



Equality Impact Assessment (EIA)

Document control

Title of activity:	<i>Housing Allocation Scheme 2016</i>
Type of activity:	<i>Policy</i>
Lead officer:	<i>Beatrice Cingtho-Taylor, Housing Demand Service Manager</i>
Approved by:	<i>Neil Stubbings, (Interim) Director of Housing Councillor Damian White, Cabinet member for Housing Services</i>
Date completed:	<i>June 2016</i>
Scheduled date for review:	<i>July 2017</i>

The Corporate Policy & Diversity team requires **5 working days** to provide advice on EIAs.

Did you seek advice from the Corporate Policy & Diversity team?	Yes
Does the EIA contain any confidential or exempt information that would prevent you publishing it on the Council's website?	No

1. Equality Impact Assessment Checklist

The Equality Impact Assessment (EIA) is a tool to ensure that your activity meets the needs of individuals and groups that use your service. It also helps the Council to meet its legal obligation under the [Equality Act 2010 and the Public Sector Equality Duty](#).

Please complete the following checklist to determine whether or not you will need to complete an EIA. Please ensure you keep this section for your audit trail. If you have any questions, please contact the Corporate Policy and Diversity Team at diversity@haverling.gov.uk

About your activity

1	Title of activity	Housing Allocations Scheme
2	Type of activity	Policy
3	Scope of activity	<p>The allocation of social housing is governed by the Housing Act 1996 (as amended by the Homelessness Act 2002). A review of the Housing Allocations Policy has been carried out in accordance with the Localism Act. The Policy sets out the way in which the Council allocates housing. The Council is required to give priority (known as reasonable preference) to certain categories of people and allow applicants to exercise choice in the allocation of social housing.</p> <p>The scheme will be different from previous versions following changes introduced through recent homelessness legislation and case law. New provisions have been introduced through the revised policy with 11 key proposals for change outlined below.</p> <p>If agreed the new Allocations Policy will apply to existing and new applicants seeking social housing from July 2016 and a wide range of stakeholders including Housing Associations and other council departments.</p> <p>The Council has proposed some amendments to the current housing allocations scheme as set out below:</p> <ul style="list-style-type: none"> • Proposal 1: Extension of the residency period criteria to be eligible to join the housing register from 5 years+ • Proposal 2: The qualifying criteria – changing the residency criteria to stipulate continuous period of residency to be able to join the register • Proposal 3: The qualifying criteria – changing the income threshold to join the housing register • Proposal 4: The qualifying criteria – introduction of unacceptable behaviour provision to exclude some households guilty of ASB from joining the register

- Proposal 5: Changes made to identified housing need priority categories
- Proposal 6: Introduction of a reduced housing priority criterion
- Proposal 7: Changes made to the priority banding system
- Proposal 8: Choice based lettings and assisted bidding system
- Proposal 9: Making one offer of a suitable property
- Proposal 10: Sheltered housing eligibility criteria
- Proposal 11: Implementing the policy transitionally

Under the Equality Act 2010, the Council must have due regard to the need to:

- a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- b) Advance equality of opportunity between those with a protected characteristic and those without;
- c) Promote good relations between those with a protected characteristic and those without.

The 'protected characteristics' referred to are: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation. It also covers marriage and civil partnership with regard to eliminating discrimination. This equalities impact assessment looks at the impact of the above proposed changes on the protected groups and suggests appropriate mitigation actions.

Context

Council housing stock in Havering has reduced from approximately 13,000 homes to just over 9,800 in the last 12 years, whilst during this time the waiting list has increased dramatically over the same period.

The current waiting list demand is 2615 with approximately 350 new applications received each month. Waiting list applicants are typically on low incomes and are benefit dependant who find the ability to rent affordable accommodation in the private rented sector extremely difficult. Havering has seen increased migration into the borough from people moving out of expensive inner-London areas in search of somewhere more economically viable to live.

Consequently, the Council is maintaining and administering a growing waiting list of applicants, many of whom are having to wait a considerable length of time before securing settled accommodation or have little prospect of being re-housed.

The revisions aim to;

- Reward people who contribute to the local community to ensure access to an affordable home
- Support local people most in need of housing
- Address the limited housing options available to residents

		<ul style="list-style-type: none"> • Make fair and transparent allocation decisions <p><u>Havering's Demographics</u></p> <ul style="list-style-type: none"> • On 2011 census day, 83% of residents were recorded as White British • As at 2015, White British at 85% & BAME at 15 % (African 8%, Asian 6% & other 1%) • An increase in the Black African population is projected from 3.8% in 2015 to 5.2% of the Havering population in 2030 • 18% of working age people in Havering disclosed that they have a disability or long term illness • Havering is estimated to have one of the highest rates of serious physical disabilities among London boroughs. • 70% of the population in Havering are home owners – one of the highest proportions across London boroughs • All adults in 52% of households (40,722) are working and no adults are working in 16% of households (12,256) • The average gross household income per household in Havering is £44,430 in 2012/13 • The proportion of working age residents in Havering claiming out-of-work benefits (7.6%) is significantly lower than England.
4a	Is the activity new or changing?	<p>This is an existing policy, where changes are being made. The policy will set out how future decisions are made surrounding the eligibility and allocation of social housing.</p> <p>Whilst some aspects within the current allocation scheme will remain, the new scheme will be introducing changes in 11 key areas. The impact of each proposal for change has been analysed within this EIA for all equality groups.</p>
4b	Is the activity likely to have an impact on individuals or groups?	<p>If agreed, the new policy will apply to all new applicants seeking social housing from July 2016 and a wide range of stakeholders including Housing Associations and other council departments.</p> <p>It will also apply to existing applicants on the housing register from January 2017 (allowing for a 6 month transition period)</p>
5	If you answered yes:	<i>Proceed to Section 2.</i>
6	If you answered no:	<i>Not applicable</i>

Completed by:	<i>Beatrice Cingtho-Taylor, Housing Demand Service Manager</i>
Date:	<i>June 2016</i>

Summary of Equalities Impact Assessment of proposed changes to the Housing Allocations Policy 2016

Analysis of the housing register applicants, Havering demographics, census 2011 and Homeless Government 2014/15 (PIE) data has informed this assessment

Proposed change	Equality Strand	Positive	Neutral	Adverse impact		
				Low	Medium	High
1. Extending the residency period from 5 to 6 years	All			√		
2. Changing the residency criteria to a continuous period of residency of up to 6 years	All			√		
3. Changing the income threshold from £27,500 to £36,000	All	√				
4. Implementing unacceptable behaviour as a criteria to exclude people from joining the housing register	All			√		
5. Restricting the housing register to those applicants who can demonstrate a housing need	All			√		
6. Implementing a reduced housing priority criterion for homeless households who have not lived within Havering for at least 6 years	All				√	
7. Changing the housing priority bands	All		√			
8. Continue to operate choice based lettings and assisted bidding.	All		√			
9. Implement one offer only of a suitable property	All			√		
10. Implement sheltered housing eligibility criteria	All	√				
11. Implementing the changes to the policy on a transitional basis of 6 months	All	√				

Summary of potential impact on different equality target groups					Adverse impact		
Protected group	Positive	Negative	Neutral	Reason	Low	Medium	High
Age	√			<i>Older people</i> - the implementation of sheltered eligibility criteria would benefit those aged 55+ as it is a positive opportunity to target assistance to those who can benefit from this supported accommodation.			
	√			<i>Older people</i> - the policy awards Community Contribution Rewards 1 and 2 for housing tenants under-occupying their property. This is largely a positive measure for older households when children have left a property large enough for a family.			
	√			<i>Older volunteers</i> - are also awarded Community Contribution Reward 2 and have priority over those in the Homeseeker Band			
				√ <i>Older people who are not disabled, do not work or volunteer</i> – they are eligible to join the housing register and can be placed in the Homeseeker band			
				√ <i>Young adults</i> - the policy is considered to have a low adverse impact on 26-39 year olds as 40% of them are on the housing register and yet 43% of them would be adversely affected if the 6 year residency option is adopted. However, this percentage increases to 48% and 50% respectively if 7 or 8 year residency options are adopted.	√		
			√ <i>Young adults – care leavers and those ready to move on from supported accommodation</i> benefit from the proposals as they are placed in the Emergency Rehousing Band (highest priority). This should mean that they are quickly provided with accommodation and valuable social services resources released to support other young people.				

	√		√	<p><i>Young adults living with parents or in private rented housing</i> – such applicants are not awarded housing priority because they are considered as adequately housed. However, where this is not the case and to mitigate the negative effect, the Council will assist through the homelessness route if they can no longer remain in the accommodation. If they have a housing need, they will be eligible to join the housing register.</p> <p><i>Children</i> – local children in care on fostering or adoption lists will be positively affected by the proposals as applicants who want to foster or be adoptive parents will qualify for Community Contribution Reward 2.</p>			
Disability	√			<p><i>Disabled households under retiring age and unable to participate in work related activities</i> - would qualify for Community contribution Reward 2 which is a high priority. <i>People with mobility needs</i> - will be provided with a clear guide by use of symbols when advertising accessible properties to help them make an appropriate bid for a suitable property.</p> <p><i>People with other disability, e.g. mental health, sensory and learning difficulties</i> – although they are awarded medical priority, the specific disability is not recorded under the current system. This can result in unintended negative consequences as it is difficult to monitor the effectiveness of the service provided to this group e.g. in relation to offer of properties.</p> <p><i>People with severe disability/medical needs</i> – who urgently need to move are placed in the Emergency Rehousing Band (highest priority)</p>	√		

Gender	√			<p><i>Women</i> - make up 77% of the housing register. This is because women are likely to be the main carers and therefore fall into a reasonable preference category (housing need). Based on current data, this is likely to continue.</p> <p><i>Married, civil partners and co-habiting couples, same sex couples, brothers and sisters</i> - who wish to live together, can make applications.</p> <p>Where they have been living together for 12 months or more, they can make joint applications and be made joint tenancies if they so wish at the point of offer of accommodation.</p>			
Gender reassignment			√	<p><i>Applicants who have undergone gender reassignment</i> – can apply to join the housing register and will qualify as long as they meet the eligibility, qualification and housing need criterion.</p>	√		
Marriage and civil partnership	√			<p>Married, civil partners, co-habiting couples and same sex couples, who wish to live together can make applications.</p> <p>Where they have been living together for 12 months or more, they can make joint applications and be made joint tenancies if they so wish at the point of offer of accommodation</p>	√		
Pregnancy and maternity	√			<p><i>Applicants who are on maternity or paternity leave</i> - are considered to be in employment or volunteering and therefore qualify for Community contribution Reward 1 or 2. The time away while in receipt of statutory maternity pay is not treated as a break.</p>	√		
Race/Ethnicity				<p>There is a close correlation between the percentage of the White population in Havering (83%) and the numbers on the housing register (81%) homeless applications (72%).</p>			

				<p>The correlation is similar to the BME – population of 17% and the numbers on the housing register (14%) and homeless applications (25%) – it is difficult to say any one group is disproportionately/disadvantaged.</p> <p>However, the data shows a slight over-representation of BME amongst homeless households.</p>	√		
Religion or belief			√	No data collected to assess the impact. However, overall the policy is considered neutral			
Sexual orientation			√	No data collected to assess the impact. However, overall the policy is considered neutral			
Socio-economic groups	√			<p>The proposal is to increase the income threshold for joining the housing register from £27,500 to £36,000 which is the income considered sufficient to afford to privately rent in the borough at current average market rents. Therefore households on low income estimated at approximately 100 a year will benefit from this change.</p> <p>The community contribution reward priorities recognises people who work (including part-time), volunteer, want to foster/adopt, carers, ex-service personnel and those wanting to downsize to smaller properties so that another applicant in need of larger accommodation can have their home. This has been developed in order to benefit applicants across the various groups in the borough who play an active part in making their neighbourhood strong, stable and healthy.</p> <p><i>Working applicants</i> – who lose their job through no fault of their own, are given an equal opportunity to apply for the Community Contribution reward as they are allowed to have a 6 month break.</p>			

Proposed change 1 & 2	Explanation																										
<p>Extending the residency period from 5 to 6 years and implement a continuous period</p>	<p>The Localism Act allows local authorities to determine who may join their register. Statutory guidance on social housing allocations strongly encourages all local authorities to adopt a minimum 2 year residency test as part of their qualification criteria.</p> <p>In accordance with the underpinning philosophy of the Localism Act Members have embraced the idea of a residency qualification to join the Housing Register. A residential qualification demonstrates a positive commitment to the borough and contribution to the life of the local community in terms of settling in the area.</p> <p>This is particularly necessary given that the rental market in Havering is an attractive and affordable option for those seeking to rent privately in East London, who can at present then apply for social housing, and attract priority if they are over-crowded. The specific impact of Welfare Reform, in combination with the current dysfunctional housing market in London, is significant in relation to inducing migration of low income households from central and inner London to outer east London boroughs and beyond.</p> <p>The Council's Housing Strategy 2014 / 17 support the provision of housing for local people. The review of the Council's Housing Allocations Policy is an opportunity to help deliver the objective within the Housing Strategy. Whilst delivering these outcomes it is important to analyse the equality profile of households who will potentially be affected by the proposed changes and assess this impact using the data available.</p>																										
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<p>* Total households on the housing register is 2615</p>																											
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3. Age group	Housing register applicants	%
17-25 years	645	24%
26-39 years	1,070	40%
40-54 years	530	21%
55-59 years	110	4%
60-79 years	235	9%
80+ years	61	2%
	2,651	

4. Tenure	Housing register applicants	%	Havinging population
Living with family/friends or renting privately	1,270	49%	10%
Private Sector Leasing	440	51%	19%
Social housing tenants	905		
Owner occupiers	0		71%
Total	2,615		

5. Rehousing Band	Housing register applicants
Community Contribution Reward	636
Emergency Rehousing	194
Homeseeker	1,599
Private Sector Leased accommodation	186
Total	2,615

6. Bedroom size	Households
1 bedroom	992
2 bedrooms	1065

			3 bedrooms	531																																																								
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Options considered	All	Low	<p>For implementing 6 year option.</p> <p>Havering is one of the most ethnically homogenous and least diverse boroughs in London with 83% of its population constituted by White British households, higher than both the London and England average. While the prevalence of minority ethnic groups is very small compared to other London Boroughs, Havering has seen the highest percentage increase between the 2001 Census and 2011 Census as the ethnic minority population has more than doubled from 8% in 2001 to 17% in 2011.</p> <p>Ethnicity</p> <table border="1"> <thead> <tr> <th></th> <th>Impact of 6 year option</th> <th>Impact of 7 year option</th> <th>Impact of 8 year option</th> </tr> </thead> <tbody> <tr> <td>White British</td> <td>199 (69%)</td> <td>327 (69%)</td> <td>390 (69%)</td> </tr> <tr> <td>BME</td> <td>57 (20%)</td> <td>98 (21%)</td> <td>121 (21%)</td> </tr> <tr> <td>Mixed Heritage</td> <td>27 (9%)</td> <td>31 (6%)</td> <td>33 (6%)</td> </tr> <tr> <td>No response</td> <td>7 (2%)</td> <td>19 (4%)</td> <td>23 (4%)</td> </tr> <tr> <td>Total</td> <td>290 (11% of total register)</td> <td>475 (18% of the total register)</td> <td>567 (22% of the total register)</td> </tr> </tbody> </table> <p>Age</p> <table border="1"> <thead> <tr> <th></th> <th>Impact of 6 year option</th> <th>Impact of 7 year option</th> <th>Impact of 8 year option</th> </tr> </thead> <tbody> <tr> <td>17-25 years</td> <td>97 (33%)</td> <td>132 (28%)</td> <td>144 (25%)</td> </tr> <tr> <td>26-39 years</td> <td>124 (43%)</td> <td>227 (48%)</td> <td>283 (50%)</td> </tr> <tr> <td>40-54 years</td> <td>53 (18%)</td> <td>89 (19%)</td> <td>104 (18%)</td> </tr> <tr> <td>55-64 years</td> <td>10 (3%)</td> <td>15 (3%)</td> <td>17 (3%)</td> </tr> <tr> <td>65-79 years</td> <td>5 (2%)</td> <td>10 (2%)</td> <td>16 (3%)</td> </tr> <tr> <td>80+ years</td> <td>1</td> <td>2</td> <td>3</td> </tr> <tr> <td>Total</td> <td>290 (11% of total register)</td> <td>475 (18% of the total register)</td> <td>567 (22% of the total register)</td> </tr> </tbody> </table>			Impact of 6 year option	Impact of 7 year option	Impact of 8 year option	White British	199 (69%)	327 (69%)	390 (69%)	BME	57 (20%)	98 (21%)	121 (21%)	Mixed Heritage	27 (9%)	31 (6%)	33 (6%)	No response	7 (2%)	19 (4%)	23 (4%)	Total	290 (11% of total register)	475 (18% of the total register)	567 (22% of the total register)		Impact of 6 year option	Impact of 7 year option	Impact of 8 year option	17-25 years	97 (33%)	132 (28%)	144 (25%)	26-39 years	124 (43%)	227 (48%)	283 (50%)	40-54 years	53 (18%)	89 (19%)	104 (18%)	55-64 years	10 (3%)	15 (3%)	17 (3%)	65-79 years	5 (2%)	10 (2%)	16 (3%)	80+ years	1	2	3	Total	290 (11% of total register)	475 (18% of the total register)	567 (22% of the total register)
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The 7 and 8 year option has a disproportionate impact on those aged 26-39 years which may be due to increased migration into the borough from younger people moving into the borough.

Gender

	Impact of 6 year option	Impact of 7 year option	Impact of 8 year option
Female	233 (80%)	365 (77%)	434 (76%)
Joint	21 (7%)	46 (10%)	57 (10%)
Male	36 (12%)	64 (13%)	76 (13%)
Total	290 (11% of total register)	475 (18% of the total register)	567 (22% of the total register)

Of the 236,100 borough population, 52% are female and 48% are male. Compared to population statistics, females are generally over-represented on the Council's housing register as they tend to be the main carers and therefore considered to be in housing need.

Summary: To focus scarce social housing resources on those with the greatest connection to Havering.

Applicants on the housing register will be equally disadvantaged whether the 6, 7 or 8 year residency option is adopted as there is no significant difference in the proportions of people from white, BAME or mixed heritage in comparison to havering population make up. However, it is notable that more people from mixed heritage are adversely affected under the 6 year residency option than is the case with the 7 and 8 year options.

In addition, there is no data to quantify the number of households who may be affected by proposal 2 where the residency period is being changed to a continuous period as this level of detail is currently not captured. Therefore, if the 2 proposals are taken together (extension of residency period and this being a continuous period) it is likely to have an adverse impact on existing applicants and those who wish to apply to the Council's housing register given the rapid demographic changes. This is can be assumed from the overall analysis which shows that extending the residency criteria to 6 years would adversely affect 11% of the current housing register households whilst extending it to 7 or 8 years would adversely affect more households - 18% and 22% of current housing register households respectively.

40% of applicants on the housing register are aged 26-39 years. In proportion, 43% of them would be adversely affected if the 6 year residency option is adopted. However, this percentage increases to 48% and 50% respectively if 7 or 8 year options are adopted.

Given the aims of the policy change is to encourage individuals to make a home for themselves and stay in the borough, the 6 year residency option allows this criterion to be met whilst having a proportionate impact on all households.

Mitigation: The Statutory Guidance expressly highlights the need for local authorities to take proper account of special circumstances which the policy allows for. It is important to note that this would include the need to protect people who are moving into the district to escape violence and would also include homeless families and care leavers whom the local authority may have placed outside of their district.

There are also sound policy reasons not to apply a residency test to existing Council tenants seeking to move between authorities or wishing to downsize and they will not be subject to the proposed residency qualification. All applicants have a statutory right to seek a review of their housing application if they are dissatisfied with the Council's decision not to accept them on to the housing register or where they have submitted fresh evidence.

Given migration patterns within the capital, it is perhaps to be expected that people from black, mixed and white-other backgrounds will be over-represented among shorter term residents. The 6 month transitional period will ensure that those affected can plan and consider alternative housing options

Action plan:

Monitor number of applications refused by ethnicity and age.

Proposed change 3	Explanation					
Changing the income threshold from £27,500 to £36,000	Under the current policy, an applicant cannot join the housing register if the household income is £27,500 or more because of the severe shortage of social and affordable rented properties in the borough.					
	The change is to increase this level to £36,000 which is the income needed to afford to privately rent in the borough at current average market rents. It is assumed that if you cannot afford to rent a private sector property, you cannot afford to buy, which is why we have used the private rental as the measure.					
	2014/2015	Total	Number of applications accepted – earning < than £27,500	Percentage accepted	Number of applications rejected – earning > than £27,500	Percentage rejected
		4189	1204	29%	306	7%
	Equality strand	Impact- Positive/Neutral Adverse Impact L/M/H	Explanation			
	All	Positive	This proposal will benefit approximately 100 additional households a year whose income threshold is above £27,500 but less than the proposed £36,000			

			to join the housing register based on previous applications.
<p>Summary: This change will assist those on low incomes to access social housing and thus reinforce the 'work pays' message. Overall the analysis shows that applications from approximately 300 households are rejected annually due to the level of household income. Out of this, approximately 100 additional households a year whose income threshold is above £27,500 but less than the proposed £36,000 will benefit by joining the housing register.</p>			
<p>Mitigation: None</p>			
<p>Action plan: Monitor the number of applications rejected due to high income levels in order to inform future policy changes.</p>			
Proposed change 4	Explanation		
Implementing unacceptable behaviour as a criteria to exclude people from joining the housing register	<p>Under the current policy, an applicant found guilty of unacceptable behaviour can join the housing register but an offer of accommodation may be withdrawn once they are successful in bidding for a property.</p> <p>The proposal is to exclude such applicants from joining the housing register altogether as such behaviour would prevent the applicant from being considered a suitable tenant. Examples of the behaviours includes anti-social behaviour; obtaining a tenancy by deception; sub-letting social housing; unspent housing or welfare benefit convictions; providing false or misleading information and threat or actual violence against neighbours, council staff, members and Council contractors.</p>		
	Equality strand	Impact- Positive/Neutral Adverse Impact L/M/H	Explanation
	All		This data is not collected and therefore not available.
<p>Summary: No data is collected to assess the impact</p>			
<p>Mitigation: N/A</p>			
<p>Action plan: Record applications rejected due to unacceptable behaviour in order to monitor impact or to inform future policy changes</p>			

Proposed change 5	Explanation																	
Restricting the housing register to those applicants who can demonstrate a housing need	<p>Under the current policy, council or private sector leased tenants who have been in their accommodation for 5 years but are not in housing need can qualify to be moved to alternative accommodation.</p> <p>The proposal is to only allow people who can demonstrate they have a housing need to join the housing register as there is limited supply of social housing. Examples of housing need include:</p> <ul style="list-style-type: none"> • Homeless people, • People who need to move on welfare or medical grounds where their situation is being made worse by their current housing, • People living in unsanitary, unsatisfactory or overcrowded housing, and • People who would face hardship unless they move to another area. 																	
	Equality strand	<p>Impact- Positive/Neutral Adverse Impact L/M/H</p> <p>Explanation</p> <p>This proposal will affect 353 existing tenants who are currently on the housing register because they have been in their current accommodation for 5 years but do not have any other housing need to move.</p> <p>It is expected that this will affect approximately 100 new applicants based on the 122 applications received during 2015/16 from tenants wanting to move to alternative accommodation of similar size. It is mainly tenants wanting to move - from flats to houses; high rise to lower floor properties or other areas.</p> <p>New applications from tenants during 2014/15</p> <table border="1" data-bbox="1021 991 1756 1070"> <thead> <tr> <th>Year</th> <th>Numbers</th> </tr> </thead> <tbody> <tr> <td>2015/16</td> <td>122</td> </tr> </tbody> </table> <p>Existing applicants on the housing register due to 5 year tenancies</p> <table border="1" data-bbox="1021 1142 1639 1374"> <thead> <tr> <th>Ethnicity</th> <th>Numbers</th> </tr> </thead> <tbody> <tr> <td>White British</td> <td>323 (92%)</td> </tr> <tr> <td>BME</td> <td>16 (5%)</td> </tr> <tr> <td>Mixed Heritage</td> <td>5 (1%)</td> </tr> <tr> <td>No response</td> <td>9 (2%)</td> </tr> <tr> <td>Total</td> <td>353</td> </tr> </tbody> </table>	Year	Numbers	2015/16	122	Ethnicity	Numbers	White British	323 (92%)	BME	16 (5%)	Mixed Heritage	5 (1%)	No response	9 (2%)	Total	353
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			Bed Size breakdown	
			Bedrooms	Numbers
			1	150 (42%)
			2	149 (42%)
			3	52 (15%)
			4	2 (1%)
			Total	353
	All			

Summary: This change will ensure that scarce social housing resources go to those with the greatest need. 92% of white households affected (81% on the housing register) and 6% of BAME households affected by the change (14% on the housing register).

Given migration patterns within the capital, it is perhaps to be expected that people from black and mixed backgrounds will not meet the 5 year tenancy only criteria due to their short term residency in the borough and therefore there would be fewer successful applications from this group.

Mitigation: All applicants have a statutory right to seek a review of their housing application if they are dissatisfied with the Council's decision to remove them from the housing register or where they have submitted fresh evidence.

In addition, the affected applicants will have a 6 month transition period to secure alternative accommodation before they are removed from the housing register.

Action plan: Clearly communicate about the change to enable applicants to understand the impact and that they have the right of a review of the decision to remove them from the housing register or can submit fresh evidence if there is a change in their circumstances.

Proposed change 6	Explanation
Implementing a reduced housing priority criterion for homeless households who have not lived within Havering for at least 6 years	<p>Implementation of a new 'reduced priority' criterion to the 'banding' system which will be awarded to accepted homeless households who do not meet the Havering residency period.</p> <p>This is because as a result of the homelessness legislation and the Housing Act, homeless households have a reasonable preference whether they comply with the residency qualification criteria or not. In addition, the local connection rules under the homelessness legislation is different from the residency criteria that a local authority can apply under the Allocation Scheme (e.g. under homelessness legislation, it is 6 out of the last 12 months or a family association). This proposal ensures that we continue to comply with the requirements placed on us by law.</p>

	Equality strand	Impact- Positive/Neutral Adverse Impact L/M/H	<p>Explanation Reduced priority is likely to be awarded to approximately 214 of the temporary accommodation occupants currently on the housing register. <i>Please note that there are a total of 670 temporary accommodation occupants and not all are currently on the housing register.</i></p> <p>.</p> <p>Homeless applications during 2014/15</p> <table border="1"> <thead> <tr> <th data-bbox="1016 427 1301 539">Ethnicity</th> <th data-bbox="1301 427 1677 539">Homeless applications made during 2014/15</th> <th data-bbox="1677 427 2074 539">Impact of 6 year option – homeless applicants on the housing register</th> </tr> </thead> <tbody> <tr> <td data-bbox="1016 539 1301 579">White British</td> <td data-bbox="1301 539 1677 579">794 (72%)</td> <td data-bbox="1677 539 2074 579">131 (61%)</td> </tr> <tr> <td data-bbox="1016 579 1301 619">BME</td> <td data-bbox="1301 579 1677 619">211 (19%)</td> <td data-bbox="1677 579 2074 619">56 (26%)</td> </tr> <tr> <td data-bbox="1016 619 1301 659">Mixed Heritage</td> <td data-bbox="1301 619 1677 659">63 (6%)</td> <td data-bbox="1677 619 2074 659">19 (9%)</td> </tr> <tr> <td data-bbox="1016 659 1301 699">Other</td> <td data-bbox="1301 659 1677 699">3</td> <td data-bbox="1677 659 2074 699">-</td> </tr> <tr> <td data-bbox="1016 699 1301 738">No response</td> <td data-bbox="1301 699 1677 738">32 (3%)</td> <td data-bbox="1677 699 2074 738">8 (4%)</td> </tr> <tr> <td data-bbox="1016 738 1301 778">Total</td> <td data-bbox="1301 738 1677 778">1103</td> <td data-bbox="1677 738 2074 778">214</td> </tr> </tbody> </table> <p>For implementing 6 year option.</p> <table border="1"> <thead> <tr> <th data-bbox="1016 847 1263 922">Age</th> <th data-bbox="1263 847 1677 922">Homeless applications accepted during 2014/15</th> <th data-bbox="1677 847 2092 922">Homeless applicants on the housing register</th> </tr> </thead> <tbody> <tr> <td data-bbox="1016 922 1263 962">16-25 years</td> <td data-bbox="1263 922 1677 962">117 (29%)</td> <td data-bbox="1677 922 2092 962">55 (26%)</td> </tr> <tr> <td data-bbox="1016 962 1263 1002">25-44 years</td> <td data-bbox="1263 962 1677 1002">216 (54%)</td> <td data-bbox="1677 962 2092 1002">108 (50%)</td> </tr> <tr> <td data-bbox="1016 1002 1263 1042">45-59 years</td> <td data-bbox="1263 1002 1677 1042">45 (11%)</td> <td data-bbox="1677 1002 2092 1042">45 (21%)</td> </tr> <tr> <td data-bbox="1016 1042 1263 1082">60-64 years</td> <td data-bbox="1263 1042 1677 1082">7 (3%)</td> <td data-bbox="1677 1042 2092 1082">5 (2%)</td> </tr> <tr> <td data-bbox="1016 1082 1263 1121">65-74 years</td> <td data-bbox="1263 1082 1677 1121">8 (2%)</td> <td data-bbox="1677 1082 2092 1121">1</td> </tr> <tr> <td data-bbox="1016 1121 1263 1161">75+</td> <td data-bbox="1263 1121 1677 1161">5 (1%)</td> <td data-bbox="1677 1121 2092 1161"></td> </tr> <tr> <td data-bbox="1016 1161 1263 1201">Total</td> <td data-bbox="1263 1161 1677 1201">398</td> <td data-bbox="1677 1161 2092 1201">214</td> </tr> </tbody> </table> <p>Accepted homeless applicants during 2014/15</p> <table border="1"> <thead> <tr> <th data-bbox="1016 1267 1263 1342">Gender</th> <th data-bbox="1263 1267 1677 1342">Homeless applications accepted during 2014/15</th> <th data-bbox="1677 1267 2092 1342">Homeless applicants on the housing register</th> </tr> </thead> <tbody> <tr> <td data-bbox="1016 1342 1263 1382">Female</td> <td data-bbox="1263 1342 1677 1382">276 (69%)</td> <td data-bbox="1677 1342 2092 1382">191 (89%)</td> </tr> <tr> <td data-bbox="1016 1382 1263 1422">Male</td> <td data-bbox="1263 1382 1677 1422">35 (9%)</td> <td data-bbox="1677 1382 2092 1422">17 (8%)</td> </tr> </tbody> </table>	Ethnicity	Homeless applications made during 2014/15	Impact of 6 year option – homeless applicants on the housing register	White British	794 (72%)	131 (61%)	BME	211 (19%)	56 (26%)	Mixed Heritage	63 (6%)	19 (9%)	Other	3	-	No response	32 (3%)	8 (4%)	Total	1103	214	Age	Homeless applications accepted during 2014/15	Homeless applicants on the housing register	16-25 years	117 (29%)	55 (26%)	25-44 years	216 (54%)	108 (50%)	45-59 years	45 (11%)	45 (21%)	60-64 years	7 (3%)	5 (2%)	65-74 years	8 (2%)	1	75+	5 (1%)		Total	398	214	Gender	Homeless applications accepted during 2014/15	Homeless applicants on the housing register	Female	276 (69%)	191 (89%)	Male	35 (9%)	17 (8%)
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			Couple	75 (19%)	6 (3%)
			Other	12 (3%)	0
			Total	398	214
	All				

Summary: There is a disproportionate impact on those applying as homeless from BME & mixed heritage as well as those aged 16-44 years who will be awarded reduced priority because they do not meet the 6 year residency criteria which may be due to recent migration into the borough from BME/Mixed heritage and younger people moving into the borough.

Mitigation: Provide suitable and long term temporary accommodation that is affordable to address their housing need.

Action plan: Provide advice and assistance to enable these households to secure alternative settled accommodation in the private rented sector. This can include help with rent deposits where appropriate.

Proposed change 7	Explanation				
Changing the housing priority bands	Under the current policy, there are four priority bands with a number of different qualifying conditions which are complicated and can be difficult to understand and administer.				
	The proposal is to introduce five simple priority bands to make it easier to determine, award appropriate housing need priority and explain to residents the rationale for the decision				
	Equality strand	Impact- Positive/Neutral Adverse Impact L/M/H	Explanation		
			Proposed Band	Households based on current Priority Band	Estimated households based on proposed Priority Band
			Emergency Rehousing Band (ER)	194 (8%)	115 (4%)
			Community Contribution Reward 1 Band (CCR1)	636 (24%)	483 (18%)
			Community Contribution Reward 2 Band (CCR2)		207 (8%)
			Home-seeker Band (H)	1785 (includes 186 in PSL Band – 68%)	1596 (61%)
			Reduced Priority Band (RP)		214 (9%)
			Total	2615	2615

			Age awarded community contribution reward	Total	
			60-79 years	78	
			80+ years	12	
				90	

All					
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Summary: The proportion of estimated households in each priority band under the new proposal shows that there will be fewer households in the highest 'emergency band' (8% to 4%). There is no remarkable difference between those previously placed in the community contribution and Homeseeker bands compared to the new proposed priority 'bands'

There are also 288 residents aged 60-80+ years on the housing register. Of which 90(31%) already qualify for community contribution reward priority. This will continue under the revised policy.

Mitigation: Neutral impact

Action plan: None

Proposed change 8	Explanation		
Continuing to operate choice based lettings and assisted bidding	It is proposed to continue to operate a Choice Based Lettings system by advertising properties through East London Lettings Company, In order to improve transparency of the system (a) the circumstances under which assisted bids (direct offers) can be made will be limited and (b) only properties available for residents to place bids on will be advertised.		
	Equality strand	Impact- Positive/Neutral Adverse Impact L/M/H	Explanation
			Under the current policy, all applicants awarded the Emergency Rehousing Band (ER) are made direct offers of accommodation (assisted bids). This results in the majority of the refusals as shown below. For example, downsizers tend to want a house with a garden; others may have been mismatched due to change in the applicant's circumstances at the point of offer.

Year	Assisted Bid/ Direct Offer	Resident Bidding	Total Council Lets
2013/14	108 (15%)	634 (85%)	742
2014/15	273 (35%)	503 (65%)	776
2015/16	225 (34%)	430 (66%)	655

Bidding option used in 2015/16	Total Bids
Telephone	33760 (56%)
Web	25680 (43%)
ELLC Call Centre Staff	429 (0.7%)
Auto-bid	176 (0.2%)
SMS	85 (0.1%)
CTI – Software for deaf or partially sighted people	11
Total	60141

Refusals by applicant in the Emergency Rehousing Band

Rehousing reason	Number of refusals
Downsizing	29
Medical	20
Move on from supported/hostel	23
Welfare and hardship	23
Other	6
Total	101

All

Summary: The change will enable most of the applicants to bid for available properties. The analysis shows that majority of the applicants can and do participate in bidding which will continue. It is also expected that at least 70% of all properties will be made available for residents to place bids. The remaining properties will be directly allocated but still reported in the feedback sheet which will improve transparency of the process.

This coupled with the one offer policy will reduce the level of refusal and result in improve turnaround time in letting properties as well as ensuring that it is let to the most suitable applicant.

Mitigation: N/A

Action plan: Monitor bidding activity to ensure that the service is accessible to applicants

Proposed change 9

Explanation

Implementing one offer of a suitable property

Under the current policy, there are different numbers of offers and penalties that can be made to households on the housing register depending on the 'priority band' a household is awarded.

The proposal is to implement a one offer only policy.

Equality strand

Impact- Positive/Neutral Adverse Impact L/M/H

Explanation

Total households on the housing register is 2615 and 504 (19%) have never placed a bid for a property.

Year	Total applicants who have placed a bid	Total applicants who have never placed a bid
2014/15	256	
2015/16	1531	504

Refusals on council Properties 2015/16

Priority Band	Total Refusals
Emergency Rehousing (ER)	101
Community Contribution Reward (CCR)	65
Home-seeker (H)	75
Total	241

655 properties were available to let and there were 241 refusals, which means 37% of the properties offered were refused which causes a delay in the letting of the properties. In addition, supply is not keeping up with demand and it is difficult to procure affordable private sector accommodation meaning the council has to be realistic about the number of offers it can reasonable give.

Analysis of data shows that people awarded Emergency Rehousing Band with an urgent need to move are more likely to refuse an offer of accommodation than all households – 15%. For example, downsizers tend to want a house with a garden

Refusals by applicant in the Emergency Rehousing Band

Rehousing reason	Number of refusals
Downsizing	29
Medical	20
Move on from supported/hostel	23
Welfare and hardship	23
Other	6
Total	101

All

Summary: As most of the refusals are by applicants in the Emergency Rehousing Band, it is likely that they are less satisfied with the offer if they feel that they have been forced into a property that they feel does not meet their needs. This is because under the current policy they are made direct offers of accommodation (assisted bids), therefore do not choose a property themselves. The proposed change to make one offer only is complemented by the change for most applicants including those on the Emergency Rehousing Band being able to place bids on properties of their choice which should address the refusal rate and improve the service for residents.

Mitigation: The Council is reviewing the demand and supply of housing for older people in order to implement a refurbishment plan to ensure schemes meet older people’s future housing needs which will also reduce the level of refusals.

Applicants with an assessed need for level access accommodation will be offered level access accommodation.

As most of the applicants including those on the Emergency Rehousing Band will be able to choose and place bids on properties that they are interested in, it will be important to clearly communicate the suitability of a property to enable applicants to understand the consequences of refusing a property if it meets their assessed needs. Applicants will have the right of a review of their offer if they feel that it is unsuitable and if

the review finds that an offer was not suitable will be given a second offer.

Action plan: Regular analysis of the applicants removed from the housing register because they refused an offer will be needed to ensure that specific groups are not being adversely affected.

Regular analysis of the applicants who are successful in a review of offer will be needed to ensure that specific groups are not being adversely affected.

Regular updates on the Council's website on housing supply and demand will reinforce the message to housing applicants that it is reasonable for one offer to be made.

Proposed change 10	Explanation			
Implementing sheltered housing eligibility criteria	Currently, there is no eligibility criterion for sheltered housing.			
	It is proposed to implement a criterion that will ensure that the lifestyle of those residing in sheltered accommodation is compatible with the scheme.			
	Equality strand	Impact- Positive/Neutral Adverse Impact L/M/H	Explanation	
			Priority Band	Age 55-59
			Age 60-79	Age 80+
			Total	
			Emergency Rehousing	18
			26	17
			61	
			Community Contribution Reward	32
			78	12
			122	
			Home-seeker	55
			2	32
			207	5
			Private Sector Leased Accommodation	3
			0	5
			5	
			Total	107
			227	61
			395	
All				

Summary: 61 households (15% of those who could be eligible for sheltered housing) are placed in the emergency rehousing band which means that they have an urgent need to move. They could benefit from the option of being assessed for sheltered accommodation which could result in a speedy move to suitable alternative accommodation.

Mitigation: N/A

Action plan: None

Proposed change 11	Explanation		
Implementing the changes to the policy on a transitional basis of 6 months	As the proposed changes will mean that some applicants on the housing register will no longer qualify, resident views were sought on the implementation options. 62% wanted a transition period. In addition, there was a split on the transition timescale with 39% opting for a year and 26% opting for six months.		
	Equality strand	Impact- Positive/Neutral Adverse Impact L/M/H	Explanation
	All	Positive	

Summary: This will mean that existing applicants who will no longer qualify due to residency or housing need criteria.

Mitigation: They will be given a transition period of 6 months from the date of implementation of the new scheme. They will therefore remain on the register with their current priority and continue to bid for alternative accommodation. If after 6 months, they have not moved, their application will be closed/removed from the housing register. Based on June Cabinet decision, if approved, the new scheme will be implemented in July 2016 and the transitional period will end in January 2017.

Action plan: Review all those on the housing register and write to them advising them of the change and what effect it has on them, amend current literature in relation to applying and bidding for properties and the online application form.

Action plan

Proposed change	Action	Timescale	Lead Officer
1. Extending the residency period from 5 to 6 years	Monitor number of applications refused by ethnicity and age.	Sept 2016	Housing Register Manager
2. Changing the residency criteria to a continuous period of residency of up to 6 years			
3. Changing the income threshold from £27,500 to £36,000	Monitor the number of applications rejected due to high income levels in order to inform future policy changes.	Sept 2016	Housing Register Manager
4. Implementing unacceptable behaviour as a criteria to exclude people from joining the housing register	Record applications rejected due to unacceptable behaviour in order to monitor impact or to inform future policy changes	Dec 2016	Housing Register Manager
5. Restricting the housing register to those applicants who can demonstrate a housing need	Clearly communicate about the change to enable applicants to understand the impact and that they have the right of a review of the decision to remove them from the housing register or can submit fresh evidence if there is a change in their circumstances.	Aug 2016	Housing Register Manager
6. Implementing a reduced housing priority criterion for homeless households who have not lived within Havering for at least 6 years	Provide advice and assistance to enable these households to secure alternative settled accommodation in the private rented sector. This can include help with rent deposits where appropriate.	Dec 2016	Housing Advice & Homelessness Manager
7. Continue to operate choice based lettings and assisted bidding.	Monitor bidding activity to ensure that the service is accessible to applicants	Dec 2016	Rehousing Manager
8. Implement one offer only of a suitable property	Regular analysis of the applicants removed from the housing register because they refused an offer will be needed to ensure that specific groups are not being adversely affected.	Sept 2016	Rehousing Manager
	Regular analysis of the applicants who are successful in a review of offer will be needed to ensure that specific groups are not being adversely affected.	Sept 2016	
	Regular updates on the Council's website on housing supply and demand will reinforce the message to housing applicants that it is reasonable for one offer to be made.	Mar 2017	
9. Implementing the changes to the policy on a transitional basis of 6 months	Review all those on the housing register and write to them advising them of the change and what effect it has on them, amend current literature in relation to applying and bidding for properties and the online application form.	Aug 2016	Housing Register Manager