

## Equality Impact Assessment (EIA)

### Document control

<b>Title of activity:</b>	<i>Homeless Placements Policy 2016</i>
<b>Type of activity:</b>	<i>Policy</i>
<b>Lead officer:</b>	<i>Gemma Meeks, Housing Strategy &amp; New Initiatives Officer</i>
<b>Approved by:</b>	<i>Neil Stubbings, (Interim) Director of Housing Councillor Damian White, Cabinet member for Housing Services</i>
<b>Date completed:</b>	<i>June 2016</i>
<b>Scheduled date for review:</b>	<i>June 2017</i>

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

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

# 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@havering.gov.uk](mailto:diversity@havering.gov.uk)

## About your activity

1	<b>Title of activity</b>	<i>Homeless Placements Policy</i>
2	<b>Type of activity</b>	<i>Policy</i>
3	<b>Scope of activity</b>	<p>This EIA concerns the approval of the Havering Council's Homeless Placements policy</p> <p>The policy relates to the placement of homeless households into interim, long-term and settled accommodation pursuant to Section 188 and Section 193 of the Housing Act 1996. The policy outlines the Council's responsibility under homelessness legislation to provide suitable accommodation for people who approach the service as homeless, eligible, in priority need and as requiring interim (emergency) or longer term temporary accommodation or settled accommodation solutions.</p> <p>The policy sets out how the Council intends to achieve an on-going commitment to procure sufficient numbers of accommodation both inside and outside the borough at affordable levels for its homeless demand, in a competitive and rapidly changing housing market.</p> <p>The overarching aim of the policy is to <i>'acquire sufficient supply of interim, temporary and settled accommodation both inside and outside of the borough to ensure the housing needs of homeless people are met. The Council will aim to make transparent, fair and justifiable allocation decisions based on principles of suitability and ensure those with the highest needs are prioritised in procedure for available accommodation'</i></p> <p>This policy also takes into account all relevant statutory legislation and requirements on local authorities in respect of the suitability of accommodation, including The Housing Act 1996, The Homelessness (Suitability of Accommodation) (England) Order 2012 and the Homelessness Code of Guidance 2006.</p>

4a	Is the activity new or changing ?	<p>This is a new policy that sets out the framework for future decisions on how temporary and settled accommodation in the private sector will be procured and allocated in Havering and outside of the borough.</p> <p>Whilst some of the key policies within the Homeless Placements policy are new (such as making privately rented accommodation to discharge homelessness duties) other operations such as suitability considerations for placements and out of borough acquisitions are currently in place on an informal voluntary basis. The policy therefore aims to formalise the scope of existing functions being taken by the Housing Service associated with applicant's assessments and lettings of temporary accommodation.</p>
4b	Is the activity likely to have an impact on individuals or groups?	<p>The policy will have impact upon both individuals and groups of residents who are likely to approach the service as homeless and in housing need.</p> <ul style="list-style-type: none"> <li>• The policy will affect those in the community who are approaching the housing service for housing advice as homeless and in need of accommodation.</li> <li>• The policy offers clear, structured guidance for how assessments of households for TA need to be carried out which will benefit staff and stakeholders. In summary, the policy sets out the main principles staff need to follow whilst taking action to; <ul style="list-style-type: none"> <li>○ Procure temporary accommodation</li> <li>○ Assess a homeless applicants suitability for temporary accommodation</li> <li>○ Make suitable offers of accommodation</li> <li>○ Support homeless people throughout the placements process</li> </ul> </li> </ul> <p>The ways in which policy principles are implemented in practice by staff depend on frontline processes and procedures, which will be drafted after policy approval.</p>
5	If you answered yes:	<i>Proceed to Section 2.</i>
6	If you answered no:	<i>Not applicable</i>

<b>Completed by:</b>	<i>Gemma Meeks, Housing Strategy &amp; New Initiatives Officer</i>
<b>Date:</b>	<i>May 2016</i>

## 2. Equality Impact Assessment

### Background/context:

This policy covers the provision of interim, long-term temporary and settled accommodation for placements made to homeless households who approach the Council's housing service for assistance.

The Council has a duty to provide suitable temporary accommodation (TA) Under Part VII Housing Act 1996 to households who are eligible, homeless and have a priority need until a decision has been reached on their application as to what duty if any is owed. If the council decides that it owes a 'full housing duty' an applicant will continue to be provided with TA until they find their own accommodation or are offered permanent housing (either social housing; or from November 2012, a local authority's homelessness duty can be discharged through the use of a suitable private rented property).

To fulfil these statutory duties, the Council is introducing five key policies through the Homeless Placements policy that will change how homeless applicants are assessed and allocated (according to level of need) for suitable homes which may be located in or out of borough.

This EIA discusses the impact of five key policies being made through the Homeless Placements Policy for people of different characteristics. To provide the context of each policy, a brief description is outlined;

#### 1. Homeless Placements Pathway process

It is the Council's policy to have a clear allocation process that is consistently applied and transparent for all stakeholders to understand. In general, the Council will implement a two stage accommodation pathway approach.

Before any offer of accommodation is made, homeless applicants will be provided housing advice and the Housing Service will try to remedy any housing issues that could be resolved. At first stage, interim accommodation in hostel or emergency placements will occur if the Council has reason to believe the applicant is eligible and in priority need. At secondary stages, if it is found the applicant is statutory homeless, long temporary accommodation or accommodation in the private rented sector will be offered where homelessness duty will be discharged.

#### 2. Suitability of accommodation assessments

The Council will be adopting a three part suitability assessment to make suitable offers of accommodation informed by the Homelessness (Suitability of Accommodation) (England) Order 2012. It will be using the suitability assessment to help decide on whether an offer of accommodation is suitable for household need. This includes consideration of factors including;

- Suitability of the property itself – type of offer and accommodation, property standards and management, size of accommodation, property condition
- Affordability
- Suitable location – including consideration of
  - The particular needs and requirements of the applicant to remain in-borough
  - Advantages that some applicants may have over others in being placed in accommodation out of borough
  - Availability of affordable accommodation in Havering
  - Health & Medical factors
  - Welfare and support factors
  - Education factors

- Employment factors
- Proximity to local community facilities and transport
- Any other special circumstances

### **3. Offers of private rented accommodation and discharge of homelessness duty decisions**

The Localism Act 2011 now provides local authorities with the additional powers to discharge the main homelessness duty into the private rented sector (PRS), without requiring the applicant's agreement. This only applies to households applying as homeless from November 2012. The regulations require local authorities to take a number of matters into account in determining the suitability of accommodation used for discharging duty in this manner.

Local authorities, including Havering have offered private rented accommodation as a method of homelessness prevention for several years. The difference introducing this policy would mean that offer of PRS would be mandatory rather than through choice. The use of private rented sector for discharge will be largely dependent on supply and in line with principles of being a suitable for the applicant household. The Council will use the PRS to discharge homelessness through a fair and thorough suitability assessment. All properties offered will be suitable, meet an agreed standard and condition and have good management from a fit and proper landlord. Households should no longer assume that applying as homeless will result in an offer of social housing.

Available private rented sector accommodation will be considered for *most* homelessness applications. Placement decisions will be made to longest waiting or prioritised homeless applicants for whom available accommodation is suitable on the day of offer (this could be a PRSO or temporary accommodation).

The policy is expected to increase the Council's supply of available accommodation for homeless households and drive efficiencies in the placement process.

### **4. Acquisition of out of borough accommodation and applying the suitability assessment factors to decide on a suitable placement location**

Havering Council is committed to securing suitable temporary and settled accommodation for homeless households where this is required under homelessness legislation. The aim to provide accommodation within Havering wherever possible, but unfortunately this is not always achievable. The Council is dependent on the supply of accommodation that is available yet the on-going increase in rents and changes to benefits means that for some households, accommodation in Havering will no longer be affordable.

As a result, there will be an increasing need to use accommodation that may be located outside of the borough and we need to have a suitability assessment process in place to ensure that we prioritise those who have the greatest needs for in-borough accommodation or to be close to a particular location.

The description of the suitability assessment is described above under point 2.

Acquiring out of borough accommodation is expected to increase the Council's supply of available accommodation for homeless households and drive efficiencies in the placement process.

### **5. Transfer moves between temporary accommodation prioritisation**

The demand for accommodation also stems from existing tenants of temporary accommodation with an urgent need to move. New prioritisation criteria have been developed to ensure there is a fair way of

maximising available scarce resources.

**Age:** Consider the full range of age groups

<i>Please tick (✓) the relevant box:</i>		<p><b><u>Overall Impact</u></b></p> <p><i>This Homeless Placements Policy sets out how the Council intends to provide housing assistance for homeless people across all age groups for whom there is a statutory duty to accommodate under homelessness legislation. The policy has a positive impact for people of all ages ensuring the homeless placements process is transparent and easier to understand.</i></p> <p><i>Whilst people of all ages could be at risk of homelessness, the Council's homeless demand data shows that at both local and national level, working age households with children in the younger age range are at an increased risk of homelessness.</i></p> <p><i>The policy is likely to have a greater overall impact for the following age groups.</i></p> <p><b>16-24 age group – young households</b></p> <ul style="list-style-type: none"> <li><i>including young single homelessness with/without children, young couples with/without children and pregnant single women</i></li> <li><i>In 2014/2015, 16-24 year old homeless applicants formed 35% of the overall demand (the second largest age group demand pressure)<sup>1</sup></i></li> </ul> <p><b>25-44 age group – working age households, primarily younger working age families with children</b></p> <ul style="list-style-type: none"> <li><i>(statutory homelessness legislation means that households with dependant with children have priority need and need to be prioritised by Local Authorities for accommodation)</i></li> <li><i>In 2014/2015, 24-44 year old homeless applicants formed 54% of the overall demand pressure (the largest age group pressure)<sup>1</sup></i></li> </ul>
<b>Positive</b>	✓	
<b>Neutral</b>		
<b>Negative</b>		

**Evidence -Key policy impact analysis**

**1. Implementing an accommodation pathway to make suitable offers and placements**

**a.) Placements pathway process**

For reasons discussed above, the policy is positive for homeless people of all ages however the policy will have more of an impact upon age groups at greater risk of homelessness. The new placement process is expected to drive efficiencies and ensure those with the greatest needs are prioritised for accommodation. This will be for the benefit of all age groups.

Working age households are proportionately most likely to be affected by the homeless placements policy and each of the five key policy impact areas. As statutory priority for housing is given through homelessness legislation to households with children, younger working age families are generally over-represented in the requirement for temporary accommodation. Young working age households compose the greatest homeless demand.

Research indicates the Council has seen an increasing demand from people evicted by friends and family from current accommodation. For many young statutory homeless households gaining access to a home through the placements process, it will be the first time living independently. To mitigate any potential negative impact and ensure homes are sustained, the Council will provide a developed tenant support

service. Applicants of all ages will have access to housing advice services throughout the placement process.

With the oldest population in London at 40.4 year<sup>2</sup>, Havering is expected to have increased housing demand pressures from older homeless households as the population continues to get older, live longer and property prices increase making in-borough accommodation increasingly unaffordable for non-working households. However, it is expected the policy will not have the greatest impact for older people. At present, the service is not reporting high demand from older residents approaching as homeless with a requirement to be accommodated into the interim or longer term temporary or settled accommodation. The vast majority (73%) of older people lives in owner occupied accommodation in the borough and lives with no mortgage<sup>3</sup>. Older people are also likely to have needs that result in high prioritisation for social housing or suitability for sheltered housing.

### **b.) Suitability assessment policy**

The suitability policy has a positive impact for people of all ages, ensuring accessibility to suitable homes.

National research has outlined the dangers of homelessness particularly for children living in unsettled accommodation and has emphasised the need for stable accommodation for households with young children. According to Shelter's study 'Living in Limbo(2004)<sup>4</sup>, homeless children are of the most deprived children in the country, often missing out on schooling, play and opportunities to develop because of their housing situation. It found children growing up in such an environment are 25% more likely to suffer severe health and are 50% more at risk of carbon monoxide poisoning than home owners or social housing tenants.

By adopting a new suitability assessment, the policy aims to ensure every property acquired in the private rented sector and every interim, temporary or settled placement made is suitable for individual needs and requirements for people of all ages. Homeless adults with children approaching the service can be confident all allocations made by the service are safe, suitable and will promote wellbeing. A process will be developed to reflect the assessment policy objectives.

## **2. Discharge of Homelessness duty by way of a settled offer of private rented accommodation for a period of 12 months**

As priority for housing is generally through having dependent children under homeless legislation, younger households are overrepresented in needing long-term or settled accommodation. Proportionately, as the 16-24 and 25-44 year old working age groups form 89% of the overall homeless demand (2014/15)<sup>1</sup>, it is these age groups who will be more likely to be offered settled accommodation in the private rented sector.

Older people are more likely to have high support needs and therefore more likely to be placed into suitable accommodation within the Council's own stock of social housing. With a relatively good supply of sheltered housing, the Council will be less likely to offer settled privately rented accommodation discharge and older people into the private sector.

Across all age groups consideration will be given to a household's ability to sustain a private tenancy and if the property is suitable for individual needs. Consideration will also be given to single people under the age of 35 who are unlikely to be able to afford private self-contained accommodation due to housing benefit restrictions. Households will be consulted on all housing options appropriate to need.

## **3. Acquisition of out of borough accommodation and**

## **4. Application of the suitability assessment to decide on the location of placements**

- ***Working age households and children***

Proportionately working age households with children, who make up the greatest homeless demand, will be most affected by this policy and are more likely to be considered under suitability factors to warrant an

in-borough placement.

Under the policy, households who are actively working in Havering will be considered for accommodation for in-borough. In terms of interim placements of accommodation, working age families with children and pregnant women are more likely to be prioritised for in-borough hostel placements than other households. This is to reduce any potential negative mitigation arising from emergency B&B placements for this client group. Homelessness legislation states emergency placements for these households as unlawful for any period longer than 6 weeks.

The placements policy has a positive impact for children who are at key stages of education enrolled at public examinations in the same school year (GCSE level or above). These households will be considered for in-borough accommodation, to prevent any disruption to educational attainment and so are less likely to be offered and placed out of borough than households with members not at key stages of education. Households with dependent children under the age of 18, who are not due to take qualification exams in the same academic year, may be adversely affected by this policy as comparably they do not have as high education need to remain in-borough. Households may find additional travel requirements and transport fares to current place of schooling. If this becomes unaffordable, a negative impact may arise meaning that an alternative school placement closer to home may have to be found. The Council will take distance to schools into consideration during individual assessments however will not use this as a reason to consider the household for in-borough allocation, unless the child is taking qualifications in the same academic year.

Households with children on the child protection register or families with children who have special educational needs will also be considered for in-borough accommodation to ensure personal development, care and support links are not disrupted by an out of borough placement. Parents and guardians of children who meet one of the other suitability factors (under welfare, medical, support, employment or other needs) will also be considered for in-borough placements to prevent any vulnerability or loss of support arising from an out of borough placement. The in-borough consideration for families with children will only be applied depending on the availability of temporary accommodation within the current stock.

Cases where the lead applicant needing accommodation is under 18 are the responsibility of Children's Services and will be placed under a different policy until the household comes of age.

To mitigate any negative impact arising from an out of borough placement, the service will be providing developed resettlement advice that will include help with aspects of travel and setting up links to support or community based amenities.

- ***Older people***

Older people are most likely of all age groups to have higher support needs. Older people in Havering are the most likely of all age groups to have higher support needs with increased risk of having long term and multiple health conditions<sup>5</sup>. Under the homeless placements policy, people will be considered for in-borough accommodation under the following factors;

- Applicants with severe or enduring health or medical needs receiving treatment or support in the Havering where an out of borough allocation would severely impact on personal wellbeing
- Applicants with high welfare or support needs including applicants in receipt of significant package of care and health options that cannot be easily transferred

This means under the policy older people with health, medical welfare or support needs are likely to be considered for in-borough placements, however there is a lower homeless demand from this group overall. The vast majority 73% of older people live in owner occupied accommodation in the borough and live with no mortgage and are at a reduced risk of homelessness compared to other age groups<sup>3</sup>. Therefore, the impact of any potential out of borough placement is low.



## 5. Introduction of prioritisation criteria for transfer moves between accommodation

In the list of prioritisation criteria for transfer moves between accommodation, people with serious medical or health needs are assigned the highest priority to be moved into alternative temporary or settled accommodation. Older people are more likely to have high medical or care needs than other age groups however as there is an overall low homeless demand for this group, it is not expected this policy will prioritise greater numbers of older people over other age groups.

The second highest priority is given to households who have been in emergency accommodation (B&B) on an interim basis for longer than 5 weeks. This is to avoid statutory penalties of pregnant women and households with children being in emergency accommodation for longer than this time period. As the greatest demand pressure comes from younger working age households (lone parents or households with children) it is expected this policy will have a positive impact for these groups.

### **Evidence: Data**

#### **1. Demographic population profile of Havering by age**

*\*Source<sup>6</sup> – Table 1: Mid-year population estimates 2014, ONS produced by Public Health Intelligence: This is Havering JSNA 2015*

The working age population continues to represent the majority 52% of Havering's overall population. Havering has experienced a net population growth of 9.3% from 2002 to 2014. The greatest reason for population growth is because of internal migration components. The largest net inflow is from households with children migrating from inner and neighbouring London Boroughs which is contributing to increased housing demand for affordable accommodation in Havering, making more homes out of reach for local people.

Working age families, particularly young families are likely to experience the greatest difficulty in securing a home in the borough and are at increased risk of homelessness. Such population statistics and housing demand pressures has contributed to the need to start acquiring out of borough accommodation to ensure the increasing local housing demand, particularly from working age families can continue to be met.

Age Group	2001 Population		2011 Population	
	Number	%	Number	%
0-4	12,429	5.54	13,661	5.76
5-9	14,553	6.49	13,230	5.58
11-17	20,096	8.96	21,269	8.97
18-24	16,769	7.48	20,763	8.75
25-64	117,732	52.50	123,365	52.00
65-84	35,454	15.81	36,221	15.27
85+	4,216	1.88	6,056	2.55
<b>Total</b>	<b>224,248</b>	<b>100</b>	<b>237,232</b>	<b>100</b>

## 2. Demand from statutory homeless households by age

\* Source<sup>1</sup> – Table 2: P1E data by age of statutory homeless applicants by age 2011-2015

The table below outlines the age of housing applicants who have applied to the Council as homeless over the past year and have been found as being owed a statutory homeless duty.

Year	Statutory Homeless Households 2011-2015											
	16-24		25-44		45-59		60-64		65-74		75+	
	No	%	No	%	No	%	No	%	No	%	No	%
2011/12	101	45%	96	43%	23	10%	1	0.4%	4	2%	1	0.40%
2012/13	87	42%	96	48%	14	7%	1	1%	3	2%	1	1%
2013/14	68	42%	72	44%	16	10%	7	4%	0	0%	0	0%
2014/15	66	35%	103	54%	16	8%	4	2%	1	0.5%	1	0.5%

The data showcases that the vast majority of those in need are aged 16-24 and younger working age households 25-44, accounting for (89%) of all successful approaches in 2014-2015. As a general impact, these age groups are most likely to be affected by the introduction of the Homeless Placements policy and all five key policies contained within its content. The homeless demand from working age households (25-44) has grown by 10% over 2013/14 to 2014/15.

## 3. Statutory homeless placements – Existing tenants by age

\*Source - Table 3: Havering Council internal OHMS snapshot data (as of 10/03/2016)

The table below outlines the ages of all current tenants of temporary accommodation by age.

In line with P1E data analysis above, the placements data highlights how the greatest demand for both interim and longer term accommodation comes from young working age tenants aged (25-44).

Age group	Interim temporary accommodation		Long-term temporary accommodation	
	Number	%	Number	%
16-24	12	19%	151	27%
25-44	42	65%	322	58%
45-59	9	14%	76	14%
60-64	1	1%	4	1%
65-74	1	1%	4	1%
75+	0	0%	0	0%
<b>Total</b>	<b>65</b>	<b>100%</b>	<b>557</b>	<b>100%</b>

## 4. Housing register by age

\*Source<sup>8</sup> - Table 4: Havering Council social housing waiting list 10/03/2016

In line with all other homeless demand data and population statistics, the demand for social housing is mainly composed of younger working age groups.

Age Band	Count	%
Age 17-25	618	24%
Age 26-39	1,037	40%
Age 40-54	519	20%
Age 55-59	107	4%
Age 60-79	221	9%
Age 80+	62	2%
<b>Total</b>	<b>2,564</b>	<b>100%</b>

## 5. Location of Placements of longer-term (PSL) accommodation, for statutory homeless

### households by age

\*Source<sup>7</sup> - Table 5: Havering Council internal OHMS snapshot data (10/03/2016)<sup>10</sup>

The table below shows the location of placements for current tenants of longer-term PSL temporary accommodation owed a statutory duty. This has been analysed against the age of the lead housing applicant to assess the impact of the out of borough placement policy.

At current the policy is in operation on a voluntary basis. The Council has a limited supply of out of borough properties which applicants are encouraged to consider if the property is suitable for needs.

Age group	In-borough placements		Out of borough placements	
	Number	%	Number	%
16-24	138	25%	13	2%
25-44	298	54%	24	4%
45-59	72	13%	4	0.7%
60-64	4	0.7%	0	0%
65-74	4	0.7%	0	0%
75+	0	0%	0	0%
<b>Total</b>	516/557	93%	41/557	7%

The majority of current tenants who are housed in out of borough accommodation are young working age households (25-44). As this group form the greatest homeless demand, they also form the majority of in-borough placements. There is low homeless demand from older people in general but no tenant owed a statutory homeless duty aged 60 above has been accommodated in out of borough temporary accommodation due to an identified need to remain in Havering.

### 6. Housing Consultation results by age

The Housing Service undertook a 6 week consultation on the proposed policy changes with key stakeholders. The impact upon people of all protected characteristics was analysed.

Online survey consultation respondents		
Age group	Number	%
16-17	2	1%
18-24	34	11%
25-44	163	53%
45-59	55	18%
60+	32	10%
Prefer not to say	7	2%
Blank	14	5%
<b>Total</b>	<b>307</b>	<b>100%</b>

All age groups as a majority were satisfied (strongly agreed or agreed) with each policy proposal in the Homeless placements policy.

The full breakdown of how each age group responded to each of the main policy proposals is attached under Appendix 3 of the Housing Consultation report.

**Sources:**

- <sup>1</sup> LBH (2016) TABLE 2: P1E Homelessness data report: Statutory homeless applicants by age 2011-2015. London Borough of Havering
- <sup>2</sup> Public Health Service (2015) *This is Havering: A Demographic and Socio-economic profile: Key Facts and Figures*. London Borough of Havering Council
- <sup>3</sup> DCA (2012) *Housing Needs Survey*. London Borough of Havering
- <sup>4</sup> Shelter, (2004). *Living in Limbo-Survey of Homeless Households Living in Temporary Accommodation* [pdf] Available at [http://england.shelter.org.uk/professional\\_resources/policy\\_and\\_research/policy\\_library/policy\\_library\\_folder/living\\_in\\_limbo\\_-\\_survey\\_of\\_homeless\\_households\\_living\\_in\\_temporary\\_accommodation](http://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/policy_library_folder/living_in_limbo_-_survey_of_homeless_households_living_in_temporary_accommodation) accessed on 10/03/2016
- <sup>5</sup> Public Health Service (2016) *Overview of Health and Social Care Needs*. London Borough of Havering
- <sup>6</sup> Public Health Service (2015) TABLE 1: *This is Havering a Demographic and Socio-economic profile: Mid-year Population estimates*. London Borough of Havering Council
- <sup>7</sup> LBH (2016) TABLE 3 & 5. *Havering Council internal OHMS snapshot data*. London Borough of Havering. Accessed on 10/03/2016
- <sup>8</sup> LBH (2016) TABLE 4: *Social Housing waiting list*. London Borough of Havering. Accessed on 10/03/2016
- <sup>9</sup> LBH (2016) *Housing Policy Consultation Report 2016*. London Borough of Havering.

**Disability:** Consider the full range of disabilities; including physical mental, sensory and progressive conditions

Please tick (✓) the relevant box:

**Positive**



**Neutral**

**Negative**

**Overall Impact**

*Overall the impact of the policy upon homeless people with disabilities is positive; ensuring all disabled groups can now access clear guidance on the whole homeless placements process.*

*In 2014/2015 only 5.7% of households in Havering were accepted as statutory homelessness with a physical or mental disability priority housing need category, however this excludes the true picture of households with disabled family members with children who are likely to be prioritised under a different priority need category such as dependent children<sup>1</sup>. Generally non-disabled homeless are most likely to be impacted by the homeless placements process as they form the greatest homeless demand compared to disabled housing applicants.*

*Whilst the housing service is not currently reporting a high level of demand from homeless applicants who are disabled, people with a disability are more likely to be on low income, have limited engagement with the labour market and have limited housing options. For this reason, homelessness guidance and legislation is framed to consider that disabled people are considered at a particularly vulnerable risk of homelessness.*

*The key policies within the Homeless Placement Policy have a particularly positive impact for disabled people by ensuring a new suitability assessment and ensuring prioritisation for disabled people with the highest needs for in-borough accommodation and transfer moves.*

**Evidence -Key policy impact analysis**

- **Implementing an accommodations pathway to make suitable offers and placements**
- **Placements pathway process policy**

For reasons discussed, more non-disabled households approach the Council as homeless. Disabled households are considered at an increased risk of homeless. For both groups, the new homeless placements process is considered to have a beneficial impact in describing how homeless placements will be made.

It is the Council's aim to ensure suitable accommodation is available and the placement process is accessible for all groups' first point of contact to placement. Upon first point of contact to the Housing Service if a disabled household presents as homeless at the Public Advice Centre, disabled applicants will find all areas are wheelchair accessible for interviews.

If the Council has reason to believe a person presenting as homeless is eligible and in priority housing need, following an initial assessment the first step is to make an interim placement of accommodation. The Council ensures a positive impact by making provision of DDA compliant rooms for physically disabled people as interim placements of hostel or refuge accommodation. If these rooms have reached full capacity, the Housing Service will explore and offer alternative options that could be suitable within its supported or council-owned stock before looking to procure emergency accommodation. If this is unavailable, as a last resort suitable emergency accommodation will be procured in compliance with the Disability Discrimination Act and needs of the household.

If the Council's investigations determine a statutory homeless duty is owed to a disabled household, the Council may offer longer term temporary accommodation or a settled offer of accommodation in the private rented sector. Due to the highly individual needs and requirements for customers in this area, there is potential inequality in that the Council will not have suitable properties readily available at short notice within its stock of long-term temporary or settled accommodation. As there is a relatively low demand from homeless households with severe disabilities, health or medical conditions, the Council does not manage any specialised or adapted temporary accommodation properties available solely for the needs of this client group. Beyond helping those with less severe mental health conditions and mobility issues the service cannot help other groups of people with disabilities and severe health conditions that otherwise require supported housing arrangements.

To prevent a negative impact upon disabled people, the policy explains how the Housing Service intends to explore and offer any suitable housing alternative across its entire stock of council-owned accommodation. People with severe disabilities and or health, mental health conditions are therefore more likely to be directly offered council accommodation and/or meet high priority banding within the Housing Allocations policy meaning social housing is allocated more efficiently. This is to ensure homeless disabled people upon making a homelessness application do not experience any negative impact with longer waiting times due to a limited stock of readily-adapted temporary accommodation. The placements pathway policy therefore has a positive impact upon this group, ensuring equality of opportunity for people with more serious disabilities.

The service will always look to ensure single or ground floor accommodation is offered to people with mobility issues and will always consider locational needs for community-based services if significant or longstanding support is being provided. The Council offers aids and adaption grants available to clients. The Housing Service will consider and help customers with arranging minor adaptations to temporary accommodation if landlords consent has been given. However major property adaptations to meet the needs of individual customers are ultimately not usually possible as property ownership remains with local landlords. Individually procuring suitable adapted homes in the private rented sector is not considered a feasible option for this group as it would create inefficiency in allocating homes to these clients. To negate any potential barriers to longer term placements, it is the policy's core objective to make best use of the housing stock.

Housing Services has developed referral processes with Adult Social Care, Children's Services and

Mental Health Services to ensure all disabled applicants are supported in their living arrangement throughout the homeless pathway. The service will continue to develop its partnership working in this area.

The new Policy has been developed to reflect objectives of The Care Act 2014 programme being implemented by Havering Council. Housing Services employees have been trained to the principles of the Care Act to guide professional practice and safeguarding in making placements under the new policy.

- **Suitability assessment policy**

Housing has a significant role to play in improving quality of life. Poor quality, unsuitable housing and the can have detrimental effects on health and wellbeing. The uncertainty that goes with being homeless or at risk of losing a home can be the cause of, or contribute to wider health or mental health problems and disabilities. Physical disabilities, mental ill health or dependency issues in their own right can also trigger, or be part of, a chain of events that lead to someone becoming homeless.

Shelter's (2004) survey 'Living in Limbo' found that over 50% of respondents had said their health or a family member's health has suffered due to living in temporary accommodation<sup>2</sup>. A negative impact on mental health was also recorded as a result of homelessness with over half of families in temporary accommodation and 71% of childless households having diagnosed depression.

With this being considered, to mitigate any negative impact arising from homelessness, the policy outlines a new suitability assessment which will help to decide if a property is suitable for individual needs. This includes needs analysis of accessibility factors such as the ability to climb stairs, ground floor requirements for wheelchair accessibility, size and space of accommodation, locational requirements and the need for documentation to be in different formats i.e. Braille, easy-read, via a translator or transmitted via text phone.

- **Discharge of Homelessness Duty by way of a settled offer of private rented accommodations for a period of 12 months policy**

If a settled private rented accommodation is suitable for a disabled household, this offer can be made and homelessness duties will be discharged.

Due to the nature of privately rented accommodation in the private sector, housing is less likely to be readily adapted, available or suitable for people with serious physical disabilities who require home adaptations. The policy explains how the service will now be offering offers of PRSOs to discharge homelessness duties under a contract period of at least 12 months. To mitigate any negative impact upon disabled people, provision is made so that this client group can be offered suitable long-term temporary accommodation or adapted properties within the Council's own housing stock.

People with more severe disabilities are therefore less likely than other households to have their duties discharged into the private rented sector by offer of a PRSO and are more likely to be offered supported or adapted accommodation within the council's own stock. For this reason, the policy has a neutral effect on this group

- **Acquisition of out of borough accommodation for use of temporary and settled offers of private rented criteria and**
- **Application of the suitability assessment to decide on the location of placements**

The policy is positive for people with disabilities and non-disabled people who have high needs that fall within the identified list of suitability considerations for location. Disabled people are more likely than non-disabled people to be considered for in-borough accommodation.

Disabled people (Inc. Physical and mental disabilities) are more likely to depend of the support of family and friends and be in support of a significant package of care or treatment from a Havering service that cannot be easily transferred. A disabled person is also more likely than non-disabled person to be out of

work, meaning that instances of low income, social exclusion and poverty are higher. This means that disabled people are more reliant on local services, sources of support and public transport

For this reason the Council is will be prioritising disabled groups with the highest needs for In-borough placements dependant on level of need.

The policy outlines potential for how out of borough placements may be made to people with mild-moderate severity of disabilities, who **do not** have a *severe or enduring* health, mental health or medical condition and **are not** in receipt of a *significant*, transferrable care or support package.

To prevent any negative impact arising from an out of borough placement, the suitability assessment will ensure any accommodation offered will be suitable for individual needs. The service will be providing developed resettlement support that will include help with aspects of travel, accessing health or support services in the placement borough and setting up links to community based amenities.

A positive impact has therefore been identified.

The rationale for this decision and needs of disabled groups are outlined below;

- *Children with Special Educational Needs (SEN)*

The number of children with special educational needs and disabilities is growing year on year in Havering, averaging increases has been recorded between 40 to 60% in all groups over the past 3 years between 2012-2015<sup>3</sup>. This increase is particularly marked in respect of children with the most severe and complex needs.

National research (Shelter, 2004) has found the impact of homelessness has a profound impact on a child's educational development with on average children missing nearly a quarter of the school year with parents stating travel as a problem<sup>2</sup>. To mitigate the potential impact of moving a child to a different school in a new borough, children with the highest needs will be considered for in-borough placements to prevent any negative impact upon educational development. This is likely to include children with SEN needs. Due to the severe shortage of accommodation, the Council is unable to prioritise all households with children for in-borough placements.

- *Households with physical disabilities*

The proportion of working age households (18-64) in Havering with members who have moderate to severe physical disabilities is one of the highest rates in London, above the average<sup>3</sup>. Whilst the service is not currently reporting a high demand from homeless physically disabled people, the Council aims to ensure all temporary accommodation is accessible and suitable for individual requirements.

National research (Habinteg 2010) indicates there is a supply issue of appropriate housing options for those who require affordable wheelchair accessible properties<sup>4</sup>. It found that 84% of homes in England do not allow someone using a wheelchair to get to their door without some significant difficulty and only 0.5% of the UK housing stock is designed as accessible for wheelchair users. More recent research found that nearly a fifth of wheelchair user households in London have an unmet need for wheelchair accessible housing compared to a national average of 15% (GLA 2010)<sup>5</sup>.

To ensure disabled people who are homeless are not disadvantaged in the homeless placements process by a limited amount of adapted or wheelchair accessible temporary accommodation, the policy ensures that the service may expedite offers of adapted council-owned accommodation to avoid additional waiting times for this group. Homeless people with severe physical disabilities or people with disabilities who are in receipt of an enduring care package in Havering are also more likely to be considered under suitability factors for in-borough accommodation to prevent any difficulties arising from an out of borough placement. People with serious health or medical conditions are also prioritised under the highest criterion for emergency moves between temporary accommodations if needs are developed whilst in occupation under the transfer moves policy.

From first point of contact with a homeless approach, physically disabled applicants will find access to the Council's Public Advice Centre is wheelchair accessible. The homeless assessment includes consideration of accessibility factors such as the need for wheelchair access, ability to climb stairs, ground floor preferences, size and space of accommodation to determine offer and property suitability.

A positive impact upon this client group has been identified.

- *Households with mental health disability*

According to the Royal College of Psychiatrists, 1 in 4 people experience mental illness in their lifetime and homeless people are a higher risk group who are disproportionately affected by mental health problems<sup>6</sup>. The prevalence of mental health problems in Havering (0.88%) is generally lower than both London and England but there is variation in how common it is across wards. Wards, which have a greater prevalence of households with mental health conditions, are also those, which have high deprivation rates and more low-income families who are at greater risk of homelessness, for example Gooshays and Havering Park.

In Havering there are a rising number of statutory homeless households presenting with a mental illness or disability priority housing need. This has increased by more than half (1.6%) over the past three years 2012/13 to 2014/15<sup>1</sup>. The Council will assist all housing applicants in making referrals to appropriate support services for people affected by mental health conditions. The Council will continue to develop its partnerships with Adult Social Care in this area to support homeless households. Provision for households affected such as floating support will be made available.

The majority of people with a priority need due to poor mental health are single people with no dependents, and therefore require one-bedroom accommodation. The Council has a greater supply of one bedroom accommodation and so people with these needs are at a reduced impact of being placed out of borough. Families who have a household member affected by mental health (who do not fulfil in-borough prioritisation criteria) are more likely to be placed out of borough due to there being a more limited supply of family size homes.

Out of borough placements for these clients may mean increased risk of social isolation and difficulty in retaining personal independence and existing support networks. To mitigate any negative impact on the wellbeing of this group, the policy outlines suitability factors to be considered in making decisions on the location of placements to ensure people with the most significant disabilities with medical, health, welfare or support needs are prioritised for in-borough temporary or settled accommodation depending on supply at any one time. For this reason the policy impact is positive upon this group.

- *Carers*

Over 2 million people become carers every year (Carers UK.)<sup>7</sup> Every day, another six thousand people take on a caring responsibility and 3 in 5 people will become a carer at some point in their lives. Valuing Carers (2011) estimates the economic value of the contribution made by carers in the UK is around £11 billion per year. This is 37% higher than an estimate made in 2007<sup>8</sup>.

Over a 1,000 adults living in Havering (2014-15) receives care support in their homes; equating to about 11.3 hours per person per week; an increase from 10.7 in 13/14. According to the 2011 Census, 25,214 people, 11% of Havering's residents identified themselves as carers, an increase from 23,253 (8.4% increase) in 2001. Twenty-three per cent (5,835) said they provided more than 50 hours of care per week. In 2013/14, 7,096 clients received adult social care support in Havering of which two thirds were aged 75<sup>9</sup>.

The numbers of carers in Havering is rising and this trend expected to continue, due to Havering's ageing population. The homeless placements policy has outlined in-borough prioritisation carers with a longstanding arrangement to provide support to another resident in Havering. This is to ensure the economic and social value of carers work is recognised in housing policy and practice. The in-borough prioritisation criterion for this group ensures that voluntary or paid care work and support links can be maintained.



Overall the policy has a positive impact upon homeless carers of people with disabilities and health/mental health/other long-term conditions.

- **Introduction of prioritisation criteria for moves between temporary accommodations policy**

It is reasonable to expect that people with a disability may have high support needs. Households with serious health, medical or support needs are prioritised under the highest category for emergency rehousing in the transfer criterion for moves between existing interim and long-term temporary accommodation.

Prioritisation is also awarded to households who have submitted a review of their housing placement on the basis that such accommodation is unsuitable. People with evidenced medical and health conditions are those who are most likely to submit a successful review of suitability.

This prioritisation will reduce waiting list time for people with disabilities / serious health conditions and mitigate any risk arising from unsuitable accommodation; a positive impact is therefore described.

### **Evidence – Data**

- **Havering’s Disability Population**

*\*Source<sup>9</sup> - Mid-year population estimates 2014, ONS produced by Public Health Intelligence: This is Havering JSNA 2015*

According to the latest ONS mid-year population survey (2014) 18% of working age people living in Havering has disclosed they have a disability or long-term illness, a similar proportion to England’s overall statistic. The estimated number of people in Havering aged 18-64 with a moderate physical disability was 11,459 in 2015 and is the second highest of local authorities in London, well above the national average. Similarly the number of people living with severe disabilities, unable to walk and dependent on a career for mobility is also one of the highest rates in London.

- **Havering Housing Needs Survey**

*\* Source<sup>10</sup> - Table 2 – Havering Council Internal OHMS data (2012)<sup>11</sup>*

According to Havering’s Housing Needs Survey, the majority of disabled people own their own home (66.9%). Disabled people are less likely to live in private rented accommodation out of all tenures (6%). People living in this tenure are most vulnerable to the experience of homelessness and are most likely to live in unsuitable accommodation. Privately rented accommodation have the lowest adaptations of all tenures in Havering, only 3.9% or 278 of the total stock contain adapted properties, compared to 1298 council owned properties with adaptations.

The lack of availability of homes in the private rented sector informs the Council’s decision for offering council-owned accommodation to disabled applicants should suitable properties not be available in temporary accommodation for people with the highest needs.

Tenure	Sample survey	Tenure by disability	Number of disabled households
Owner occupied with mortgage	45.7%	25.7%	4828
Owner occupied without mortgage	33.9%	41.2%	7747
Private rented	6.8%	6.0%	1131
Council rented	9.1%	18.6%	3491

Registered provider rented	4.2%	8.2%	1532
Shared Ownership	0.2%	0.0	0
Tied to employment/Living rent free	0.1	0.3	65
Total	100%	100%	18,794

- 19.19% (18,794) of Havering households include a member with a disability
- 56.2% of all disabled household members were over the age of 65
- 37% of disabled households have a walking difficulty
- 19% of people with a disability have a limiting long term illness
- 44% of disabled households have a support need

### • **Havering Disability Needs Data**

*\*Source<sup>3</sup> - Public Health Service (2016) Havering Health and Social Care Needs JSNA. London Borough of Havering*

Havering's JSNA on health and social care needs explain some of the main pressures operating in the borough.

- Havering was estimated to have 945 adults with moderate or severe learning disability in 2015, of which about 300 are estimated to be living with a parent.
- There is an increasing number of Havering residents living with long term conditions (LTCs)
- The prevalence of mental health problems in Havering (0.65%) is generally lower than both London (1.07%) and England (0.88%) but there is variation in how common it is across the wards in the borough.
- The number of children with special educational needs and disabilities is growing year on year, averaging increases of between 40 to 60% in all groups over the past 3 years.
- Working age adults comprise the largest age group in Havering and are more likely to experience serious mental health issues
- The number of Child Protection Plans in Havering increased by 50% from 2013/14 (143) to 2014/15 (214). The projected number for 2015/16 is 329, which would be a further 56% increase on the previous year
- In 2013/14, 7,096 clients received adult social care support in Havering of which two thirds were aged 75. The majority of the demand (98%) is driven by the following: physical disability (78%), learning disability (12%) and mental health (8%).
- According to the 2011 Census, 25,214 people, 11% of Havering's residents identified themselves as carers, an increase from 23,253 (8.4% increase) in 2001. Twenty-three per cent (5,835) said they provided more than 50 hours of care per week

The policy has been framed to acknowledge the above factors to ensure those with serious health and care needs are prioritised for in-borough accommodation.

### • **Statutory Homelessness by priority need (physical and mental)**

*\*Source<sup>1</sup> - Table 3 – P1E data statutory homeless households by disability (2012-2015)<sup>1</sup>*

5.7% of the households owed at statutory homeless duty in 2014-2015 had a priority housing need from physical or mental illness. This does not include the reflection of households with children where a member has a disability and a priority need for accommodation. This figure is largely composed of single applicants or couples with physical and mental disabilities. The data on number of existing tenants in long-term or interim temporary accommodation is currently unavailable.

The Housing Service aims to improve its understanding of the true demand from statutory homeless households with disabled members by making improvements made to internal data monitoring and

recording.

<b>P1E Data: Statutory Homelessness and Disability by Priority Need Category 2012-2015</b>							
	2012/13		2013/14		2014/15		% change
	No	%	No	%	No	%	
Physical disability	9	5%	8	5%	5	2.6%	- 2.4%
Mental illness or disability	3	1.5%	3	1.8%	6	3.1%	+ 1.6%

- **Housing Register and Temporary Accommodation Transfer Requirements**

\* Source <sup>10</sup> - Havering Council Internal OHMS data 2016

- On the Council's housing register, 1.4% has an evidence medical need to move with 0.3% of people requiring home adaptations. The average age of people requiring adaptations is 57 years old, as the proportion of older residents increase, the demand from older people with disability on adapted properties is expected to increase.<sup>12</sup>
- Within the Council's existing stock of temporary accommodation, 39 households require a transfer into alternative accommodation, of which 33% have a serious medical or health need to move, including 23% with a ground floor wheelchair accessible need <sup>13</sup>

- **Housing Consultation results by disability**

\* Source<sup>11</sup> – Housing Policy Consultation Report 2016

The Housing Service undertook a 6-week consultation on the proposed policy changes with key stakeholders. The impact upon people of all protected characteristics was analysed.

<b>Online survey consultation respondents</b>		
<b>Disability group</b>	<b>Number</b>	<b>%</b>
<b>Disabled</b>	42	14%
<b>Non-disabled</b>	230	75%
<b>Prefer not to say</b>	22	7%
<b>Blank</b>	13	4%
<b>Total</b>	307	100%

Both disability groups as a majority were satisfied (strongly agreed or agreed) with each policy proposal in the Homeless placements policy.

The full breakdown of how each age group responded to each of the main policy proposals is attached under Appendix 3 of the Housing Consultation report.

**Sources:**

- <sup>1</sup>LBH (2015) Table 3: P1E Homelessness Data Report: Statutory Homeless applicants by disability 2012-2015. London Borough of Havering
- <sup>2</sup>Shelter, (2004). Living in Limbo-Survey of Homeless Households Living in Temporary Accommodation [pdf] Available at: [www.england.shelter.org.uk/professional\\_resources/policy\\_and\\_research/policy\\_library/living\\_in\\_limbo\\_-\\_survey\\_of\\_homeless\\_households\\_living\\_in\\_temporary\\_accommodation](http://www.england.shelter.org.uk/professional_resources/policy_and_research/policy_library/living_in_limbo_-_survey_of_homeless_households_living_in_temporary_accommodation) [accessed on 10/03/2016]
- <sup>3</sup>Public Health Service (2016) Overview of Health and Social Care Needs. London Borough of Havering
- <sup>4</sup>Habinteg (2010) Mind the Step, Online. Available at: <http://www.habinteg.org.uk/main.cfm?Type=NI&objectid=2675> [accessed on 10/03/2016]

- <sup>5</sup>Royal College of Psychiatrists (2010) No Health without Public Mental Health: The Case for Action. Available at: <http://www.rcpsych.ac.uk/pdf/Position%20Statement%204%20website.pdf>.
- <sup>6</sup>Royal College of Psychiatrists (2010) No Health without Public Mental Health: The Case for Action. Available at: <http://www.rcpsych.ac.uk/pdf/Position%20Statement%204%20website.pdf>.
- <sup>7</sup>CarersUK (2016) Making life better for carers: Facts and Figures Press Release. Available at: <https://www.carersuk.org/news-and-campaigns/press-releases/facts-and-figures> [accessed on 10/03/2016]
- <sup>8</sup>Carers UK (2011) Valuing Carers: Calculating the value of carers support. University of Leeds. Available at: <http://webcache.googleusercontent.com/search?q=cache:vHBGyiJlwUsJ:circle.leeds.ac.uk/files/2012/08/110512-circle-carers-uk-valuing-carers.pdf+&cd=1&hl=en&ct=clnk&gl=uk> [accessed on 10/03/2016]
- <sup>9</sup>Public Health Service (2015) *Mid-year population estimates 2014, ONS produced by: This is Havering JSNA. LBH*
- <sup>11</sup>DCA (2012) Table 2: *Housing Needs Survey*. London Borough of Havering
- <sup>10</sup>LBH (2016) Havering Council internal OHMS snapshot data. London Borough of Havering. Accessed on 18/03/2016
- <sup>11</sup>LBH (2016) Housing Policy Consultation Report 2016. London Borough of Havering.

**Sex/gender:** Consider both men and women

Please tick (✓) the relevant box:

**Positive**

✓

**Neutral**

**Negative**

**Overall impact**

*Overall the impact of the Homeless placements policy on all genders is positive. The policy ensures all gender types can access clear guidance on the homeless placements process.*

*There is no evidence of any discrimination on grounds of gender in the allocation of interim or longer-term temporary and settled privately rented accommodation, however proportionately all key policies will have a greater impact on women who form the greater share of the overall population and Council's homeless demand<sup>1</sup>.*

*2014/2015, the Council accommodated 73% of lone parent and single parent homeless households headed by a female lead applicant<sup>1</sup>. This is in comparison to just 8% of single or lone parent male led applicants<sup>1</sup>. The number of females approaching the Council as homeless has been increasing over the last three years<sup>1</sup>.*

*Women are therefore over-represented both in interim and long-term temporary accommodation, with a rate of 70% female composition compared to 30% men<sup>2</sup>. This is a similar statistic to the gender split of people on the housing register (67:33)<sup>3</sup>. The main reason for the over-representation of women is due to the Housing Act 1996 and Homelessness (Priority Need for Accommodation) (England) Order 2002 legislation which defines priority housing need as pregnant women, households with dependent children and people who are vulnerable due to fleeing domestic violence. Women fulfill the prevalent majority within these priority need groups and as a result, are more likely gender to approach the local authority and become accepted with a statutory homeless duty under homelessness legislation.*

*Gender is an issue in relation to economic status with women being adversely affected. National, London-wide and local level research indicates women earn much less than their male counterparts and have a higher representation in economically inactive households, largely explained by the take up of care*

roles. The trends described and the notable 'gender pay-gap' affects women's ability to access affordable housing in the borough and places women at greater risk of homelessness.

The key policies within this Homeless Placements Policy will therefore have a disproportionate and greater impact on female homeless applicants compared to men. The sections below describe the key policy impact in further detail.

## **Evidence -Key policy impact analysis**

### **1. Implementing an accommodations pathway to make suitable offers and placements**

#### **• Placements pathway process policy**

For reasons discussed, there is a greater housing demand from women for homeless assistance due to an inherent bias in homeless legislation towards women. Whilst all groups will have an improved understanding of the placements process, more women will be impacted by the policy.

The Council has developed other housing options to provide assistance to non-priority homeless groups such as single homeless men who are less likely to be eligible for long-term temporary or settled accommodation under homeless legislation. For example, shared accommodation and find your own deposit schemes.

#### **• Suitability assessment policy**

Women are more likely to have needs and requirements that make some placements unsuitable for occupation. The policy outlines how the use of emergency B&B placements will be limited for women with dependent children and pregnant women to prevent any risk of occupying beyond 6 weeks to ensure compliance with homeless legislation. This means homeless women with children and pregnant women are more likely than men to be placed into available hostel temporary accommodation over single men as an interim measure while homeless investigations are being completed. Hostels are mixed-gender provision, family and single rooms are available.

As women are more likely to be affected than men by domestic violence in Havering, victims who are women can also be offered placements into refuges, in locations away from the abuser. Due to the demand profile, refuge provisions in the borough are female only units. Victims will not be placed near perpetrators. The Council must increase its understanding of males affected by domestic violence in the borough to ensure there are no gaps in housing provision for this group. This is an action recommended by this EIA.

For all other placement types i.e. with longer-term temporary or settled accommodation, offers will be made in response to general homeless demand and will have a neutral impact on sex/gender.

### **2. Discharge of Homelessness Duty by way of a settled offer of private rented accommodations for a period of 12 months policy**

Proportionately, as women are more likely to become statutory homeless in Havering, more longer-term and settled placements will be made in general to this group. As such the policy will be negative for women who are more likely to be affected by settled offers of privately rented accommodation and discharge of homelessness duty decisions.

However in scenarios where an accommodation (longer term TA or settled PRSO) becomes available and there are two applicants (male or female) with the same level of need, the offer will be made to the longest waiting person with same level of need on the housing waiting list for whom the property is suitable. The decision will not be made in consideration to gender, but on the suitability of accommodation assessment that ensures all homes are fit for purpose. In this sense, a positive impact of this policy is described through ensuring all genders have access to suitable homes.

- **Acquisition of out of borough accommodation for use of temporary and settled offers of private rented criteria *and***
- **Application of the suitability assessment to decide on the location of placements**

As there is a greater homeless demand for long-term accommodation from women, it is reasonable to expect women are greater impacted by the new acquisition and prioritisation policies. As a result of this policy it is expected more women will be placed in out of borough locations compared to men where there is a lower homeless demand. Currently 88% households living in out of borough locations (long-term private sector leased accommodation) are headed by female housing applicants, compared to just 12% of men<sup>2</sup>.

All placement decisions made are based on individual applicants housing needs and the outcomes of the suitability assessment and are not guided by gender. As a result the suitability factors on location have no direct impact that advances or adversely affects the position of men or women. Both sexes on the same level of housing need will have an equal chance of being placed in or out of borough at the point of making a long-term placement. However a greater number of women who have dependants may be considered for having needs under suitability factors of welfare (care, carers and support) and education factors..

Outer-borough placements will be considered for people affected by domestic violence if there are clear safeguarding benefits for the household. Housing officers will ensure support is available for any victims facing resettlement.

- **Introduction of prioritisation criteria for moves between temporary accommodations policy**

The transfer prioritisation policy has no impact on gender that directly advances or adversely affects men or women in the placements process. However, indirectly women may fit the profile of households prioritized under first and second criterion. Criteria 1 place an urgent need to move category for people affected by serious domestic violence. Women in Havering are more affected by domestic violence than men. Criteria 2 prioritises people who have an emergency need to move due to being in B&B accommodation for 5 weeks. Pregnant women and households with children are likely to be prioritised over male applicants with no dependent's in the transfer process to comply with homeless legislation.

Due to the order of prioritization, If a need to move is developed whilst living in temporary accommodation, women may experience shorter wait times compared to men.

## **Evidence - Data**

- **Demographic population of Havering by gender (Census 2011)**

*\*Source<sup>4</sup> - Table 1: Economic status in Havering by gender, Havering 16-74 age profile (Census 2011)*

- In Havering, men have a higher representation as economically active in comparison to women
- Women have higher representation as part time workers and likely lower paid employment than men and lower representation than men as full time workers
- Women have a higher representation in economically inactive households compared to men
- Women are more likely than men to be economically inactive due to taking up a care role

	<b>Economically active</b>				<b>Economically inactive</b>				
	Part time	Full time	Self-employed	Unemployed	Full time student	Retired	Student	Looking after family	Sick disabled
Male	2%	23%	8%	3%	2%	6%	2%	0%	2%
Total				36%					11%
Female	11%	16%	2%	2%	1%	8%	2%	5%	2%
Total				31%					17%

- The general population in Havering is 52% (128,110) female compared to 48% (118,024) male
- Over a 10-year period 2010 to 2011, both genders experienced a 5.7% increase in population.
- Life expectancy in Havering is 80.2 years from birth for males compared to 83.9 years for females (This is Havering 2016)

- **Housing demand from statutory homeless households by gender**

\*Source<sup>1</sup> - Table 2 – P1E Data Statutory Homeless households by gender and household type (2013-2015)

This table shows statutory homeless placement trends over the past three years (2013-2015).

<b>P1E Data: Households accommodated by household type and gender of household 2013-2015</b>			
<b>Household type</b>	<b>2013/14</b>	<b>2014/15</b>	<b>2015/16</b>
Couples with children	76 (12%)	123 (20%)	91 (14%)
Lone parent			
• Male applicant	19 (3%)	12 (2%)	19 (3%)
• Female applicant	299 (48%)	280 (45%)	372 (57%)
Single person			
• Male applicant	52 (8%)	49 (8%)	30 (5%)
• Female applicant	116 (19%)	125 (20%)	102 (16%)
All other household groups	55 (9%)	34 (6%)	35 (5%)
<b>Total</b>	<b>617 (100%)</b>	<b>623 (100%)</b>	<b>649 (100%)</b>

The table shows that the majority of homeless demand over time is from female lone parent and female single people. In total women applicants' form (73%) of the overall homeless demand compared to 8% from men.

- **Homeless placements by gender**

\* Source<sup>2</sup> - Table 3 - Havering Council internal OHMS snapshot data: Current Temporary Accommodation Tenants (10/03/2016)

This table details current tenants of interim and long-term temporary accommodation by gender and location.

<b>Placements by location and gender</b>						
	Interim placements (hostel)		Long-term temporary accommodation			
			In-borough placements		Out of borough placements	
<b>Gender</b>	<b>Count</b>	<b>%</b>	<b>Count</b>	<b>%</b>	<b>Count</b>	<b>%</b>
<b>Female</b>	59	91%	389	70%	36	88%
<b>Male</b>	6	9%	168	30%	5	12%
<b>Total</b>	65	100%	557	100%	41	100%

As there is a greater demand in general from women, females comprise of the majority of in-borough and out of borough placements. Women are therefore more likely than men to be placed out of borough **and** receive in-borough prioritisation for accommodation over male applicants.

- **Housing register by gender**

\*Source<sup>4</sup> - Table 4 Havering Council social housing waiting list 09/03/2016

<b>Housing register by gender</b>	count	%
Female lead applicants	1822	67%
Male lead applicants	904	33%

Total	2726	100%
-------	------	------

Women make up nearly 70% of tenants taking up an offer of accommodation from the Housing register. Women are more likely to come under a reasonable preference category given the pattern of child care. These categories will remain in place under the new Housing Allocations policy.

• **Transfer requests by gender**

\* Source<sup>5</sup> - *Havering Council Internal OHMS data: Temporary accommodation transfer demand (2016)*

- Within the Council's existing stock of temporary accommodation, 39 households require a transfer into alternative accommodation, of which 28% are male and 72% are female. 13% of transfer moves are from women facing domestic violence in current home.

As a result it can be assumed on the basis of need, more women are likely to experience shorter transfer wait times compared to men on the basis of need, in line with homeless legislation and guidance.

• **Housing consultation results by gender**

\* Source<sup>6</sup> - *Table 5 - Havering Council Housing Consultation data report*

Online survey consultation respondents		
Gender	Number	%
Female	223	73%
Male	62	20%
Transgender	0	0%
Prefer not to say	8	3%
Blank	14	5%
<b>Total</b>	<b>307</b>	<b>100%</b>

Both genders as a majority were satisfied (strongly agreed or agreed) with each policy proposal in the Homeless placements policy. The full breakdown of how each age group responded to each of the main policy proposals is attached under Appendix 3 of the Housing Consultation report.

**Sources used:**

- <sup>1</sup> LBH (2015) *Table 3: P1E Homelessness Data Report: Statutory Homeless applicants by gender and household type 2013-2015*. London Borough of Havering
- <sup>2</sup>LBH (2016) *Havering Council internal OHMS snapshot data: Temporary Accommodation tenants*. London Borough of Havering. Accessed on 10/03/2016
- <sup>3</sup> LBH (2016) *Social Housing waiting list*. London Borough of Havering. Accessed on 10/03/2016
- <sup>4</sup> ONS (2011) *Population Statistics in Havering 2011-2016*. London Borough of Havering.
- <sup>5</sup> LBH (2016) *Havering Council internal OHMS snapshot data: Transfer demand*. London Borough of Havering. Accessed on 10/03/2016
- <sup>6</sup> LBH (2016) *Housing Policy Consultation Report 2016*. London Borough of Havering.

**Ethnicity/race:** Consider the impact on different ethnic groups and nationalities

Please tick (✓) the relevant box:

**Overall impact:**

**Positive**

✓

*Overall the impact of the Homeless Placements Policy on people of all ethnicities is positive; ensuring that all groups can access clear guidance on the whole homeless*



<b>Neutral</b>	<p><i>placements process.</i></p>
<b>Negative</b>	<p><i>Whilst the Housing service does not directly advance, discriminate or negatively impact the position of households with different ethnicities in the homeless placements process, there are ethnic groups in the borough who are more likely to become homeless or be at risk of homeless. As a result the policy and all key policies are likely to have a greater impact on these groups.</i></p> <p><i>Havering is one of the most ethnically homogenous and least diverse boroughs in London with 83.3% of its population constituted by White British households, higher than both the London and England average<sup>1</sup>. 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<sup>1</sup>.</i></p> <p><i>Over this period, the levels of homelessness among BME communities have remained disproportionately high at around three times higher than population levels.</i></p> <p><i>In particular, black households and people of mixed ethnicities are significantly over-represented in the homeless population. The situation is not specific to Havering but is representative of national trends. The Shelter (2004) BME Housing Crisis report stated that Black African and Black Caribbean homeless households were the most over-represented group across the country<sup>2</sup>.</i></p> <p><i>In Havering, black households accounted for 18% of homeless acceptances in 2014/15 but forms just 5% of Havering's overall population<sup>3</sup>. This rate of homelessness over-representation has risen by 3% over the past three years for black households. Similarly mixed ethnicity households form just 2% of Havering's population but a disproportionate 6% of homeless households<sup>3</sup></i></p> <p><i>Housing Services internal BME Housing Research<sup>4</sup> has found that some reasons for the homelessness over-representation include;</i></p> <ul style="list-style-type: none"> <li><i>• BME households in Havering are most likely to become homeless due to loss of an assured short-hold tenancy in the private rented sector</i></li> <li><i>• BME households have lower incomes on average in comparison to white counterparts</i></li> <li><i>• BME households are more likely to apply in older age band groups compared to white British households</i></li> <li><i>• BME households are more likely to have larger families and live in overcrowded conditions because dependants are more likely to live with families for longer than white dependants</i></li> <li><i>• BME households are facing increased homelessness due to friends, family eviction</i></li> <li><i>• Displacement and increased migration into Havering from inner London Boroughs where BME population is higher</i></li> <li><i>• BME households are more likely to have a priority housing need due to being an applicant with dependent children, compared to white British households</i></li> </ul> <p><i>BME Households form 37% of the current tenants in interim temporary accommodation, compared to 63% of white households in Havering. In terms of longer-term temporary accommodation placements, BME households compose of 21% of current tenants compared to 69% of white tenants<sup>5</sup>. On the Housing register, BME groups compose 12% of the waiting list<sup>6</sup>. Whilst this appears a low composition, as a collective group, proportionately (compared to their prevalence in the population) there are more accepted statutory homeless applicants from the BME community.</i></p>

	<i>Gypsies or Irish Travelers represent only 0.1% (or about 160 people) of Havering's population<sup>1</sup>. The Council needs to do more research on the housing needs of this group and understand links to homelessness. This is a recommended action from this EIA.</i>
--	--

### **Evidence - Key Policy Impact:**

#### **1. Implementing an accommodations pathway to make suitable offers and placements**

##### **a) Placements pathway process policy**

In general, the policy is positive for all households of all ethnicities, as it will lead to transparency and an improved understanding of how homeless applications are dealt with in the placements process.

Numerically, White/white other households comprise of the greatest homeless demand for accommodation in Havering and therefore a greater impact upon this ethnicity group will apply.

It is recognised the Homeless Placements Policy needs to be accessible within all ethnic groups. Havering has a low percentage of 'no people in household have English as a main language' (2.3%) compared to other London Boroughs<sup>1</sup>. However some service users do have language barriers and have difficulty reading publications. According to 2011 census data, the main foreign languages spoken in Havering after English by count and percentage are: Lithuanian, Polish, Panjabi, Bengali, Tagalog and Filipino<sup>1</sup>. The Service will offer translation services that will be available to all homeless applicants on request. Documentation will be available in easy-read and other formats.

The effect on applications and household ethnicity needs to be monitored. As more people from the BME community are moving into Havering from inner-London boroughs, the service will need to monitor the location of placements against ethnicity to prevent segregated communities. It will also need to monitor the cultural needs and requirements of applicants to ensure this increasing group in the population do not experience any negative impact in the placements process.

The Housing Service works in partnership with Children's Services and may provide accommodation to homeless people to whom the Council has a duty of care under legislation towards, for example this may include No Recourse to Public Funds (NRPF) where ethnic minority households are prevalent. As such households are ineligible for provision under the Housing Act 1996 and so the placements pathway process will not strictly apply however separate procedures are implemented by Children's Services teams. Aspects such as the suitability assessment policy and acquisition policy will ensure that all accommodation provided to these clients are fit for purpose and suited to individual need.

#### **2. Suitability assessment policy**

Overall the policy impact is positive for households of all ethnicity types. The suitability carried out on each case allows for any factors such as race be considered in making decisions on a suitable property location. The Council will not offer temporary or settled accommodation near a perpetrator of race crime or harassment.

In considering whether the property itself is suitable for individual circumstance, the size of accommodation will be assessed against space and room standards in line with legislation. The Council's research has indicated that BME households are more likely to live in overcrowded conditions and are most in need of larger family size homes. Upon first point of contact to the service, the suitability assessment will ensure that the size of accommodation provided is according to need. If a household becomes overcrowded whilst living in long-term temporary accommodation, prioritisation criteria are awarded under the 'prioritisation transfer for moves between TA policies'.

The service will also consider access to cultural or faith resources in making decisions on the suitability of property location however this will not have any impact on whether an application is prioritised for in-borough or out of borough accommodation. The Council will not acquire socially isolated accommodation

and will ensure local facilities including cultural or faith resources are considered in making a property acquisition.

### **3. Discharge of Homelessness Duty by way of a settled offer of private rented accommodations for a period of 12 months policy**

White households in Havering drive the majority of homeless demand. As a consequence white households are more likely to be impacted by a discharge of homelessness duty by way of a PRSO for a period of 12 months, due to sheer demand from this ethnic group.

Offers to statutory homeless households will be made to the longest waiting (prioritised) household on the list for long-term temporary or settled accommodation, for whom the available property is suitable. This decision will not be made in relation to ethnicity.

### **4. Acquisition of out of borough accommodation for use of temporary and settled offers of private rented criteria *and***

### **5. Application of in-borough prioritisation criteria, to decide how accommodation will be allocated to homeless applicants both inside and outside of Havering policy**

Compared to white British households, BME groups in Havering have a need for larger accommodation, primarily three bedroom homes<sup>7</sup>. There is a more limited supply of three and four bedroom accommodation in Havering, which has a disproportionate impact on waiting times for BME groups, as the greater demand has historically been for one and two bedroom accommodation. To mitigate this impact, the procurement team is currently aiming to procure accommodation of all bedroom sizes both inside and outside the borough it has seen the increased demand across all bedroom sizes.

BME households are over-represented in homelessness statistics compared to population demographics but do not spend any longer in interim or emergency accommodation than white households. Households from all backgrounds are spending longer in emergency or interim temporary accommodation, as there is a limited supply of suitable long-term options. The acquisition of out of borough accommodation is a strategy for increasing the Council's stock of long-term accommodation for homeless households, which is envisioned to alleviate pressures on waiting times and drive efficiencies in move ons throughout the placements process. A drive in efficiency is expected to benefit all household types of all ethnicities.

Race has no significant impact on the likelihood of being placed in or out of borough. BME households currently represent 29% of out of borough placements compared to 64% of white counterparts<sup>5</sup>. The suitability factors on deciding location is based entirely on assessment of housing need. Available (longer-term or settled) accommodation will be offered to the longest waiting household with the highest needs for whom the property (in or out of borough) is suitable.

Due to their over-representation in homeless statistics, it has been considered whether any out of borough allocation policy would disproportionately affect those where homelessness is more prevalent compared to their cohort in the population (for example, black African and mixed households), where displacement would raise concerns of potential inequality for these groups. Whilst this has been taken into consideration, the Council is only able to make placements according to a case by case assessment of need that will ensure all accommodation provided is suitable. Geographical distribution of different racial groups to accommodation across the stock will be monitored in and out of borough by the service to ensure that locational decisions do not lead to segregation. This is an action made by this EIA.

The Housing Options service can offer other advisory alternatives such as rent deposit schemes if homeless applicants want to stay inside the borough.

The in-borough prioritisation criterion has no direct positive, negative or discriminatory effect on ethnicity.

### **6. Introduction of prioritisation criteria for moves between temporary accommodation policy**

The transfer prioritisation policy will not directly advance or adversely affect people of different races in the placements process. The impact described is neutral.

An increased number of BME households may meet transfer prioritisation criterion (7) for overcrowding as research has found that BME households in Havering are more likely to be overcrowded than white households<sup>7</sup>. Further research can be done to further understand the needs of people across different ethnicities with a transfer requirement.

## **Evidence – Data**

### **1. Demographic population in Havering by ethnicity**

\* Source<sup>1</sup>: Table 1 – Census 2011 Population Estimates, ONS ref. 'This is Havering' 2015, Public Health Intelligence:LBH

- Havering is one least diverse boroughs in London, with 83.3% of its population as White British, this is a level higher than the England and London average
- As a broad ethnic group Asian households form the second largest group (4.9%) behind white households
- As a single ethnicity, Black African households (3%) form the greatest group of all BME households.
- Over 2001 Census to the 2011 Census, the BME population has more than doubled from 8% to 17%

		Comparable Census 2011 Ethnic Groups	Population count	% of total Havering population
White		White; English/Welsh/Scottish/Northern Irish/British	197,615	83.3%
		White; Irish	2,989	1.3%
		White; Gypsy or Irish Traveller	180	0.1%
		White; Other White	7,185	3.0%
Mixed		Mixed/Multiple Ethnic Groups; White and Black Caribbean	1,970	0.8%
		Mixed/Multiple Ethnic Groups; White and Black African	712	0.3%
		Mixed/Multiple Ethnic Groups; White and Asian	1,154	0.5%
		Mixed/Multiple Ethnic Groups; Other Mixed	1,097	0.5%
Asian		Asian/Asian British; Indian	5,017	2.1%
		Asian/Asian British; Pakistani	1,492	0.6%
		Asian/Asian British; Bangladeshi	975	0.4%
		Asian/Asian British; Chinese	1,459	0.6%
		Asian/Asian British; Other Asian	2,602	1.1%
Black		Black/African/Caribbean/Black British; African	7,581	3.2%
		Black/African/Caribbean/Black British; Caribbean	2,885	1.2%
		Black/African/Caribbean/Black British; Other Black	1,015	0.4%
Other		Other Ethnic Group; Arab	311	0.1%
		Other Ethnic Group; Any Other Ethnic Group	1,013	0.4%

### **2. Havering Housing Needs Data of BME household and housing requirement**

\*Source 7 -Table 2 – Havering Housing Needs Survey 2012

The table below details the housing needs (size of accommodation) and current housing situation of ethnic minority groups in Havering. BME Households have a greater need than other households in the borough for larger accommodation. The greatest housing need is for three bed properties. BME households are more likely to live in flats for 1 and 2 bedroom accommodation and semi-detached or terraced properties for 3 and 4 bedroom accommodations.

Type	Bedsit/ 1-bed		2-bed		3-bed		4-bed		5+ bed		Total
	N <sup>os</sup> .	%	N <sup>os</sup> .	%	N <sup>os</sup> .	%	N <sup>os</sup> .	%	N <sup>os</sup> .	%	
Detached	0	0.0	0	0.0	487	9.3	402	21.8	209	59.1	<b>9.9</b>
Semi-detached	50	4.6	257	9.8	2,564	49.2	1,132	61.6	122	34.6	<b>37.1</b>
Terraced	29	2.7	592	22.6	1,501	28.8	173	9.4	0	0.0	<b>20.7</b>
Flat / Maisonette	908	82.9	1,534	58.7	244	4.7	0	0.0	22	6.3	<b>24.3</b>
Bungalow	107	9.8	231	8.8	415	8.0	132	7.2	0	0.0	<b>8.0</b>
<b>Total</b>	<b>1094</b>	<b>100.0</b>	<b>2,614</b>	<b>99.9.0</b>	<b>5,211</b>	<b>100.0</b>	<b>1,839</b>	<b>100.0</b>	<b>353</b>	<b>100.0</b>	<b>100.0</b>

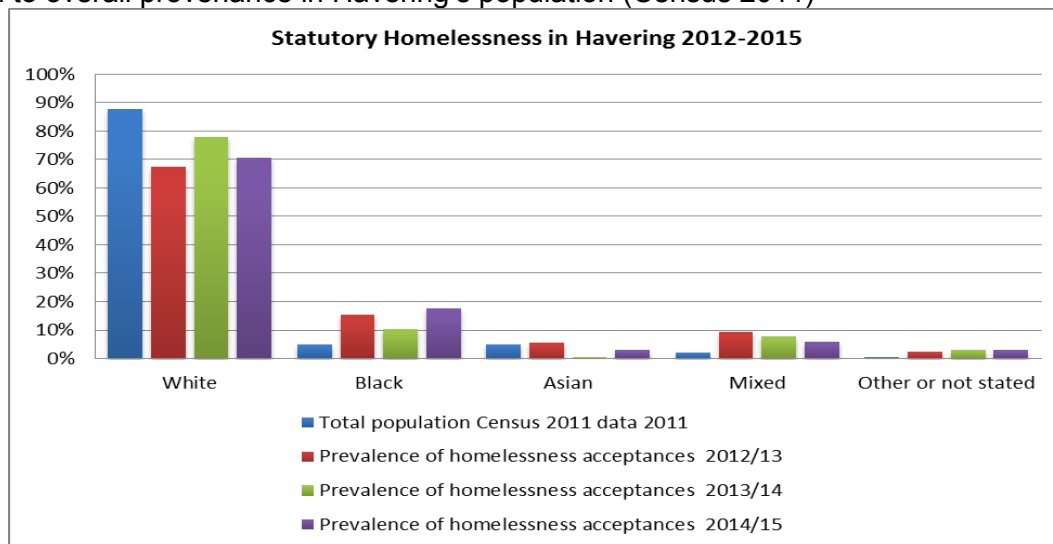
- There are more BME households with no earnings (9.8%) than the whole population (7.8%)
- 64.8% of BME households who responded to the survey earn less than £40,000
- 37.1% of BME households who responded to the survey are living in a semi-detached property and 24.3% live in flat / maisonette

- 46.9% of those BME households who said their home was inadequate cited that it was too small compared to 36.3% for all households
- Over-occupation affects 9.2% (1,024 implied households) in the BME community according to the 'Bedroom standard'. (Borough – 3.2%).
- 14.1% of BME households had a member with a disability. 46.3% of them had a walking difficulty.

### 3. Housing demand from statutory homeless households by ethnicity

\*Source3 -Table 3– P1E Data statutory homeless households by ethnicity and population comparison (Census 2011 data)<sup>4</sup>

The table below details statutory homeless placement trends by ethnicity over the past three years, in comparison to overall provenance in Havering's population (Census 2011)



The table shows that in 2014-2015 there is a significant over-representation of black households who are homeless compared to general proportion of Havering's population. This is similar for mixed/other households or those who have not disclosed ethnicity. There is an under-representation of homeless, white and Asian households in Havering.

### 4. BME Research

\* Source4 - Internal Housing Service - BME Homelessness Research 2015<sup>5</sup>

- White households are under-represented in homeless households in Havering and have below average homeless acceptance rates. This is the same for Asian households
- BME households with dependent children form the largest priority housing need group in Havering. Homelessness amongst white households with dependent children is also increasing
- The second highest priority housing need category for BME households is applications from pregnant women with no dependents, this is a similar trend for all ethnicity groups
- Of white households, the most prevalent reason for making a homeless application includes 'Parents no longer willing to accommodate'.
- For BME households, the greatest reason for making a homeless application is 'loss of an assured Shorthold tenancy in the private rented sector', this is a proportionately higher representation than white British households
- The white British group is over-represented by over 50% than other ethnicities as facing homelessness due to friends and family eviction.
- Homelessness is rising most in the 18-24 age band for white British households. The bands 25-34 and 35-44 age bands are facing the greatest increase in homeless applications from BME households

### 5. All Housing Decisions 2009-2014 by ethnicity

\* Source3 -Table 4 – Havering Council P1E Submissions 2009 to 2014/15 Q1<sup>6</sup>

Homeless Decisions from 01/04/2009 to 24/11/2014					
Ethnicities	Duty	%	non duty	%	acceptance%
White British	629	66%	4059	71%	15%
White Irish	8	1%	50	1%	16%
White Other	53	6%	286	5%	19%
White all	690	72%	4395	76%	16%
White and Black Caribbean	20	2%	123	2%	16%
White and Black African	29	3%	137	2%	21%
White and Asian	9	1%	37	1%	24%
Other Mixed Background	9	1%	42	1%	21%
Mixed all	67	7%	339	6%	20%
Black African	91	10%	295	5%	31%
Black Caribbean	24	3%	110	2%	22%
Black Other	22	2%	90	2%	24%
Black all	137	14%	495	9%	28%
Bangladeshi	7	1%	20	0%	35%
Chinese	0	0%	6	0%	0%
Indian	4	0%	13	0%	31%
Pakistani	2	0%	17	0%	12%
Asian Other	8	1%	67	1%	12%
Asian all	21	2%	123	2%	17%
Other	0	0%	2	0%	0%
not known/no response	38	4%	395	7%	10%
<b>total</b>	<b>953</b>		<b>5749</b>		<b>17%</b>
total other ethnicity not stated	324	34%	1690	29%	19%

As this table demonstrates the highest acceptance rates of a single collective group are for the Black population at 28%. The White group sits at 16% whilst the White British group is even lower at 15%. This indicates that proportionally speaking there are more accepted applicants from 'BME' backgrounds (19%) than the White British backgrounds.

## 6. Homeless placements by ethnicity

\*Source5 -Table 5- Havering Council Internal OHMS snapshot data: Current Temporary Accommodation tenants (10/10/2016)<sup>7</sup>

The table below details current tenants of interim and long term temporary accommodation by ethnicity of the lead applicant.

Placements by ethnicity						
Ethnicity	Interim placements (hostel+ non secure tenancies)		Long-term temporary accommodation			
			In-borough placements		Out of borough placements	
	Count	%	Count	%	Count	%
White/ white other	55	62%	348	70%	38	64%
Black / black other	15	17%	49	10%	11	19%
Asian / other	12	14%	17	3%	2	3%
Mixed/other	5	6%	33	7%	4	7%
Unknown or not stated	1	1%	51	10%	4	7%
<b>Total</b>	<b>88</b>	<b>100%</b>	<b>498</b>	<b>100%</b>	<b>59</b>	<b>100%</b>

As there are greater homeless demands in general from white/white other households in Havering, this group comprises of the majority of interim and long-term placements both in and out of borough. BME households are no more likely than white households to be placed out of borough. Due to their

prevalence in the homeless population, white households are more likely to be placed both in and out of borough.

## 7. Housing register by ethnicity

\*Source 6- Table 6 – Havering Council Social Housing Waiting List<sup>8</sup>

The table below details the composition of the Council's Housing Register by ethnicity of the lead applicant.

Housing register by ethnicity	count	%
White / white other	2290	84%
Black / black other	60	7%
Asian / other	19	2%
Mixed / other	37	3%
Unknown/not stated	55	3%
Total	2726	100%

BME households compose of 12% of the overall social housing waiting list compared to the vast majority being white households 84%.

## 8. Housing consultation results by ethnicity

\*Source 8 - Havering Council Housing Consultation Data Report 2016<sup>9</sup>

Consultation results by ethnicity type		
Ethnicity	Count	%
White/ white other	217	71%
Black / black other	33	11%
Asian / other	13	4%
Mixed	9	3%
Other	4	1%
Prefer not to say	16	5%
Blank	15	5%
Total	307	100%

All ethnicities as a majority were satisfied with all proposals in the placements policy, excluding the 'other ethnic' group who had a split opinion between agree to disagree for the accommodation pathway process policy, placements suitability factors and transfer prioritisation criteria. Other ethnic groups mainly disagreed with the discharge of duty policy however there was a low response rate from this group overall. There was high dissatisfaction rate from Black households for the discharge of duty policy however on the whole more people agreed or strongly agreed with the policy overall.

The full breakdown of how each ethnicity group responded to each of the main policy proposals is attached under Appendix 3 of the Housing Consultation report.

### Sources:

- <sup>1</sup> ONS (2011) *Population Statistics in Havering 2011-2016*. London Borough of Havering & Public Health Service (2015) *Table 2: This is Havering: A Demographic and Socio-economic profile: Key Facts and Figures*. London Borough of Havering Council
- <sup>2</sup> Shelter (2004) *The Black and Minority Ethnic Crisis Report*. [pdf] Available at: [http://england.shelter.org.uk/professional\\_resources/policy\\_and\\_research/policy\\_library/policy\\_library\\_folder/the\\_black\\_and\\_minority\\_ethnic\\_housing\\_crisis](http://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/policy_library_folder/the_black_and_minority_ethnic_housing_crisis) Accessed on 10/03/2016
- <sup>3</sup> LBH (2016) *P1E Homelessness data report: Statutory homeless applicants by ethnicity 2012-2015*.

London Borough of Havering

- <sup>4</sup> LBH (2015) *BME Homelessness Internal Research*. London Borough of Havering
- <sup>5</sup> LBH (2016) *Havering Council internal OHMS snapshot data*. London Borough of Havering. Accessed on 18/03/2016
- <sup>6</sup> LBH (2016) *Social Housing waiting list*. London Borough of Havering. Accessed on 10/03/2016
- <sup>7</sup> DCA (2012) *Housing Needs Survey*. London Borough of Havering
- <sup>8</sup> LBH (2016) *Housing Policy Consultation Report 2016*. London Borough of Havering.

**Religion/faith:** Consider people from different religions or beliefs including those with no religion or belief

Please tick (✓) the relevant box:

**Positive**

**Neutral**

**Negative**

**Overall Impact:**

*Although the council does not collect measurable data on homeless applicant's religion or belief, the general impact of the Homeless Placements Policy on people of all religions and belief systems is positive. The new policy ensures people of all backgrounds can access transparent guidance on the placements process that will be beneficial to all religious groups.*

*The Council has a statutory legal duty under Homelessness legislation to provide accommodation to people who are eligible, homeless and in housing need. The Housing Service responds to an overall general demand and does not have a negative nor discriminatory effect on people with different religious belief systems whilst placing applicants into interim, long term temporary or settled accommodation.*

*To ensure an improved impact analysis can be made between homelessness and religion in the future, the service will adapt monitoring forms to ensure this information can be recorded.*

**Evidence - Key Policy Impact:**

- 1. Implementing an accommodations pathway to make suitable offers and placements**
- 2. Placements pathway process policy**

In general, the policy is positive for households of all religions and faith groups, as it will lead to transparency and an improved understanding of how homeless applications are dealt with in the placements process.

**3. Suitability assessment policy**

The impact of the new suitability assessment will be positive for people of all religions, making the assessment process more transparent and clearly defined for customers.

All Housing staff has been trained in cultural awareness. A lack of awareness about a person's religious or other beliefs can lead to discrimination. This is because religion can play a very important part in the daily lives of people and access to cultural and faith resources may be of significant importance in the suitability of accommodation (impact discussed under 1b). Whilst religion will not wholly direct if a placement location is suitable for a household, it is something council staff will ask for in the suitability assessment as a consideration.

The Council will not offer temporary or settled accommodation near a perpetrator of race crime or



religious harassment.

#### **4. Discharge of Homelessness Duty by way of a settled offer of private rented accommodations for a period of 12 months policy**

Religious groups where homelessness is more prevalent will be disproportionately affected by this policy however; as the Council does not collate data on religion or faith the direct impact of this policy cannot be identified.

An offer of settled private rented accommodation will only be made in accordance with the suitability of accommodation assessment. A PRSO and discharge of homelessness duty will have to be identified as a suitable outcome. As outlined, the religious needs of households will be considered.

#### **5. Acquisition of out of borough accommodation for use of temporary and settled offers of private rented criteria and**

#### **6. Application of the suitability assessment to decide on the location of placements**

The Council will consider religious sites and makeup of nearby communities in the area prior to making out of borough acquisition decisions to ensure sites are in locations that are accessibility for all faith communities. This policy could have a potential impact upon all faith groups since it is possible households may be placed out of borough which may mean additional travel to current place of worship or relocation to a closer establishment.

To mitigate this impact, the Council will not acquire out of borough accommodation in remote locations but will ensure local facilities and amenities including places of worship are in reasonable travel proximity. Therefore, any in-borough or out of borough offer will be considered in equal measure for people with different religions- whereby the need to be close to a faith establishment will be considered.

Any potential impact will also be mitigated by the Council through a review of a person's individual circumstances during the new suitability assessment, and information will be provided about facilities and amenities in the vicinity of the proposed temporary or settled accommodation. The suitability assessment will ensure that where families will need to be relocated, cultural considerations have been taken into account such as places of worship and community faith groups.

Individuals will be have the opportunity to show 'other' circumstances which demonstrate an exceptional and compelling need which cannot be met outside or near to the London Borough of Havering. For example this may include the need to be near religious sites or faith organisations in the local community.

For this reason a positive impact is described.

#### **7. Introduction of prioritisation criteria for moves between temporary accommodation policy**

The council's prioritisation criterion for moves between TA will not advance or discriminate people of different religions or faiths in the process. A neutral impact is therefore identified.

### **Evidence – Data**

#### **8. Demographic population in Havering by Religion**

*\* Source 1 - Census 2011 Population Estimates, ONS ref. 'This is Havering' 2015, Public Health Intelligence: LBH*

In the 2011 Census, over 66% of the population of Havering stated that they are Christian, with 23% who declared that they do not have any religion. Just below 7% preferred not to state their religion. For other religions/faiths: Muslim-2%, Hindu-1%, Sikh-1%, Jewish-0.5%, Buddhist 0.3%, 'Other' 0.3%.

The Council does not hold data on the religious beliefs of its homeless applicants to be able to analyse

the direct impact in this area.

## 9. Housing Consultation Results by Religion

\*Source 2 - Havering Council Housing Consultation Data Report 2016<sup>9</sup>

Consultation results by religion		
Religion	Count	%
Buddhist	3	1%
Christian	145	47%
Hindu	4	1%
Jewish	2	1%
Muslim	7	2%
Sikh	3	1%
No religion	99	32%
Other	10	3%
Prefer not to say	21	7%
Blank	13	4%
<b>Total</b>	<b>307</b>	<b>100%</b>

Households of each type of religion as a majority were satisfied (strongly agreed or agreed) with each key policy in the Homeless Placements Policy. Sikh households had a split decision between agree, disagree and I don't know type responses.

The full breakdown of how each ethnicity group responded to each of the main policy proposals is attached under Appendix 3 of the Housing Consultation report.

### Sources used:

- <sup>1</sup>ONS (2011) *Population Statistics in Havering: Religion*. London Borough of Havering & Public Health Service (2015) *This is Havering: A Demographic and Socio-economic profile: Key Facts and Figures*. London Borough of Havering Council
- <sup>2</sup>LBH (2016) *Housing Policy Consultation Report 2016*. London Borough of Havering.

**Sexual orientation:** Consider people who are heterosexual, lesbian, gay or bisexual

Please tick (✓) the relevant box:

**Positive**

**Neutral**

**Negative**

### Overall impact:

*Although the council does not collect measurable data on homeless applicant's sexual orientation overall the impact of the Homeless Placements Policy on people of all orientations is positive. The new policy ensures people of all backgrounds can access transparent guidance on the placements process that will be beneficial to all people of all sexual orientations.*

*The Council has a statutory legal duty under Homelessness legislation to provide accommodation to people who are eligible, homeless and in housing need. The Housing Service responds to an overall general demand and does not have a negative nor discriminatory effect on people with different sexual orientations whilst prioritizing applicants for interim, long term temporary or settled accommodation.*

## **Evidence: Key Policy Impact analysis**

### **1. Implementing an accommodations pathway to make suitable offers and placements**

#### **a) Placements pathway process policy**

Crisis's (2005) research paper on 'Sexuality and Homelessness'<sup>1</sup> identified there is vulnerability and associated risk with homophobia contributing to the loss of a stable home. This is particularly the case with single homeless youths who are gay, lesbian, bisexual or transgender in the LGBT community. Common experiences for these youths include homelessness caused by when parents become hostile or intolerant of a child's expressed LGBT orientations. Estimates suggest up to 30% of single people evicted or threatened by homelessness could be because of this reason. The main cause of homelessness in Havering is eviction by parents who are no longer willing to accommodate.

The Council has no data relating to the sexual orientation of homeless applicant and therefore the full impact of the homeless placements process and each key policy cannot accurately be judged. The Council will be improving monitoring of this protected characteristic, which is a recommended action of this EIA.

In general, the policy will be positive for households of all sexual orientations as it will lead to transparency and an improved understanding of how homeless applications are dealt with in the placements process.

#### **b) Suitability assessment policy**

As part of the duties under the Equality Act 2010, the Council will have due regard to the sexual orientation of an applicant when determining the suitability of a property. Any issues associated with applicants sexual orientation in making a placement will be considered under 'other special circumstance factors' in the suitability assessment outlined. For example, a victim of harassment or violence based on sexuality will not be placed in locations close to a perpetrator.

The impact of the new suitability assessment will be positive for people of all sexual identities making the assessment process more transparent and clearly defined for all customers.

### **2. Discharge of Homelessness Duty by way of a settled offer of private rented accommodations for a period of 12 months policy**

Sexual orientations where homelessness is more prevalent will be disproportionately affected by a settled offer or privately rented accommodation and discharge of homelessness duty decision; however as the Council does not collate this data, the impact cannot be identified.

Offers to statutory homeless households will be made to the longest waiting (prioritised) household on the list for long-term temporary or settled accommodation, for whom the available property is suitable. This decision will not be made in relation to sexual orientation.

### **3. Acquisition of out of borough accommodation for use of temporary and settled offers of private rented criteria *and***

### **4. Application of in-borough prioritisation criteria, to decide how accommodation will be allocated to homeless applicants both inside and outside of Havering policy**

The Council is able to procure a greater supply of accommodation that is affordable for homeless residents located outside of Havering Borough boundaries. This policy is therefore expected to increase the Council's overall portfolio and the Council aims to drive efficiencies in the placements process for this

reason. This has a positive impact for all households.

Sexual identity does not fulfill a standalone suitability factor for consideration of an in-borough placement. This means that different sexual orientations will not be directly prioritised over another for accommodation inside of Havering. However, the Council will consider 'any other special circumstance' for an in-borough prioritisation decision on a case by case basis, which may include consideration to factors such as sexual harassment or the need to be placed away from a perpetrator of violence caused by homophobia

#### 5. Introduction of prioritisation criteria for moves between temporary accommodation policy

The council's prioritisation criterions for moves between TA will not advance or discriminate people of sexual orientations in the process. A neutral impact is therefore identified. The Council will consider people who need to move from current accommodation due to serious violence or due to a serious safeguarding issue caused by homophobia.

### Evidence – Data

#### 1. Housing Consultation Results by Sexual Orientation

\*Source 2 - Havering Council Housing Consultation Data Report 2016<sup>9</sup>

Consultation results by Sexual orientation		
Heterosexual	225	73%
Gay man	4	1%
Gay woman/lesbian	4	1%
Bi-sexual	3	1%
Other	12	4%
Prefer not to answer	36	12%
Blank	23	7%
total	307	100%

Households of all sexual orientations as a majority were satisfied (strongly agreed or agreed) with each key policy in the Homeless Placements Policy.

The full breakdown of how each ethnicity group responded to each of the main policy proposals is attached under Appendix 3 of the Housing Consultation report.

#### Sources used:

- <sup>1</sup>Crisis (2005) Sexuality and Homelessness [pdf] Available at: <http://www.crisis.org.uk/publications-search.php?fullitem=131> [Accessed on 04/04/2016]
- <sup>2</sup>LBH (2016) Housing Policy Consultation Report 2016. London Borough of Havering.

**Gender reassignment:** Consider people who are seeking, undergoing or have received gender reassignment surgery, as well as people whose gender identity is different from their gender at birth

Please tick (✓) the relevant box:

**Positive**

#### Overall impact

<b>Neutral</b>	✓	<i>Although the Council does not collect data on gender re-assignment overall the new policy ensures people of all backgrounds can access transparent guidance on the placements process that will be beneficial to all gender identities.</i>
<b>Negative</b>		<p><i>The Council has a statutory legal duty to provide accommodation for people of all protected characteristics including people who have had a gender re-assignment who are eligible, homeless and in priority housing need.</i></p> <p><i>This policy therefore ensures people across a range of equality backgrounds can access clear guidance on the whole placements process. Transgender households or households seeking a gender re-assignment will not be discriminated against in the homeless placements process.</i></p>

**Evidence- Key Policy Impact:**

- 1. Implementing an accommodations pathway to make suitable offers and placements**
- 2. Placements pathway process policy**

National estimates indicate up to 10,000 people have gone through gender reassignments (ONS 2009)<sup>1</sup>. Service specific data on gender-reassignment is unavailable. Therefore the full impact of this homeless placements process on transgender people cannot be accurately judged. However it is not expected that this cohort of service users will be negatively affected, the Council has to provide accommodation for homeless people who are eligible under homelessness legislation.

To understand if there is any over-representation of transgender people in the homeless community and determine if there is any disproportionate impact of this policy the Housing Service will be working on improving our monitoring of this protected characteristic. To ensure an improved impact analysis can be made in the future, the service will adapt monitoring forms to ensure all demographic detail can be recorded. This is a recommended action of this EIA.

**3. Suitability assessment policy**

As part of the duties under the Equality Act 2010, the Council will have due regard to the gender of an applicant when determining the suitability of a property. Transgender women affected by domestic violence can be offered placements into refuges. For all other placement types offers will be made in response to a general homeless demand and will not have a negative impact upon gender identity. Any transgender issues in making a placement to a particular location will be considered under 'other special circumstance factors' in the suitability assessment outlined. For example, a victim of harassment or violence will not be placed in locations close to a perpetrator.

**4. Discharge of Homelessness Duty by way of a settled offer of private rented accommodations for a period of 12 months policy**

As the Council does not collate data on transgender households the full impact of this policy cannot be identified however as the transgender community is a minority group within the population, this policy is expected to have a reduced impact.

Offers to statutory homeless households will be made to the longest waiting (prioritised) household on the list for long-term temporary or settled accommodation, for whom the available property is suitable. This decision will not be made directly on the basis of gender.

- 5. Acquisition of out of borough accommodation for use of temporary and settled offers of private rented criteria *and***
- 6. Application of the suitability assessment to decide on the location of placements**

The Council is able to procure a greater supply of accommodation that is affordable for homeless residents located outside of Havering Borough boundaries. This policy is therefore expected to increase the Council's overall portfolio and the Council aims to drive efficiencies in the placements process for this reason. This has a positive impact for all households.

Gender-reassignment does not fulfill a standalone suitability consideration factor for an in-borough placement. This means people who are transgender or seeking a gender re-assignment will not be directly prioritised over other gender identities for accommodation inside of Havering. However, the Council will consider 'any other special circumstance' for an in-borough prioritisation decision on a case by case basis, which may include consideration to other factors such as harassment, hate crime or the need to be placed away from a perpetrator .

### 7. Introduction of prioritisation criteria for moves between temporary accommodation policy

The council's prioritisation criterions for moves between TA will not advance or discriminate people of different genders. A neutral impact is therefore identified. The Council will consider people who need to move from current accommodation due to serious violence or due to a serious safeguarding issue caused hate crime against transgenderism.

### Evidence- Data

### 8. Housing Consultation Results

*\*Source 2 - Havering Council Housing Consultation Data Report 2016<sup>9</sup>*

No transgender or people facing a gender reassignment responded to the housing consultation and so their opinion on the key policy proposals cannot be analysed.

### Sources used:

- <sup>1</sup>Crisis (2005) *Sexuality and Homelessness* [pdf] Available at: <http://www.crisis.org.uk/publications-search.php?fullitem=131> [Accessed on 04/04/2016]
- <sup>2</sup>LBH (2016) *Housing Policy Consultation Report 2016*. London Borough of Havering.

### **Marriage/civil partnership:** Consider people in a marriage or civil partnership

*Please tick (✓) the relevant box:*

**Positive**

**Neutral**

**Negative**

### Overall impact:

*Although the council does not collect measurable data on homeless applicant's marital status overall the impact of the Homeless Placements Policy on people of all orientations is positive. The new policy ensures people of all backgrounds can access transparent guidance on the placements process that will be beneficial to all people of all backgrounds.*

*The Council has a statutory legal duty to respond to a general demand under Homelessness legislation to provide accommodation to people who are eligible, homeless and in housing need.*

### Evidence: Key Policy Impact

1. Implementing an accommodations pathway to make suitable offers and placements
2. Placements pathway process policy

In general for reasons discussed, the policy is positive on all household types (married, civil partnership single, divorced and widowed) as it will lead to transparency and an improved understanding of how homeless applications are dealt with in the placements process.

The policy will have the greatest and most positive impact upon lone parent and single people who make up the overwhelming majority of the homeless demand in Havering (81%)<sup>1</sup>.

Interim accommodation has provision for both single and family size rooms to meet the needs of all household sizes. There is a greater supply of one and two bedroom long term temporary accommodation in line with the Council's greater demand pressures from smaller household structures (single people and lone parents)<sup>2</sup>. To prevent any negative impact in wait times for typically larger households with children, it is the Council's policy to focus on procuring accommodation of all property sizes.

Havering has a higher population of married people or couples in a same sex civil partnership and couples who are living together than England or London wide averages (57.6%)<sup>3</sup>. The borough has the lowest population of single households compared to England and London averages and the lowest population of single people living alone<sup>3</sup>. Many single people in Havering live with friends or family and there are estimated high rates of concealed homelessness within this group.

Despite single people forming a low proportion of the population compared to regional comparators, Havering has a high representation of single people presenting as homeless within the population. Single people form the second highest statutory homeless group (21%) behind lone parents (60%)<sup>1</sup>. Couples who are married, in a civil partnership or cohabiting form a lower homeless demand in comparison to these groups. Couples with children form the third highest statutory homeless demand in Havering (14%) above homeless single or lone parents<sup>1</sup>.

Under legislation, homelessness assessments define priority housing need categories in line with statutory tests of vulnerability. Within the legislation there is inherent bias against single persons who are less likely to fulfil a priority need definition or meet the necessary statutory test of vulnerability; this is the case particularly for non-vulnerable young single males aged 18 to 35 on low incomes who have no physical handicap or disability. This is accepted as a necessary discrimination by both the ECHR and the Courts under the Human Rights Act 1998 and is, therefore, not considered sufficiently discriminatory as to make the legal framework untenable or unlawful.

As a result, this homeless placements policy is expected to have a reduced impact upon single people assessed as not 'vulnerable' under homelessness legislation, despite there being a pressing housing demand from this group. More household structures (married or couples in civil partnership with children) are more likely to be accepted as statutory homeless and require long-term temporary accommodation due to their priority need under homeless legislation.

### **3. Suitability assessment policy**

Overall the impact will be positive for all household structures as it ensures all homes provided are fit for purpose and individual needs. The policy makes the new suitability assessment process more transparent and clearly defined for all married couples, cohabiting couples, single people and people in a civil partnership.

### **4. Discharge of Homelessness Duty by way of a settled offer of private rented accommodations for a period of 12 months policy**

Proportionately, as the vast majority of lone parents and single people comprise of the greatest statutory homeless demand, these households are more likely to be affected by this policy compared to other groups (married people or those in a civil partnership cohabiting with or without children). However, in circumstances where a settled PRSO property becomes available, offers will be made according to the suitability of accommodation assessment and length of time on the waiting list. In this sense a neutral impact is described. No one household structure is directly prioritised for a particular type of offer (long term temporary accommodation or PRSO) over another.

5. Acquisition of out of borough accommodation for use of temporary and settled offers of private rented criteria *and*
6. Application of the suitability assessment to decide on the location of placements

The acquisition of out of borough accommodation is expected to have a positive impact on all types of statutory homeless households (married, civil partnership single, divorced or widowed). Increasing the Council's stock of long term temporary and accommodation has the potential to reduce waiting time spent in interim temporary hostel or emergency accommodation for all households. Overall the policy is expected to help drive efficiencies in the placements process.

Households of all structures (married, civil partnership, single or other) can be offered out of borough accommodation if suitable. Households with children (married, couples, lone parents, civil partnership, divorced or widowed) are more likely to be considered for in-borough placements through the identified suitability factors.

### 7. Introduction of prioritisation criteria for moves between temporary accommodation policy

The policy has a positive impact for households (married, civil partnership, lone parents, divorced or widowed) with children and pregnant mothers as it ensures a transfer from emergency accommodation will be prioritised within 5 weeks to avoid statutory penalties of being in emergency accommodation for a period beyond 6 weeks under homelessness legislation.

The criteria also outline prioritisation for households who become overcrowded whilst living in current accommodation. This secures a positive impact for family structures that grow with births of additional children.

### Evidence: Data

### 8. Demographic population in Havering by Marital Status

*\*Source 3 - Census 2011 Population Estimates*

#### 9. Table 1 - Martial/Civil partnership status percentage breakdown in Havering<sup>1</sup>

10. According to the 2011 Census, 49% of Havering residents are married while 33% are single (never married or never registered a same-sex civil partnership), 8% are divorced or formerly in a same-sex civil partnership which is now legally dissolved, 8% are widowed or a surviving partner from a same-sex civil partnership, 2% are separated (but still legally married or still legally in a same-sex civil partnership) and 0.1% are in a registered same-sex civil partnership.

11. Havering has the lowest proportion of single households over all England, Wales and London averages but the highest proportion of married households

12. Havering has the lowest population of registered same sex civil partnerships over all England, Wales and London average

	Single (never married or never registered a same-sex civil partnership)	Married	In a registered same-sex civil partnership	Separated (but still legally married or still legally in a same-sex civil partnership)	Divorced or formerly in a same-sex civil partnership which is now legally dissolved	Widowed (including surviving partner from a same-sex civil partnership)
England and Wales	34.6	46.6	0.2	2.6	9.0	7.0
England	34.6	46.6	0.2	2.7	9.0	6.9
London	44.1	39.8	0.4	3.2	7.4	5.0
Havering	33.0	48.5	0.1	2.4	8.0	7.9

#### 13. Table 2 - Living arrangement percentage breakdown<sup>1</sup>

14. Out of all England & Wales, England and London wide average, Havering has the highest population of people living as a couple - married or same sex civil partnership



	Living in a Couple: Married or in a registered same-sex civil partnership	Living in a Couple: Co-habiting	Not Living in a Couple: Single (never married or never registered a same-sex civil partnership)	Not Living in a Couple: Married or in a registered same-sex civil partnership	Not Living in a Couple: Separated (but still legally married or still legally in a same-sex civil partnership)	Not Living in a Couple: Divorced or formerly in a same-sex civil partnership which is now legally dissolved	Not Living in a Couple: Widowed (including surviving partner from a same-sex civil partnership)
England and Wales	45.9	11.9	25.8	1.4	2.1	6.6	7.0
England	45.9	11.9	25.8	1.5	2.1	6.5	6.9
London	37.4	10.8	35.4	2.9	2.7	6.1	5.0
Havering	47.5	10.1	25.9	1.2	2.0	6.0	7.9

## 15. Housing demand from statutory homeless households by household type

\*Source 1 - P1E Data Statutory Homeless households by household type (2013-2015)<sup>2</sup>

P1E Data: Households accommodated by household type and gender of household 2013-2015			
Household type	2013/14	2014/15	2015/16
Couples with children	76 (12%)	123 (20%)	91 (14%)
Lone parent			
• Male applicant	19 (3%)	12 (2%)	19 (3%)
• Female applicant	299 (48%)	280 (45%)	372 (57%)
Single person			
• Male applicant	52 (8%)	49 (8%)	30 (5%)
• Female applicant	116 (19%)	125 (20%)	102 (16%)
All other household groups	55 (9%)	34 (6%)	35 (5%)
Total	617 (100%)	623 (100%)	649 (100%)

The table shows that the majority of homeless demand over time is from female lone parent and female single people. Households with children form 74% of the overall homelessness demand. Female lone parents form the greatest demand from a single group.

## 16. Housing Consultation Results

\*Source 4 - Havering Council Housing Consultation Data Report 2016<sup>9</sup>

Housing consultation results by household type		
Household type	Respondent profile	
	No.	%
Couple no children	32	10%
Couple with children	81	26%
Lone parent	84	27%
Prefer not to say	31	10%
Single person	67	22%
Blank	12	4%
Total	307	100%

Whilst the consultation captured the household type of respondents it did not ask for declaration if couples were single or married or in a civil partnership. All household types were satisfied (strongly agreed or agreed) with each key policy within the homeless placements policy.

The full breakdown of how each ethnicity group responded to each of the main policy proposals is attached under Appendix 3 of the Housing Consultation report.

**Sources used:**

- <sup>1</sup>LBH (2016) *P1E Homelessness data report: Statutory homeless applicants by household type and gender 2013-2015*. London Borough of Havering
- <sup>2</sup>DCA (2012) *Housing Needs Survey*. London Borough of Havering
- <sup>3</sup>Census (2011) *Population estimates: Local Authority level*. ONS
- <sup>4</sup>LBH (2016) *Housing Policy Consultation Report 2016*. London Borough of Havering.

**Pregnancy, maternity and paternity:** Consider those who are pregnant and those who are undertaking maternity or paternity leave

Please tick (✓) the relevant box:

**Positive**

**Neutral**

**Negative**

**Overall impact:**

*Overall the general impact of the Homeless Placements policy on pregnancy and maternity is positive for reasons of offering clarity and transparency in the placements process. The Council has a statutory legal duty to provide accommodation to all household types who are eligible, homeless and in housing need.*

*The Housing Act 1996 defines homeless pregnant women and households with dependent children as a priority housing need category. This means that families with children or expectant mothers are prioritised within homelessness legislation for accommodation and form the Council's greatest homeless demand for temporary accommodation. As a result, the policy (in particular all prioritisation criteria) is likely to have a greater impact on pregnant women and households with dependent children (i.e. lone parents, couples with children household structure) over single male applicants and couples without children.*

**Evidence: Key Policy Impact**

**1. Implementing an accommodation pathway to make suitable offers and placements**  
**a. Placements pathway process**

As the population of Havering has grown there has been a corresponding change in the number of births to women residents in Havering. There has been a 26% increase in the number of births per year in Havering from 2002 to 2012), and this is forecast to continue to increase<sup>1</sup>. The teenage conception rate (under age 18 in Havering is below that of London and England however the conception rate is significantly higher than averages in certain wards of the borough where deprivation rates are also high<sup>2</sup>. Teenage pregnant households (16 and 17 years old) are also classed as a vulnerable priority housing need category under homeless legislation.

Single pregnant households are a high risk group susceptible to homelessness. This is particularly the case for young pregnant households who are more likely to be unemployed and on low income. The homeless demand from pregnant women and households with children in Havering mirror demographic data, with notable increases being seen in the number of homelessness presentations over the past three years.<sup>3</sup> The policy will have the greatest and most positive impact upon lone parent, single or expectant mothers who make up the overwhelming majority of the homelessness demand (57%)<sup>3</sup>

Homeless households with children composed of 74% of the statutory homeless demand in Havering in 2015/2016, an increase of 7% from the previous year<sup>3</sup>. The number of people living in interim or long-term temporary accommodation who are in the maternity or paternity leave phase is not data which is collated by the Council and therefore the impact of the policy on this group cannot be analysed.

Havering has experienced the largest net inflow of children across all London boroughs in recent years. In a six year period (from 2009 to 2014), 4,606 children have settled in the borough from another London borough. The biggest inflows of children into Havering for 2014 came from neighbouring Outer London Boroughs, Barking & Dagenham (123 children) and Redbridge (103 children)<sup>1</sup>.

Demographic changes with this protected characteristic have led to increased pressures on the Council's housing service from this group. To ensure there is continuing sufficient supply of temporary accommodation available for all eligible homeless households, the new pathway approach aims to ensure suitable homes are allocated as efficiently and prioritised for those with the highest needs. For this reason a positive impact is described.

#### **b. Suitability assessment policy**

Households with child dependants and pregnant women are more likely to have needs and requirements that make some placements unsuitable for occupation. The policy outlines how the use of emergency B&B placements will be limited for families with dependent children and pregnant women to prevent any risk of occupying beyond 6 weeks in compliance with homeless legislation. This means homeless families and pregnant women are prioritised in the homeless placements process more likely to be placed into available hostel temporary accommodation over single people and couples without dependants as an interim measure while homeless investigations are being completed. However, due to the limited supply of hostel accommodation and an overwhelming demand for accommodation from this group, some households of this type may be subject to an emergency placement. To mitigate any potential negative impact arising because of an extended stay in emergency accommodation for a period longer than 5 weeks, this group are awarded prioritisation under the 'transfer moves between temporary accommodation' policy.

The assessment will take into consideration the suitability of a property location for individual households. Welfare and support requirements are considered in this assessment. This includes consideration of the need for any children to be in close proximity to support services due to health, medical needs, for child protection purposes and care reasons. It will also consider the need for families to remain close to existing schools; however considerations for in-borough placements will only apply for children at key stages of education.

#### **2. Discharge of Homelessness Duty by way of a settled offer of private rented accommodations for a period of 12 months policy**

Proportionately, as the vast majority of households with children and pregnant women applicants comprise of the greatest statutory homeless demand, these households are more likely to be disproportionately affected by this policy compared to other groups. In particular lone parent females or pregnant women have a greater likelihood of being offered settled privately rented accommodation and be affected by a discharge of homelessness duty decision. However ultimately, in circumstances where an accommodation (longer term TA or settled PRSO) becomes available, offers will be made according to the suitability of accommodation assessment and length of time on the waiting list.

#### **3. Acquisition of out of borough accommodation for use of temporary and settled offers of private rented criteria *and***

#### **4. Application of the suitability assessment to decide on the location of placements**

The acquisition of out of borough accommodation policy enables the Council to procure additional units of affordable accommodation to meet the needs of the increasing homeless demand. This has a positive impact for all household types in driving efficiencies in the homeless placements process.

As there is a greater homeless demand for long term temporary and settled accommodation from households with children and expectant mothers, numerically, more households with children and expectant mothers will be placed in out of borough locations than household types where there is a lower demand. Similarly, this group are more likely to be considered for in-borough placements due to having needs under suitability factors to remain in-borough or close to a particular location.

The suitability factors will consider in-borough placements for households with children on the child protection register, those with high social care needs, households containing a child with SEN needs or households with a child at a key stage of education. Due to the extreme shortage of temporary accommodation, the policy will consider people with children for in-borough accommodation who have the highest needs..

An out of borough placement may mean displacement from existing care and support networks for some households. Moving a household with a young baby away from known services, care and support networks may have an adverse impact on this group. Moving households with children out of borough may also mean that a change of school is necessary to ensure travel time is reduced and is more affordable/

To mitigate this impact, the service will provide developed relocation advice that will include help with aspects of travel, setting up links to family support groups and childcare services in areas where accommodation is sourced.

## 5. Introduction of prioritisation criteria for moves between temporary accommodation policy

The policy has a positive impact for households with children and pregnant mothers as it ensures a transfer from emergency accommodation is high prioritisation to be moved within 5 weeks to avoid statutory penalties of being in emergency accommodation for a period beyond 6 weeks under homelessness legislation.

The criteria also outline prioritisation for households who become overcrowded whilst living in current accommodation. This secures a positive impact for family structures that grow with birth of additional children.

### Evidence: Data

#### 1. Demographic population of Havering by household type

*\*Source 1 - This is Havering 2015: A Demographic and Socio-economic Profile. Public Health Intelligence, LBH.<sup>1</sup>*

As the population of Havering grows, there has been a corresponding change in the number of births to women resident in Havering. As well as increases in the number of births in Havering, there has been an increase in the general fertility rate (GFR) from 54 (per 1,000 women aged 15-44) in 2003 to 66 in 2014. Havering has experienced the largest net inflow of children across all London boroughs in recent years. In a six year period (from 2009 to 2014), 4,606 children have settled in the borough from another London borough. The biggest inflows of children into Havering for 2014 came from neighbouring Outer London Boroughs, Barking & Dagenham (123 children) and Redbridge (103 children).

#### 2. *\*Source 2 - Children and Young Peoples JSNA 2013-2014, Public Health Intelligence, LBH.<sup>2</sup>*

There has been a 26% increase in the number of births per year in Havering from 2002 to 2012), and this is forecast to continue to increase.

The teenage conception rate (under age 180 in Havering is below that of London and England however the conception rate is significantly higher than averages in certain wards of the borough where deprivation rates are also high. Teenage pregnant households (16 and 17 years old) are also classed as a vulnerable priority housing need category under homeless legislation.

#### 3. Housing demand from statutory homeless households by household type

*\*Source 3 – P1E Data Statutory Homeless households by household type (2013-2015)<sup>3</sup>*

P1E Data: Households accommodated by household type and gender of household 2013-2015			
Household type	2013/14	2014/15	2015/16
Couples with children	76 (12%)	123 (20%)	91 (14%)

Lone parent			
• Male applicant	19 (3%)	12 (2%)	19 (3%)
• Female applicant	299 (48%)	280 (45%)	372 (57%)
Single person			
• Male applicant	52 (8%)	49 (8%)	30 (5%)
• Female applicant	116 (19%)	125 (20%)	102 (16%)
All other household groups	55 (9%)	34 (6%)	35 (5%)
Total	617 (100%)	623 (100%)	649 (100%)

The table shows that the majority of homeless demand over time is from female lone parent and female single people. Households with children form 74% of the overall homelessness demand. Female lone parents form the greatest demand from a single group.

#### 4. Housing register by pregnancy

\* Source 4 - Havering Council Social Housing waiting list 09/03/2016<sup>4</sup>

67 people in 2015/2016 disclosed being pregnant at the point of making a homeless application  
The average age of these people was 25 years

#### 5. Housing consultation results by maternity and paternity factors

\* Source 5 - Havering Council Housing Consultation data report

The Consultation did not specifically ask respondents on pregnancy or paternity status and so the views of this characteristic on each key policy cannot be accurately analysed.

#### Sources used:

- <sup>1</sup>Public Health Service (2015) *This is Havering: A Demographic and Socio-economic profile: Key Facts and Figures*. London Borough of Havering Council
- <sup>2</sup>Public Health Service (2014) *Children and Young People JSNA*. London Borough of Havering Council
- <sup>3</sup>LBH (2016) *P1E Homelessness data report: Statutory homeless applicants by household type and gender 2013-2015*. London Borough of Havering
- <sup>4</sup>LBH (2016) *Social Housing waiting list*. London Borough of Havering. Accessed on 10/03/2016

#### Socio-economic status: Consider those who are from low income or financially excluded backgrounds

<i>Please tick (✓) the relevant box:</i>		<b>Overall Impact</b>
<b>Positive</b>		<p><i>This Homeless Placements Policy sets out how the Council intends to provide housing assistance for homeless people for whom there is a statutory duty to accommodate under homelessness legislation. The policy has a positive impact for people of all socio-economic backgrounds ensuring the homeless placements process is transparent and easier to understand.</i></p> <p><i>Whilst people of all financial backgrounds could become homeless in their life span (i.e. due to mortgage repossession or eviction), the policy is most likely to have the most positive impact upon low income groups who are at a greater risk of homelessness and are more likely to subsequently require interim or long-term temporary accommodation.</i></p>
<b>Neutral</b>		
<b>Negative</b>		

## **Evidence: Key Policy Impact**

### **Key Policy Impact:**

#### **1. Implementing an accommodations pathway to make suitable offers and placements**

#### **2. Placements pathway process policy**

77.5% of working age residents living in Havering were in employment between October 2014 and September 2015<sup>1</sup>. Overall this employment rate in Havering is higher than London (72.3%) and England (73.6%) however; despite the high employment rate the average gross income per household in Havering (£44,430) is much lower than the London average (51,770)<sup>1</sup>. As with most outer London Boroughs low pay is lower than inner-London. One in four jobs in the borough is paid below the London Living wage. Havering is one of only seven London boroughs in which the unemployment rate has increased between 2009-11 and 2012-14, from 5.9% to 6.5% (Havering had the greatest increase of all London Boroughs)<sup>1</sup>.

As with all London boroughs, the demand for housing in Havering is very high with many local residents unable to afford available market options. Despite the economic uncertainty, average house prices are on the rise whilst mortgage availability and the supply of social housing is becoming increasingly limited. In 2015, Havering had one of the fastest rising annual house price rises in London of 12.4% above the national average<sup>2</sup>. The predicted soar in prices is a direct result of welfare reform impacts and people move out of inner London zones 1, 2 and 3 in search of more space, better value for money and more affordable solutions.

As a result, many households in the borough have turned to a reliance on private rented accommodation. This has led to considerable growth in the sector in Havering, which has doubled over the past 10 years. 39% of private renters in the borough are on housing benefit which is in the highest quartile of all London Boroughs<sup>1</sup>. The increased competition for private sector homes, combined with other socio-economic factors operating in the borough as described above, this has led to increased pressures on Havering's homelessness and housing advice service.

The policy sets out how the Council intends to continue working with local landlords in a challenging socio-economic climate, to procure sufficient temporary accommodation in Havering to meet the rising homeless demand for future years to come.

Upon making a presentation to the Council as homeless, all housing applicants will be presented with suitable housing options and alternatives if affordable for individual circumstance, for example this may include discussions of rent deposit schemes, private rented sector landlord mediation services, money and debt services or low cost housing schemes such as shared ownership. This advice will be made available to all homeless people in the placements pathway process. It is the Council's aim to make best use of the stock of interim and longer term temporary accommodation so it remains available for homeless people with the greatest needs.

#### **3. Suitability assessment policy**

The second part of the suitability test asks if the accommodation in question is affordable for the applicant. The authority will undertake an income and expenditure assessment on every applicant due to be offered interim or longer term temporary accommodation to determine the level of LHA entitlement based on personal income. The money and debt advice service will also provide support to all applicants throughout the placements process and will act to resolve any issues that may act as a financial barrier to retaining current accommodation (for example, mediation in settling multiple or priority debts). This service can also provide budgeting advice will be available for all tenants of temporary accommodation whilst in tenure.

The policy allows for consideration to be given as to whether the applicant can afford the housing without being deprived of basics such as food, clothing, heating, transport and other essentials; and in doing so will take account of costs resulting from the location of accommodation. The assessment will consider if

an out of borough placement would be suitable or place an adverse impact by additional cost to existing place of employment, education and existing care or support services currently in use.

At the end of this assessment the service will have considered the applicants financial resources offset against the cost of accommodation. For this reason the impact of the policy is positive for applicants of all incomes.

#### **4. Discharge of Homelessness Duty by way of a settled offer of private rented accommodations for a period of 12 months policy**

If a homeless investigation finds that a statutory homeless duty is owed to a household, a longer-term temporary accommodation offer *or* settled accommodation offer of privately rented accommodation will be made, in or outside the borough. This decision will be made in line with the suitability assessment that will ensure a PRSO offer of accommodation is affordable for an applicant's individual circumstance. All homeless applicants will be considered for a PRSO subject to need however properties will be offered to longest waiting homeless applicants for whom the property is suitable.

There is a risk that people may go into the private sector and then experience increasing levels of debt. To ensure people owed a statutory homeless duty are not negatively affected by a discharge of homelessness duty and accrue increasing levels of debt once in the private rented sector, the Council will mitigate any impact through supporting the applicant in the placements process with its money and debt advice service

There is a noted risk that landlords may raise rental prices in the private rented sector property that then makes accommodation unaffordable, increasing the risk of repeat homelessness. This risk is mitigated under section 195A Housing Act 1996, should the applicant re-approach the Authority as eligible, unintentionally homeless or threatened with homeless and is eligible for assistance within a period of two years of the tenancy start date following acceptance of the private rented sector offer under s.193 (7AA) Housing Act 1996 the household will be treated as homeless from the date of expiry of the S.21 notice served by a private sector landlord. This means the Council will accept a re-application duty and the household will be further considered for another offer of PRSO and discharge of duty decision or long-term temporary accommodation.

The rationale of implementing this policy is to increase the Council's supply of available housing for homeless households. This means that the policy has a positive impact by driving efficiencies in the placements process for homeless households. Other households in housing need on the housing register will benefit from an increase in available social housing lets as settled private rented sector offers are being made to homeless clients.

#### **5. Acquisition of out of borough accommodation for use of temporary and settled offers of private rented criteria *and***

#### **6. Application of the suitability assessment to decide on the location of placements**

The Council is able to procure a greater supply of accommodation that is affordable for homeless residents located outside of Havering Borough boundaries. This policy is therefore expected to increase the Council's overall portfolio and means that homeless households (across a range of socio-economic backgrounds) will spend less time in temporary accommodation and for this reason a positive impact applies.

The in-borough prioritisation policy ensures an in-borough accommodation is allocated to homeless people with the highest needs so far as reasonably practicable where there is available supply at any one time.

Out of borough acquisitions will be identified in consideration to local facilities and sources of employment to ensure work and other community services can be accessed by homeless applicants within a close and affordable travel distance.

## 7. Introduction of prioritisation criteria for moves between temporary accommodation policy

The policy has a positive impact for homeless people of all financial backgrounds as it ensures people with the highest needs are prioritised in the waiting list where there is a need to move from existing temporary accommodations. The criterion will not advance or adversely affect people with different employment statuses or levels of income.

### Evidence-Data

#### 1. Employment status of long-term temporary accommodation tenants with a statutory homeless duty

\* Source <sup>3</sup> - Havering Council internal OHMS snapshot data

The data shows that the majority of existing tenants are unemployed (50%). Of those that are employed the majority do work for more than 16 hours +. This has led to the decision to prioritise households working for more than 16 hours for in-borough accommodation under the in-borough prioritisation criteria policy.

<b>Employment Status: Statutory Homeless Tenants of Long-term Temporary Accommodation (10/03/2016)</b>			
<b>Employment status</b>	<b>Sub-category</b>	<b>No</b>	<b>%</b>
Employed total		138	25%
	employed 16 hours+	81	59%
	employed -16 hours	17	12%
	employed in-borough	24	17%
	employed OOB	16	12%
Student		17	3%
Unemployed		278	50%
Unknown		124	22%
Total tenants		557	100%

#### 2. Housing Benefit status of long-term temporary accommodation tenants with a statutory homeless duty

\* Source <sup>3</sup> - Havering Council internal OHMS snapshot data

The vast majority of current tenants are on housing benefit.

<b>Housing Benefit Status: Statutory Homeless Tenants of Long-term Temporary Accommodation</b>			
<b>Housing Benefit status</b>	<b>Sub-Category</b>	<b>No</b>	<b>%</b>
Tenants on housing benefit total		544	98%
	Full HB	467	84%
	Part or suspended HB	77	14%
Tenants on no housing benefit	No HB	13	2%
Total tenants		557	100%

#### 3. Affordability of private rented accommodation in Havering

\* Source 4 - Market rent figures zoopla.co.uk (accessed 10/03/2016)

The table below highlights the affordability of different accommodation in Havering. The average market rent in Havering has been taken to directly compare on whether it would be affordable to someone on full housing benefit. As can be seen there is a limited availability of accommodation and none are available within LHA limit. Whilst some properties may be more affordable at lower quartile rents, this information shows the difficulty the Council has in procuring accommodation at rents its client profile could afford.



This has led to the rationale of having to procure and make placements to out of borough accommodation where rents are more affordable.

**Table 6 - Availability of affordable rented accommodation in Havering for those in receipt of full HB**

Household type example	Bed size	Average rent	Properties advertised	LHA weekly *Outer North East BRMA	LHA Monthly	Properties within LHA %
single u35/ shared room	shared room	£500	97	£75.15	£325.65	0%
single o35 and couples with children	1 bed	£950	97	£155.17	£672.40	0%
Families with children	2 bed	£1,200	149	£192.62	£834.69	0%
Families with children	3 bed	£1,500	100	£242.40	£1,050.40	0%
Families with children	4 bed	£1,600	36	£312.77	£1,355.34	0%

\*Expand box as required

### Sources used:

- 1 Public Health Service (2015) *This is Havering: A Demographic and Socio-economic profile: Key Facts and Figures*. London Borough of Havering Council
- 2 Land Registry (2016) House price data. [online] Available at: <http://landregistry.data.gov.uk/app/hpi/>
- 3 LBH (2016) *Havering Council internal OHMS snapshot data*. London Borough of Havering. Accessed on 10/03/2016
- 4 Zoopla (2016) Average market rent. [online] Available at: <http://www.zoopla.co.uk/market/uk/> [accessed on 10/03/2016]

\*Expand box as required

## Action Plan

There is no likely profoundly negative impact on any equality group through the introduction of this policy; the action plan below outlines several actions to prevent any possible negative outcome from occurring.

Due to welfare reform, the financial constraints faced by the Council and increasing cost of local accommodation in Havering, many of the policies within the Homeless Placements policy are a necessary measure to reduce any risk of procuring enough supply of temporary accommodation to settle the demand from homeless households.

Protected characteristic	Identified negative impact	Action taken to mitigate impact*	Outcomes and monitoring**	Timescale	Lead officer
All	The on-going impact of policy implementation cannot be identified through lack of demographic data on homeless applicants	Improved statistical recording and monitoring of protected characteristics of the groups that use housing advice, homelessness and support services. Adapt all forms to ensure all demographic questions can be answered and recorded on the system. This should be completed as part of the 'One Housing' systems review.	This will ensure there is no indirect discrimination of any one particular group and improve data recording so thorough analysis between homelessness and all groups can be made in the future	June 2017	Beatrice Cingtho-Taylor
Gender	Provision is made for homeless females affected by domestic abuse however the Council has a gap in knowledge about men who also might be affected without provision	Improve monitoring of male victims of domestic abuse in relation to homelessness	This will help to remove any possible indirect discrimination.	June 2017	Beatrice Cingtho-Taylor and Peter Doherty
All	Temporary accommodation is acquired in socially isolated locations out of borough that do not meet the needs of the demand profile	To develop a temporary accommodation procurement policy to ensure that we have a range of temporary accommodation to meet the needs of all clients of all protected characteristics. I.e. acquisition checklist to be developed to ensure suitable properties are	This will ensure there is no discrimination and will promote equal opportunities.  It will enable the service to explore housing alternatives that	June 2017	Beatrice Cingtho-Taylor and Kevin Hazlewood

		<p>procured i.e. ensuring landlords are fit and proper persons, meeting the needs of those with physical disabilities, acquiring accommodation close to certain community facilities etc.</p> <p>This will also ensure cost-effective procurement and management of temporary accommodation (i.e. affordability analysis tools, direction on where to procure, property types and sizes according to level of need from homeless demand profile)</p>	<p>could be made available to disabled persons.</p> <p>Improved provision of affordable temporary accommodation.</p> <p>More efficient management service. Providing better value for money and streamlining current portfolio.</p>		
All	Placements are not made to reflect new policy objectives regarding suitability assessments	<p>Adopt allocation and suitability assessment forms in line with the policy.</p> <p>Placement decisions are recorded. This means that lettings systems must be adapted to show results of the matching exercise under the suitability assessment on a daily basis.</p>	<p>New procedures will be developed to ensure homes are allocated more efficiently to those with the greatest, prioritised needs for accommodation</p> <p>Adapting systems will enable the Council to see housing need trends and the specific reasons why households may need to be placed in-borough. This will be particularly interesting to identify the circumstances households are considered for in-borough placements under 'other suitability considerations'.</p>	June 2016	Beatrice Cingtho-Taylor
All	A repeat cycle of homelessness occurs as there is insufficient support leading to tenancies not being sustained	Continue to develop partnership working with internal and external partners to provide support to homeless applicant and existing tenants of temporary accommodation. Provide support services that will promote the	Suitable homes are provided and sustained by clients in need	June 2017	Beatrice Cingtho-Taylor and Peter Doherty

		wellbeing of tenants and ensure tenancies are sustained.			
All	Homeless people are placed out of borough and do not know how to access support in an unfamiliar location, leading to vulnerability and a negative impact arising from an out of borough placement	Development of an out of borough relocation support service	All homeless people are appropriately advised on their housing options and local area of placement. The wellbeing of applicants are safeguarded,	June 2017	Beatrice Cingtho-Taylor, Peter Doherty and Kevin Hazlewood
All	One protected characteristic is disproportionately affected and more out of borough placements are made to a single group leading to segregation and isolation	Monitor out of borough placements for all households against demographic data to prevent any one group from experiencing a disproportionate impact by the out of borough policy i.e. ethnicity	No indirect discrimination occurs	June 2017	Beatrice Cingtho-Taylor

As we cannot anticipate incoming future homeless demand, we do not know the effect that the introduction of this policy will have on the behavior of different equality groups. We are unable to measure the direct impact at current within this EIA. Once the policy has been introduced we will assess if behavior has changed to the homeless applications from any protected characteristic group.

## Review

This EIA and the Homeless Placements Policy will be monitored on a continuous basis by the Service Management Team on a monthly basis. A formal policy and EIA review will occur on an annual basis. The next review will be due on June 2017 and will be completed by the Housing Demand Service Manager, Beatrice Cingtho-Taylor.