aims and Objectives

The aim of the Common Allocations Policy (CAP) is to meet housing need fairly and help secure accommodation for households in the greatest housing need. For people who are homeless or threatened with homelessness, Home First aims to prevent homelessness occurring and to ensure that where homelessness cannot be prevented, homeless households move directly into settled accommodation, avoiding the stigma, cost and uncertainty of temporary accommodation and homelessness.

The CAP and Home First response to homelessness operate in tandem and share a number of key principles and objectives. The development and delivery of these Access to Housing Pathways is consistent with the Human Rights PANEL principles;

- Participation – these policies have been developed in partnership and service-users and other stakeholder have been consulted and involved in policy development and review. Service-users have ongoing opportunities to provide feedback on the services they receive and we use this information to continuously improve.
- Accountability – we are accountable for the decisions we make and have a range of measures in place to ensure accuracy, fairness and consistency in our approach.
- Non-discrimination and Equality – we have adopted a key principle of respecting diversity and promoting equality in everything we do.
- Empowerment – people using our Access to Housing Pathways are given housing options advice and assistance and are empowered to make informed decisions.
- Legality – we are committed to operating in line with legislation and statutory guidance that is relevant to the Access to Housing pathways.

The Common Allocations Policy is based on 6 key principles – we will;

1. Apply our policy consistently: this means that we apply our policy to every applicant and property we allocate, wherever that property is, whoever the applicant is, and whoever allocates it or processes the application
2. Be clear about what we do and when we will do things. We will be clear about how we do things and explain why we do things wherever we can
3. Be open and honest with you and talk clearly and directly about your housing options. We will be clear about what we can and cannot do to help you
4. Follow what the law and guidance says we must do and what the law allows us to do. Wherever we can, we will follow what guidance recommends we should do
5. Respect diversity and promoting equality in everything we do. No one will be treated unfairly because of race, colour, ethnic or national origin, language, religion, belief, age, gender, sexual orientation, marital status, family circumstances, employment status, physical ability or mental health
6. Use all the information we receive about you and everyone you apply with in line with the law and hold that information securely

Common Allocations Policy Objectives

1. **Responding quickly to people in acute and urgent housing need and giving the right priority to people who are in most need of housing. This includes specific groups identified in legislation to which we must give reasonable preference. These groups are;**
 - **People who are homeless or threatened with homelessness (including those at risk of harassment or abuse)**
 - **People who are living in unsatisfactory housing conditions with unmet housing needs**
 - **Social housing tenants who are under-occupying their homes**

Practice elements:

Advice, assistance and support, service standards – deliver service in line with legislation

Equality aspects:

Provide advice in various locations 24/7, language line, provide translated documents, same sex officers, disability friendly services, complaints and appeals

Staff training, quality assurance, surveys

Equality aspects:

No immediate impact

2. **Providing suitable (affordable and sustainable) housing solutions to households with an assessed housing need**

Practice elements:

Ensure appropriate offers are made taking account of needs/preferences (ground floor, house type and location) – in line with information from lead services and agencies

Tenancy support – advocacy

Seek advice and assistance (joint working) social work, police, OT health, Medical Advisory Service
Financial assessment

Equality aspects:

No immediate impact

3. Delivering services that meet legal and statutory responsibilities and corporate outcomes of Best Value

Practice elements:

Policy and procedures

Staff training – supervision, DOO sessions

Equalities Operational Group

Keeping up to date with legislation and new guidance

Monitoring and quality assurance (customer feedback, complaints and appeals)

Performance Framework and monitoring

Scottish Housing Regulator (SHR) – Charter Return

Statistical Returns to the Scottish Government

SURE – Tenant scrutiny feedback and inspections

Case Law

Equality aspects:

No immediate impact

4. Creating a service culture which upholds the rights of applicants to the Common Housing Register in meeting their needs

Practice elements:

As above and consult/engage with homeless people (Homeless Voice)

Customer and Stakeholder Surveys

Peer Audits – Tayside, Fife & Central Housing Options Hub

Equality aspects:

No immediate impact

Home First Objectives

5. Resolving homelessness more quickly and/or preventing homelessness from occurring

Practice elements:

Advice, assistance and support, service standards – deliver service in line with legislation

Equality aspects:

Provide above in various locations 24/7, language line, provide translated documents, same sex officers, disability friendly services, complaints and appeals

Staff training, quality assurance, surveys,

6. Reducing the time that homeless households spend in TA

Practice elements:

The length of stay in temporary accommodation (currently around 70 days). This is closely linked with case duration (currently around 90 days)

Every case monitored and reviewed on an individual basis

Equality aspects:

Individual needs would be met (or assessed on a case by case basis) for those with protected characteristics

No immediate impact – variances in length of stay would be caused by households' needs rather than on equality grounds eg. A household that requires a large property or an area with limited turnover.

7. a) Achieving greater parity between mainstream and TA costs for households

Practice elements:

Service charges

Temporary Accommodation rents

Standard of accommodation

Equality aspects:

No immediate impact as charges on property not individual

No immediate impact as Temporary Accommodation rent same as mainstream

All accommodation let to a lettable standard. Additional standards in place for temporary accommodation

b) Identifying ways to reduce rehousing costs for homeless households

Practice elements:

Providing advice, assistance, and support – financial assessment and budget planning

Furniture packs, budgeting, signposting to relevant projects and initiatives (Re-use schemes, Community Care Grants etc)

Support plan/liase with landlord

Equality aspects:

No immediate impact

8. Providing suitable (affordable and sustainable) housing solutions to homeless households and those facing homelessness

Practice elements:

Ensure appropriate offers are made taking account of needs/preferences (ground floor, house type and location) – in line with Code of Guidance and homeless legislation

Tenancy support – advocacy

Seek advice and assistance (joint working) social work, police, OT health

Financial assessment

Equality aspects:

No immediate impact

9. Delivering services that meet legal and statutory responsibilities and corporate outcomes of Best Value

Practice elements:

Policy and procedures

Staff training – supervision, DOO sessions

Equalities operation group

Keeping up to date with legislation and new guidance

Monitoring and quality assurance (customer feedback, complaints, and appeals)

Performance Framework and monitoring

Equality aspects:

No immediate impact

10. Creating a service culture which upholds the rights of homeless people in meeting their needs

Practice elements:

As above and consult/engage with homeless people (Homeless Voice)

Surveys

Peer Audits

Equality aspects:

No immediate impact

EQIA – understanding protected characteristics and the impacts of the Common Allocations Policy

What characteristics do households have that will use the Access to Housing pathways?	How is this evidenced?	Are there any ways in which the Access to Housing Pathways will specifically support households with these characteristics?
Age (young or old)	<ul style="list-style-type: none"> • Performance Management Framework • Quality Assurance audits • Training Plans • Returns to Scottish Government and SHR • Support Plans 	<p>Younger people – greater focus on transitional support and tenancy skills to enhance tenancy sustainment</p> <p>Older people – prioritisation of hospital delayed discharge cases. Provision of aids & adaptations where required.</p>
Disability	As above	<p>Assessment, medical support needs, links to OT/aids and adaptations/extensions.</p> <p>Independent Living Pathway and specialist Panel have been established. This is a partnership with key services and agencies – Housing, Social Work, Health, Commissioning etc.</p> <p>Independent Living Panel creates understanding of current and future demand and informs the new build programme (wet rooms, barrier free) and use of technology enabled care</p>
Gender reassignment	As above	<p>Quick move to permanent accommodation may be beneficial, avoiding the need to spend time in temporary accommodation and hostel accommodation. Any placement or offer of housing would be on a person centred approach that fully considers the needs and wants of the individual</p>
Pregnancy and maternity	As above	<p>Offer accommodation before baby born, also offer 2 bed to single and couple to support future circumstances. Close partnership working with Family Nurse Partnership and Health & Social Care.</p>

Race	As above	Any placement or offer of housing would be on a person centred approach that fully considers the needs and wants of the individual. Would also seek support and assistance from Safer Communities Team. We will carry out Environmental Risk Assessments where appropriate to minimise the risk of racially motivated crimes. We recognise that significant events such as the Coronavirus pandemic and Brexit may have a disproportionate impact on non-UK citizens, and we have worked in partnership with partners and 3 rd sector organisations to minimise the impact where possible.
Religion or belief	As above	Would consider location of place of worship and any link in with Safer Communities Team in terms of neighbourhood issues re crimes and issues – Environmental Risk Assessment.
Sex	As above	Closure of commissioned 3 rd sector provision which catered for male/female and had some shared rooms. Service standards, same sex officers
Sexual orientation	As above	Staff training/awareness, participation in equalities operational group Support assessments

What impacts might the Access to Housing Pathways have on advancing equality of opportunity?	Positive impact	Negative impact	No impact
Age (young or old)	Young – Support Plans, Housing education programme, Youth Boost and Future Builders programmes commissioned from and/or delivered in partnership with The Rock Trust Old – delayed discharge, assessment processes		
Disability	Accessible properties or those with pre-existing adaptations targeted to applicants with disabilities. Independent Living Pathway provides access to mainstream and supported accommodation for people with physical and learning disabilities.		

Gender reassignment	Quick move to permanent accommodation may be beneficial, avoiding the need to spend time in temporary accommodation.		
Pregnancy and maternity	Offer accommodation before baby born, also offer 2 bed to single and couple to support future circumstances		
Race			Our Common Allocations Policy has been developed in line with Equalities legislation and is designed to be non-discriminatory.
Religion or belief			No impact identified
Sex			No impact identified
Sexual orientation			No impact identified

What impacts might the Access to Housing Pathways have on eliminating unlawful discrimination?	Positive impact	Negative impact	No impact
Age (young or old)			Our Common Allocations Policy has been developed in line with Equalities legislation and is designed to be non-discriminatory. Home First consistently applies these principles.
Disability			As above
Gender reassignment			As above
Pregnancy and maternity			As above
Race			As above
Religion or belief			As above

Sex			As above
Sexual orientation			As above

What impacts might the Access to Housing Pathways have in fostering good relations between people who share a protected characteristic and those who do not?	Positive impact	Negative impact	No impact
Age (young or old)	Social media Homeless Voice Twitter/Facebook Older persons' forum		
Disability	Newsletter Office layout Staff training		
Gender reassignment	Staff training		
Pregnancy and maternity			No impact identified
Race	Translation and interpretation services		
Religion or belief			No impact identified
Sex	Same sex officer Service standards		
Sexual orientation	Equalities group		

EQIA – monitoring

Methods for monitoring policy

Performance Management Framework, Business Management Implementation Plan, National Statistical Data

ARC return & returns to Scottish Government

Feedback from stakeholders, customers and applicants

Complaints and appeals

Forums and feedback/surveys and questionnaires

Who will be involved in monitoring the policy?

Housing Options and Support Team including managers
 Scottish Government
 Senior Management Team
 Customers and stakeholders
 Partner Organisations

Ways in which data will be used to develop the policy.

Data will be used to inform staff training and further policy development.

When will policy be reviewed?

Every 3 years
 Or sooner if there are significant policy or legislative changes

EQIA – embedding EO action matrix

Common Allocations Policy and associated activities.	Method of analysis	Lead officer	Timescale	Measure of success
Common Allocation Policy	<ul style="list-style-type: none"> • Performance management • Quality assurance audits • Feedback from partners and stakeholders • Customer feedback including complaints • SHR return 	Elaine Ritchie	Monthly - ongoing	<p>People in housing need are provided with appropriate and sustainable housing solutions and individual needs are considered.</p> <p>Housing is allocated in a fair and consistent way and in line with the Common Allocation Policy</p>
Homeless procedures	<ul style="list-style-type: none"> • As above • SHR return • SG statistical return • Hub benchmarking 	Elaine Ritchie	Monthly - ongoing	There is a sustained decrease in the levels of homelessness and the duration of homelessness
Housing option procedures	<ul style="list-style-type: none"> • As above • SHR return • SG statistical return • Hub benchmarking 	Elaine Ritchie	Monthly - ongoing	There is an increase of people with housing needs being provided with appropriate and sustainable solutions which prevents their homelessness

System processes	<ul style="list-style-type: none"> • Performance management • Quality assurance audits • Feedback from partners and stakeholders • Customer feedback including complaints 	Elaine Ritchie	Monthly - ongoing	
Service standards	<ul style="list-style-type: none"> • Performance management • Quality assurance audits • Feedback from partners and stakeholders • Customer feedback including complaints 	Elaine Ritchie	Monthly - ongoing	Document/information materials that clearly indicate to people how to access the service, who it supports and what it provides. How particular vulnerabilities are safeguarded