



Hyndburn Borough Council

Customer First Analysis

B with us Allocations Policy

What is it for?

Our corporate values include putting the customer first, providing opportunities for bright futures and narrowing inequality across the Borough.

From 1 April 2011, a new legal duty applies to all public authorities. It covers these protected characteristics:

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- gender;
- sexual orientation; and, for some aspects,
- marriage and civil partnerships.

The duty means that – as previously - we should analyse the effect of existing and new policies and practices on equality. It does not specify how we should do this. However, legal cases on the meaning of the previous general equality duties make it clear that we must carry out the analysis **before making the relevant policy decision**, and include consideration as to whether we can reduce any detrimental impact.

The framework overleaf – our Customer First Analysis - is suggested when making a written record of the analysis. This replaces Equality Impact Assessments.

The Analysis should be **proportionate** to the policy decision being taken. In some cases the written record will be a quick set of bullet points or notes under each heading, to deal with any questions which are relevant (or briefly explain why if they aren't). Others will need to be much more detailed. A meaningful Analysis will help the Council make the best decision or formulate a policy which best meets our customers' needs.

Please return completed Customer First Analyses to Human Resources. I can guide you through the process if this would be helpful.

If you have any suggestions for improving this process, please let me know.

Kirsten Burnett
Head of HR

Customer First Analysis

1. Purpose

- What are you trying to achieve with the policy / service / function?

The B with us allocations policy ensures that social rented housing within the borough is allocated fairly in accordance with legislation (Housing Act 1996 Part VI), recognising housing needs and making the best use of the limited stock available. The policy establishes the priorities in which applicants may be allocated to properties from the housing register. To help and maintain sustainable local communities within the borough

- Who defines and manages it?

Section 166a of Part VI of the Housing Act 1996 requires that every local housing authority in England (whether they have any housing stock or not) to have a scheme for determining the priority of households seeking social housing, as well as a procedure to be followed in the allocation of such housing. To fulfil the requirement for a scheme the Council is a member of B-with-us.

- Who do you intend to benefit from it and how?

All households in the Borough and Pennine Lancashire who are in housing need and/or threatened with homelessness who require alternative accommodation.

- What could prevent people from getting the most out of the policy / service / function?

Inadequate promotion and publicity of the scheme. Inaccurate determination of a households housing need that means they don't receive the appropriate priority under the policy.

- How will you get your customers involved in the analysis and how will you tell people about it?

Customers, service users and the public were consulted on the draft consultation version of the allocations policy during December 2019 and January 2020 and their views taken into account in finalising the policy. 1900 responses were received to this consultation.

2. Evidence

- How will you know if the policy delivers its intended outcome / benefits?

The B with Us Steering Group and Operational Group alongside the Lettings Facilitator (B-with-us) will monitor and oversee the operation of the policy.

- How satisfied are your customers and how do you know?

Customers can challenge the policy or their priority on the housing register through the partnership. There is also the right to pursue judicial review challenges about the policy.

- What existing data do you have on the people that use the service and the wider population?

Annual monitoring reports on the profile of the customers using the service are produced. Additionally ad hoc reports can be produced at any time. Data includes household size and profile, age, gender, ethnicity and economic status,

- What other information would it be useful to have? How could you get this?

The information that can be obtained from the 'application form / process' gives sufficient information.

- Are you breaking down data by equality groups where relevant (such as by gender, age, disability, ethnicity, sexual orientation, marital status, religion and belief, pregnancy and maternity)?

Yes. Annual monitoring reports on the profile of the customers using the service are produced. Additionally ad hoc reports can be produced at any time. Data includes household size and profile, age, gender, ethnicity and economic status,

- Are you using partners, stakeholders, and councillors to get information and feedback?

Feedback is obtained regularly from partners via the B with us Steering and Operational Groups, from stakeholders via multi-agency forums e.g. Homeless in Hyndburn Forum and from Councillors through day to day contact on individual applications and through Council meetings i.e. Regeneration and Housing Panel.

3. Impact

- Are some people benefiting more – or less - than others? If so, why might this be?

Some households may not be eligible for assistance from the service provided. For example restrictions on eligibility determined by statute and through qualification criteria imposed through the policy. Applicants under the age of 18 are not legally allowed to hold a tenancy agreement in the social housing sector.

Home owners will be disqualified from joining B-with-us unless in housing need, and older people are statistically more likely to be home owners.

4. Actions

- If the evidence suggests that the policy / service / function benefits a particular group – or disadvantages another - is there a justifiable reason for this and if so, what is it?

The Housing Act 1996 (Part VI) and the accompanying Allocation of accommodation: guidance for local housing authorities in England (2012) sets out who is eligible for assistance and gives reasonable preference to all vulnerable groups.

- Is it discriminatory in any way?

No legislation and guidance defines eligibility and preference.

- Is there a possible impact in relationships or perceptions between different parts of the community?

Certain groups within the community might perceive that ineligibility for services or a reduced preference is discriminatory although there is no evidence to this effect. The policy has been developed in accordance with legislation and guidance.

- What measures can you put in place to reduce disadvantages?

Highlight to stakeholders and partner organisations the restrictions that certain groups may face in accessing services. Revise the policy further should there be legal challenges that prove discriminatory.

- Do you need to consult further?

Not at this stage.

- Have you identified any potential improvements to customer service?

Providing news and updates about the policy on the B with us website. Upgrading the IT software that improves customer experience and ease of use.

- Who should you tell about the outcomes of this analysis?

Discussions at the B with us Steering and Operational Groups, Hyndburn Borough Council Management Team and Departmental Managers.

- Have you built the actions into your Business Plan with a clear timescale?

Yes

- When will this assessment need to be repeated?

When there is significant amendments to legislation or guidance.

Name: Fiona Goodfellow

Signed:



Service Area: Regeneration and Housing

Dated: 20th February 2020

If applicable, please attach copy of – or website link to - the cabinet report for reference.

Don't forget to return your written record to HR.