



# CABINET

<b>7.30 pm</b>	<b>Wednesday 15 May 2024</b>	<b>Council Chamber - Town Hall</b>
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Members 9: Quorum 3

Councillor Ray Morgon (Leader of the Council), Chairman

**Cabinet Member responsibility:**

Councillor Keith Darvill	Lead Member for Climate Change & Housing Need
Councillor Gillian Ford	Lead Member for Adults & Wellbeing
Councillor Oscar Ford	Lead Member for Children and Young People
Councillor Paul McGeary	Lead Member for Housing & Property
Councillor Paul Middleton	Lead Member for Digital, Transformation & Customer Services
Councillor Barry Mugglestone	Lead Member for Environment
Councillor Christopher Wilkins	Lead Member for Finance
Councillor Graham Williamson	Lead Member for Regeneration

**Zena Smith**  
**Head of Committee and Election Services**

**For information about the meeting please contact:**  
**Bernadette Lynch tel: 01708 434849**  
**e-mail: [bernadette.lynch@havering.gov.uk](mailto:bernadette.lynch@havering.gov.uk)**



**Webcast**

**Please note that this meeting will be webcast.**  
**Members of the public who do not wish to appear**  
**in the webcast will be able to sit in the balcony,**  
**which is not in camera range.**

***Under the Committee Procedure Rules within the Council's Constitution the Chairman of the meeting may exercise the powers conferred upon the Mayor in relation to the conduct of full Council meetings. As such, should any member of the public interrupt proceedings, the Chairman will warn the person concerned. If they continue to interrupt, the Chairman will order their removal from the meeting room and may adjourn the meeting while this takes place.***

***Excessive noise and talking should also be kept to a minimum whilst the meeting is in progress in order that the scheduled business may proceed as planned.***

### **Protocol for members of the public wishing to report on meetings of the London Borough of Havering**

Members of the public are entitled to report on meetings of Council, Committees and Cabinet, except in circumstances where the public have been excluded as permitted by law.

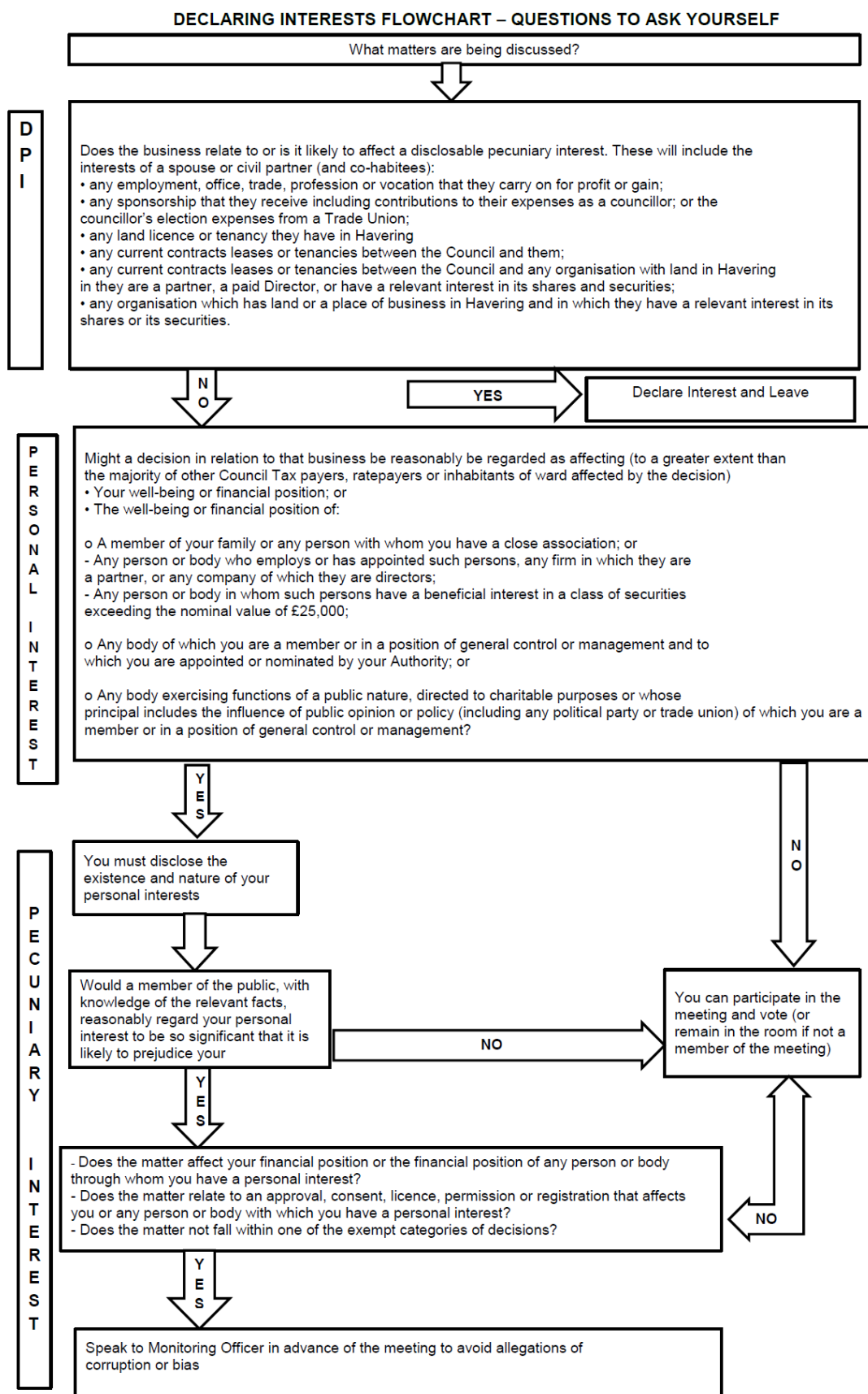
Reporting means:-

- filming, photographing or making an audio recording of the proceedings of the meeting;
- using any other means for enabling persons not present to see or hear proceedings at a meeting as it takes place or later; or
- reporting or providing commentary on proceedings at a meeting, orally or in writing, so that the report or commentary is available as the meeting takes place or later if the person is not present.

Anyone present at a meeting as it takes place is not permitted to carry out an oral commentary or report. This is to prevent the business of the meeting being disrupted.

Anyone attending a meeting is asked to advise Democratic Services staff on 01708 433076 that they wish to report on the meeting and how they wish to do so. This is to enable employees to guide anyone choosing to report on proceedings to an appropriate place from which to be able to report effectively.

Members of the public are asked to remain seated throughout the meeting as standing up and walking around could distract from the business in hand.



## **AGENDA**

### **1 ANNOUNCEMENTS**

On behalf of the Chair, there will be an announcement about the arrangements in case of fire or other events that might require the meeting room or building's evacuation.

### **2 APOLOGIES FOR ABSENCE**

(if any) - receive

### **3 DISCLOSURES OF INTEREST**

Members are invited to disclose any interests in any of the items on the agenda at this point of the meeting. Members may still disclose an interest in an item at any time prior to the consideration of the matter.

### **4 MINUTES** (Pages 5 - 8)

To approve as a correct record, the minutes of the meeting held on **10<sup>th</sup> April 2024** and to authorise the Chair to sign them.

### **5 HAVERING HEALTHY WEIGHT STRATEGY 2024 -2029: EVERYBODY'S BUSINESS** (Pages 9 - 104)

### **6 HOME TO SCHOOL TRANSPORT POLICY** (Pages 105 - 276)

### **7 AWARD OF HEATING MAINTENANCE AND REPLACEMENT CONTRACT** (Pages 277 - 308)

### **8 HOUSING ALLOCATIONS SCHEME** (Pages 309 - 408)





**MINUTES OF A CABINET MEETING**  
**Council Chamber - Town Hall**  
**Wednesday, 10 April 2024**  
**(7.40 - 8.45 pm)**

**Present:**

Councillor Ray Morgon (Leader of the Council), Chairman

**Cabinet Member responsibility:**

Councillor Keith Darvill

Lead Member for Climate Change & Housing Need

Councillor Paul McGeary

Lead Member for Housing & Property

Councillor Paul Middleton

Lead Member for Digital, Transformation & Customer Services

Councillor Christopher Wilkins

Lead Member for Finance

Councillor Graham Williamson

Lead Member for Regeneration

**In attendance:** Councillor Keith Prince (Con); Councillor Martin Goode (EHRG)

Also, in the Chamber, Councillor Matt Stanton (Lab)

**176 ANNOUNCEMENTS**

On behalf of the Chair, there was an announcement about the arrangements in case of fire or other events that might require the meeting room or building's evacuation.

**177 APOLOGIES FOR ABSENCE**

Apologies received from Councillor/s Gillian Ford, Oscar Ford and Barry Mugglestone.

**178 DISCLOSURES OF INTEREST**

Disclosure of interests: Councillor Christopher Wilkins declared an interest in relation to item 5 on the agenda (Private Sector Housing Enforcement Policy Revision) as a landlord in the borough, and left the Chamber for the duration of the discussion.

179 **MINUTES**

The minutes of the meeting held on **13<sup>th</sup> March 2024**, were agreed as a correct record and the Chair signed them.

180 **PRIVATE SECTOR HOUSING ENFORCEMENT POLICY REVISION**

Report: **Private Sector Housing Enforcement Policy Revision**

The original Private Sector Housing Enforcement Policy was approved by Cabinet in December 2017 following the decision taken at Cabinet to establish a property licensing scheme in October 2017.

The policy has been reviewed and updated to keep pace with changes to legislation, enforcement options and updated fees and charges to ensure that it remains current and fit for purpose. This Cabinet Report seeks approval for those updates.

The Private Sector Enforcement team is a small team with only three staff and is a net cost to the general fund.

The proposed new policy does slightly increase the scope of the team and so may create additional work. However, it is expected that it will be possible to absorb this within the team, so no additional resources are required.

The Cabinet:

1. **Agreed** to the revised Private Sector Housing Enforcement policy in Appendix 1.

181 **LAND HAVING FRONTAGE TO NORTH STREET (AKA SAINSBURY'S BILLET LANE CAR PARK) LEASE RENEWAL**

**Report:** Land having frontage to North Street (aka Sainsbury's Billet Lane Car Park), Hornchurch, RM11 1TS – Lease Renewal

**Introduced by:** Councillor Paul McGeary – Cabinet Member for Housing & Property

This report seeks Cabinet approval to agree and complete a new lease with Sainsbury's for the land having frontage to North Street (aka Sainsbury's Billet Lane Car Park), Hornchurch, RM11 1TS.

The previous lease expired on 14<sup>th</sup> November 2021 and terms have been agreed with the tenant for a new lease on the terms set out in Exempt Appendix A.

**Cabinet:**

1. **Approved** the grant of a new lease to Sainsbury's Supermarkets Ltd, for the subject land on terms as set out in Exempt Appendix A.
2. **Authorised** the Deputy Director of Legal & Governance Services to undertake all relevant measures to implement the proposed grant.

182 **HAVERING CLIMATE CHANGE ACTION PLAN 2024-27**

**Report:** Revised Havering Climate Change Action Plan (HCCAP) 2024-27

**Introduced by:** Councillor Keith Darvill, Cabinet Member for Climate Change

This report presents the revised Havering Climate Change Action Plan (HCCAP) 2024-27 which is attached as Appendix 1. It builds on the actions introduced in the HCCAP in 2021 and provides a framework for the Council's actions to deliver on its target of becoming carbon neutral by 2040 or sooner. This is an evolving framework, and the Council will continue to update the approach over time; as targets change, new data becomes available, and following major Government decarbonisation strategies. Havering Council has a solid data base and a robust intelligence hub which leads the coordination and development of applied data.

The HCCAP is primarily focussed on actions to reduce greenhouse gases, but interlinks closely with a range of other Council strategies such as:

- Local Plan.
- Parks and Open Spaces Strategy.
- Health & Wellbeing Strategy.
- Cycling and Walking Strategy.
- Air Quality Action Plan.
- Electric Vehicle Charging Strategy.
- Reduction & Recycling Plan.

**Cabinet:**

**Approved** and **adopted** the revised HCCAP 2024-27 in Appendix 1.

183 **CORPORATE PLAN 2024-2027**

**Report:** Corporate Plan 2024-2027

**Introduced by:** Councillor Ray Morgon, Leader of the Council

This report presents a draft Corporate Plan for 2024 onwards, which has been aligned to the Council's current Vision and the three corporate priority themes upon which our new operating model is based: People, Place and Resources.

The Corporate Plan sets out the Council's key outcomes, actions / deliverables and the metrics required to monitor progress against each of these.

**Cabinet:**

**Approved** the updated Corporate Plan including the proposed key performance indicators and metrics.

184 **POVERTY REDUCTION STRATEGY**

**Report:** Poverty Reduction Strategy

**Introduced by:** Councillor Keith Darvill: Cabinet Member for Climate Change on behalf of Councillor Gillian Ford, Deputy Leader, Cabinet Member for Health and Adult Social Care

The report includes 'our vision for poverty reduction in Havering'

- 1.1 The Havering Place based Partnership will work together to collectively address the underlying causes of poverty, facilitate community action and build resilience to alleviate the effects of poverty. Partners will seek to embed this approach across all programmes of work.

**Cabinet:**

**Approved** the Havering Poverty Reduction Strategy 2024 attached at Appendix 1.

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**Chairman**



## CABINET

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**Subject Heading:**

**Havering Healthy Weight**

**Strategy 2024-2029:**

**Everybody's Business**

**Cabinet Member:**

Councillor Gillian Ford

**ELT Lead:**

Mark Ansell, Director of Public Health

**Report Author and contact details:**

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**Policy context:**

National policy context: Tackling the obesity epidemic is one of the major public health challenges of the 21st century. The UK Government published a new obesity strategy in 2020 with policies and legislative measures designed to make the healthy choice the easiest choice and support individuals to lose weight. This previous national 2018 childhood obesity strategy set an ambition to halve childhood obesity by 2030.

Local policy context: Preventing and addressing overweight and obesity along with the associated health problems is a priority for Havering Council and the NHS as set out in the Havering Corporate Plan, the Havering Health and Wellbeing Board's Health and Wellbeing Strategy 2019/20–2023/24 and the

Havering Place Based Partnership's Interim Health and Care Strategy.

This decision paper was prepared before the Health and Wellbeing Board meeting on 3 April, when it is anticipated that Board members will indicate their support for the strategy.

**Financial summary:**

There are no direct financial costs associated with adoption of the strategy. Any subsequent programmes of work that require financing will be subject to separate decision making, in accordance with Council and partners decision-making processes.

**Is this a Key Decision?**

Yes - Significant effect on two or more wards

**When should this matter be reviewed?**

Not applicable

**Reviewing OSC:**

Not applicable

**The subject matter of this report deals with the following Council Objectives**

People - Things that matter for residents - X

Place - A great place to live, work and enjoy - X

Resources - A well run Council that delivers for People and Place. - X

<b>SUMMARY</b>
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Obesity rates in Havering are very high for both children and adults, either similar or above the London and England averages, and they look set to get worse. The problem of overweight and obesity is cutting lives short, and negatively impacting the quality of life of Havering residents. Prevention is a key priority for Havering Council and the NHS, as set out in the Havering Corporate Plan, the Havering Health and Wellbeing Board's Health and Wellbeing Strategy 2019/20–2023/24 and the Havering Place Based Partnership's Interim Health and Care Strategy.

It is a common misconception that individuals are completely in control of their own weight and that an overweight problem is entirely the result of personal choices. Over recent years it has become increasingly evident that obesity is a much more complex issue, and one that is caused by multiple factors that interact with each other; the modern-day changes in the circumstances where we live, work and play that now make us more likely to opt for unhealthy options of foods and less likely to be physically active. In short, it is largely the circumstances where we live, known as 'the system', that has resulted in the increasing rates of overweight and obesity.

The scale and complexity of the problem means that the Council, the local NHS, and stakeholders must work together to change the system.

Over 100 local partners came together for two healthy weight summits to identify the system-wide factors that are contributing to overweight and obesity in Havering, and to consider the solutions. The work from these summits, and wider engagement, contributed to the development of a draft five-year healthy weight strategy on taking a whole systems approach, and a twenty-year vision for the Borough.

The resultant draft strategy (including an easy read version), an obesity needs assessment, and information videos were published on the Havering Council's Consultation and Engagement Hub. A public consultation took place from 17 January to 3 March 2024 when residents and stakeholders were invited to comment. <https://consultation.havering.gov.uk/public-health/healthy-weight-strategy-consultation/>

The public consultation resulted in a total 660 responses received. Analysis of the responses showed that there was overall support for the strategy approach. Most of the feedback was concerned with implementation of the strategy (i.e. actions to be taken to deliver the approach).

This decision paper was prepared before the Health and Wellbeing Board meets on 3 April 2024; it is anticipated that members will indicate their support for the final draft of the strategy.

**RECOMMENDATIONS**

Approve and adopt the Havering Healthy Weight Strategy 2024-2029: Everybody's Business

**REPORT DETAIL**

See attached draft Healthy Weight strategy 2024-2029: Everybody's business

**REASONS AND OPTIONS**

**Reasons for the decision:**

The Council has a duty to improve health and wellbeing of the local population. Overweight and obesity is a major risk to health, as set out in the attached.

**Other options considered:**

The strategic "whole systems approach" to tackling obesity in the borough was co-produced by partners and stakeholders, including elected members; participating in workshops and wider engagement and discussions. It is based on evidence and national guidance, as described in the strategy.

**IMPLICATIONS AND RISKS**

**Financial implications and risks:**

There are no direct financial costs associated with adoption of the strategy. Any subsequent programmes of work that require financing will be subject to separate decision making, in accordance with Council and partners decision-making processes.

**Legal implications and risks:**

There are no legal implications arising from the recommendations in the report.



The adoption of the Healthy Weight Strategy is consistent with the Council's statutory duty to take such steps as are considered appropriate to improve the health of the people in its residents in accordance with section 2B(1) NHS Act 2006.

### **Human Resources implications and risks:**

The Strategy and joined up action plan will align the existing good work of the Council teams and external partners to the strategy as part of the whole systems approach to obesity. The recommendations made in this report do not give rise to any identifiable HR risks or implications that would affect either the Council or its workforce.

### **Equalities implications and risks:**

A comprehensive equality health impact assessment was completed and approved and is included in appendix 5 of the strategy document.

### **Health and Wellbeing implications and Risks**

The health and wellbeing implications are included as part of the equality health impact assessment. No risks have been identified in relation to the implementation of the strategy. Below is the summary:

The Healthy Weight Strategy 2024-2029: Everybody's Business will have a positive impact on the health and wellbeing of all Havering residents. This impact is clearly outlined in the strategy document and action plan and local strategic outcomes, including

1. The development of the Borough as a place that promotes healthy weight, where the healthier choice is the easiest choice, with foundations laid to achieve the twenty-year vision of eradicating childhood obesity
2. An improvement in healthy weight levels in reception aged children across the Borough, compared to the England average
3. An improvement in measures of excess weight among year 6 children in the targeted neighbourhood of Gooshays and Heaton wards, compared to statistical neighbours

### **ENVIRONMENTAL AND CLIMATE CHANGE IMPLICATIONS AND RISKS**

Actions and outputs in the Healthy Weight Strategy will also have positive impacts on environmental and climate change objectives

Theme 2 objective 4 (page 22 of healthy weight strategy) focuses on shaping the borough to increase physical activity including the development of active travel interventions such as enhancing the street scene, expanding school streets, and

making parks safe which aligns with key deliverables in the place theme of the corporate action plan 22/23-26/27 including supporting pedestrian routes and cycling in the borough that meets the Healthy Streets criteria. This also aligns with the Havering air quality action plan 2018-2023 action number 2.11 supporting the healthy streets agenda and providing options for people to travel sustainably.

The Healthy Weight Strategy and action plan include actions that are expected to increase physical activity by making it easier to opt for active travel and so will also benefit the Council's climate change and air quality objectives.

*» [Climate Change Committee Guidance \(havering.gov.uk\)](https://www.havering.gov.uk/climate-change/committees)*

## **BACKGROUND PAPERS**

1. The Havering Healthy Weight Strategy 2024-2029: Everybody's Business
2. The Havering Obesity Health Needs Assessment
3. Havering Healthy Weight Strategy EqHIA
4. [Tackling obesity: government strategy](#)
5. [Whole systems approach to obesity: a guide to support local approaches to promoting a healthy weight](#)

# Havering Healthy Weight Strategy 2024-2029: Everybody's Business

A whole systems approach to reducing overweight and obesity



The vision for Havering is that within 20 years' childhood obesity will have been eradicated, that the Borough will have become a healthier place to live, work and play, and a place where communities have come together to make the healthier choice the easier choice

## Document Control

### Document details

<b>Name</b>	Havering Healthy Weight Strategy 2024-2029
<b>Version number</b>	Draft v 2
<b>Status</b>	Second draft
<b>Authors</b>	Elaine Greenway, Assistant Director Public Health, London Borough of Havering (LBH) Jack Davies, Public Health Specialist, LBH Luke Squires, Public Health Practitioner, LBH Victoria Stokes, Public Health Programme Manager, LBH Thomas Goldrick, Senior Public Health Analyst, LBH
<b>Lead Officer</b>	Mark Ansell, Director of Public Health London Borough of Havering
<b>Approved by</b>	
<b>Scheduled review date</b>	

### Version history

Version	Change	Date	Dissemination
<b>Draft 2</b>			Second draft, revised to take into account consultation findings
<b>Draft 1</b>			First draft published for public consultation

### Equality & Health Impact Assessment record

<b>1</b>	<b>Title of activity</b>	Havering Healthy Weight Strategy 2024-29; Everybody's Business: A whole systems approach to reducing overweight and obesity
<b>2</b>	<b>Type of activity</b>	A new strategy

3	Scope of activity	<p>This document sets out the local strategic approach for addressing high levels of overweight and obesity in the Borough, through a “whole systems place-based approach”. This will support the longer term vision for the Borough; within 20 years’ childhood obesity will have been eradicated, and that the Borough will have become a healthy place to live work and play, and a place where communities have come together to make the healthier choice the easier choice.</p> <p>There is sound evidence that shows where we live influences how and what we eat, and how active we are. The system (the conditions that affect how we live) can shape the choices that we make. There are over 100 causes of overweight and obesity in the system that are pushing us towards unhealthy choices.</p> <p>A whole systems approach to obesity prevention means addressing all the different causes of obesity and being aware of the potential health implications of actions taken, and working towards making the healthier choice the easier choice.</p> <p>A whole systems approach takes a long time to embed. Once embedded, it takes many years for rates of obesity to fall.</p> <p>During the five-year lifetime of this strategy, we will (a) embed changes through an all systems place-based approach for the whole Borough, (b) introduce an enhanced and targeted neighbourhood-level place-based approach to address inequalities (starting with the neighbourhood of Gooshays and Heaton wards).</p> <p>By 2029 we expect to see:</p> <ul style="list-style-type: none"> <li>• An improvement in healthy weight levels in reception aged children across the Borough, compared to the England average.</li> <li>• An improvement in measures of excess weight among year 6 children in the targeted neighbourhood of Gooshays and Heaton wards compared to statistical neighbours.</li> <li>• The development of the Borough as a place that promotes healthy weight and where the healthier choice is the easier choice; enabling people to eat healthily and be active.</li> </ul>
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4a	Are you changing, introducing a new, or removing a service, policy, strategy or function?	Yes	If the answer to <u>any</u> of these questions is 'YES', please continue to question 5.	If the answer to <u>all</u> of the questions (4a, 4b & 4c) is 'NO', please go to question 6.
4b	Does this activity have the potential to impact (either positively or negatively) upon people (9 protected characteristics)?	Yes		
4c	Does the activity have the potential to impact (either positively or negatively) upon any factors which determine people's health and wellbeing?	Yes		
5	If you answered YES:	Please complete the EqHIA in Section 2 of this document. Please see Appendix 1 for Guidance.		
6	<p>If you answered NO: (<i>Please provide a clear and robust explanation on why your activity does not require an EqHIA. This is essential in case the activity is challenged under the Equality Act 2010. </i>)</p> <p><i>Please keep this checklist for your audit trail.</i></p>			

Date	Completed by	Review date
01. 09. 23	Jack Davies	

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## Executive summary

Obesity rates in Havering are very high for both children and adults, either similar or above the London and England averages, and they look set to get worse. The problem of overweight and obesity is cutting lives short, and negatively impacting the quality of life of Havering residents. Prevention is a key priority for Havering Council and the NHS, as set out in the *Havering Corporate Plan*,<sup>i</sup> the Havering Health and Wellbeing Board's *Health and Wellbeing Strategy 2019/20–2023/24* and the Havering Place Based Partnership's Interim Health and Care Strategy.<sup>ii</sup>

It is a common misconception that individuals are completely in control of their own weight and that an overweight problem is entirely the result of personal choices. Over recent years it has become increasingly evident that obesity is a much more complex issue, and one that is caused by multiple factors that interact with each other; the modern-day changes in the circumstances where we live, work and play that now make us more likely to opt for unhealthy options of foods and less likely to be physically active. In short, it is largely the circumstances where we live, known as 'the system', that has resulted in the increasing rates of overweight and obesity.

The scale and complexity of the problem means that the Council, the local NHS, and stakeholders must work together to change the system.

Over 100 local partners came together for two healthy weight summits to identify the system-wide factors that are contributing to overweight and obesity in Havering, and to consider the solutions. The work from these summits contributed to the development of this five-year healthy weight strategy on taking a whole systems approach, and a twenty-year vision for the Borough.

The shared vision for Havering is that, *within 20 years, childhood obesity will have been eradicated, and that the Borough will have become a healthy place to live work and study and a place where communities have come together to make the healthier choice the easiest choice.*

Over the lifetime of this strategy the Council and NHS, with partners will

- deliver a Borough-level whole systems approach that makes the healthier choice the easier choice and supports individuals to achieve and maintain a healthy weight
- introduce an enhanced and targeted neighbourhood-level whole systems approach to address inequalities, starting with Gooshays and Heaton wards initially, and expanding to other neighbourhoods in the future

By the end of this five-year strategy we expect to see

- The development of the Borough as a place that promotes healthy weight, where the healthier choice is the easiest choice; with foundations laid to achieve the twenty-year vision of eradicating childhood obesity
- An improvement in healthy weight levels in reception aged children across the Borough, compared to the England average
- An improvement in measures of excess weight among year 6 children in the targeted neighbourhood of Gooshays and Heaton wards, compared to statistical neighbours



## **Joint Foreword between Mark Ansell, Director of Public Health, and Councillor Gillian Ford, Cabinet Member for Adults and Wellbeing**

Welcome to Havering's draft Healthy Weight Strategy.

We share an ambition for the Borough to be a place where residents achieve the very best for their health and wellbeing. Sadly, we know that this isn't happening; levels of overweight and obesity in the local population are among the highest in the country, which means that too many people living in Havering are at greater risk of poor health. Even more worryingly, too many children in the Borough are overweight or obese and set on a path of experiencing lifelong illnesses that were once only seen in adults. As rates of overweight and obesity have increased over the years, and are projected to increase still further in the future, the reality is that obesity is cutting too many lives short and, unless we take urgent action, the problem will only get worse.

The Council, the NHS, and our partners are determined to tackle the problem. We have so many fantastic assets in the Borough; beautiful green spaces and parks, excellent leisure and sporting facilities, and good schools. But along with the rest of the UK and other developed countries, Havering is host to conditions that stand in the way of good health and wellbeing; the food environment, the way that we work and other circumstances that favour inactivity, are all pushing the population in the direction of overweight and obesity.

As this draft strategy sets out, we propose adopting an approach which is proving to be effective in other cities. Known as a 'whole systems approach', the Council, the NHS and other partners will work together to address the over 100 factors that are contributing to the problem of growing rates of overweight and obesity.

We share the vision that Havering will become a place where the healthier choice will be the easier choice, with childhood obesity eradicated within 20 years.

Whether you live, work, or visit the Borough, we encourage you to consider the Obesity Health Needs Assessment chapter on obesity that has informed this strategy's approach, and comment on the draft strategy itself.

Councillor Gillian Ford, Deputy  
Lead of Havering Council and  
lead member for Health



Mark Ansell  
Director of Public Health  
London Borough of Havering



## Support for the Health Weight Strategy

*"I am seeing more cases of fatty infiltration of liver and Type 2 diabetes in children and young people, which are a direct result of higher numbers of obesity. Fatty infiltration of liver is a precursor to Liver cirrhosis leading to liver failure. Type 2 diabetes in children and younger population is a much more aggressive condition and leads to both kidney failure and heart disease at an early age."*

*The NHS can't deal with increasing rates of obesity by itself; it is important for all local partners to work together."*

Diabetes Specialist Paediatric Consultant  
Barking, Havering and Redbridge University Trust

*"Everyone Active fully supports this strategy and is committed to playing our part in supporting local residents to achieve a healthy weight."*

Area Contract Manager  
Everyone Active

*"As the independent voice of people who use health and social care services in Havering, we know how overweight and obesity can affect the day to day lives of local people. We fully support this strategy, and as an organisation, pledge to play our part in preventing overweight and obesity."*

Senior Manager  
Healthwatch Havering

*"Schools are seeing increasing numbers of children who are overweight and obese. As a head teacher, I welcome this strategy, and want my school to play a full part in achieving the vision for a healthier Borough."*

Head teacher,  
Harold Hill Junior School

## Introduction

Preventing overweight and obesity and the health issues caused by overweight and obesity are priorities for Havering Council and the NHS, as set out in the *Havering Corporate Plan*, the Havering Health and Wellbeing Board's *Health and Wellbeing Strategy 2019/20–2023/24* and the Havering Place Based Partnership's *Interim Health and Care Strategy*.

This draft five year *Havering Healthy Weight Strategy 2024-2029* summarises the scale of the problem of overweight and obesity, why it is a concern and what causes obesity. It sets out how residents, the Council, the NHS, schools, leisure centres, the voluntary and community sector and local businesses must work together on delivering a 'whole systems approach'<sup>1</sup> to achieve a healthier population. This document should be considered alongside the new Havering Obesity Health Needs Assessment.

The development of this strategy has been led by the Council and has involved elected members, including the Leader of the Council and Lead Member for Adults and Wellbeing, as well as relevant service areas, and NHS partners. In total, over 30 stakeholder organisations have been engaged in its development, including representatives from schools, local businesses and the voluntary and community sector. The focus is on upstream prevention; stopping increasing rates of obesity in the local population, whilst recognising that help and support should be available for those individuals who want to lose excess weight.

Work started on this strategy during 2022 by bringing together information about overweight and obesity in the local population, evidence about the causes of and solutions for tackling obesity, a review of national strategy and published research on what has worked in the UK, and the achievements that have been made to address overweight and obesity in other cities around the globe.

This information was presented at two healthy weight summits, which were attended by over 30 stakeholder organisations.

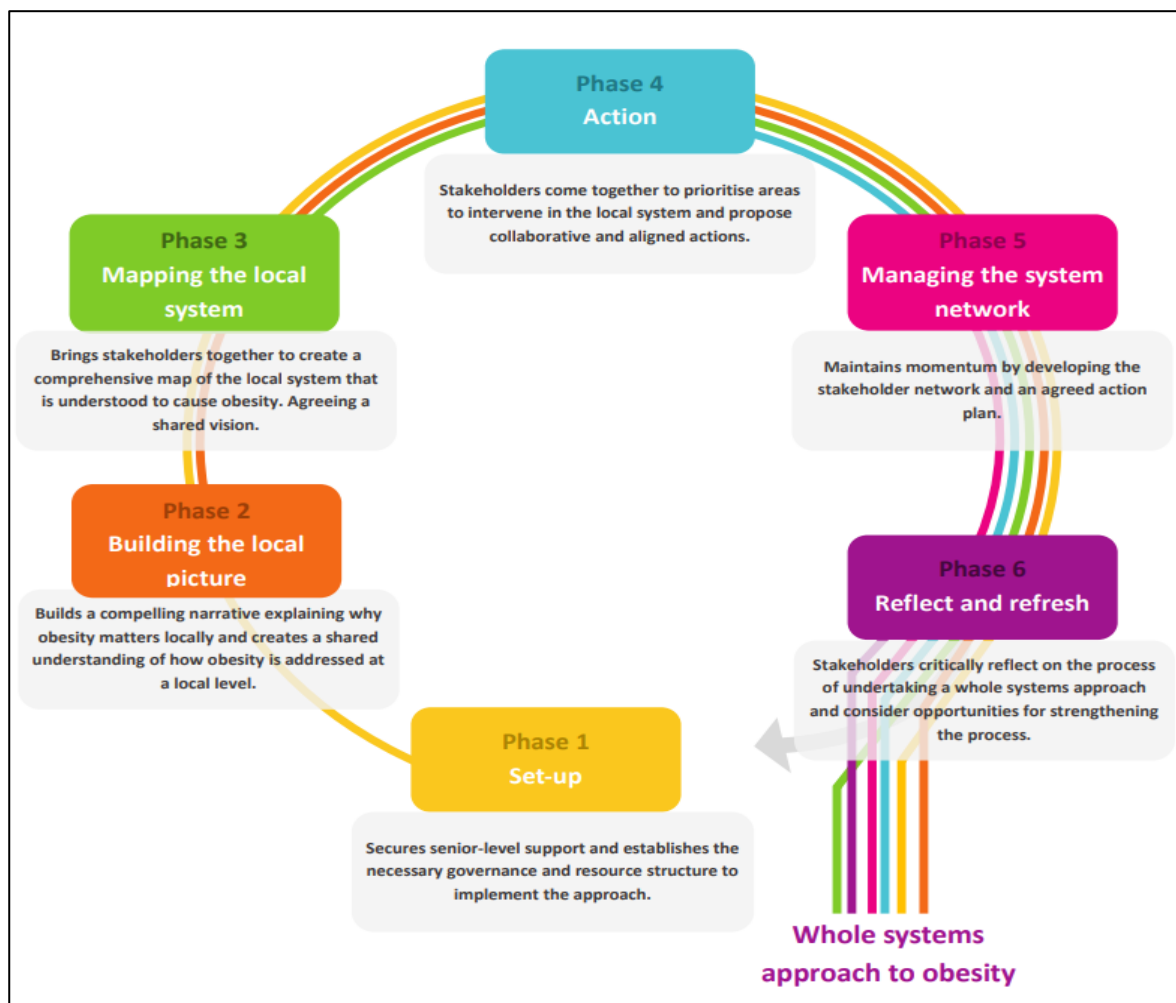
The discussions from those workshops and ongoing engagement with stakeholders informed the content of this strategy, the twenty year vision for the Borough, the guiding principles for development and implementation, and the process for implementing a whole systems approach.<sup>iii</sup>

The publication *What Good Healthy Weight for all Looks Like* provided the guiding principles for the development and implementation of this strategy, and for future assessment (see appendix 2)

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<sup>1</sup> OHID and the Department for Health and Social Care (DHSC) defined a local whole systems approach as a response to "complexity through an ongoing, dynamic and flexible way of working. It enables local stakeholders, including communities, to come together, share an understanding of the reality of the challenge, consider how the local system is operating and where there are the greatest opportunities for change. Stakeholders agree actions and decide as a network how to work together in an integrated way to bring about sustainable, long-term systems change

**Figure 1:** Six step model for implementing a whole system approach to tackle obesity



Source: OHID Whole Systems Approach Guide

Phases 1 to 4 of the six step model guided the development of this strategy during 2022-2023. Phases 5 and 6 will commence when the strategy is agreed.

## Prevalence of overweight and obesity

Rates of overweight and obesity have been increasing and are expected to increase further in the future.

The latest data for children is for the 2022/23 school year which shows that for Havering:

- 22.2% of children aged 4 – 5 years old (school year reception) were overweight or obese. Havering is similar to the London and England averages (which are high).<sup>iv</sup>
- 40.1% of children aged 10-11 (school year 6), were overweight or obese. Havering is similar to the high London average and above the England average.<sup>v</sup>

Overweight and obesity rates in Havering for children aged 10 – 11 (school year 6) has increased by 20% over the last 15 years from 32.9% to 40.1%.

The most recent data for adults is from the 2021/22 *Active Lives Adult Survey* which shows that for Havering:

- 60.3% of adults aged 18 – 64 years old are estimated to be overweight or obese. Trend data shows that Havering consistently has one of the highest proportion of adult overweight and obesity in London and is above the high England average.<sup>vi</sup>
- 24.9% of adults aged 18 – 64 years old are estimated to be obese. Trend data shows Havering is consistently above the London average and is following the rising England average.<sup>vii</sup>

The prevalence of overweight and obesity is expected to continue to rise:

- The proportion of adults who are overweight or obese has risen in England from 52.9% in 1993 to 64.3% in 2021, and the proportion of those people who are obese has risen from 14.9% in 1993 to 26.0% in 2021.<sup>viii</sup>
- In 2022, Cancer Research UK suggested that 36% of the population would be obese by 2040.<sup>ix</sup> If overweight and obese trends continue then the combined prevalence of overweight and obesity may reach 71% of the population by 2040.<sup>x</sup>

### FACT BOX 1: What is a healthy weight?

Healthy weight for both adults and children is determined by Body Mass Index (BMI).

For adults, a BMI between 18.5 and 24.9 is considered healthy. BMI is calculated by dividing body mass by the square of the body height, and is expressed in units of kg/m<sup>2</sup>

For children, age and gender is also taken into account when calculating BMI and the result is then compared to national datasets of children's BMI to assess whether they are a healthy weight. Children with a BMI between the 2<sup>nd</sup> and 85<sup>th</sup> centiles are a healthy weight. Children above the 85<sup>th</sup> centile are overweight and above 95<sup>th</sup> centile obese.

Excess weight is classified by the NHS as an adult living with overweight, obese or severe obesity. With a BMI  $\geq 25$ kg/m<sup>2</sup>.

## Inequalities

Health inequalities are the systematic, unfair, and avoidable differences in health between different groups of people.

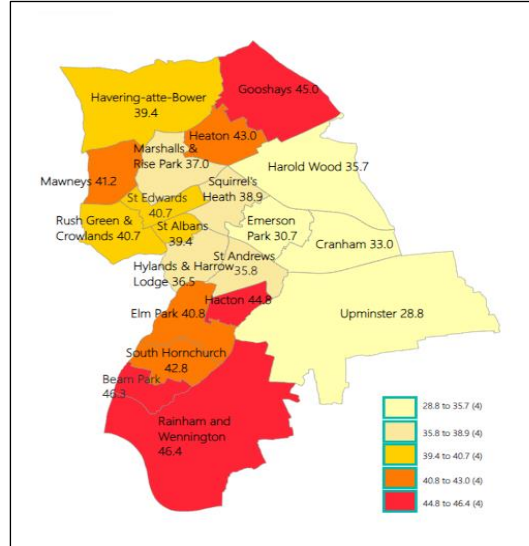
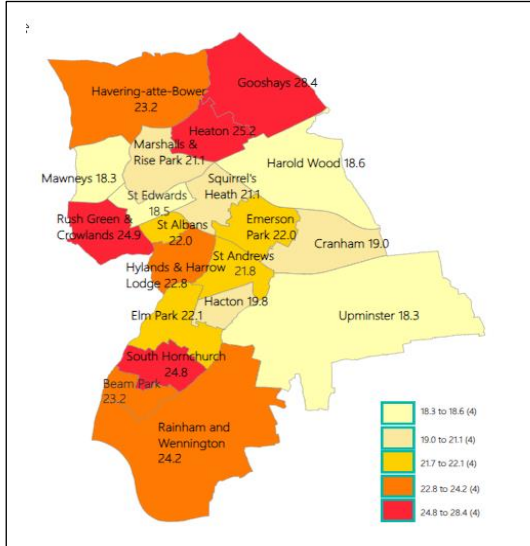
There are inequalities associated with overweight and obesity, which mean that some groups of people are affected more than others.

National evidence is that rates of obesity are highest in areas of greatest disadvantage. Children growing up in these areas are more at risk of obesity. Children who are obese are more likely to be obese in adulthood.<sup>iv</sup>

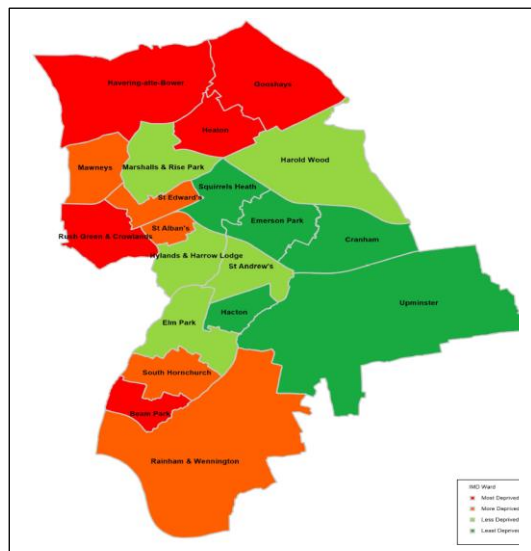
**Figure 2: Percentage of excess weight among children aged 4-5 by ward 2019/20-2022/23**

**Figure 3: Percentage of excess weight among children aged 10-11 by ward, 2019/20-2022/23**

Data Source: National Child Measurement Programme (NCMP) 20 - 23 OHID.



**Figure 4: Map of Havering wards showing the English Indices of Deprivation 2019**



Data Source: Ministry of Housing, Communities & Local Government. 2019

As figures 2 and 3 above show, the highest rates of excess weight among children in reception year (ages 4-5) are in Gooshays, Heaton, South Hornchurch and Rush green & Crowlands wards. For children in year 6 (ages 10-11), the wards with the highest rates of excess weight are Beam Park, Rainham and Wennington followed closed by Gooshays and Hacton. The maps illustrate the association between higher levels of excess weight and wards of greater disadvantage as presented in figure 4.

As set out in the Obesity Health Needs Assessment chapter on obesity, overweight and obesity is also higher in particular population groups such as in some ethnic groups, people with physical and learning disabilities, people with severe mental illness, and people of middle age. Men are more likely to be overweight compared to women, but women are more likely to be obese compared to men.

## Why is overweight and obesity a problem?

Overweight and obesity is affecting the quality of life of Havering residents and cutting lives short.

Children are beginning to develop diseases previously seen only in adults, such as type 2 diabetes, high blood pressure, high cholesterol, liver conditions, and bone and joint problems.<sup>xi</sup> Overweight and obesity could also be affecting children's life chances as there are higher rates of school absence among children who are overweight, compared with children of healthy weight,<sup>xii</sup> and there is emerging evidence of an association between obesity and poorer educational attainment.<sup>xi</sup> Being obese can result in stigma and bullying which has been found to result in lower self-esteem and can impact emotional and behavioural development.<sup>xi</sup>

In adults, overweight and obesity is the second biggest preventable cause of cancer after smoking.<sup>xiii</sup> Obesity reduces life expectancy by an average of three years or by eight to ten years with severe obesity.<sup>xiv</sup> Being overweight or obese increases risk factors for cardiovascular disease, such as high blood pressure, high cholesterol and type 2 diabetes.<sup>xiv</sup> People who are obese are a third more likely to develop dementia compared to those of a healthy weight.<sup>xv</sup>

Maternal obesity rates doubled from 7.6% in 1989 to 15.6% in 2007. Pregnant women who are obese are more likely to experience complications in labour, and their children have increased risk of health conditions such as heart disease, diabetes and asthma.<sup>xi</sup> Children born to obese mothers are more likely to develop obesity themselves<sup>xi</sup> and obesity in childhood is more likely to lead to overweight and obesity in adulthood.<sup>v</sup> This is resulting in an added problem in that overweight and obesity is increasingly being handed down through generations. Breastfeeding is associated with lower chances of children becoming obese.<sup>xvi</sup>

Obesity significantly increases the risk of hospitalisation, and morbidly obese individuals make significantly more visits to GPs and to hospital.<sup>xvii</sup> Multiple studies have estimated that the NHS spends approximately £6 billion on obesity-related health care each year.<sup>xviii</sup> A 2022 study estimated obesity costs the UK around £58 billion per year through NHS cost of treating the associated illnesses, provision of social care, as well as to the individual in regards to quality of life, and to business due to loss of workplace productivity.<sup>xix</sup>

Obese individuals are three times more likely to need adult social care than people of a healthy weight.<sup>xx xxi</sup> A 1 kg/m<sup>2</sup> increase in BMI is associated with a five per cent rise in the odds of need for help with social care.<sup>xxii</sup> When social care is required for people who are obese, this can often mean costly housing adaptations and additional carers. It is estimated that the yearly cost of local authority funded community-based social care for an individual with severe obesity and a BMI of 40, would be £1,086, nearly double the cost for a person with a BMI of 23, which is in the healthy range.<sup>xxii</sup>



## The causes of obesity

It has been a common misconception that the answer to addressing the problem of obesity lies in education, food labelling, and individual willpower.<sup>xxiii</sup> Most people know what is a healthy lifestyle. More than 90% of us know that we should limit our consumption of foods that are high in fat, sugar and salt.<sup>xxiii</sup> Almost everyone (99%) knows that eating fruit and vegetables is important for a healthy lifestyle.<sup>xxiv</sup> The majority (75%) of people know what a healthy diet is, 78% understand that diet has an impact on their health and 87% think it is important to eat a healthy diet.<sup>xxiii</sup> However, as Table 1 below shows, similar to the rest of the UK population, the majority of Havering residents do not have a healthy lifestyle.

**Table 1:** Average '5 a day' consumption and physical activity levels in Havering, London and England

Area	The number of children (aged 5 - 15) eating '5 a day'*	The number of children meeting physical activity guidelines**	The number of adults (16+) eating '5 a day'***	The number of adults meeting physical activity guidelines***
Havering	not available at borough level	42.9%	31.0%	61.2%
London Region	not available at regional level	46.1%	31.5%	66.8%
England	18.0%	46.8%	32.5%	67.3%

Sources:

\* NHS England 2019 *Health Survey for England* (Data for year 2018)

\*\* OHID 2023 Based on Active Lives Children and Young People Survey, Sport England (Data for year 2021/22)

\*\*\* OHID 2023 Based on the Active Lives Adult Survey, Sport England (Data for year 2021/22)

Achieving a healthy lifestyle isn't solely the combination of individual knowledge and willpower. Eating healthily and being physically active is largely influenced by the circumstances where we live, work and play.<sup>xxv xxvi</sup> Changes in modern day living have resulted in high streets and dining options that have become saturated with unhealthy food, and infrastructure and cultural attitudes that have led to fewer opportunities to be physically active.

The impact of these changes in modern day living is a system of circumstances and factors that encourage us to eat more foods that are high in fat, sugar and salt and to be physically inactive, so that it has now become easier to become overweight or obese.



## Turning the tide on obesity through a whole systems approach

The influential Foresight Project Report *Tackling Obesities: Future Choices* describes over 100 interacting factors that influence individual choices.<sup>xxv</sup>

The Foresight Report makes the case that these over 100 factors are so inter-related that they create a very complex system. Focusing on single initiatives will not achieve the scale of change needed to reduce levels of obesity. Instead, broad action is needed that address the wide-ranging factors across the whole system.

Turning the tide on obesity through a whole systems approach means responding to the complex and inter-related factors that

A system is a collection of interdependent parts. Where there is change in one part of the system, this will affect other parts.

are driving increased rates of obesity. It requires the Council and NHS working with other partners and stakeholders to identify local factors that are influencing decisions about diet and physical activity, and developing a local plan to change the local system and

so make healthier choices the easier choices.

Factors that influence individual choices range from the external environment, to social culture, behaviour, psychology and biology; many of which are outside individual control but heavily influence decisions about diet and physical activity. These factors continuously interact and result in a very complex system that promotes overweight.

**Figure 5: Example of whole systems working 1: healthier food environment**



Healthy food options need to be conveniently available in the places where we live, work and play. No one organisation is responsible for all of these settings, so partners must work together to change the whole food environment. This is an example of a whole system approach, with stakeholders and partners sharing a common vision, and then working together to make change happen across the whole system.

In 2019, Public Health England (now office for Health Improvement and Disparities (OHID)) with Leeds Beckett University and the Local Government Association (LGA) published the '*Whole Systems Approach to Obesity: a guide to support local approaches*'.<sup>iii</sup> The guide was based on evidence appearing from Amsterdam and Australia about the success of implementing whole systems approaches to address overweight and obesity.<sup>xxvii xxviii</sup> A number of local authorities in the UK are now testing and embedding systems thinking, with early evidence appearing to show positive impacts.<sup>xxix xxx</sup>

To be effective, a local whole systems approach needs an extensive range of local stakeholders to work together to understand and tackle the different parts of the system.

**Figure 6:** Stakeholders recommended to develop a whole system approach to obesity



Source: OHID Whole Systems Approach Guide

## Developing the Havering whole system approach

Over 150 stakeholders representing the many parts of the local system (as per figure 6) took part in two Havering Healthy Weight Summits to map the local causes of obesity and develop the local response.

Participants at Summit 1 identified over 120 local features that impact on maintaining a healthy weight. Figure 7 was produced as a result; a system map that captures the features, their interdependencies and their interconnections.

OHID and the Department for Health and Social Care (DHSC) defined a local whole systems approach as a response to “*complexity through an ongoing, dynamic and flexible way of working. It enables local stakeholders, including communities, to come together, share an understanding of the reality of the challenge, consider how the local system is operating and where there are the greatest opportunities for change. Stakeholders agree actions and decide as a network how to work together in an integrated way to bring about sustainable, long-term systems change*”

At Summit 2, participants used the system map below (figure 7) to identify where they could take action to deliver a place-based whole systems approach for the Borough, taking into account national and regional initiatives.

[illegible]

To use the map, identify any cause and follow the direction of the arrows to see the relationship between the cause and how it relates to diet or physical activity. The direction of the arrows indicates the nature of the relationship.

## National and regional initiatives

This strategy will complement and influence action at regional and national levels including the following initiatives:

- In 2020 Government announced a new national strategy to introduce legislation to restrict the placement of less healthy products in large retailers, both in store and online, to reduce the likelihood of impulse purchases. From 2025, there will be a ban on multi-buy promotions such as “Buy One Get One Free” and a ban on advertising less healthy products in the media.<sup>xxxix</sup>
- In 2021 the London Childhood Obesity Taskforce, chaired by the Mayor for London, developed a 10 point plan for addressing childhood obesity, which includes policies that restrict the advertising of products high in fat, salt and sugar across all Transport for London estate in London boroughs and supports food businesses to sell healthier options.<sup>xxxix</sup>

**Table 3:** National, regional, and local healthy weight initiatives

National	Regional	Local
<p><b>UK Government Tackling Obesity Strategy 2020</b> <sup>xxxix</sup></p> <ul style="list-style-type: none"> <li>• Introduce legislation to require large out of home food businesses to include calorie information</li> <li>• Legislate to prevent supermarkets selling high fat, sugar and salt foods next to supermarket tills</li> <li>• Ban advertising of high fat, sugar and salt products being shown on TV and online before 9pm</li> <li>• Fund the expansion of weight management services and a campaign to support individuals to take steps to move towards a healthier weight</li> <li>• Legislate to end the promotion of foods high in fat, sugar and salt by restricting volume promotions such as buy one get one free</li> </ul>	<p><b>The London Plan 2021</b> <sup>xxxix</sup></p> <ul style="list-style-type: none"> <li>• Recognises that Londoners’ physical and mental health is largely determined by the environment in which they live, work and play</li> <li>• The plan includes policies on developing a healthy city to enable health to flourish</li> </ul> <p><b>London Child Obesity Taskforce: 2021</b> <sup>xxxix</sup></p> <p>The taskforce set 10 ambitions, and works with the GLA to provide content for local authorities to implement locally whilst doing research and influencing policy at a London region level.</p> <ol style="list-style-type: none"> <li>1. End child poverty</li> <li>2. Support women to breastfeed</li> <li>3. Skill up early years professionals</li> <li>4. Use NCMP to better support parents</li> <li>5. Ensure all nurseries and schools are enabling health for life</li> <li>6. Make free ‘London water’ available everywhere</li> <li>7. Create more active, playful streets</li> <li>8. Stop unhealthy marketing</li> <li>9. Transform fast-food businesses</li> <li>10. Fund good-food innovation</li> </ol>	<p>Healthy weight is a priority for the Council and Havering Place Based Partnership (HPBP) which includes BHRUT, NELFT, NEL Integrated Care Board</p> <ul style="list-style-type: none"> <li>• Vision for Havering “The Havering you want to be part of”</li> <li>• Havering Health and Wellbeing Board Strategy</li> <li>• Havering Place-Based Partnership Board priority</li> </ul> <p>Havering Healthy Weight strategy is or will be aligned with relevant Council and partner strategies and plans. This will include the Council’s:</p> <ol style="list-style-type: none"> <li>1. Havering Corporate Plan</li> <li>2. Havering Local Plan</li> <li>3. Havering Climate Change Action Plan</li> <li>4. Havering Community Safety Partnership Plan</li> <li>5. Havering Infant Feeding Plan</li> <li>6. Havering Housing Strategy</li> <li>7. Havering regeneration plan</li> <li>8. Parks Strategy</li> <li>9. Havering Active Travel Strategy</li> <li>10. Sports and Physical Activity Strategy</li> <li>11. Early Help Strategy</li> <li>12. Havering Advertising Policy</li> </ol>



## Assets and activities

The Borough already has many community assets that contribute to making Havering a healthy place to live:

- Safe and clean green areas with 16 parks achieving green flag status
- Five leisure centres
- 69 schools achieving Healthy School London accreditation
- Offer of healthy school meals
- Planning restrictions to limit the number of new takeaways within 400m from schools
- Thirteen school streets operating to help children travel safely to school and achieve the recommended daily 60-minute physical activity
- Over 45 schools achieving accreditation with the TfL Travel for Life school programme which supports children to travel sustainably around the Borough.
- 116 early years' settings achieving the Healthy Early Years London accreditation
- The introduction of the UNICEF breastfeeding accreditation scheme in key places such as early years' centres, maternity settings and health visiting services to ensure residents get the knowledge they need from public services about breastfeeding
- Over 22 venues achieving breastfeeding welcome status which helps support families to feel confident breastfeeding when visiting local cafés, restaurants and venues.
- Buggy walk and talk sessions to help new parents to be active
- Adult weight management services, including a specialised offer for adults with a learning disability
- An exercise referral scheme which provides subsidised gym access for those with certain health conditions
- Healthy start vouchers being available for those who need them, giving those most in need the opportunity to buy discounted fruit and vegetables
- 50 business signed up for the water refill scheme
- Two community pantries in Harold Hill and Rainham to help people access affordable healthy food
- Free swimming for children in the school holidays



While a great deal is already happening to make the Borough a healthier place to live, work and play, clearly these actions and activities are not enough to hold back the rising rates of obesity.

## Moving forward

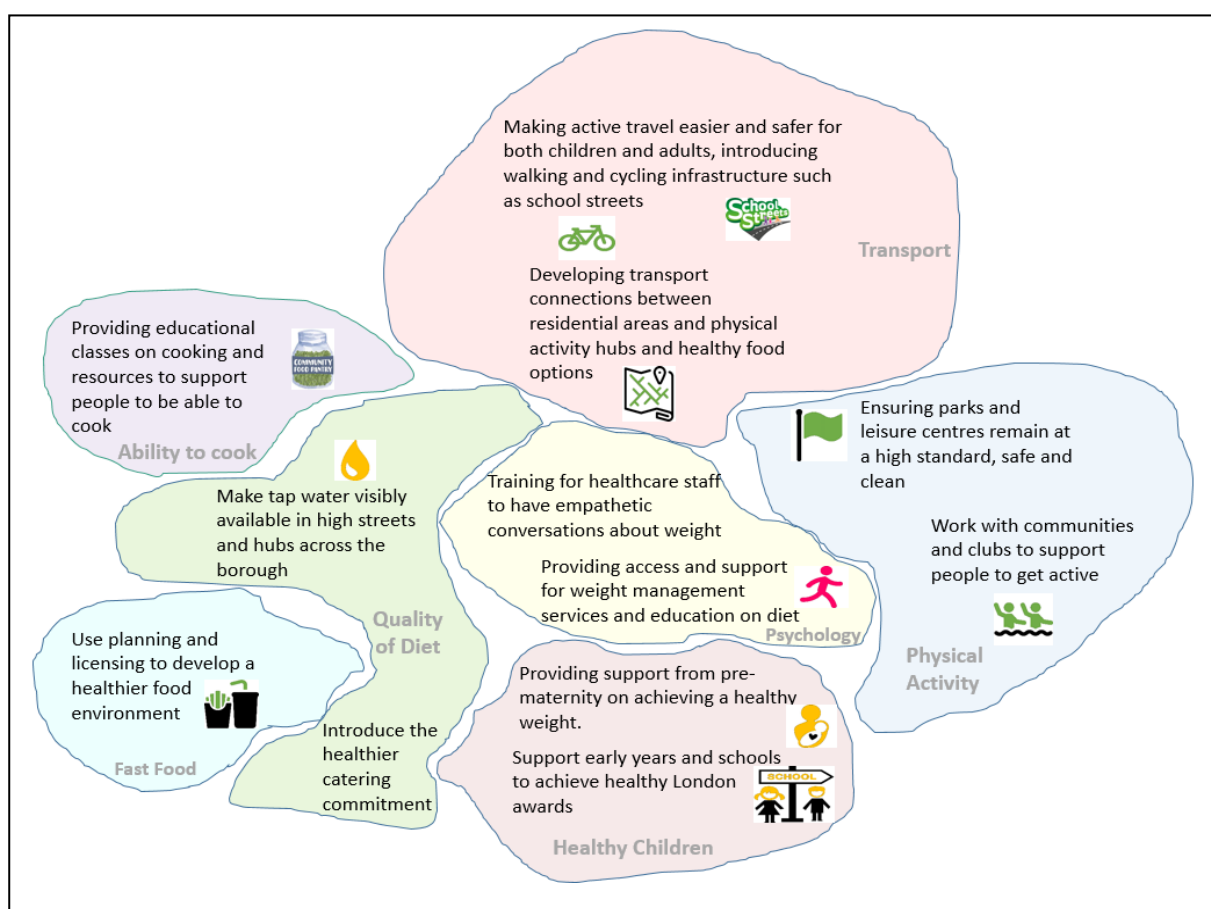
Developing this strategy has brought together the Council, the local NHS and other partners and stakeholders who are committed to working collaboratively to address the root causes of obesity and reduce inequalities.

The vision for Havering is that **within 20 years', childhood obesity will have been eradicated**, and **that the Borough will have become a healthier place to live, work and play**, a place where communities have come together to make the healthier choice the easier choice.

Changing from an obese-promoting system to one that promotes healthy weight requires action across the whole system and will take the lifetime of this strategy (or longer) to achieve. It is unlikely that there will be reductions in measures of overweight and obesity during the first few years of this strategy. What we will see in the first few years are changes to the system; creating the conditions that will eventually lead to improvements in rates of overweight and obesity.

By the end of this five-year strategy, we will have set in place firm foundations for achieving the twenty-year vision of eradicating childhood obesity.

**Figure 8:** Extract from the Havering Obesity System Map 2022 with examples of actions to be taken



## Aims

This strategy has two strategic aims; The first aim is to implement a Borough-level place based approach. This will build a firm foundation to support the twenty-year vision of eradicating childhood obesity, with the Borough becoming a place where the healthier choice is the easier choice. Developing a response which covers all the different causes of obesity and ensure support is available for people looking to lose weight.

**FACT BOX:** What does it mean for childhood obesity to be eradicated in Havering within 20 years?

In 2021/22, it was estimated that, in Havering, 10.4% of reception aged children (4-5 years old) and 25.8% of year 6 children (aged 10-11 years old) were obese.

The UK government set an ambition in 2018 to 'halve childhood obesity by 2030'. At that time, the obesity rate in Havering for Reception aged children was 9.5% and for year 6 aged children was 20.1%.

Havering is looking to go further and eradicate childhood obesity by 2044. This means that by 2044, less than 5% of Havering children will be obese.

Residents will see tangible differences in the Borough; changes that result in healthier foods being more accessible and available, opportunities for active travel being safer and more appealing and public spaces that encourage physical active, and opportunities to get involved in actions that contribute to the creation of a healthier Borough.

The second aim is to develop an intensive neighbourhood-level place-based approach to address inequalities in Gooshays and Heaton Wards which will identify changes needed for relevant services and the public realm, informed and prioritised by engagement with local communities.

Achieving the two aims depends on the continued commitment of and collaboration between partners. Achieving the twenty-year vision means maintaining that commitment for the long term. The governance structure set out below shows where progress will be monitored.

## Objectives

This strategy's aims will be delivered through eight objectives, grouped into three themes:

- Theme one is concerned with ensuring that the whole system is engaged and works together on the many drivers of obesity
- Theme two is concerned with the Borough becoming a place that promotes healthy weight; recognising that the places where people live, work and play shape the type of foods they eat and how physically active they are.
- Theme three recognises the importance of a life-course approach, and ensuring that individuals are supported to achieve a healthy weight.

All objectives will take into account inequalities described in this strategy and in the Obesity Health Needs Assessment. Progress will be monitored against outputs described in the table below. Outputs described for Havering apply to all wards in the borough, and will be further amplified in Harold Hill alongside additional outputs.

## Themes and outputs for delivering objectives

Theme 1: Engaging the whole system to work together on the many drivers of obesity		
Objective	Outputs – Havering	Outputs – Harold Hill
Objective 1: We will embed a whole systems approach across Havering which will be the foundation for addressing healthy weight. This will enable the introduction of policies and practices that have an influence on healthy weight.	<ul style="list-style-type: none"> <li>• A steering group formed, jointly led by the Council and NHS</li> <li>• A network formed comprising system partners.</li> <li>• Network partners to commit to a detailed action plan and contribute to monitoring its delivery. The action plan will be transformative and co-ordinated across a broad range of disciplines and stakeholders.</li> <li>• A training programme that covers whole systems approach and wider influences on health will be developed for Council key and non-key decision-makers</li> <li>• Local healthcare professionals trained to discuss healthy weight with their patients</li> </ul>	<ul style="list-style-type: none"> <li>• Engage a wide variety of system partners local to Gooshays and Heaton wards as part of the consultation on the healthy weight strategy</li> <li>• Host a workshop to design an enhanced and targeted neighbourhood-level place-based approach for Gooshays and Heaton wards</li> <li>• Network formed comprising system partners from across Gooshays and Heaton wards</li> <li>• A detailed action plan specific to Gooshays and Heaton wards with network partners committed. Ongoing monitoring in place</li> </ul>
Objective 2: We will develop partnerships which lead to effective community engagement into addressing healthy weight	<ul style="list-style-type: none"> <li>• A healthy weight alliance is formed and one meeting held per year.</li> <li>• Residents and businesses will take a central role in shaping the approach and delivering actions</li> <li>• Establishing a healthy food partnership to strengthen the local food system.</li> <li>• Production of a digital intelligence dashboard containing key statistics on weight and updated annually to inform the strategic approach.</li> </ul>	<ul style="list-style-type: none"> <li>• Councillors, residents and businesses in Gooshays and Heaton wards involved in shaping and the designing the approach</li> </ul>

Theme 2: Becoming a borough that promotes healthy weight		
Objective	Outputs – Havering	Outputs – Harold Hill
Objective 3: We will develop communities in Havering which promote and provides access to healthy, nutritious and sustainable food for all; enabling a healthy diet to become the easier option.	<ul style="list-style-type: none"> <li>• Public sector food premises in the Borough will promote healthy and affordable food and beverages, leading the way for a change in the food environment.</li> <li>• Private sector food retail offers are supported to become healthier food retail offers working to achieve the healthier catering commitment.</li> <li>• Enhancement on the restrictions in place on the availability of fast food outlets.</li> <li>• Changes in advertising policy to support promotion of healthier products.</li> </ul>	<ul style="list-style-type: none"> <li>• Identify local enablers and barriers to consuming a healthy diet in Gooshays and Heaton wards</li> <li>• Public sector business in Harold Hill to provide and promote healthy and affordable food and drink beverages</li> <li>• Identify key food business in Harold Hill to be involved in the healthy weight strategy and assess food offers</li> </ul>



	<ul style="list-style-type: none"> <li>Encouraging healthier retail offers through the Havering business awards scheme.</li> </ul>	<ul style="list-style-type: none"> <li>Introduce public water fountains and ensure a healthy food retail offer as part of regeneration plans</li> </ul>
Objective 4: We will provide leadership to further shape the Borough as a place where rates of physical activity increase and residents enjoy the benefits that physical activity provides.	<ul style="list-style-type: none"> <li>The development of active travel interventions including enhancement of the street scene.</li> <li>The expansion of school streets where appropriate.</li> <li>Public sector organisations demonstrate system leadership in approaches to active travel.</li> <li>Havering parks continue to be safe and clean and provide opportunities for residents to be physically active.</li> <li>Review health impact assessments for large developments undertaken by developers &amp; leverage opportunities to promote and support healthy weight.</li> </ul>	<ul style="list-style-type: none"> <li>Identify enablers and barriers to physical activity for children and adults in Gooshays and Heaton wards</li> </ul>

Theme 3: Taking a life-course approach to enabling people to achieve and maintain a healthy weight		
Objective	Outputs - Havering	Outputs – Inequalities
Objective 5: We will support healthy pregnancies and help families achieve the best start to life for their babies and young children. (pre-conception – 5 years old)	<ul style="list-style-type: none"> <li>Those contemplating pregnancy are supported to optimise their health and wellbeing prior to conception to improve pregnancy outcomes and give their child the best start in life. <sup>xxxvi</sup></li> <li>Introduce the forthcoming government standards on healthy weight from maternity. <sup>xxxvii</sup></li> <li>Develop further support options and environments that enable those mothers who wish to breastfeed.</li> <li>Early years settings are supported to achieve the 'Healthy Early Years London' award.</li> </ul>	<ul style="list-style-type: none"> <li>Identify enablers and barriers for young families achieving a healthy weight</li> </ul>
Objective 6: We will support children and young people (5 years old to 18 years old), along with their families to achieve a healthy weight	<ul style="list-style-type: none"> <li>Schools are supported to achieve the 'Healthy Schools London' award.</li> <li>The family support programme is available for those who wish to learn about healthy behaviours.</li> <li>Through the national childhood measurement programme, identify children and families who may need extra support.</li> <li>Provide a children's weight management support to those who are eligible for the programme that enable individuals to achieve a healthier weight.</li> </ul>	<ul style="list-style-type: none"> <li>Identify enablers and barriers for young children achieving a healthy weight in Gooshays and Heaton wards</li> <li>Further promote the children's weight management service to eligible families in Gooshays and Heaton wards</li> </ul>
Objective 7: There will be greater opportunity for adults to achieve and maintain a healthy weight, including information / support to lose excess weight and maintain	<ul style="list-style-type: none"> <li>Public and private sector workplaces and community settings enable good health by achieving the Good Work Standard.</li> </ul>	<ul style="list-style-type: none"> <li>Identify enablers and barriers for adults achieving a healthy weight in Gooshays and Heaton wards</li> </ul>

a healthy weight (18 years old +).	<ul style="list-style-type: none"> <li>Promote national tailored information campaigns which have been informed by behavioural science and provide trustworthy up to date and consistent advice.</li> <li>Provide weight management support to those who are eligible for the programme that enable individuals to achieve a healthier weight.</li> </ul>	<ul style="list-style-type: none"> <li>Identify key workplaces in Harold Hill to participate in the development of a neighbourhood-level approach</li> </ul>
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## Outcomes

The following outcomes should be achieved over the five-year lifetime of the strategy:

- The development of the Borough as a place that promotes healthy weight, where the healthier choice is the easiest choice, with foundations laid to achieve the twenty-year vision of eradicating childhood obesity
- An improvement in healthy weight levels in reception aged children across the Borough, compared to the England average
- An improvement in measures of excess weight among year 6 children in the targeted neighbourhood of Gooshays and Heaton wards, compared to statistical neighbours

## Indicators

The following indicators will be monitored periodically:

- Breastfeeding at 6-8 weeks
- Child excess weight in 4-5yrs old (reception age)
- Child excess weight in 10-11yrs old (year 6 age)
- Number of children meeting physical activity guidelines
- Number of adults eating '5 a day'
- Number of adults meeting physical activity guidelines
- Percentage of adults classed as having excess weight
- Percentage of adults classed as obese
- Effective partnership working, including an annual assessment of the system response in accordance with the '*What Good Looks Like*' guide

## Delivering the strategy

A steering group will be formed that will be jointly led by the Council and NHS. The steering group will be accountable to the Health and Wellbeing Board, the Place-based Partnership, and Council Cabinet.

The steering group will oversee implementation of the place-based Borough-level whole system approach, by:

- ensuring that a detailed action plan is produced that captures actions proposed by partners and stakeholders
- monitoring progress against the action plan
- periodically assessing the state of the local system
- producing an annual report for the Havering Health and Wellbeing Board, the Place Based Partnership, and Cabinet. The report will be published on the Council's website

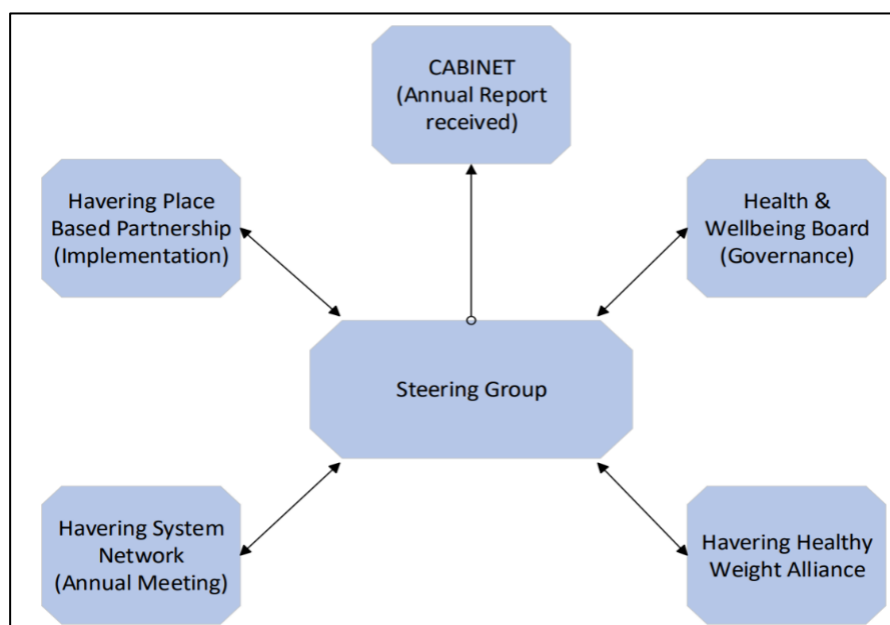
The Steering Group will oversee the

- setting up of a multi-agency system-wide Havering Healthy Weight System Network with a broader membership comprising those organisations responsible for actions
- development of a Healthy Weight Alliance; giving residents and organisations opportunity to shape further action and be part of the solution to addressing obesity

The Steering Group will oversee the approach for developing an intensive place-based neighbourhood level whole system approach for Gooshays and Heaton wards, including

- governance
- detailed action plan

**Figure 9: Governance Structure for the delivery of the healthy weight strategy**



Havering System Network: a forum of organisations that are responsible for actions to implement the place-based whole system approach for the Borough

Havering Healthy Weight Alliance: a group of residents and community groups who are committed to addressing the problem of obesity

## Consultation

A public consultation took place between 17 January and 3 March 2024, when residents and stakeholders were invited to submit their views about the approach to obesity prevention. The consultation survey was published on the Council's consultation and engagement website, Citizen Space, and was widely publicised by the Council, NHS, and partners. 660 responses were received.

The consultation comprised

- Survey: gathering both quantitative and qualitative feedback
- Draft Healthy Weight Strategy
- Easy read version of the draft Healthy Weight Strategy
- Obesity Health Needs Assessment
- Video by the Deputy leader of Havering Council and Lead Member for Adults and Wellbeing explaining Havering's Healthy Weight Strategy
- Video by Public Health England explaining how to address obesity.

At the conclusion of the consultation, feedback was reviewed and analysed, and a consultation report prepared. The feedback was mostly supportive of the strategy approach, with the majority of comments focusing on implementation. The consultation report describes what changes have been made in response to findings from the consultation.

## Appendix 1: Acknowledgements and thanks

Havering Council led the development of this strategy, working closely with partner agencies and wider stakeholders. The Council thanks the representatives from the many organisations who took time to attend summits and participate in discussions, and further thanks them for their commitment to future action.

Age UK Redbridge, Barking and Havering  
Barking, Havering and Redbridge University Hospitals NHS Trust  
Cranham Health Centre  
Drapers Maylands Primary School  
Engayne Primary School  
Everyone Active  
Havering Adult College  
Havering Crest Primary Care Network  
Havering Diabetes UK Network  
Havering Disabled Sports Association  
Havering Marshall Primary Care Network  
Havering MIND  
Having North Primary Care Network  
Havering South Primary Care Network  
Havering Volunteer Centre  
Kent Community Health  
London Sport  
My Health Matters  
North East London Foundation Trust  
North East London Integrated Care Board  
North East London Local Pharmacy Committee  
Outdoor Classroom  
Romford Business Improvement District  
St Edwards Medical Centre  
Sanders Draper School  
Squirrels Heath Infant School  
Tigers Football Club  
Transport for London  
University College London

## Appendix 2: Principles of a whole system approach

The principles that have guided the development of this strategy, and which will continue to guide its implementation, are set out by the Association of Directors of Public Health (ADPH) and OHID in *What Good Healthy Weight for all Looks Like*, a document that provides a high-level framework for a local approach to promoting healthy weight.<sup>xxxviii</sup> A corresponding self-assessment matrix enables local systems to assess the progress in these areas.

The table below summarises the principles, outlining what success looks like. The Havering system will be assessed annually using these principles.

1	Systems leadership	Anchor organisations will work in a way that exemplifies the approach. Local system leaders including politicians, Council leaders, Director of Public Health and NHS leaders will prioritise and champion achieving a healthy weight for the Borough.
2	A long-term whole system approach	The Borough will develop an approach which is long-term, where local stakeholders work together using all available policy levers across the system in combination with systems thinking.
3	A health-promoting environment	The response focuses on addressing the environments in which people live, play and work to stop the excess calorie consumption and encourage active lifestyles.
4	Community Engagement & Partnership	Local communities will be given the opportunity to be at the centre of decision-making, engaged in the whole system approach and drive local solutions. The Borough will work as one to address obesity.
5	Focus on inequalities	There are marked inequalities in the drivers of obesity such as access to healthy food and overall rates of obesity. The approach will work to address those deep rooted system causes and those most in need.
6	A life course approach	The work will target those most in need or those at highest risk at every age group with a focus on maximising prevention and early intervention. The approach will include working collaboratively with specific life course settings such as maternity services, early years, schools, workplaces and services for older people.
7	Monitoring, evidence, evaluation and innovation	Evaluating actions and approaches, continuous improvement and sharing data and good practice across the local system to inform decisions and practice.

## Appendix 3: Glossary

**Anchor organisations:** large organisations that are unlikely to relocate and have a significant stake in their local area. They have sizeable assets that can be used to support their local community's health and wellbeing and tackle health inequalities, for example, through procurement, training, employment, professional development, and buildings and land use.

**Place based approach:** understanding the issues, interconnections and relationships in a place and coordinating action and investment to improve the quality of life for that community.

**Shared vision:** A clear and aspirational statement of what the whole systems approach is trying to achieve.

**Statistical neighbours:** Areas that have similar characteristics.

**System:** A system is a collection of interdependent and interconnected parts. If something happens to one part of the system, other parts of the system will be affected.

**System mapping (for obesity):** A process to identify and visually represent how the local causes of obesity are linked.

**System network:** A broad set of stakeholders from the local place, from both within and outside of the local authority, responsible for the sustained implementation, adaptation and refinement of the whole systems approach and action plans.

**Systems thinking:** A way of looking at, learning about, and understanding complex situations

**Whole systems approach:** A local whole systems approach responds to complexity through an ongoing, dynamic and flexible way of working. It enables local stakeholders, including communities, to come together, share an understanding of the reality of the challenge, consider how the local system is operating and where there are the greatest opportunities for change. Stakeholders agree actions and decide as a network how to work together in an integrated way to bring about sustainable, long term systems change.

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## Healthy Weight Strategy Action Plan

Engaging the whole system to work together on the many drivers of obesity					
Action Number	Objective	Objective Description	Action(s)	Indicators	Service Area/Organisation
1.1	<b>1.Embedding a systems approach</b>	<b>Investing in our approach to achieve the long term goal</b>	Develop a Borough wide strategy	Healthy Weight in Service plans	LBH ICB BHRUT
1.2			Embed healthy weight priority into Council staff		LBH Public Health
1.3			Healthy Weight lead to attend theme boards and update cabinet members on actions relevant to their services		LBH Public Health
1.4			Training for Councillor's and decision makers regarding addressing obesity	Training delivered for Councillor's regarding decision making	LBH HR & LBH Public Health
1.5			Embedding obesity actions in PBPB working groups		
1.6			Maintain, grow and continue to inform the system network to enable action on the healthy weight agenda	Size of the healthy weight network	LBH Public Health
1.7			All PCNs to have practices achieve the Enhanced Weight MGMT Service Specification		
1.8			Form a steering group, jointly led by the Council and the NHS and introducing Governance and ToR		LBH Public Health
2.1	<b>2.Healthy Partnerships</b>	<b>Embedding residents into the healthy weight strategy</b>	Development of a Healthy Weight Alliance to embed local people into decision-making on healthy weight.	Healthy Weight Alliance developed	LBH Public Health & LBH Community Development
2.3			Development of a community food partnership	Community food partnership	Voluntary Sector - Tapestry
2.4			Havering Behaviour Change Campaign		LBH Communications

2.5			Health champions to deliver information on relevant services and train X amount		My Health Matters
2.6			Development of digital intelligence dashboard	Digital Dashboard on the Healthy Weight Agenda	LBH Public Health Intelligence
2.7			Development of obesity monitoring approach		LBH Public Health Intelligence
2.8			Public Health to scope using BMI data from 2-2.5 year review to project and plan future interventions	2-2.5 year review BMI data reported to Public Health	LBH Public Health
<b>Becoming a Borough that promotes healthy weight</b>					
Action Number	Objective	Objective Description	Action(s)	Indicators	Service Area/Organisation
3.1	<b>3. A healthy diet is the easiest option</b>	<b>Our diet is a product of our environment. To enable people to achieve a healthy weight we need public and community settings where the healthy option is the easiest option</b>	Collier Row Superzone Introduce Healthier Business Scheme (Healthier Catering Commitment, Breastfeeding welcome and water refill scheme)	HCC sign up	LBH Public Health
3.2			Continue to implement HFSS advertising policy	New advertising contract which bans HFSS advertising	LBH Public Health LBH Comms
3.3			Maintain the food pantry and consider how to strategically revamp the approach	Food pantry usage	LBH Customer Services

3.4			Policy on Council owned food standards	Policy on food standards	LBH
3.5			Council to adopt policy regarding healthy choice the easy one	# of Assets in which healthy option is the easiest one	LBH
3.6			NELFT -public sector premises adopt policy regarding healthy choice the easy one	# of Assets in which healthy option is the easiest one	NELFT
3.7			BHRUT - public sector premises adopt NHS Food Standards regarding healthy choice the easy one	# of Assets in which healthy option is the easiest one	BHRUT
3.8			Review planning policies to encourage healthy affordable outlets		LBH Planning
3.9			To develop Harold Hill High Street to make the healthy option the easiest		LBH Regeneration
3.10			Work to make drinking water widely and conspicuously available in public places and buildings		
3.11			Introduce a healthy food business award		LBH Public Health
4.1	<b>4.Active Environment</b>	<b>Developing which enable people to move more</b>	Increase the number of school streets starting from 10	Number of school streets	LBH Environment
4.2			Pilot a school Superzone in Rainham	School Superzone	LBH Public Health
4.3			Implementation of new cycle routes to improve connectivity between minor and district centres		LBH Transport Planning (Planning & Public Protection)

4.4			Development and adoption of an active travel strategy	Adopted Active-travel strategy	LBH Transport Planning (Planning & Public Protection)
4.5			Review phase 2 of the new WQS estate to consider space for Physical activity with planning and housing	Council estate outcomes	LBH Regeneration
4.6			Housing Strategy to be shaped alongside the healthy weight agenda		LBH Housing
4.7			Council estates to be improved to encourage physical activity		LBH Housing
4.8			Pilot working with schools to open facilities before and after school and during school holidays		LBH Education
4.9			Continue to offer schools and education facilities the opportunity to install cycle and scooter parking through the council's voluntary school travel plan programme		LBH Education & Transport Planning
4.10			Develop pilot proposal for Active travel for GLA Healthy Streets approach for Beam Park		
4.12			Through the Councils annual cycle parking programme, ensure that there is adequate cycle parking provision at public sector premises across the Borough		LBH Transport
4.13			Health Impact Assessment of major developments		LBH Planning & Public Health
4.15			Embedding the Transport for London Healthy Streets Indicators (LHS) into the delivery of Local Implementation Plan and Liveable Neighbourhoods Schemes		LBH Transport Planning (Planning & Public Protection)
4.16			Continue to offer free cycle training - 'Bikeability' to all schools in the Borough		LBH Transport Planning (Planning & Public Protection)

4.17			Develop staff travel plan		LBH Transport Planning (Planning & Public Protection)
4.18			Re-brand the current cycling liaison group into an 'Active and Sustainable Travel Forum'		LBH Transport Planning (Planning & Public Protection)
4.19			Regeneration; North Street - Romford Ring Road - Future Years		LBH Regeneration
4.20			Development of a physical activity strategy	PA strategy	LBH Health & Sports Development
4.21			Maintain green flag status in boroughs parks	Green flags status	LBH Parks
4.22			Bid to improve Facilities in Parks (e.g. Outdoor Classroom etc.)		LBH Parks
4.23			Support Community Safety with Public Health approach linking across to actions in the Havering Violence and Vulnerability Reduction Action Plan		
4.24			Open more facilities and enable sport in the borough		
4.25			Monitor parks usage to attract investment from cafes	Parks Usage	LBH Parks
4.26			Complete Bretons Masterplan		LBH Leisure & Culture
4.27			Maintain and grow allotment provision in the borough		LBH Parks

Taking a life-course approach to enabling people to achieve and maintain a healthy weight					
Action Number	Objective	Objective Description	Action(s)	Indicators	Service Area/Organisation
5.1	<b>5. Healthy Start (Pregnancy to the first year of life)</b>	<b>Embedding achieving a healthy weight from conception. Supporting parents and carers to establish a healthy foundation for their children</b>	In line with new NICE guidance due 2024, undertake an initial review and development of antenatal healthy weight offer		Public Health BHRUT NELFT
5.2			Work with partners to increase sign up to BF welcome scheme. Including key venues such as Council owned premises and popular private sector outlets		LBH Public Health LBH Registrars
5.3			Establish clear, consistent information about healthy weight in pregnancy across mutually agreed platforms (e.g. Baby Buddy app, JOY app)		Public Health BHRUT NELFT
5.4			Delivery of starting solid food workshops	Number of workshops delivered/ number of people attending	LBH Early Help
5.5			Review Starting Solid Foods workshop content (to include comparison with HENRY Starting Solids session)		LBH Public Health LBH Early Help BHRUT NELFT
5.6			Deliver a Henry 0-5 service		NELFT
			Develop and pilot a weight management referral pathway linking with the NCMP in Harold Hill, Romford and Rainham (Trial a new NCMP feedback approach)		LBH Public Health

5.7			Pilot a targeted HENRY 0-5 programme for Early Pregnancy Pathway families		LBH Public Health LBH Early Help BHRUT NELFT
5.8			Maintain and increase the buggy walk programme	No. of buggy walks	LBH Health & Sports Development
5.9			To identify Children and Young People at high risk of overweight and obesity using risk stratification		
5.10			All eligible services (Children's Centres, Health Visiting, Maternity and Neonatal) to achieve and/or maintain Baby Friendly Initiative Stage 1 as a minimum	BFI accreditation awarded	LBH Early Help BHRUT Health Visiting
5.11			Improve system-wide collation and reporting of infant feeding data		LBH Public Health
5.12			Increase provision of breastfeeding support sessions (including Early Help/HV and Latch On sessions) to at least 5 per week (min. 1 on each day Mon-Fri)	No. of breastfeeding/ infant feeding support sessions	LBH Early Help
5.13			Review breastfeeding peer support offer with a view to developing a funding bid to enhance this service and better support volunteers		LBH Early Help
5.14			Young Mum and Parent groups to support breastfeeding - HVC		
5.15			Continue to increase the uptake of Healthy Start within the Borough and the number of SMEs accepting Healthy Start	% uptake of Healthy Start	LBH Public Health

5.16			Explore options for creating and sustaining delivery of healthy cooking workshops (in partnership with voluntary sector) e.g., family food champions, community chefs, integration with those already being provided in community hubs and elsewhere	No. of community healthy cooking workshops in the borough	
6.1	<b>6. Healthy childhood</b>	<b>Building upon the healthy start to supporting families of early years to eat healthily and do adequate physical activity Supporting schools, youth provision and families to eat healthily and do adequate physical activity</b>	Publicise the new refreshed Healthy Early Years Programme and encourage settings to participate. Increase the number of early years settings registered on the new Healthy Early Years London Programme	Number of settings registered and achieving first steps, bronze, silver and gold awards	LBH Public Health
6.2			Review the Early Years Oral Health offer to ensure opportunities to incorporate healthy weight promotion are maximised		LBH Public Health
6.3			Publicise the new refreshed Healthy Schools Programme and encourage schools to participate. Increase the number of schools registered on the new Healthy Schools London Programme	Number of settings registered and achieving first steps, bronze, silver and gold awards	LBH Public Health
6.4			Promote water only schools	Number of water only schools	LBH Public Health



6.5			Increase the uptake of school meals (including free school meals)	School meal and free school meal uptake	LBH Catering Services
6.6			Develop local evaluation of the school meals programme by GLA		LBH Public Health
6.7			Pilot a Tier 2 CYP parental weight management programme	Number of families starting and completing programme	LBH Health & Sports Development
6.8			Maintain sports collective programme		Havering Sports Collective
6.9			Increase the number of schools taking part in TfL Travel for Life programme	Number of accredited schools	LBH Transport Planning
6.10			Junior Citizen Day (held at the end of the school year with the Council, TfL and primary schools). Include a healthy eating message in as part of their return from the school day at the end of next year		
6.11			Active travel embedded into school travel plans	Number of schools joining the programme	LBH Transport Planning
7.1	<b>7. Support Adults to live a healthy lifestyle</b>	<b>Deliver health services and workplaces that promote healthy choices and support people to achieve and maintain a healthy weight</b>	Develop and implement a care pathway for healthy weight in adults, engaging with residents to design services	Tier 2 WMS uptake	BHRUT GP's
7.2			Building upon initial pilot, provide a range of Tier 2 adult weight service	Tier 2 WMS uptake	LBH Commissioning & Public Health

7.3			Work with LBH CTLD team to develop a Tier 2 WMS for adults with a learning disability		LBH Commissioning & Public Health
7.4			Develop a business case to commission and deliver an adult T3 weight management service		NEL ICB
7.5			Maintain and increase annual health check uptake	Number of NHS Health checks completed	LBH Public Health
7.6			All PCN's to maintain a dietician's offer into the care pathway for healthy weight		PCN's
7.7			Introduce an approach to improve uptake of NDPP in Havering		
7.8			Continue to promote Sports development offer		LBH Health & Sports Development
7.9			Develop an approach for an SME workplace health scheme in Havering		
7.10			Provide community support events and day to address root causes of weight		
7.11			Continue to promote Walking Groups	# of Walking groups	LBH Health & Sports Development
7.12			Training for NHS staff in primary care regarding healthy weight as recommended by APPG for Obesity		
7.13			Low calorie diet champion (T2DR) - Type 2 Diabetes Remission		Clinical Pharmacist

## Healthy Weight Strategy EqHIA

### Document control

<b>Title of activity:</b>	Havering Healthy Weight Strategy 2024-29: Everybody's business
<b>Lead officer:</b>	Luke Squires, Public Health Practitioner, Public Health Service
<b>Approved by:</b>	
<b>Date completed:</b>	
<b>Scheduled date for review:</b>	2027

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

## Equality & Health Impact Assessment Checklist

Please complete the following checklist to determine whether or not you will need to complete an EqHIA and ensure you keep this section for your audit trail. If you have any questions, please contact [EqHIA@havering.gov.uk](mailto:EqHIA@havering.gov.uk) for advice from either the Corporate Diversity or Public Health teams. Please refer to the Guidance in Appendix 1 on how to complete this form.

### About your activity

1	Title of activity	Havering Healthy Weight Strategy 2024-29: Everybody's business
2	Type of activity	A new strategy
3	Scope of activity	<p>An EqHIA is being performed to assess the impact of introducing a new strategy to address overweight and obesity in the borough. This strategy sets out the local strategic approach for addressing high levels of overweight and obesity in the borough through a "whole systems approach".</p> <p>There is now sound evidence that shows that where we live influences how and what we eat, and how active we are. The system (those places where we live, work and play) can shape the choices that we make. There are over 100 causes of overweight and obesity in the system that are pushing us towards unhealthy choices.</p> <p>A whole systems approach to obesity prevention means addressing all of the different causes of obesity. Doing this would make the healthy choice the easiest choice.</p> <p>A whole systems approach takes a long time to embed. Once embedded, it takes many years for rates of obesity to fall.</p> <p>During the five-year lifetime of this strategy, we will be (a) embedding changes in the Havering system through an all systems approach, and (b) introducing a place-based approach which means starting with a focus on one neighbourhood in particular, and then expanding to other neighbourhoods in the future. By 2029 we should expect to see:</p> <ul style="list-style-type: none"> <li>• An improvement in healthy weight levels in reception aged children across the borough, compared to the national average</li> <li>• An improvement in measures of excess weight among year 6 children in the targeted</li> </ul>

		neighbourhood of Gooshays and Heaton wards, compared to statistical neighbours <ul style="list-style-type: none"> <li>The development of places in the borough that promote healthy weight, where the healthy choice is the easiest choice; enabling people to eat healthily and be active.</li> </ul>		
4a	Are you changing, introducing a new, or removing a service, policy, strategy or function?	Yes	If the answer to <u>either</u> of these questions is ' <b>YES</b> ', please continue to question 5.	
4b	Does this activity have the potential to impact (either positively or negatively) upon people (9 protected characteristics)?	Yes		
4c	Does the activity have the potential to impact (either positively or negatively) upon any factors which determine people's health and wellbeing?	Yes	Please use the <a href="#">Screening tool</a> before you answer this questions	If you answer ' <b>YES</b> ', please continue to question 5.
5	If you answered YES:	Please complete the EqHIA in Section 2 of this document. Please see Appendix 1 for Guidance.		
6	If you answered NO:			

Completed by:	Luke Squires, Public Health Practitioner, Public Health Service
Date:	22/02/2024

## The EqHIA – How will the strategy, policy, plan, procedure and/or service impact on people?

### Background/context:

The Healthy Weight Strategy 2024-2029: Everybody's businesses outlines the approach of the borough to addressing and preventing obesity. Obesity remains one of the biggest public health challenges of our time with nearly a quarter of children in Havering & England obese or overweight by the time they start primary school rising to one third by the time they leave aged 11. In adults, on average across Havering and England over two thirds of the population are overweight or obese.

Obesity is cutting lives short in Havering. Being overweight or obese can seriously affect physical and mental health as well as quality of life. Obesity is associated with diseases such as type 2 diabetes, cancer, cardiovascular disease, high blood pressure, high cholesterol, dementia, liver conditions and bone and joint problems. The impact of obesity has wider social and economic implications.

The health and economic drivers for addressing the obesity epidemic are clear, and the benefits to length and quality of life significant. The strategy sets out a vision for how Havering, as a place and community, will support its residents to eat healthily, be active and achieve a healthy body weight.

The strategy sets out the local ambition, which is to eradicate childhood obesity within 20 years, going further than the national ambition of halving childhood obesity by 2030.

The aim of this strategy is to build a firm foundation to achieve the 20 year vision . Reversing the current trend of increasing levels of overweight and obesity will take time, and the initial phase of this strategy will mean putting in place a firm foundation. It will mean making tackling obesity everybody's business, and for the many Council services and partners to reshape the environment to make the healthy option the easy option.

We will also start some targeted work that focuses on a specific neighbourhood to address some of the inequalities. Once this work is sufficiently progressed, we plan to replicate this "place-based approach" in other parts of the borough in an ongoing effort to address inequalities.

Over the lifetime of this strategy we will lay down the foundations needed to achieve the 20-year vision in line with the Joint Strategic Needs Assessment chapter on obesity by

- embedding and resourcing a whole systems approach to healthy weight which will underpin and enable the high-level action needed
- developing places that promote healthy weight, where the healthy choice is the easiest choice
- taking a life course approach to supporting individuals to achieve and maintain a healthy weight; with a specific focus on pregnancy and early years.
- prioritising those areas of highest need by taking a place-based approach to reducing overweight and obesity in Gooshays and Heaton wards and gaining learning to inform future action in the borough

By the end of this five-year strategy we expect to see

- A noticeable difference across the borough which promotes healthy weight, and which means that people are more likely to eat healthily, and be more active
- an improvement in rates of healthy weight in school reception aged children, compared to the national average
- An improvement in the rise of excess weight among year 6 children in the targeted neighbourhood of Gooshays and Heaton wards, compared to statistical neighbours

Associated policies/actions to deliver the healthy weight strategy will be subject to individual decisions and EqHIA.

*\*Expand box as required*

### Who will be affected by the activity?

The strategy and associated actions will be targeted across the life course having an effect on the whole population. Some protected characteristics have higher rates of overweight and obesity than average, therefore for the populations with these protected characteristics there may be a larger scope for health benefits.

During the lifetime of this work, the evidence base will be continuously monitored to identify possible changes in those groups who are most likely to experience health inequalities. As well as the growth in the evidence base in regards to what is the most effective method to address obesity and minimise health inequalities.

*\*Expand box as required*

### Protected Characteristic - Age: Consider the full range of age groups

Please tick (✓)  
the relevant box:

**Positive**

✓

**Neutral**

**Negative**

#### Overall impact:

The Healthy Weight Strategy has taken account of the needs of different age groups. Actions planned will have a positive impact on people of all ages, with a particular focus on improving outcomes for children by supporting them to be a healthy weight.

*\*Expand box as required*

#### Evidence:

The prevalence of obesity increases with age. National Child Measurement Programme data from 2022/23 demonstrates that in 22.2% of children in Reception Year (aged 4-5) in Havering were overweight or obese, whilst amongst Year 6 children (aged 10-11) prevalence is 40.1%. The most recently available data for adults is from 2021/22 Active Lives Adult Survey which shows that for Havering 60.3% of adults aged 18 – 64 years old are estimated to be overweight or obese. Trend data shows that Havering consistently has one of the highest proportion of adult overweight and obesity in London and is in line with the high national average.

In adults, trend data from the Active Lives Adult Survey estimates obesity and overweight prevalence to be highest in the age cohorts, 55-64 years old, 65-74 years old, 75-84 years old.

As reported in Havering's Obesity Needs Assessment:

- maternal obesity is a risk in the short term to the health of both mother and baby, and also increases the risk that the child and possibly the child's children may be obese;
- breastfeeding reduces the risk of childhood obesity
- a child is more likely to be overweight if he or she has one or more overweight parents;
- obese children are between two and ten times more likely to be obese in adulthood;
- weight is more difficult to lose once gained; and
- Attitudes and behaviours established during childhood shape lifestyle in later life.

The strategic approach to achieving healthy weight for all covers all age groups of the population but place emphasis on giving children the best start in life. Most importantly the introduction of a whole systems approach and addressing the food and physical activity environments will benefit the whole population. However, the third strategic theme has two objectives focusing on giving children the best focusing on the early years.

Adults will be supported with services and appropriate workplace initiatives meanwhile people not in work will benefit from community activities. As a result, intended outcomes are expected to positively impact all age groups whilst aiming specifically to address the increase in obesity levels from birth through childhood.

*\*Expand box as required*

#### Sources used:

National Child Measurement Programme

Public Health Outcomes Framework

Havering Obesity Needs Assessment

OHID. 2023/ Public Health Profiles: percentage of adults (aged 18 plus) classified as overweight and obese.

OHID. 2023/ Public Health Profiles: percentage of adults (aged 18 plus) classified as overweight and obese.

OHID. 2023. Public Health Profiles: reception prevalence of obesity (including severe obesity), 5 years data combined (4-5yrs)

*\*Expand box as required*

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

Please tick (✓) the relevant box:

<b>Positive</b>	✓	<b>Overall impact:</b>  The strategy will be published electronically so that it is fully accessible to people who are partially sighted or blind.  The healthy weight strategy has taken account of people living with disabilities and long term conditions. Actions planned are inclusive of the whole population, including people with disabilities and long term conditions. A Tier 2 Weight Management Service for people with
<b>Neutral</b>		
<b>Negative</b>		



		<p>learning disabilities will also be delivered as part of the Healthy Weight Strategy.</p> <p>Reducing obesity prevalence, the overarching aim of the strategy, reduces the risk of developing long term conditions associated with obesity.</p> <p style="text-align: right;"><i>*Expand box as required</i></p>
<p><b>Evidence:</b></p> <p>As noted in the Havering Obesity Needs Assessment, a person is more likely to be overweight or obese if he or she has a physical disability, long-term health problem or learning disability. A child is more likely to be overweight if he or she has a limiting illness, particularly a learning disability. The settings in which actions will take place (e.g. schools, community facilities) provide equity of access for people with disabilities and reasonable adaptations will be made as appropriate.</p> <p>The strategic response is inclusive of the whole population including people with disabilities and long term conditions. We expect that the proposed response will have a positive impact on disabled and non-disabled individuals.</p> <p style="text-align: right;"><i>*Expand box as required</i></p>		
<p><b>Sources used:</b></p> <p>Havering Obesity Needs Assessment OHID. 2023/ Public Health Profiles: percentage of adults (aged 18 plus) classified as overweight and obese.</p> <p style="text-align: right;"><i>*Expand box as required</i></p>		

Protected Characteristic - Sex/gender: Consider both men and women		
Please tick (✓) the relevant box:		<p><b>Overall impact:</b></p> <p>Overweight and obesity affect both men and women. In children the prevalence of overweight and obesity is higher in boys than girls.</p> <p>In adults the prevalence of overweight is higher amongst men, whilst obesity tends to be higher amongst women.</p> <p>The Healthy Weight Strategy system-wide approach to addressing obesity is inclusive of men and women and aim to make the healthy choice the easiest choice. System changes that impact on dietary choices may benefit men more than women whereas system changes that impact on physical activity may benefit women more than men.</p>
Positive	✓	
Neutral		
Negative		

### Evidence:

There are differences in obesity prevalence depending on gender, data for England shows boys are consistently heavier than girls for both reception age and year 6 age children. Data for England from 2022/23 found:

- For children in reception, the obesity prevalence is 9.3% for boys and 9.0% for girls
- For children in year 6, the obesity prevalence is 25.1% of boys and 20.1% of girls.

In adults, trend data for England from the Active Lives Adult Survey by Sport England demonstrates that men are more likely to be overweight or obese than women. However, women are more likely to be obese than men. Morbid obesity is twice as common in women (%) as it is in men (%).

Having a healthy diet is one of the main contributors to maintain a healthy weight. At a local and national level there is too little data to identify the difference in girls' and boys' diets. However, for adults it was found that 28% of adults were eating the recommended five portions of fruit and vegetables a day. However, women were more likely to meet this target (30%) than men (25%).

Regular physical activity also contributes towards maintaining a healthy weight. Health survey for England data tells us boys are more likely than girls to meet the recommended levels. Data from the Active Lives Survey tells us men are more likely than women to meet the recommended levels.

\*Expand box as required

### Sources used:

Havering Obesity Needs Assessment  
Health Survey for England  
Active Lives Survey

OHID. 2023/ Public Health Profiles: percentage of adults (aged 18 plus) classified as overweight and obese.

OHID. 2023. Public Health Profiles: reception prevalence of obesity (including severe obesity), 5 years data combined (4-5yrs)

OHID. 2023. Public Health Profiles: year 6 prevalence of obesity (including severe obesity), 5 years data combined (10-11yrs)

\*Expand box as required

### Protected Characteristic - Ethnicity/race: Consider the impact on different ethnic groups and nationalities

Please tick (✓) the relevant box:

**Positive**

✓

**Neutral**

**Negative**

### Overall impact:

There are notable differences in obesity prevalence across different ethnicities in Havering.

The approach in this strategy can benefit all ethnicities, but it does not specifically target

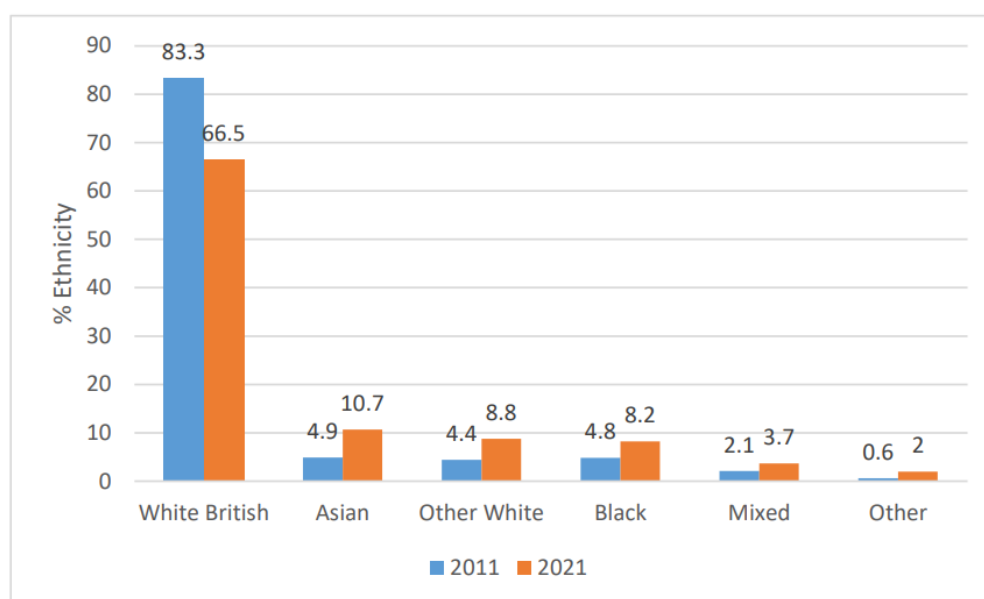
individuals of any ethnicity. The actions that support the strategic approach should target particular ethnicities to minimise the health inequalities experienced due to obesity.

*\*Expand box as required*

## Evidence:

At the 2021 British Census, 66.49% of Havering residents were recorded as white British, this compares to 83.3% in 2011. The next most common ethnic group is Asian, accounting for 10.7% (28,150) of the population, up from 4.9% (11,545) in 2011.

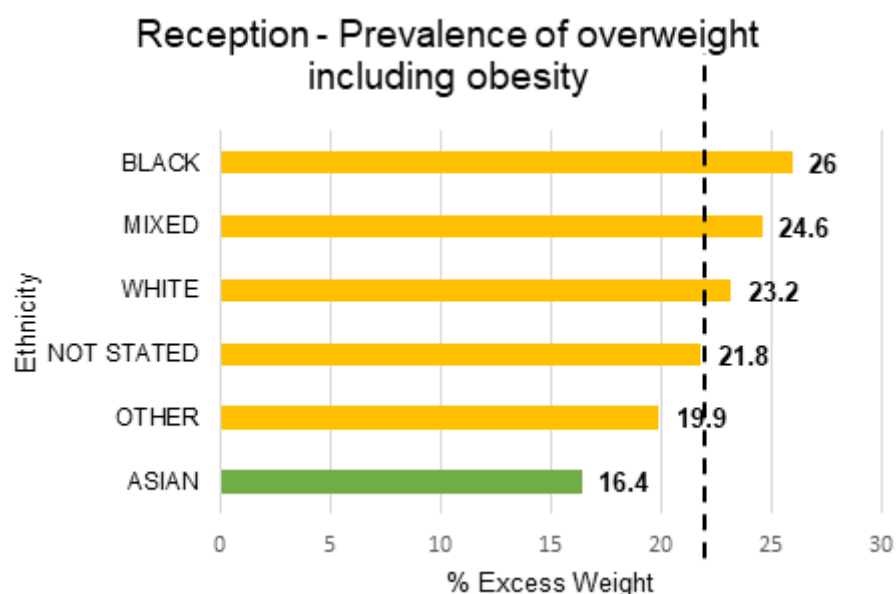
**Figure 1** – Havering population in 2011 and 2021 by main ethnic group



**Source:** Office for National Statistics (ONS), Census 2011 & 2021; Produced by: Havering PHI

There are notable differences in obesity prevalence across racial groups for both children and adults. Differences in weight between racial groups arise due to various factors such as environmental factors, health behaviors, socio-economic status, access to health, social marginalization or discrimination. The definition of ethnic groups is available here <https://www.ethnicity-facts-figures.service.gov.uk/ethnic-groups>

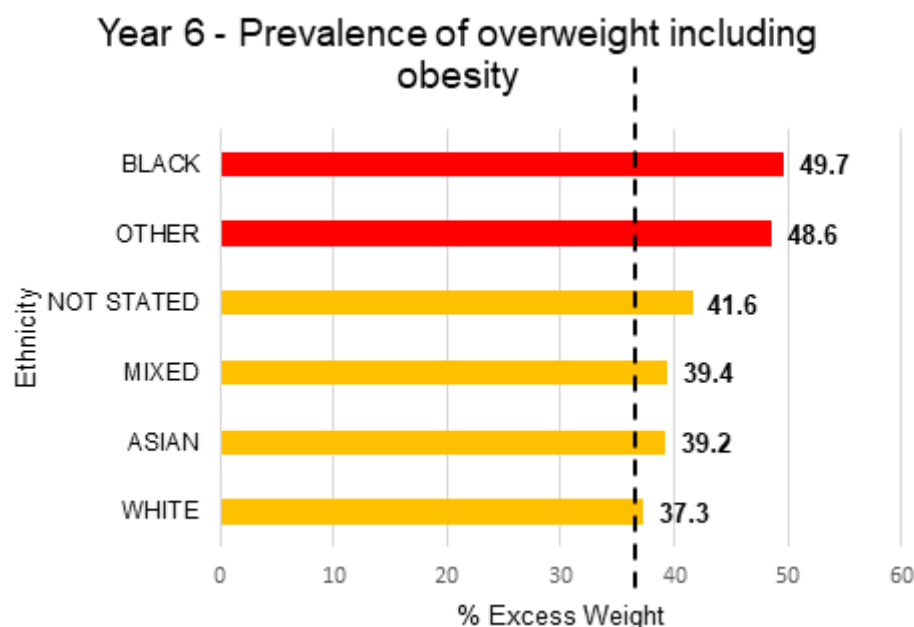
**Figure 2:** Prevalence (%) by ethnic groups of Reception (aged 4-5) children classified as overweight including obese in Havering, 2022/23



*Data Source: National Child Measurement Programme (NCMP) 2022-23.*

In 2022/23 reception aged children shows individuals categorised as black ethnicities have the highest prevalence overweight and obesity. Publically available 5-year data on prevalence of obesity in reception aged children shows individuals categorised as black ethnicities have the highest prevalence of obesity.

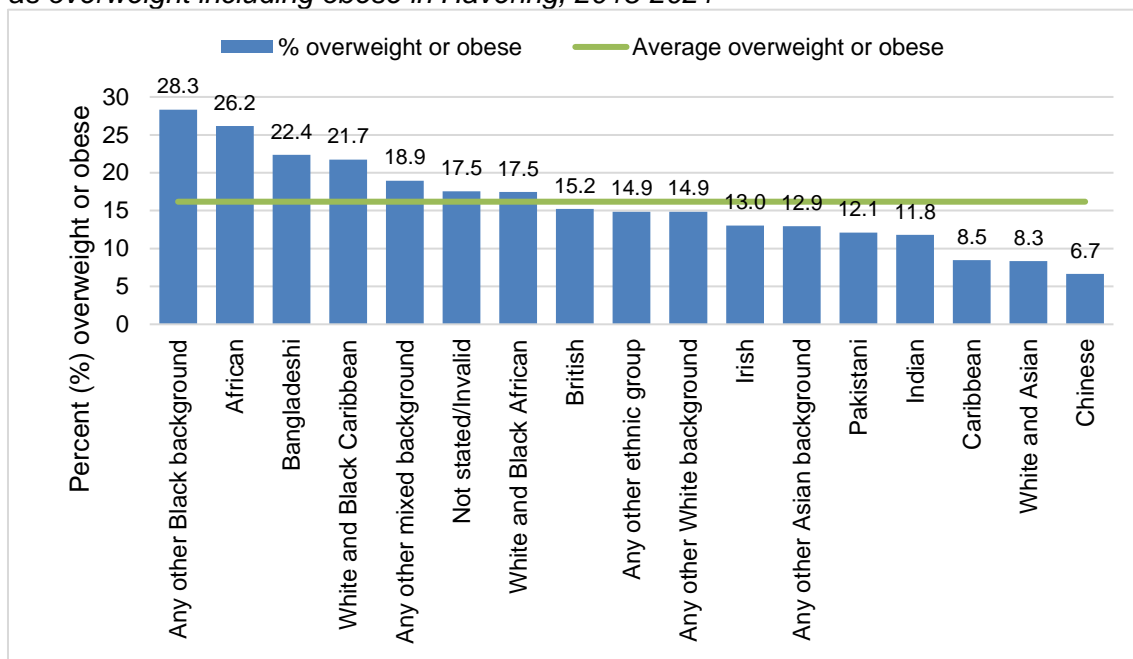
**Figure 3:** Prevalence (%) by ethnic groups of Year 6(aged 10-11) children classified as overweight including obese in England, 2022/23



*Data Source: National Child Measurement Programme (NCMP) 2022-23.*

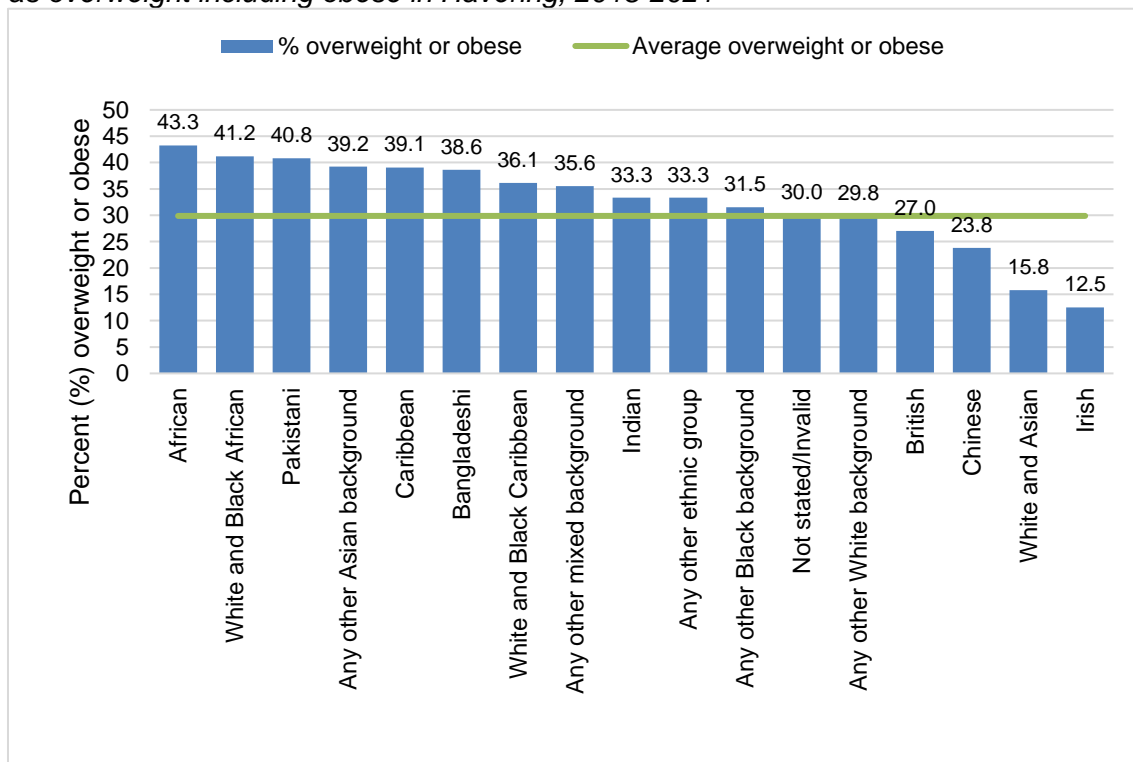
In 2022/23 year 6 aged children shows individuals categorised as black ethnicities have the highest prevalence of overweight and obesity. Publically available 5-year data on prevalence of obesity in year 6 aged children shows individuals categorised as black ethnicities have the highest prevalence of obesity.

**Figure 4: Prevalence (%) by ethnic groups of Reception (aged 4-5) aged children classified as overweight including obese in Havering, 2018-2021**



Data Source: National Child Measurement Programme (NCMP) 2018-21, Office for Health Improvement & Disparities. Analysis by Havering PHI 2022

**Figure 5: Prevalence (%) by ethnic groups of Year 6 (aged 10-11) aged children classified as overweight including obese in Havering, 2018-2021**



Data Source: National Child Measurement Programme (NCMP) 2018-21, Office for Health Improvement & Disparities. Analysis by Havering PHI 2022

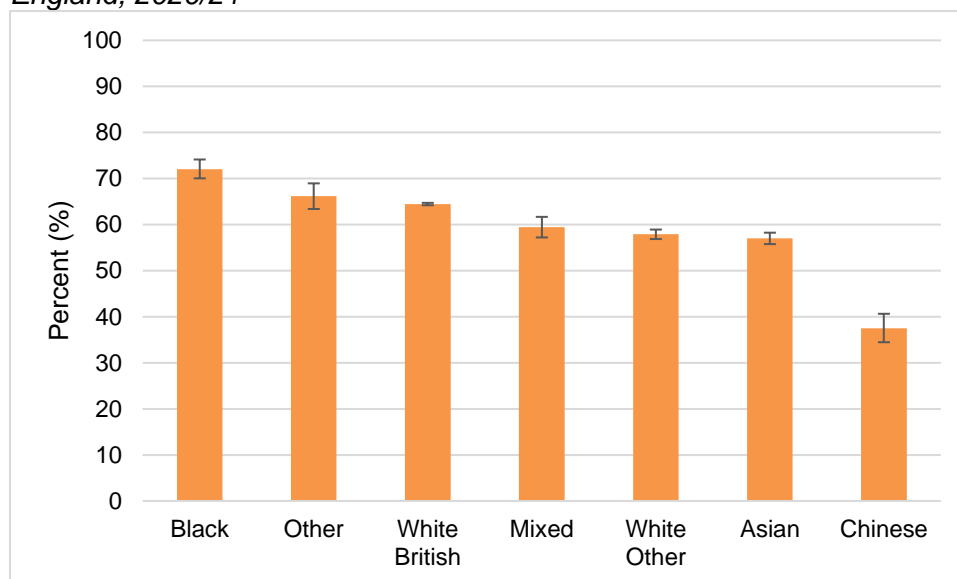
The more detailed local data analysis illustrate differences in prevalence across ethnicities for both reception age and year 6 children. At reception age individuals

with another black background, African, Bangladeshi and White and Black Caribbean ethnicity have the highest prevalence. At year 6 age individuals with an African, White and Black African, Pakistani or any other black background ethnicity have the highest prevalence. Of the 17 different ethnicities, 7 are above average at Reception age but at Year 6 Age, 13 are above average. For all ethnicities there is a fluctuation in the number of people in each category therefore it is important to reflect local numbers against national statistics.

Adult

### Obesity by ethnic group

**Figure 6:** Prevalence (%) of adults (18+) classified as overweight or obese by ethnic group, England, 2020/21

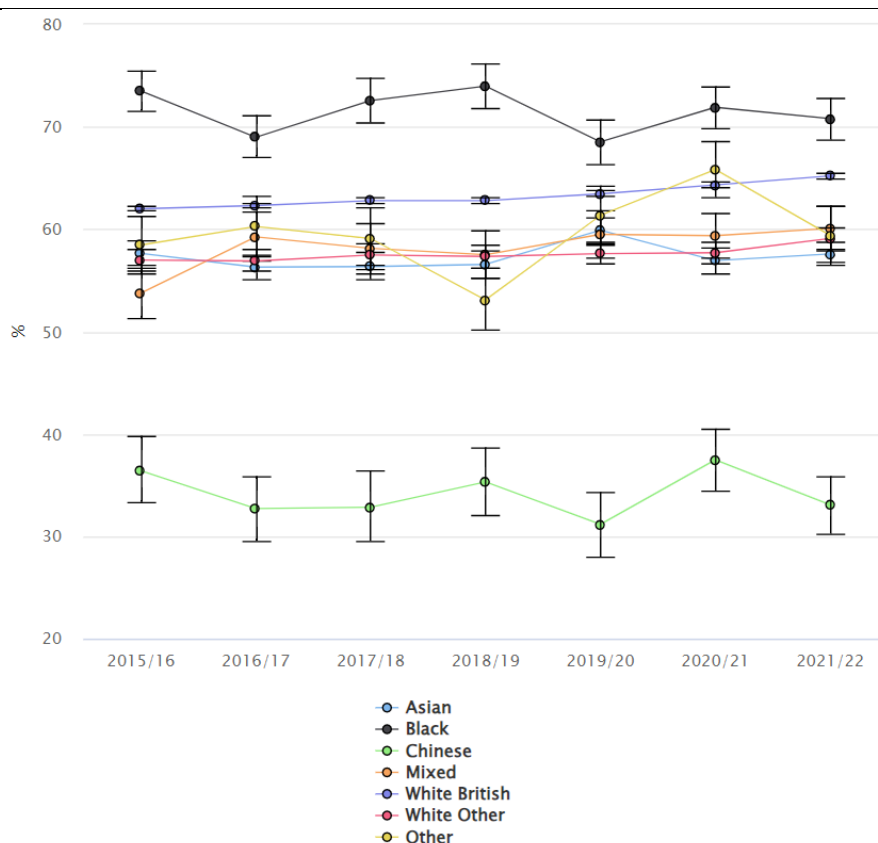


*Data Source: Sport England 2019-20 Active Lives Adult Survey, Office for Health Improvement & Disparities. Public Health Profiles. 2022*

Evidence from figure X demonstrates there are significant disparities in the prevalence of overweight and obesity between ethnic groups at a national level. Adults of black ethnic origin have the highest prevalence (67%) out of all ethnic groups. This is closely followed by White British Adults (63%).

**Figure 7:** Prevalence (%) of adults (18+) classified as overweight or obese by ethnic group, England, 2015-22

Trend data for overweight and obesity in adults shows, the highest prevalence is found with individuals of black ethnicity, with individuals of white British ethnicity followed closely behind.



*\*Expand box as required*

### Sources used:

Havering Council. 2022. Census 2021 Briefing #3: Ethnic group, national identity, language and religion. <https://www.haveringdata.net/wp-content/uploads/2023/01/Census-2021-Topic-Summary-Ethnic-group-national-identity-language-religion.pdf>

OHID. 2023. Public Health Profiles: reception prevalence of obesity (including severe obesity), 5 years data combined (4-5yrs)

OHID. 2023. Public Health Profiles: year 6 prevalence of obesity (including severe obesity), 5 years data combined (10-11yrs)

OHID. 2023/ Public Health Profiles: percentage of adults (aged 18 plus) classified as overweight and obese.

Sankar, P., Cho, M. K., Condit, C. M., Hunt, L. M., Koenig, B., Marshall, P., ... & Spicer, P. (2004). Genetic research and health disparities. *Jama*, 291(24), 2985-2989.

*\*Expand box as required*

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

Please tick (✓) the relevant box:

**Overall impact:**

<b>Positive</b>		There are no known inequalities in healthy weight between different religions. Planned actions are inclusive of people from all religions or beliefs, including those with no religion or belief.
<b>Neutral</b>	✓	
<b>Negative</b>		

*\*Expand box as required*

**Evidence:**  
The Havering Obesity Needs Assessment identifies groups at greater risk of becoming overweight or obese. People of different religions are not identified as an at risk group.

Actions planned in the Healthy Weight strategy will benefit people from all religions or beliefs, including those with no religion or belief.

*\*Expand box as required*

**Sources used:**

Havering Obesity Needs Assessment  
OHID. 2023/ Public Health Profiles: percentage of adults (aged 18 plus) classified as overweight and obese.

*\*Expand box as required*

<b>Protected Characteristic - Sexual orientation:</b> Consider people who are heterosexual, lesbian, gay or bisexual		
<i>Please tick (✓) the relevant box:</i>		<b>Overall impact:</b>  The strategic approach is inclusive of people from all sexual orientations. There are no known inequalities in healthy weight between people of different sexual orientations.
<b>Positive</b>		
<b>Neutral</b>	✓	
<b>Negative</b>		

*\*Expand box as required*

**Evidence:**  
The approach planned in the healthy weight strategy will benefit people from all sexual orientations.

The Havering Obesity Needs Assessment identifies groups at greater risk of becoming overweight or obese. Sexual orientation is not identified as having any impact on inequalities related to healthy weight. However, we must consider that higher percentages of LGBTQ+ people have mental health conditions versus the general population. Stonewall commissioned YouGov in 2018 to carry out a survey asking more than 5,000 lesbian, gay, bisexual and trans (LGBT) people across England, Scotland and



Wales about their life in Britain today. 52% said they've experienced depression in the last year, compared to in the general population, aged 18+, GP recorded depression was 11.8% in Havering in 2022/23. A two-way association has been identified between mental health problems and obesity, with conditions such as depression often leading to weight gain and obesity leading to depression.

There are approximately 4,000 people in Havering identifying as either gay, lesbian or bisexual. This is a significant number but proportionately less than the London and England averages.

**Table 1.**

Table: Estimated number and percentage of persons by sexual orientation, Havering, London and England

Sexual Orientation	Number	%	London	England
Heterosexual or straight	201,700	97.2%	88.9%	93.3%
Gay or lesbian	2,800	1.3%	2.6%	1.6%
Bisexual	1,100	0.5%	1.2%	1.1%
Other	-		0.7%	0.7%
Don't know or refuse	1,200	0.6%	6.5%	3.3%

*\*Expand box as required*

#### Sources used:

Havering Obesity Needs Assessment

OHID. 2023/ Public Health Profiles: percentage of adults (aged 18 plus) classified as overweight and obese.

OHID. 2023/ Public Health Profiles: Depression: QOF Prevalence (18+ years)

[Tackling obesity: empowering adults and children to live healthier lives](#)

Office for National Statistics: Annual Population Survey

[YouGov LGBT in Britain - Health \(2018\)](#)

*\*Expand box as required*

**Protected Characteristic - 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:

<b>Positive</b>		<b>Overall impact:</b> There is limited research on the impact of gender reassignment and maintaining a healthy weight but some considerations are shown below. People who are seeking gender reassignment surgery or whose gender identity is different from their gender at birth are not identified as an at risk group. The approach planned in the healthy weight strategy will benefit people from all genders.
<b>Neutral</b>	✓	
<b>Negative</b>		

		<i>*Expand box as required</i>																											
<p><b>Evidence:</b></p> <p>The Havering Obesity Needs Assessment identifies groups at greater risk of becoming overweight or obese. People who are seeking gender reassignment surgery or whose gender identity is different from their gender at birth are not identified as an at risk group. The approach planned in the healthy weight strategy will benefit people from all genders. There is limited research, but we need to consider the risk of weight gain in people taking Gender affirming Hormone Therapy (GAHT) or the requirement for people to have a BMI of &lt;25 if they wish to undergo gender reassignment surgery who may need increased support to maintain a healthy weight</p> <p>According to Census 2021 data there are over 1,000 residents aged over 16 in Havering who can be classified as transgender.</p> <p><b>Table 2.</b> Detailed breakdown of gender identity in Havering for residents aged 16 and over</p> <table> <tr> <th>Gender Identity</th><th>Number</th><th>Percentage</th></tr> <tr> <td>Gender identity the same as sex registered at birth</td><td>196,462</td><td>93.67%</td></tr> <tr> <td>Gender identity different from sex registered at birth but no specific identity given</td><td>528</td><td>0.25%</td></tr> <tr> <td>Trans woman</td><td>228</td><td>0.11%</td></tr> <tr> <td>Trans man</td><td>212</td><td>0.10%</td></tr> <tr> <td>Non-binary</td><td>60</td><td>0.03%</td></tr> <tr> <td>All other gender identities</td><td>39</td><td>0.02%</td></tr> <tr> <td>Not answered</td><td>12,201</td><td>5.82%</td></tr> <tr> <td>Total</td><td>209,730</td><td>100.00%</td></tr> </table>			Gender Identity	Number	Percentage	Gender identity the same as sex registered at birth	196,462	93.67%	Gender identity different from sex registered at birth but no specific identity given	528	0.25%	Trans woman	228	0.11%	Trans man	212	0.10%	Non-binary	60	0.03%	All other gender identities	39	0.02%	Not answered	12,201	5.82%	Total	209,730	100.00%
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<p><b>Sources used:</b></p> <p>Havering Obesity Needs Assessment</p> <p>OHID. 2023/ Public Health Profiles: percentage of adults (aged 18 plus) classified as overweight and obese.</p> <p><a href="https://ons.gov.uk">Census - Office for National Statistics (ons.gov.uk)</a></p> <p><a href="#">NHS: Gender dysphoria</a></p>																													
<i>*Expand box as required</i>																													

Protected Characteristic - Marriage/civil partnership: Consider people in a marriage or civil partnership		
Please tick (✓) the relevant box:		<p><b>Overall impact:</b></p> <p>The strategic approach is inclusive of people of all relationship types. There are no known inequalities in healthy weight between people in different relationship types.</p>
Positive		
Neutral	✓	
Negative		

		<i>*Expand box as required</i>
<b>Evidence:</b>  <p>The Havering Obesity Needs Assessment identifies groups at greater risk of becoming overweight or obese. Being in a marriage or in civil partnership is not known to have any impact on inequalities related to healthy weight. The strategy will continue to monitor the evidence base to identify if there are any changes in the at-risk groups.</p> <p>The approach planned in the healthy weight strategy will benefit people of all relationships.</p> <p style="text-align: right;"><i>*Expand box as required</i></p>		
<b>Sources used:</b>  <p>Havering Obesity Needs Assessment</p> <p style="text-align: right;"><i>*Expand box as required</i></p>		

<b>Protected Characteristic - Pregnancy, maternity and paternity:</b> Consider those who are pregnant and those who are undertaking maternity or paternity leave		
<i>Please tick (✓) the relevant box:</i>		<b>Overall impact:</b>
<b>Positive</b>	<input checked="" type="checkbox"/>	<p>Maternal obesity presents a short and long term risk to the health of both mother and child. If adverse health effects were to occur this may impact the health of an individual on maternity or paternity leave.</p> <p>The approach in the healthy weight strategy places great emphasis on supporting women effectively during pregnancy and maternity.</p> <p style="text-align: right;"><i>*Expand box as required</i></p>
<b>Neutral</b>	<input type="checkbox"/>	
<b>Negative</b>	<input type="checkbox"/>	
<b>Evidence:</b> <p>Women who are obese when they become pregnant have increased risks to their own and their babies' health. Women are more likely to experience complications in labour and their children have increased risks of obesity in childhood and adulthood and other health conditions later in life</p> <p>As evidenced in the Havering Obesity Needs Assessment:</p> <ul style="list-style-type: none"> <li>Maternal obesity rate have doubled from 7.6% in 1989 to 15.6% to 2007.</li> </ul>		

- Obese women spend an average of 4.83 more days in hospital and the increased levels of complications in pregnancy and interventions in labour represent a 5-fold increase in cost of antenatal care.

The approach in the healthy weight strategy acknowledges the significant impact of maternal obesity on a child becoming obese. As such the approach in the healthy weight strategy has a particular emphasis on pregnancy and maternity. Additionally, the approach towards addressing the wider food environment, would affect the eating behavior of all groups, including women at childbearing age. Therefore, we can expect a positive impact from the proposed approach on maternal obesity rates, and a knock-on positive impact on the associated risks with maternal obesity.

Data for England for 2020 shows that at the start of pregnancy 46% of women are at a healthy weight, 28% of women are overweight and 22% of women are obese

*\*Expand box as required*

#### Sources used:

[PHE. 2020. Maternity high impact area 3: Supporting healthy weight before and between pregnancies](#)

Havering Obesity Needs Assessment

*\*Expand box as required*

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

Please tick (✓)  
the relevant box:

**Positive**

✓

**Neutral**

**Negative**

#### Overall impact:

A person is more likely to be overweight or obese if he or she lives in a disadvantaged community. The strategy acknowledges this and aims to have a positive impact on people from all socioeconomic statuses with a specific focus on those in disadvantaged areas.

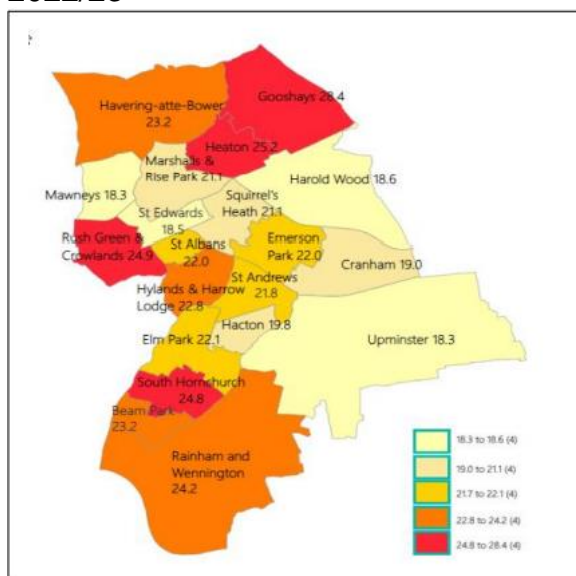
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## Evidence:

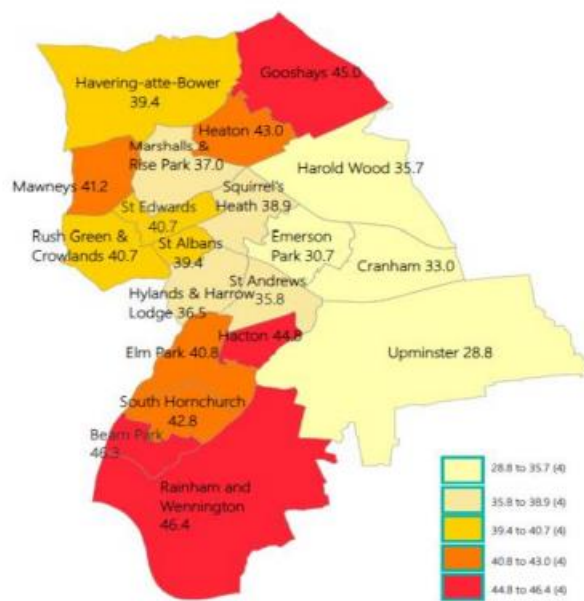
National evidence for England found that rates of obesity are highest in areas of greatest disadvantage, children growing up in these areas are more at risk of obesity.

Figures 8 and 9 show the rates of excess weight among Havering children by ward and figure 10 shows levels of disadvantage by ward. The highest rates of excess weight among children in reception year (ages 4-5) are in Gooshays, Heaton, South Hornchurch and Rush green & Crowlands wards. For children in year 6 (ages 10-11), the wards with the highest rates of excess weight are Beam Park, Rainham and Wennington followed closed by Gooshays and Hacton. The maps illustrate the association between higher levels of excess weight and wards of greater disadvantage.

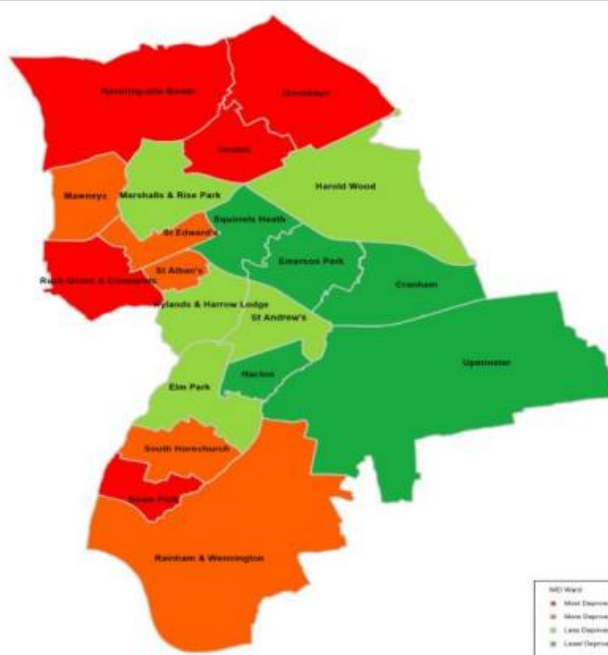
**Figure 8.** Percentage of excess weight among children aged 4-5 by ward 2019/20-2022/23



**Figure 9.** Percentage of excess weight among children aged 10-11 by ward, 2019/20-2022/23



**Figure 10.** Map of Havering showing the English Indices of Deprivation 2019



The Havering Obesity Needs Assessment identifies an association between obesity and area disadvantage. Obesity prevalence in children is strongly correlated with disadvantage, with prevalence in the most disadvantaged decile being about twice that in the least disadvantaged for both Reception and Year 6 children.

The Strategic approach proposes to focus on Harold Hill specially Gooshays and Heaton wards, a particular disadvantaged neighbourhood with high levels of obesity in which the system is currently focused on supporting. If successful, this approach would be repeated in other areas of the borough to continuously improve the health inequalities experienced due to obesity.

*\*Expand box as required*

#### **Sources used:**

Havering Obesity Needs Assessment

OHID. 2023. Public Health Profiles: reception prevalence of obesity (including severe obesity), 5 years data combined (4-5yrs)

OHID. 2023. Public Health Profiles: year 6 prevalence of obesity (including severe obesity), 5 years data combined (10-11yrs)

OHID. 2023/ Public Health Profiles: percentage of adults (aged 18 plus) classified as overweight and obese.

[NHS Digital. 2022 Health Survey for England, 2021 part 1.](#)

[English indices of deprivation 2019](#)

*\*Expand box as required*

#### **Health & Wellbeing Impact:**

Consider both short and long-term impacts of the activity on a person's physical and mental health, particularly for disadvantaged, vulnerable or at-risk groups. Can health and wellbeing be positively promoted through this activity?

*Please tick (✓) all the relevant boxes that apply:*

**Positive**

✓

**Neutral**

**Negative**

#### **Overall impact:**

The Healthy Weight Strategy: Everybody's Business will have a positive impact on the health and wellbeing of all Havering residents. This impact is clearly outlined in the strategy document as local strategic outcomes.

These include:

- a) Embedding changes through an all systems place-based approach for the whole Borough
- b) Introducing an enhanced and targeted neighbourhood-level place based approach to address inequalities, starting with the neighbourhood of Gooshays and Heaton wards initially, and expanding to other neighbourhoods in the future

By 2029 we should expect to see:

- An improvement in healthy weight levels in reception aged children across the borough, compared to the national average
- An improvement in measures of excess weight among year 6 children in the targeted neighbourhood of Gooshays and Heaton wards, compared to statistical neighbours
- The development of places in the borough that promote

		<p>healthy weight, where the healthy choice is the easiest choice; enabling people to eat healthily and be active with the foundations laid to achieve the twenty-year vision of eradicating childhood obesity</p> <p style="text-align: right;"><i>*Expand box as required</i></p> <p><b>Do you consider that a more in-depth HIA is required as a result of this brief assessment?</b> Please tick (✓) the relevant box</p> <p style="text-align: right;"> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input checked="" type="checkbox"/> </p>
<p><b>Evidence:</b></p> <p>Obesity is a global problem, with adult obesity having increased in every country over the past four decades. Most countries in the G20 have seen an increase of 11%-25% in rates of obesity. No country has reversed increases in obesity; although some cities are using methods to help curb its rise.</p> <p>In 2021/22, it was estimated that 60% of adult residents in Havering were overweight or obese (collectively referred to as excess weight). This was higher than the London average (56%) but lower than the England average (63%). For the period 2022/23, 25.2% of Havering children in year 6 (aged 10-11 years old) were obese, and 14.9% were overweight. Prevalence and trend data for Havering shows that levels of overweight and obesity in Havering are similar to the London and England averages with rates rising everywhere. The London region has one of the highest prevalence of overweight and obesity for children in the country. For Havering children in year 6 childhood obesity has increased by 20% over the last 15 years. Evidence suggests that where children are obese at age 10-14, 80% will become obese as adults.</p> <p>There are inequalities in overweight and obesity prevalence in children and adults, as described for each of the protected characteristics in this document however, we also need to acknowledge the intersectionality of these protected characteristics that could put someone at an even higher risk of obesity for example, women are more likely to be obese than men but black ethnic groups have the highest rates of excess weight as do those aged 45-74 and those living in a disadvantaged areas of the borough so coupling these risk factors together multiplies the risk of obesity.</p> <p>Obesity causes long-term illnesses and cuts lives short. Children with obesity are more likely to experience a range of health problems during childhood. This can lead to prolonged periods of illness and a shorter life expectancy compared with children of a healthy weight. Children living with obesity are now beginning to develop associated physical diseases previously usually only seen in adults like type 2 diabetes and fatty liver disease. In adult's obesity can reduce life expectancy by an average of three years or by 8-10 years with severe obesity, obesity is the second biggest preventable cause of cancer in the UK after smoking and increases your chances of developing dementia and poor mental health.</p> <p>It is a common misconception that individuals are completely in control of their own weight and that an overweight problem is entirely the result of personal choices. However, we have not all collectively consciously decided to eat more and move less, over recent years it has become increasingly evident that obesity is a much more complex issue, and one that is caused by multiple factors that interact with each other; the modern-day changes in the circumstances where we live, work and play that now make us more likely to opt for unhealthy options of foods and less likely to be physically active. Living in a place where</p>		



the circumstances make it more difficult to make healthier choices has been described as akin to pushing a ball uphill. An individual can be motivated and knowledgeable about making changes to achieve a healthy weight, but circumstances make it harder to do so. In short, it is largely the circumstances where we live, known as 'the system', that has resulted in the increasing rates of overweight and obesity. To be effective in changing population weight levels, the circumstances (the system/environmental determinants) needs also to change; to one that makes healthier choices the easier choices; in effect the hill needs to be removed.

In 2019 Public Health England (now Office for Health Improvement and Disparities (OHID)) went on to publish guidance on how to develop a whole a systems approach for tackling obesity. It describes the role of the local authority as the facilitator; being in a uniquely influential position to (a) lead communities and local partners to tackle obesity, and (b) in shaping the local area. The guidance recommends working through a six step circular process which is refreshed as the system is developed and moves forward.

It is recommended that the Council and NHS work with stakeholders, including residents, to convene and implement a Borough-level place-based whole systems approach for tackling obesity in the borough, and develop an action plan that addresses the multiple causes of obesity, as well as providing support for those who are looking to lose weight. The aim should be to reshape the places where people live, work and play so that these places become health promoting environments. This whole systems approach will also address inequalities by the Council and NHS working with stakeholders, including residents, to develop a more intensive neighbourhood-level place-based whole system approach where there are inequalities in rates of obesity coupled with greater disadvantage. It is further recommended that the place-based approach commences with a focus on Heaton and Gooshays wards. Both wards consistently have some of the highest levels of childhood obesity, higher numbers of children and higher proportions of Free School Meal recipients, and there are opportunities to embed a place based approach into existing Council and NHS programmes. It is also recommended that the learning should be taken from implementing the intensive neighbourhood-level place based approach in Heaton and Gooshays wards and so provide learning for a second and subsequent waves of neighbourhood-level place-based approaches in the Borough in the future.

*\*Expand box as required*

#### **Sources used:**

1. [Tackling obesity: government strategy](#)
2. [Whole systems approach to obesity: a guide to support local approaches to promoting a healthy weight](#)
3. The Havering Healthy Weight Strategy 2024-2029: Everybody's Business
4. The Havering Obesity Health Needs Assessment (OHNA) 2024

*\*Expand box as required*

## Health & Wellbeing Screening Tool

Will the activity/service/policy/procedure affect any of the following characteristics? Please tick/check the boxes below

The following are a range of considerations that might help you to complete the assessment.

<b>Lifestyle</b> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	<b>Personal circumstances</b> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	<b>Access to services/facilities/amenities</b> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
<input checked="" type="checkbox"/> Diet <input checked="" type="checkbox"/> Exercise and physical activity <input type="checkbox"/> Smoking <input type="checkbox"/> Exposure to passive smoking <input type="checkbox"/> Alcohol intake <input type="checkbox"/> Dependency on prescription drugs <input type="checkbox"/> Illicit drug and substance use <input type="checkbox"/> Risky Sexual behaviour <input type="checkbox"/> Other health-related behaviours, such as tooth-brushing, bathing, and wound care	<input type="checkbox"/> Structure and cohesion of family unit <input checked="" type="checkbox"/> Parenting <input checked="" type="checkbox"/> Childhood development <input checked="" type="checkbox"/> Life skills <input type="checkbox"/> Personal safety <input type="checkbox"/> Employment status <input type="checkbox"/> Working conditions <input checked="" type="checkbox"/> Level of income, including benefits <input type="checkbox"/> Level of disposable income <input type="checkbox"/> Housing tenure <input type="checkbox"/> Housing conditions <input type="checkbox"/> Educational attainment <input type="checkbox"/> Skills levels including literacy and numeracy	<input checked="" type="checkbox"/> to Employment opportunities <input checked="" type="checkbox"/> to Workplaces <input checked="" type="checkbox"/> to Housing <input checked="" type="checkbox"/> to Shops (to supply basic needs) <input checked="" type="checkbox"/> to Community facilities <input checked="" type="checkbox"/> to Public transport <input checked="" type="checkbox"/> to Education <input checked="" type="checkbox"/> to Training and skills development <input checked="" type="checkbox"/> to Healthcare <input checked="" type="checkbox"/> to Social services <input checked="" type="checkbox"/> to Childcare <input checked="" type="checkbox"/> to Respite care <input checked="" type="checkbox"/> to Leisure and recreation services and facilities
<b>Social Factors</b> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	<b>Economic Factors</b> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	<b>Environmental Factors</b> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
<input type="checkbox"/> Social contact <input type="checkbox"/> Social support <input checked="" type="checkbox"/> Neighbourliness <input type="checkbox"/> Participation in the community <input type="checkbox"/> Membership of community groups <input checked="" type="checkbox"/> Reputation of community/area <input type="checkbox"/> Participation in public affairs <input type="checkbox"/> Level of crime and disorder <input type="checkbox"/> Fear of crime and disorder <input type="checkbox"/> Level of antisocial behaviour <input type="checkbox"/> Fear of antisocial behaviour <input type="checkbox"/> Discrimination <input type="checkbox"/> Fear of discrimination <input type="checkbox"/> Public safety measures <input checked="" type="checkbox"/> Road safety measures	<input checked="" type="checkbox"/> Creation of wealth <input type="checkbox"/> Distribution of wealth <input type="checkbox"/> Retention of wealth in local area/economy <input type="checkbox"/> Distribution of income <input type="checkbox"/> Business activity <input type="checkbox"/> Job creation <input type="checkbox"/> Availability of employment opportunities <input type="checkbox"/> Quality of employment opportunities <input type="checkbox"/> Availability of education opportunities <input type="checkbox"/> Quality of education opportunities <input type="checkbox"/> Availability of training and skills development opportunities <input type="checkbox"/> Quality of training and skills development opportunities <input type="checkbox"/> Technological development <input type="checkbox"/> Amount of traffic congestion	<input checked="" type="checkbox"/> Air quality <input type="checkbox"/> Water quality <input type="checkbox"/> Soil quality/Level of contamination/Odour <input type="checkbox"/> Noise levels <input type="checkbox"/> Vibration <input type="checkbox"/> Hazards <input type="checkbox"/> Land use <input type="checkbox"/> Natural habitats <input type="checkbox"/> Biodiversity <input checked="" type="checkbox"/> Landscape, including green and open spaces <input checked="" type="checkbox"/> Townscape, including civic areas and public realm <input type="checkbox"/> Use/consumption of natural resources <input type="checkbox"/> Energy use: CO2/other greenhouse gas emissions <input type="checkbox"/> Solid waste management <input type="checkbox"/> Public transport infrastructure

## Outcome of the Assessment

The EqHIA assessment is intended to be used as an improvement tool to make sure the activity maximises the positive impacts and eliminates or minimises the negative impacts. The possible outcomes of the assessment are listed below and what the next steps to take are:

Please tick (✓) what the overall outcome of your assessment was:

✓	1. The EqHIA identified <u>no significant concerns</u> OR the identified <u>negative concerns</u> have already been <u>addressed</u>	➔	<b>Proceed with implementation</b> of your activity
	2. The EqHIA identified some <u>negative impact</u> which still needs <u>to be addressed</u>	➔	<b>COMPLETE SECTION 5:</b> <b>Complete action plan</b> with measures to mitigate the and finalise the EqHIA <b>negative impact</b>
	3. The EqHIA identified some <u>major concerns</u> and showed that it is <u>impossible to diminish negative impacts</u> from the activity to an acceptable or even lawful level	➔	<b>Stop and remove</b> the activity or <b>revise</b> the activity <b>thoroughly</b> . <b>Complete an EqHIA on the revised proposal.</b>

## EqHIA Action Plan

The real value of completing an EqHIA comes from the identifying the actions that can be taken to eliminate/minimise **negative** impacts and enhance/optimize positive impacts. In this section you should list the specific actions that set out how you will address any **negative** equality and health & wellbeing impacts you have identified in this assessment. Please ensure that your action plan is: more than just a list of proposals and good intentions; sets ambitious yet achievable outcomes and timescales; and is clear about resource implications.

Protected characteristic / health & wellbeing impact	Identified Negative or Positive impact	Recommended actions to mitigate Negative impact* or further promote Positive impact	Outcomes and monitoring**	Timescale	Lead officer
Age	<p>By 2029 we should expect to see:</p> <ul style="list-style-type: none"> <li>An improvement in healthy weight levels in reception aged children across the borough, compared to the national average</li> <li>An improvement in measures of excess weight among year 6 children in the targeted neighbourhood of Gooshays and Heaton wards, compared to statistical neighbours</li> </ul>	<p>Expansion of school superzones</p> <p>Introduce Healthier Business Scheme (Healthier Catering Commitment, Breastfeeding welcome and water refill scheme)</p> <p>Increase the number of school streets starting from 10</p> <p>Pilot working with schools to open facilities before and after school and during school holidays</p>	<p>Outcomes include</p> <p>(a) embedding changes in the Havering system through an all systems approach</p> <p>(b) introducing a place-based approach which means starting with a focus on one neighbourhood in particular, and then expanding to other neighbourhoods in the future.</p>	5 years, annual reviews and quarterly progress monitoring updates.	Luke Squires, Public Health Practitioner

	<ul style="list-style-type: none"> <li>The development of places in the borough that promote healthy weight, where the healthy choice is the easiest choice; enabling people to eat healthily and be active.</li> </ul>	<p>Introduce a policy for all schools and colleges to have scooter and cycle parking</p> <p>Remove no ball game signs from Council estates</p> <p>Publicise the new refreshed Healthy Early Years Programme and encourage settings to participate.</p> <p>Increase the number of early years settings registered on the new Healthy Early Years London Programme</p> <p>Publicise the new refreshed Healthy Schools Programme and encourage schools to participate.</p> <p>Increase the number of schools registered on the new Healthy Schools London Programme</p>	<p>The following indicators will be monitored periodically:</p> <ol style="list-style-type: none"> <li>1. Breastfeeding at 6-8 weeks</li> <li>2. Child excess weight in 4-5yrs old (reception age)</li> <li>3. Child excess weight in 10-11yrs old (year 6 age)</li> <li>4. Number of children meeting physical activity guidelines</li> <li>5. Number of adults eating '5 a day'</li> <li>6. Number of adults meeting physical activity guidelines</li> <li>7. Percentage of adults classed as having excess weight</li> </ol>		
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		<p>Promote water only schools</p> <p>Increase the uptake of school meals (including free school meals)</p> <p>Develop local evaluation of the school meals programme by GLA</p> <p>Pilot a Tier 2 CYP parental Weight Management Service.</p> <p>Coordinate a T&amp;F group to develop and pilot a weight mgmt referral pathway linking with the NCMP in Harold Hill, Romford and Rainham (Trial a new NCMP feedback approach)</p> <p>Maintain sports collective programme</p> <p>Increase the number of schools taking part in Travel for Life (formerly TFL STARS) programme</p>	<p>8. Percentage of adults classed as obese</p> <p>9. Effective partnership working, including an annual assessment of the system response in accordance with the 'What Good Looks Like' guide</p>		
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		<p>Junior Citizen Day (held at the end of the school year with the Council, TFL and primary schools). Include a healthy eating message in as part of their return from the school day at the end of next year</p> <p>Active travel embedded into school travel plans</p> <p>Work with Community Safety on Serious Youth Violence work</p>			
Pregnancy, maternity and paternity	<p>By 2029 we should expect to see:</p> <ul style="list-style-type: none"> <li>An improvement in healthy weight levels in reception aged children across the borough, compared to the national average</li> </ul>	<p>In line with new NICE guidance due 2024, undertake an initial review and development of antenatal healthy weight offer</p> <p>Work with partners to</p>	<p>Outcomes include</p> <p>(a) embedding changes in the Havering system through an all systems approach</p> <p>(b) introducing a place-based approach which</p>	5 years, annual reviews and quarterly progress monitoring updates.	Luke Squires, Public Health Practitioner

	<ul style="list-style-type: none"> <li>An improvement in measures of excess weight among year 6 children in the targeted neighbourhood of Gooshays and Heaton wards, compared to statistical neighbours</li> <li>The development of places in the borough that promote healthy weight, where the healthy choice is the easiest choice; enabling people to eat healthily and be active.</li> </ul>	<p>increase sign up to Breast Feeding (BF) welcome scheme. Including key venues such as Council owned premises and popular private sector outlets</p> <p>Establish clear, consistent information about healthy weight in pregnancy across mutually agreed platforms (e.g. Joy App, Baby Buddy app)</p> <p>Delivery of starting solid food workshops</p> <p>Review Starting Solid Foods workshop content (to include comparison with HENRY Starting Solids session)</p> <p>Deliver a Henry 0-5 service Weight Management Service in addition to the Adult T2 WMS.</p> <p>Pilot a targeted HENRY 0-5 programme for Early Pregnancy Pathway families</p>	<p>means starting with a focus on one neighbourhood in particular, and then expanding to other neighbourhoods in the future.</p> <p>The following indicators will be monitored periodically:</p> <ol style="list-style-type: none"> <li>1. Breastfeeding at 6-8 weeks</li> <li>2. Child excess weight in 4-5yrs old (reception age)</li> <li>3. Child excess weight in 10-11yrs old (year 6 age)</li> <li>4. Number of children meeting physical activity guidelines</li> <li>5. Number of adults eating '5 a day'</li> <li>6. Number of adults meeting physical activity guidelines</li> <li>7. Percentage of adults classed as having excess weight</li> <li>8. Percentage of adults classed as obese</li> <li>9. Effective partnership working, including an</li> </ol>		
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		<p>To offer and to build the buggy walk programme, currently 1</p> <p>To identify Children and Young People at high risk of overweight and obesity using risk stratification</p> <p>All eligible services (Children's Centres, Health Visiting, Maternity and Neonatal) to achieve and/or maintain Baby Friendly Initiative Stage 1 as a minimum</p> <p>Improve system-wide collation and reporting of infant feeding data</p> <p>Increase provision of breastfeeding support sessions (including Early Help/HV and Latch On sessions) to at least 5 per week (min. 1 on each day Mon-Fri)</p> <p>Review breastfeeding peer support offer with a view to developing a</p>	<p>annual assessment of the system response in accordance with the 'What Good Looks Like' guide</p>		
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		<p>funding bid to enhance this service and better support volunteers</p> <p>Young Mum and Parent groups to support breastfeeding – Havering Volunteering Centre (HVC)</p> <p>Increase the uptake of Healthy Start within the Borough</p> <p>Introduce ban on HFSS and Infant Feeding in the new advertising contract</p> <p>Explore options for creating and sustaining delivery of family cooking workshops (in partnership with voluntary sector)e.g. family food champions</p> <p>Review the Early Years Oral Health offer to ensure opportunities to incorporate healthy weight promotion are maximised</p>			
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Disability	<p>By 2029 we should expect to see:</p> <ul style="list-style-type: none"> <li>• An improvement in healthy weight levels in reception aged children across the borough, compared to the national average</li> <li>• An improvement in measures of excess weight among year 6 children in the targeted neighbourhood of Gooshays and Heaton wards, compared to statistical neighbours</li> <li>• The development of places in the borough that promote healthy weight, where the healthy choice is the easiest choice; enabling people to eat healthily and be active.</li> </ul>	Work with LBH CTLD team to develop a Tier 2 Weight Management Service (WMS) for adults with a learning disability	<p>Outcomes include</p> <p>(a) embedding changes in the Havering system through an all systems approach</p> <p>(b) introducing a place-based approach which means starting with a focus on one neighbourhood in particular, and then expanding to other neighbourhoods in the future.</p> <p>The following indicators will be monitored periodically:</p> <ol style="list-style-type: none"> <li>1. Breastfeeding at 6-8 weeks</li> <li>2. Child excess weight in 4-5yrs old (reception age)</li> <li>3. Child excess weight in 10-11yrs old (year 6 age)</li> <li>4. Number of children meeting physical activity guidelines</li> <li>5. Number of adults eating '5 a day'</li> <li>6. Number of adults meeting physical activity guidelines</li> </ol>	5 years, annual reviews and quarterly progress monitoring updates	Luke Squires, Public Health Practitioner
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			<p>7. Percentage of adults classed as having excess weight</p> <p>8. Percentage of adults classed as obese</p> <p>9. Effective partnership working, including an annual assessment of the system response in accordance with the 'What Good Looks Like' guide</p>		
SES	<p>By 2029 we should expect to see:</p> <ul style="list-style-type: none"> <li>An improvement in healthy weight levels in reception aged children across the borough, compared to the national average</li> <li>An improvement in measures of excess weight among year 6 children in the targeted neighbourhood of Gooshays and Heaton wards, compared to statistical neighbours</li> <li>The development of places in the borough that promote healthy weight, where the healthy choice is the easiest</li> </ul>	<p>To develop Harold Hill High Street to make the healthy option the easiest</p> <p>Review planning policies to encourage healthy affordable outlets</p> <p>Maintain the food pantry and consider how to strategically revamp the approach</p> <p>Council estates to be improved to encourage physical activity</p> <p>Regeneration; North Street - Romford Ring Road - Future Years</p>	<p>Outcomes include</p> <p>(a) embedding changes in the Havering system through an all systems approach</p> <p>(b) introducing a place-based approach which means starting with a focus on one neighbourhood in particular, and then expanding to other neighbourhoods in the future.</p> <p>The following indicators will be monitored periodically:</p> <ol style="list-style-type: none"> <li>Breastfeeding at 6-8 weeks</li> <li>Child excess weight in 4-5yrs old (reception</li> </ol>	5 years, annual reviews and quarterly progress monitoring updates	Luke Squires, Public Health Practitioner

	choice; enabling people to eat healthily and be active.		age) 3. Child excess weight in 10-11yrs old (year 6 age) 4. Number of children meeting physical activity guidelines 5. Number of adults eating '5 a day' 6. Number of adults meeting physical activity guidelines 7. Percentage of adults classed as having excess weight 8. Percentage of adults classed as obese 9. Effective partnership working, including an annual assessment of the system response in accordance with the 'What Good Looks Like' guide		
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## **EqHIA Review**

In this section you should identify how frequently the EqHIA will be reviewed; the date for next review; and who will be reviewing it.

### **Review:**

**Scheduled date of review:** February 2027

**Lead Officer conducting the review:** Public Health Specialist, Healthy Weight

*\*Expand box as required*

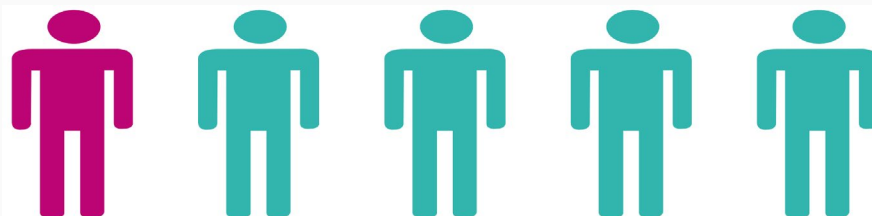
# Draft Healthy Weight Strategy 2024-2029: Everybody's Business

## Summary of consultation report findings



Elaine Greenway – Assistant Director of Public Health (Resources)

In Havering, more than **1 in 5 children aged 4-5 years** are overweight or obese.  
Havering is **in line** with London and England averages



This **doubles to 2 in 5** by the time children 10-11 years of age.  
Havering is **above** London and England averages



By adulthood, approximately 68% of Havering residents are overweight or obese  
Havering is **significantly above** London and England averages





# Draft Healthy Weight Strategy 2024-2029: Everybody's business in a nutshell

**Havering has an ambition to eradicate childhood obesity in the next 20 years**

The strategy acknowledges there is no-one single cause of obesity, therefore proposes to implement a whole system approach working to make the healthy choice the easiest choice

## Aims

1. Introduce a whole system approach in Havering
2. Introduce a targeted whole system approach in Harold Hill

## Outcomes:

1. The development of the Borough as a place that promotes healthy weight
2. An improvement in healthy weight levels in reception aged children across the Borough
3. An improvement in measures of excess weight among year 6 children in the targeted neighbourhood of Harold Hill

## Strategic themes:

There are 3 themes and 7 objectives



### Resources

engaging the whole system and working together on the many drivers of obesity



### Healthy borough

working to make it easy and affordable to eat healthy and be active



### Healthy people

Taking a life course approach and ensuring that key life settings support healthy weight

We asked residents and other stakeholders for their thoughts and comments on the approach for addressing obesity to achieve the vision of eradicating childhood obesity in 20 years.

The consultation opened on 17 January 2024 and closed on 3 March 2024.

**660** responses were received; mostly positive of proposals.

## Demographics

- 86% (572/660) of respondents were residents followed by 11% (73/660) who work for a public sector organisation. Other respondents included councillors, community groups/charities, businesses
- 69% (457/660) of respondents aged between 35-74 (note that additional engagement took place with young people)
- 60% (399/551) of respondents were women
- 88% (487/552) of respondents were from White backgrounds followed by 4% (24/552) from Asian/Asian British backgrounds

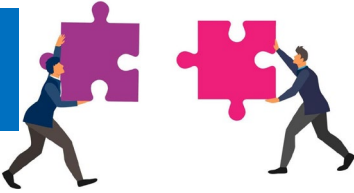
## Opinions on obesity

- 98% (644/658) of respondents said it is important to them that themselves or family and friends maintained a healthy weight
- 70% (461/656) of respondents said it was not easy to maintain a healthy weight
- 87% (573/659) of respondents said there are negative attitudes about obesity
- 93% (616/659) of respondents think that individuals who are obese themselves are responsible – but 47% (312/659) also stated they think local authorities have responsibilities and 60% (399/660) of respondents stated that they think healthcare professionals have responsibilities

## Policies to address obesity

- 68% (451/658) of respondents said they supported restricting availability of fast food outlets
- 89% (590/657) of respondents said they supported working with local food outlets to have healthier food available and make current options healthier
- 89% (587/651) of respondents said they supported making active travel safer and more accessible in the borough
- 87% (571/657) of respondents said they think it is important to have a joined up approach that focuses on obesity prevention

1. At the moment, many things push us to have an unhealthy lifestyle. This is a problem with “the system”. The system is the circumstances where we live, work and play and the current system means it’s difficult to eat healthy and to be physically active. For example, the advertising of unhealthy food, coupled with the types of foods that are available and affordable in local shops & restaurants influence decisions people make about their diet.  
- Anything else? **(279/660)**
2. The strategy puts forward actions to encourage people to be more physically active. Do you support the following? - Anything else? **(206/660)**
3. The strategy says that some people are more likely to be overweight or obese than others. Do you have any comments about how to reduce these health inequalities? - Please comment below **(356/660)**
4. Do you think it is important to have a joined up approach that focuses on preventing obesity, such as this strategy? - Please comment **below (179/660)**
5. If you have any further comments about overweight and obesity, the draft strategy, or types of actions that you feel are needed locally, please use the space below - Please comment below **(280/660)**

**6**

Overall, respondents were supportive of the joined up approach set out in the Havering Healthy Weight Strategy

Of the 183 people who responded

- 84 approved of a joined up approach (with recurrent calls for working with the NHS and schools)
- 19 thought it was more about individual responsibility
- 79 answered the question with an unrelated comment.

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**7**

In approx. 43 answers respondents reported that exposure to fast food outlets in Havering is too high and that this should be addressed. Respondents suggested:

- reducing the number of fast food outlets near schools and on high streets
- existing food businesses provide healthier options and reduce the amount of fat, sugar and salt on their menus.

**1**

Approx. 272 answers reported that healthier foods cost more than unhealthy, processed, or packaged foods. This makes it difficult for people to choose the healthier options. Respondents suggested:

- More free school meals
- Subsidies on healthy food particularly fruit & veg i.e. a voucher system

**2**  
Page 100

Approx. 264 answers reported that more education initiatives are needed to help support people maintain a healthy weight, the most common suggestion being healthy cooking workshops (highlighted in 110 responses) to learn how to make quick, healthy, & budget-friendly meals

**3**

Approx. 237 answers commented on affordability of leisure centre memberships and sport pitches and mentioned subsidies/concessions for:

- whole households
- children and young people
- older people
- people on low incomes.



4



Approx. 143 answers suggested focussing efforts on creating safe and accessible outdoor spaces for physical activity including

- more outdoor gyms
- more or better playground equipment
- affordable sports pitches/courts
- cheaper or free activities incl. sports clubs, fitness classes & park runs
- no car parking charges at parks
- making parks inclusive for everyone by having safe pathways, toilets and changing rooms

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5



Approx. 125 answers suggested focussing efforts on promoting safe active travel in Havering and encouraging fewer car journeys, including:

- better walking and cycling infrastructure
- more children walking to school
- lower speeds in residential areas and by schools
- restricting parking by schools

- Feedback analysed
- Consultation report prepared
- Changes made to the final draft of the Healthy Weight Strategy and Action Plan.
- Specific suggestions made by respondents either added to the Healthy Weight Strategy Action Plan or planned to be revisited during the lifetime of the strategy
- Responses to questions and comments raised included in the consultation report
- Summary of consultation report presented to HWB

- Request for Cabinet approval of Healthy Weight Strategy 15 May 2024
- June 2024 – Assuming Cabinet approval, strategy launched
- July 2024 – first Healthy Weight System Network meeting with HWS published

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## CABINET

<b>Subject Heading:</b>	Home to School Transport Policy
<b>Cabinet Member:</b>	Cllr Oscar Ford, Cabinet Member for Children and Young People
<b>SLT Lead:</b>	Tara Geere
<b>Report Author and contact details:</b>	Trevor Cook, 01708 431250, <a href="mailto:trevor.cook@havering.gov.uk">trevor.cook@havering.gov.uk</a>
<b>Policy context:</b>	This is a proposed change to the existing Home to School Transport Policy for the purpose of facilitating eligible children within Havering to attend their relevant educational establishment in line with statutory duties.
<b>Financial summary:</b>	This Policy change will enable the service to fulfil its duties and deliver a cost-effective home to school transport service to support delivery of a Medium-Term Financial Saving (MTFS) target over the next 4 years of £1.4m
<b>Is this a Key Decision?</b>	Indicate grounds for decision being Key: (a) Expenditure or saving (including anticipated income) of £500,000 or more
<b>When should this matter be reviewed?</b>	Before September 2024 and then annually
<b>Reviewing OSC:</b>	People OSC

**The subject matter of this report deals with the following Council Objectives**

People - Things that matter for residents      X

Place - A great place to live, work and enjoy X

Resources - A well run Council that delivers for People and Place. X

<b>SUMMARY</b>
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Local authorities (LAs) have a legal responsibility to provide home to school transport for eligible students of statutory school age, including children with Special Education Needs and Disability (SEND).

LAs are responsible for deciding what travel arrangements to make, provided they are suitable for the needs of the children for which they are made.

Havering Council currently provides transport assistance to nearly 800 individuals up to 25 years old with Special Educational Needs and Disabilities. In recent years, Havering has experienced a significant and continued increase in the number of requests for an Education Health and Care Plan (EHCP) and the number of EHCPs being issued. The number has increased from 1,328 in 2017/18 to over 2,300 in 2022/23. This increase is forecast to increase further, and we expect to have over 3,200 plans in place by 2025/26.

This increase in EHCPs has also resulted in a significant increase in demand for transport assistance and spend has exceeded budgets for a number of years, despite various mitigations being introduced. The pandemic impacted on spend as travel was disrupted due to the various periods of lockdown, which meant that spend was suppressed in 2020/21 and 2021/22. However, spend in 2022/23 was £5.5m, against a budget of £2.7m resulting in a £2.8m overspend.

The Department for Education (DfE) has recently updated their statutory guidance, replacing the previous Home to School Travel and Transport guidance from 2014.

In response to the changes to the government guidance, Havering Council undertook a consultation on a new Home to School Transport policy. There was a good response rate to the consultation, made over the statutory consultation period, with a total of 575 individuals responding.

Of the 575 responses, the vast majority were from Parents/Guardians accounting for 83 % of the responses, followed by school or educational settings at 6%, the general public at 4% and children under 16 offering a 3.5% contribution.

The consultation identified that some parents and guardians had fears that transport would be cut to accommodate savings targets. The Council is committed to maintaining a full transport provision, in compliance with its statutory duties. It will work with parents in collaboration to identify the best fit transport arrangement for the needs of the child. Whilst the Policy supports a greater focus on cost efficient travel provision, this does not mean that inappropriate arrangements will be forced upon families.

Home-to-school travel is an integral part of the school system. It ensures no child of compulsory school age is prevented from accessing education through a lack of transport or due to the cost of transport.

The cost to the LA of delivering free home-to-school travel has increased significantly in recent years. The DfE statutory guidance states that it is important that local authorities take travel costs into account when planning the supply of school places. Capital expenditure, revenue costs and travel costs need to be considered together with efficient systems and practices to ensure financial sustainability.

The Council is under a duty to have regard to the DfE guidance when:

- carrying out their duties in relation to arrangements for travel to school for eligible children of compulsory school age;
- exercising their discretionary power to arrange travel for other children;
- carrying out their duties in relation to the promotion of sustainable travel to school (this duty applies in relation to young people of sixth form age as well as children of compulsory school age).

Parents are responsible for ensuring their child attends school. This means they must take all the action necessary to enable their child to attend school. For most parents, this includes making arrangements for their child to travel to and from school.

However, local authorities must make arrangements for eligible children to travel to school free-of-charge, ensuring that families, local authority school travel, and special educational needs teams work together to ensure travel arrangements are considered when deciding what school to name in a child's Education, Health and Care Plan.

## **RECOMMENDATIONS**

Cabinet is recommended to agree the recommendations below:

1. To adopt the revised Home to School Transport policy attached at appendix A, providing appropriate support according to need and ability, ensuring that the Council meets the statutory requirements in accordance with guidance issued by the DfE
2. To not introduce a charge for Post 16 Travel at this time
3. To note that the draft policy for approval was the subject of changes in light of responses received by the council, through its consultation,

## **REPORT DETAIL**

1. Havering Council currently offers advice, support and assistance to eligible children and young people travelling between home and school/college in accordance with the criteria set out in our home to school travel assistance policy.
2. In recent years, Havering has seen a significant rise in the child population of 15.2% compared to the England 3.9% increase. And we have experienced a significant and continued increase in the number of requests for an Education Health and Care Plan (EHCP) and the number of EHCPs being issued. This is in line with the rise in the number of Education, Health and Care Plans (EHCPs; or their predecessor, Statements of Special Educational Needs) that has been seen nationally by 52% between 2010 and 2022. In the last three years we have seen an 155% increase from having 1602 children and young people with EHCPs in 2020 to 2494 children and young people in Havering with EHCPs, as of November 2023. This continues to rise and furthermore, our forecasts predict this number could rise by a further 54% to 3864 by 2030.
3. This increase in EHCPs has also resulted in a significant rise in demand for transport assistance. Spend has exceeded budgetary provision for a number of years, despite various mitigations being introduced. The pandemic impacted on spend, as travel was disrupted due to the various periods of lockdown. This resulted in spend being suppressed in 2020/21 and 2021/22, rising the following year. Spend in 2022/23 was £5.5m, against a budget of £2.7m – a £2.8m overspend. Currently, nearly 800 all with SEN and have an EHCP children are receiving some form of transport assistance, and this number has increased in recent years in line with the increase in the number of children with an EHCP, as can be seen below:

<b>Havering Travel Assistance</b>	<b>2017/18</b>	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>	<b>2021/22</b>	<b>2022/23</b>	<b>2023/24</b>
Total Applications Recieved	449	428	495	175	690	840	<b>780</b>
Students Approved for Passenger Bus	303	347	373	348	366	358	<b>438</b>
Students Approved for Taxi/ Shared Taxi	79	97	133	158	175	199	<b>189</b>
Students Approved for Personal Transport Budget	22	14	45	17	43	68	<b>99</b>
Students Approved for Travel Training	19	11	25	11	13	29	<b>8</b>

4. Travel needs are directly connected to the location and availability of appropriate school places. Support for, and investment in, new and improved SEND provision increases the number of SEND Units and Special school places in and across the borough. Below is a summary of the new additional places delivered over the last two years or planned in the next 3 years:

Primary;

- St Edwards Primary – 12 places
- Suttons Primary – 12 places



- Harrow Lodge Primary – 12 places
- RJ Mitchell – expansion from 21 to 40 places
- Harold Wood Primary – 12 places
- Newtons Primary – 12 places

Secondary

- Bower Park secondary – 12 places
- Harris secondary – 20 places
- Sander Draper secondary – 20 places

Special;

- Compass special school – 60 places
- Lime Academy – expansion from 120 to 150 places
- Balgore special school – 300 places

5. These additional school places will have a significant impact on our home to school transport demand and associated costs, as more provision is made available within borough this will reduce the need for high cost out of borough transport arrangements.
6. As part of the improvement into our existing travel services, we are introducing a new transport management system to oversee the scheduling and arrangements of our travel service. The new system will have fully integrated applications, with a driver app that allows two-way communication to speak directly to the central team, parents/guardians and/or passengers. This will provide real-time live GPS locations, enabling parents to be alerted to any potential delays and giving them greater confidence in pick up and drop off times.
7. The systems routing algorithms enable journeys to be automatically planned with the greenest and fastest routes, based on real-time traffic data, leading to shorter journey times, and reduced fuel usage, which is better for the environment and the children.
8. As stated, the purpose of this report is to gain endorsement for the new policy to be adopted which ensures Havering is legally compliant with the current legislation and introduces alternative options for transport assistance to support children to be independent where this is safe and appropriate.
9. A review of existing policies in other boroughs has shown that Havering is an outlier in many aspects. For example, many other LA's do not provide transport assistance if the school is the parental choice, and an alternative school is closer. Many also seek financial contributions for pupils who are post-16 but require transport. All boroughs use the statutory distance criteria, but passenger assistants are not universally provided. Most boroughs promote the use of travel training and personal transport budgets, and whilst most state that a seat on a passenger bus and/or taxi are exceptional, the

majority of children in Havering currently access transport assistance in this way.

10. Following the launch of the new DfE statutory guidance, a revised Home to School Policy was drafted and was subject to a public consultation which was held with a wide range of stakeholders over a 28-day period (extended for a further 28 days to include out of Borough schools). The consultation took the form of an online questionnaire and a face-to-face event. A total of 575 individuals responded to our consultation questions, of which the vast majority as expected were from parent/Guardians and they accounted for 83% of the responses, followed by school or educational settings at 6%, the general public at 4% and children under 16 accounting for 4% of the responses.
11. There was a wide range of responses which has given the local authority helpful feedback, see Appendix B. This has been carefully considered and incorporated where appropriate into the revised Policy at Appendix A for example not charging for post 16 Travel. (please see point 26 for the main changes to the policy).
12. The consultation was broken down into a number of specific areas relating to the new proposals and changes within the policy. Analysis of the consultation responses considered both the quantitative and qualitative feedback to understand impact.
13. The first of these areas focussed on travel training, and in particular whether undertaking travel training would support a child's independence. Of the respondents to whom this applied, 213 (52%) strongly agreed/agreed with this statement, whereas 197 (48%) strongly disagreed/disagreed with this statement.
14. In addition, of the 426 consultees to whom travel training applied, 255 (60%) strongly agreed/agreed that undertaking travel training would not be suitable. This feedback has been incorporated into the policy changes and we have strengthened the need to ensure assessments of individual children's needs are undertaken as part of travel training considerations.
15. The consultation also focussed on gaining feedback on the use of Personal Transport budgets. There were a high number of responses (248 respondents) who strongly disagreed/disagreed (total 57.5%) that the use of personal budgets would improve school attendance, but with 161 (39%) strongly agreeing/agreeing with this statement.
16. There were a high number (228) of respondents who strongly disagreed/disagreed (55%) that personal transport budgets would be a positive impact on their own, or their child's mental health and 185 respondents who strongly agreed/agreed (45%) that there would be a positive impact.

17. This feedback has been considered in relation to how the need for personal transport budgets is assessed (see criteria on page 5 of the policy) and the need to not be prescriptive, but to support creative dialogues to find innovative solutions to support young people to get to and from school. (Please see p10 of the policy).
18. The consultation received a high number of responses regarding post-16 travel assistance, and whether a charging mechanism should be introduced. 160 respondents (29%) told us they strongly agreed to the proposal to cap the level of charge, and 100 people (18%) strongly disagreed.
19. Analysis shows a higher agreement rate regarding charges/contributions being means tested from the 471 people to whom this proposal applied to, with 279 people, (59%) strongly agreed/agreed, and 192 (41%) strongly disagreed/disagreed.
20. 142 respondents (25%) strongly disagreed that any charges/contributions should be means tested, and 112 people (20%) who strongly agreed. As can be seen, response rates were very close when analysing the combined views of those 471 people to whom this proposal applied to, with 240 people (51%) either strongly agreed/ agreed to this proposal, and 231 (49%) strongly disagreed/disagreed.
21. Having carefully considered the feedback, and balancing the small potential income that might be possible against the impact on this cohort of young people in education, it is proposed that a charging arrangement for post 16 transport will not be implemented at this time. From the current cohort of Post 16 students this would generate a revenue of £16k based on the higher fee charge of £934 per annum. The revenue generated would not cover the cost of administering this scheme, therefore it is not cost effective to implement such a scheme. This aspect of the policy will be regularly reviewed, including to ensure that there is an appropriate alignment with arrangements that are in place for Adult Transport.
22. The consultation produced over 600 free text responses including 589 comments in relation to the policy.
23. Analysis of the consultation document in appendix B shows 181 respondents (31.5%) commented that the draft proposed policy would have a negative impact, with specific concern for young person's individual needs (23%), safety (11.8%) and their mental health (11.5%).
24. Comments were also received regarding the current transport assistance service. 24 respondents (4.2%) commented that they would not want to lose an invaluable service, with 22 respondents (3.8%) saying that more specialist school provision is needed in the borough. 12 people said more bus routes are needed (2.1%) and 9 people felt that taxis are not always reliable (1.6%).

25. Views on the introduction of personal transport budgets reflected parent concerns around how they would be able to manage the budget. There was a 60/40 split in individuals believing these budgets would make a positive contribution to their lives and those of their children.
26. The policy has been refreshed based on the feedback from the consultation, the statutory DfE guidance, as well as a comparison to other Local Authority policies. The main changes to the policy are:
- To provide clarity within the policy that sustainable cost-effective levels of support will be promoted and offered to families, and that offers of transport assistance will be developed to better fit the need of the child.
  - To introduce flexible models of transport assistance which would allow families to adopt creative arrangements that better fit the needs of their child.
  - All applications will be subject to an initial face-to-face assessment, looking at existing family support arrangements, and resilience, and discussing the best options for the family.
  - Reviewing the provision of single occupancy taxis as a travel assistance option and promoting the flexibility of a personal transport budget offer to families.
  - Promoting the use of a personal transport budget through the use of a prepaid card and individual accounts to families so they can organise their own transport, including paying for a travel card for parents to escort their child to school/college using public transport.
  - Developing robust monitoring of personal transport budgets through the use of a prepaid card and account system to ensure audit compliance and reconciling against school attendance to ensure usage/spend is appropriate and utilised in the most appropriate manner.
  - Increasing the number of young people accessing travel training by reviewing the current offer.
  - To not introduce a charging model for Post-16 transport assistance at this time; this will need to be kept under consideration.
  - To increase the number of collection points to reduce bus journey times.

## **REASONS AND OPTIONS**

### **Reasons for the decision:**

The launch of the DfE Statutory guidance requires Havering to review its current Home to School policy to ensure it meets the statutory duties. The revised policy

provides a wider range of choices and greater flexibility for the Parents/Carers of eligible Children within the Borough using Home-to-school transport.

To continue to support Post 16 young people to access their education choices through not introducing a charging policy similar to all other local authorities at this time.

Improve the options available to Parents and Carers to enable their children to get to school.

**Other options considered:**

Government guidelines require that Council review its policy for Home to School transport provision, a do-nothing approach maintaining the current policy would not ensure that we comply with our statutory duties. The statute and guidelines, whilst not wholly prescriptive, do place specific duties on the Council meaning that options are limited in terms of suitable provision and delivery arrangements.

Increasing the Fuel Reimbursement to incentivise the use of personal transport budgets was considered. However, this is currently paid the maximum of the HMRC currently set threshold and any additional funds above this will be treated as taxable income and will create a burden on parents/guardians in declaring the additional income and subsequently having to pay the tax on this income.

<b>IMPLICATIONS AND RISKS</b>
-------------------------------

**Financial implications and risks:**

In 2019, LGA, ISOS and CCN reported that between 2014/15 and 2017/18, the total national spend on home-to-school transport increased by 6.5% from £1.02 billion to £1.08 billion. The percentage of LAs that were overspending their home to school transport budgets rose from 71% to 83%, and the total national deficit on home to school travel stood at £111 million (LGA, ISOS, CCN, 2019).

The increase was largely driven by transport for children with SEND. The total national spend has not been calculated since, but CCN reported in 2022 that the costs of delivering home to school travel for children with SEND for the 28 county authorities who responded to their survey, had risen by 33% from 2016/17 to 2020/21, and accounted for 11% of the total spend on children's services (CCN, 2022). LAs continue to provide this service as efficiently as possible, yet with both need, cost and funding pressures increasing, members report that forecasts for home to school travel costs have significantly increased for 2024/25.

The London Borough of Havering is one of those authorities that has seen increased pressures and is forecasting an overspend of £1m in 2023-24. Budget growth has been provided in the 2024-25 budget to meet the increased levels of demand. However, there is also a requirement to find more cost effective ways of delivering the service to help improve financial sustainability. A saving of £1.4m over four years has also been included in the MTFS. It should be noted that even with the saving there is will be a net increase in the budget over the MTFS period.

Fin Year	2023-24	2024-25	2025-26	2026-27	TOTAL
	£m	£m	£m	£m	£m
Savings Target	0.100	0.200	0.500	0.600	1.400

The rational to achieve MTFS savings was based on the reduction of single use taxis which are extremely expensive. The target is to reduce these taxi usages over 4 years and to offer personal transport budgets, capped at an average of 45% of the current taxi costs. Over 4 years this would equate to a £1.4m MTFS target.

This report identifies additional best value measures that will deliver further cost efficiencies through an enhanced transport management system as well as through reductions in taxi usage such as the provision of more in-borough specialist school places, and a focus on transport procurement arrangements to deliver cost reductions.

The decision not to introduce charging for post 16 transport would mean in theory that the Council will forego a very small amount of offsetting income. However once eligibility and means testing has been taken into account this is estimated to be only around £20k which would be offset by the costs of administering the process so the decision not to charge has only minimal impact. It is still expected that the savings will be made through the other measures set out in the report and the changes to the policy.

Without the endorsement of the Policy, it will not be possible to achieve the MTFS target for transport costs.

The impact of the changes, the total expenditure on transport and the levels of demand will be monitored throughout the year as part of the Council's budget and savings monitoring.

**Legal implications and risks:**

As stated in the main body of the Report the Local Authority has to arrange free transport for eligible pupils.

The Council has other relevant statutory duties in relation to school transport.

S 508 A Education Act 1996 requires the Council to have an annual sustainable modes of travel strategy

In terms of the main duty to provide free school transport for eligible children in section 508B Education Act 1996

(1) A local authority in England must make, in the case of an eligible child in the authority's area to whom subsection (2) applies, such travel arrangements as they consider necessary in order to secure that suitable home to school travel arrangements, for the purpose of facilitating the child's attendance at the relevant educational establishment in relation to him, are made and provided free of charge in relation to the child.

Subsection (2) applies in the following circumstances:

(a) no travel arrangements relating to travel in either direction between his home and the relevant educational establishment in relation to him, or in both directions, are provided free of charge in relation to him by any person who is not the authority, or

(b) such travel arrangements are provided free of charge in relation to him by any person who is not the authority but those arrangements, taken together with any other such travel arrangements which are so provided, do not provide suitable home to school travel arrangements for the purpose of facilitating his attendance at the relevant educational establishment in relation to him.

(4) "Travel arrangements", in relation to an eligible child, are travel arrangements of any description and include—

(a) arrangements for the provision of transport, and

(b) any of the following arrangements only if they are made with the consent of a parent of the child—

(i) arrangements for the provision of one or more persons to escort the child (whether alone or together with other children) when travelling to or from the relevant educational establishment in relation to the child;

(ii) arrangements for the payment of the whole or any part of a person's reasonable travelling expenses;

(iii) arrangements for the payment of allowances in respect of the use of particular modes of travel.

It is possible for parents to make their own arrangements for eligible pupils without recourse to the Council but under ss(5) the Council can only decide that it does not need to make its own travel arrangements if the parents have made their own arrangements voluntarily.

If there is to be a change to the current policy then the Guidance indicates that there should be consultation.

125. Where they propose changes to their school travel policy which may affect

children's eligibility for transport, local authorities should consult locally. As a minimum, this should include consulting:

- schools whose pupils will be affected by the proposed changes, including those located in other local authority areas;
- parents whose children will (or may) be affected by the proposed changes, including those whose children attend school in a neighbouring authority, and those whose children may be affected in the future – for example, because they live in the catchment area of, or attend the feeder school of, a school affected by the proposed changes; and
- the local Parent Carer Forum

The consultation should run over 28 days. As set out in the Report the consultation has followed this Guidance. The requirement of a lawful consultation is that the results of the consultation should be conscientiously taken into consideration by the decision makers before any final decisions are taken. For that reason the extensive responses are set out in the Appendices and should be fully read and considered.

Para127 of the Guidance states that before making a final decision on the content of the policy local authorities should give careful consideration to:

- the impact proposed changes to their policy will have on parents' choice of school, particularly where travel arrangements have been made to support parents' preference for their children to attend a school with a designated religious character (some such arrangements are associated with long-standing local agreements about the siting of schools);
- the financial impact the changes will have on affected families, paying particular attention to the potential impact of any changes on children from low-income families;
- the impact the changes will have on people with protected characteristics

Furthermore, para 128 provides:

"Wherever possible, local authorities should phase in changes so that children who begin attending a school under one set of travel arrangements continue to benefit from those arrangements until they leave that school."

The Policy appears compliant with the current legislation.

Therefore, there do not appear to be any legal risks in adopting the new policy.

**Human Resources implications and risks:**

There are no human resource implications as a result of this report.

**Equalities implications and risks:**



The EQIA is as Appendix C

### **Health and Wellbeing implications and Risks**

The risks to the mental well-being of staff will be affected trying to manage and maintain the current process and maintain the cost implications.

### **Environmental and Climate Change Implications and risks**

The introduction of increased SEND provision will mean smaller journeys will be made through vehicles impacting positively on the emissions reduction targets.

A new transport management system is being implemented to oversee the scheduling and arrangements of our travel service. The new system will have fully integrated applications, and the systems routing algorithms enable journeys to be automatically planned with the greenest and fastest routes, based on real-time traffic data, leading to shorter journey times, and reduced fuel usage, which is better for the environment.

The perception of personal budgets meaning more cars on the road is unfounded and the aim is to find alternative ways to get to school such as reducing cars through shared arrangements or greater use of public transport. Either way this is a positive impact on the environment through reduced emissions.

## **BACKGROUND PAPERS**

Appendix – A New Revised Policy

Appendix – B Consultation Outcomes Review

Appendix – C [EqHIA Home to School Post Consultation.docx](#)

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1	Title of activity	Home to School Transport Policy		
2	Type of activity	Policy		
3	Scope of activity	<p>This policy outlines the support and assistance available for children and young people travelling between home and school/college.</p> <p>Local Authorities are under a <a href="#">statutory duty</a> to make free-of-charge travel arrangements to facilitate the attendance at school/college of eligible children resident in their area, and this policy sets out how we will meet this duty.</p> <p>Support and guidance may be provided by the council based on the different eligibility criteria, which is dependent on the age of the student.</p>		
4a	Are you changing, introducing a new, or removing a service, policy, strategy or function?	Yes / <del>No</del>	<p>If the answer to <u>any</u> of these questions is 'YES', please continue to question 5.</p>	<p>If the answer to <u>all</u> of the questions (4a, 4b &amp; 4c) is 'NO', please go to question 6.</p>
4b	Does this activity have the potential to impact (either positively or negatively) upon people (9 protected characteristics)?	Yes / <del>No</del>		
4c	Does the activity have the potential to impact (either positively or negatively) upon any factors which determine people's health and wellbeing?	Yes / <del>No</del>		
5	If you answered YES:	Please complete the EqHIA in Section 2 of this document. Please see Appendix 1 for Guidance.		
6	<p>If you answered NO: (Please provide a clear and robust explanation on why your activity does not require an EqHIA. This is essential in case the activity is challenged under the Equality Act 2010.)</p> <p>Please keep this checklist for your audit trail.</p>			

Date	Completed by	Review date
14/03/2024	Paul Young	

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## **Introduction**

This policy outlines the support and assistance available for children and young people travelling between home and school/college and describes how the Council fulfils its duties and exercises its discretionary powers as required by the Education Act 1996 and subsequent legislation and guidance.

The policy explains the criteria for eligibility for travel assistance for pupils to their school/college for children of statutory school age (5 to 16 years old). It describes how parents and carers can apply for travel assistance and how decisions are made. It sets out how parents and carers may appeal against decisions that they believe do not comply with this policy.

For updates relating to operational decisions and information regarding application timescales, please visit our main [Travel Assistance Webpage](#).

## **Policy statement**

Havering Council is committed to ensuring that all pupils have a great start to life, are safe and healthy, and have access to high quality education so that they can achieve their full potential. The Children and Families Act 2014 commits partners to work together to develop services which strengthen the abilities and resilience of children and their families to be independent.

The Council is also committed to meeting the educational needs of as many children and young people as possible within local schools/colleges. In many cases, this will mean that pupils can walk or cycle to school/college with their parents or guardians. This policy sets out how we will help the small number of pupils who find it difficult to travel to school/college without some assistance.

As a Council we want to make sure we continue to deliver our statutory responsibilities for home to school travel assistance to meet the travel needs of children and young people, enabling them to access their place of education. The Council acknowledges that without this service some children and young people would be unable to access their school/college, especially those who have significant additional needs, are isolated within the community, are deemed extremely vulnerable or have a combination of such factors.

Engagement with young people with special educational needs in Havering confirmed that young people value independence highly, and that they want their parents, schools and the services that support them to help them prepare for adulthood, including continued access to education, employment opportunities and access to essential services and activities in the community. The ability to travel independently is important to them now to attend school/college, participate in community life and socialise with friends; it is also fundamental to their future ambitions.

We want to support parents and guardians to fulfil their responsibility to ensure their children attend school or college regularly and to make any necessary arrangements to ensure that they attend. Those children and young people not in receipt of travel

assistance from the Council can use a wide range of forms of travel in Havering, accompanied as necessary, including bus, train, concessionary fares, walking and cycling. We also want to support schools and colleges to promote safe routes to school/college and safe travel skills through their regular curriculum.

Parents are responsible for ensuring their child attends school, and this means they must take all the action necessary to enable their child to attend school. For most parents, this includes making arrangements for their child to travel to and from school. Local authorities must make arrangements, free-of-charge, for eligible children and young people to travel to school/college.

This policy sets out travel assistance options which may be employed to assist eligible children and young people, please note that references to transport within this document are related to travel assistance.

Travel assistance may take one of the following forms:

- Provision of a bus or train pass
- Training to travel independently (walking and using public transport)
- Training to cycle independently (reimbursement of bicycle and safety equipment) subject to the agreement of parent/guardian
- Personal Transport Budget including reimbursing of mileage costs through a Prepaid card and account provided by the Local Authority
- Provision of Havering's Passenger Transport Service (bus)
- Provision of a private bus, coach, or minibus
- Provision of taxis or licensed private car hire (in exceptional circumstances)

## **Eligibility**

Parents and Guardians have a legal duty to ensure that their statutory school-aged children (age 5 to 16) attend school regularly and to make any necessary arrangements to ensure that they attend school.

A child becomes of compulsory school age at the start of term after their fifth birthday and ceases to be of compulsory school age on the last day of the academic year in which they are in year 11. This applies to both children with and without an Education Health and Care Plan (EHCP).

There are four core categories of eligible children set out in law:

- Children living beyond the statutory walking distance from school
- Children who cannot reasonably be expected to walk to school due to special educational needs, disability, and mobility problems, even if they were accompanied by their parent.
- Children who cannot reasonably be expected to walk to school safely, even if they were accompanied by their parent.



- Children from low-income households who have extended rights to travel assistance to a choice of schools.

Ordinarily and in accordance with the Council's statutory duty, children under the age of 5 will not be entitled to travel assistance between their home and school. Where circumstances exist where the Council determines that travel assistance is necessary it may exceptionally apply its discretionary powers on a case-by-case basis.

## **Statutory walking distances**

Havering Council, in accordance with its statutory duty, will provide free home to school transport for children of compulsory school age to the nearest suitable school from their home address who meet the 'qualifying distance' criteria which are:

- 2 miles or more for children below the age of eight, measured by the shortest walking distance between the home and the school.
- 3 miles or more for children aged eight and above, measured by the shortest walking distance between the home and the school.

Children who live between 2 and 3 miles from their school will cease to be entitled to travel assistance from the start of the term following their eighth birthday.

When a child cannot be offered a place at the nearest school to the home address, the Council will, subject to the criteria set within this policy and the qualifying distance being met, provide transport to the next nearest school with space to admit.

For transport to be provided in this instance the parent must provide evidence that they have applied for and been refused a place at the school which is the nearest school for their home address and any other schools closer than the school offering admission.

If the child/family qualify for free school meals or they are in receipt of maximum Working Tax Credit, then please refer to the section on extended rights.

## **Children with special educational needs or disabilities**

For children with special needs or a disability or mobility problems, if it is deemed unreasonable to expect them to walk to school (accompanied by an adult as necessary), then the distance criteria does not apply and they are entitled to free school travel assistance regardless of the distance they live from school.

## **Unsafe walking routes**

Where a child is not deemed eligible for transport to their nearest qualifying school because it is under the relevant distance threshold and the parent/guardian believes the child is unable to walk the assessed route safely (accompanied by an adult as necessary) due to the nature of the route, they should complete the online application form outlining the aspect of the route they believe to be unsafe.

The travel team will validate the claim of unsafe routes by inspecting the route against the [Road Safety GB Guidelines on the Assessment of walked routes to school](#). If the route is agreed to be unsafe an alternative safe route will be measured and if the child is then beyond the statutory walking distance, he/she will be eligible for free travel assistance.

Where a new route previously considered to be unavailable becomes available (for example through the provision of a new footpath), transport will no longer be provided to any new applicants for travel assistance. Those applicants who have been entitled to transport due to an unavailable route that has become available will be written to with an explanation of the change and provided with assistance for four weeks, or the end of the half-term whichever is longer, after a route is re-assessed before travel assistance will be withdrawn. A parent and or carer will be able to appeal against the decision to withdraw assistance in these circumstances.

## **Extended rights**

Statutory entitlement is extended for children from low-income groups. Children from low-income groups are defined as those who are entitled to free school meals, or those families who are in receipt of the maximum level of Working Tax Credit (WTC).

Children above the age of 8, but under the age of 11, from low-income families will be entitled to travel assistance to their nearest suitable school if the shortest walking distance between their home and the school is more than two miles.

Children aged 11 and over (years 7 to 11) from low-income families will be entitled to travel assistance if they attend a school which is more than two miles (measured by the shortest walking distance) and less than 6 miles (measured by the shortest road route) from their home and the school attended is one of the three nearest suitable schools to their home.

Children aged 11 and over (years 7 to 11) from low-income families who are attending their nearest designated faith school preferred on the grounds of religion or belief will also be entitled to travel assistance if their school is more than two miles (measured by the shortest walking distance) but not more than 15 miles (measured by the shortest road route) from their home.

When considering whether a faith school is preferred on the grounds of religion or belief, Havering Council will consider the nature of other schools that may have been named as higher preferences on the application form. For an application for travel assistance to be agreed under this section, the expectation will be that the school that is preferred on the grounds of religion or belief will be named above any non-faith schools that have been named on the application form.

Parents must provide supporting evidence regarding their genuine adherence to their religion or belief, and this will normally be confirmed by asking their minister of religion to sign the application form.

## **Special educational needs, disability, and mobility problems**

Where a child with special education needs, a disability and/or mobility problems does not meet the other three eligibility criteria but has identified specific needs/circumstances that may mean it is unreasonable to expect the child to walk to school (accompanied by an adult as necessary), then an assessment based on their individual needs and circumstances will be undertaken.

In determining whether a child cannot reasonably be expected to walk between home and school, the Council will consider whether the child could reasonably be expected to walk if accompanied and, if so, whether the child's parent or carer can reasonably be expected to accompany their child. Ordinarily, the expectation is that a child will be accompanied by a parent or carer, work commitments and other care will not be considered.

When assessing entitlement for travel assistance for a child with SEND or mobility problems, the Council will consider the individual needs of each child. This may include taking professional advice from educational psychologists, medical officers and teachers and consulting with parents and carers before arriving at a final decision.

Consideration will also be given to the child's physical and medical requirements including any disabilities they may have. Assessments may include face to face contact with the child. The findings and decision will be recorded on a transport assessment form.

The following factors will be taken into consideration when assessing transport entitlement:

- the age of the child
- the distance of the child from school
- whether the child is physically able to walk the journey to school
- whether the walking route is appropriate for the pupil and their specific needs and allows them to arrive in a fit state to be educated
- whether a child's emotional and behavioural difficulties will create a clear health and safety hazard to themselves or others on the journey to school
- the SEND of the child
- any other individual circumstance.

This is not an exhaustive list. It is not presented in any order and is for guidance only. Meeting one or more of the criteria does not automatically entitle a child with SEND to transport assistance.

The fact that a child has an EHCP or attends a special school does not automatically entitle him or her to travel assistance.

Other family circumstances, such as parents and carers attending work or looking after other children, cannot be considered when determining eligibility

## **Children attending schools on grounds of religion or belief**

Ordinarily assistance with travel to a faith school will only be provided if it is the nearest suitable school. If parental preference results in children's attendance at a faith school when there are suitable schools nearer to home, then no travel assistance will normally be provided. However, if children meet the Extended Rights eligibility category criteria, then travel assistance to a faith school which is not the nearest suitable school may be considered.

Under Extended Rights, when considering whether a faith school is preferred on the grounds of religion or belief, Havering Council will consider the nature of other schools that may have been named as higher preferences on the application form. For an application for travel assistance to be agreed under this condition, the expectation will be that the school that is preferred on the grounds of religion or belief will be named above any non-faith schools that have been named on the application form.

When applying under Extended Rights for travel to a faith school, parents must provide supporting evidence regarding their genuine adherence to their religion or belief, and this will normally be confirmed by asking their minister of religion to sign the application form.

## **Extenuating circumstances**

Section 7 of the Education Act 1996 sets out parental duty to ensure their child(ren) receive a suitable and full time education, with the overriding expectation that parents should undertake their legal responsibility to get their child(ren) to and from school and as such the Council will need to be satisfied that the parent has demonstrated why they, for social, medical, financial, or personal reasons cannot undertake this duty.

Recognising that the Council's discretionary powers should not be unreasonably restricted by its general policy, the Council will consider and may agree requests for home to school transport where there are considered to be extenuating circumstances that prevent a child accessing their school unless travel assistance is put in place. If the parent believes extenuating circumstances exist and assistance with travel is demonstrated as necessary, then a transport application form must be completed and submitted with all relevant information and evidence for consideration.

The determination will be based on evidence received to support the case whether transport is necessary for the child to receive an education. Consideration will be given as to whether the circumstances could have reasonably been foreseen by the parent/carers. For example, moving to temporary accommodation owing to flood damage cannot be foreseen, whereas choosing a school other than a child's nearest school and realising following this decision that transport is not available could be foreseen.

Where it is decided that a child does not qualify for assistance with travel based on the presented needs/circumstances then it remains solely the parent/ carer's responsibility to ensure school attendance or consider transferring the child to a more local school.

In all cases the decision whether to exercise discretion will be taken on a case-by-case basis.

## **Children below the Age of 5**

There is no legal requirement for the Council to make special arrangements for children under the age of 5 to travel between home and school. The Council expects that children under the age of 5 will be taken to their educational provision by a parent or guardian. However, Havering Council may use its discretionary powers to provide Travel Assistance for children who are aged four and entering the reception year at primary school if extenuating circumstances have been demonstrated.

## **Appeals**

Parents/carers of children who live in Havering and who wish to appeal a decision that did not grant Travel Assistance regarding one of the following, may apply for their case to be considered at a Stage 1 appeal in relation to any of the following:

- their child's eligibility
- the distance measurement in relation to statutory walking distances and
- the safety of the route.
- the travel arrangements offered including the use of personal transport budgets.

During an appeal about an application for travel assistance, travel assistance will not be provided to the child/young person unless the appeal concerns the travel arrangements offered, in which case the offered arrangements will be available pending the appeal decision. Where the appeal concerns a change to existing travel arrangements, then the previously agreed travel arrangements will continue until the review is complete.

When considering appeals, the following will also not normally be taken into account:

- Parent/carers' work or other commitments
- Attendance by siblings at other schools
- A work experience placement
- An address other than the home address, including a childminder's address
- Ad hoc visits to other establishments or locations
- Out of hours' clubs (for example breakfast club or after school activities).

### **Stage one: Case review by a senior officer**

The request for a review can be made either

- online at [www.havering.gov.uk/schooltravelassistance](http://www.havering.gov.uk/schooltravelassistance)

- or verbally via a telephone call on 01708 434785

All requests must be made within 20 working days of the original notification of a decision. The request must include the reasons for the review and any additional information that is felt not to have been considered when the decision was made.

Following the council's review, the outcome will be confirmed, in writing, within 20 working days of the receipt of the appeal. This will outline:

- The nature of the decision reached
- How the review was conducted
- What factors were considered
- Information about other departments and/or agencies consulted
- The rationale for the decision.

## **Stage two: Case review by an independent panel**

If the parent/carers remains unhappy with the decision at stage one of the appeal, they can complete a 'Stage 2 appeal form' to request that their case is escalated for consideration by an independent panel.

The independent appeal panel will be independent of the original and stage one decision-making process (but are not required to be independent of the local authority) and suitably experienced. Panel members may include officers of the local authority along with Havering Council councillors along with an Independent Lay Panel Member. Including officers on independent panels will strengthen the experience and knowledge of the panel and allow appeals to be heard more rapidly as there will be a larger number of panel members to draw on. Councillors will continue to be part of appeal hearings.

Requests for a stage two appeal must be made within 20 working days from receipt of the local authority's stage one written decision.

Stage two appeals will normally be considered within 40 working days of receipt of the parent/carers request for it to be escalated. Any additional supporting documents should be supplied by the parent at least 10 working days prior to the review hearing date. A copy of the paperwork that has been submitted to the stage two appeal panel will be sent to the parent at least seven working days prior to the review.

The stage 2 appeal panel will give equal consideration to all case reviews whether conducted in the presence of all parties or heard in the absence of one/both parties. If the panel considers that further information is required, the case will be adjourned so that the information can be made available.

The clerk at the stage two appeal will write to the parent/carers, normally within five working days of the review, setting out:

- the decision reached
- how the review was conducted
- information about other departments and/ or agencies that were consulted as part of the process
- what factors were considered
- the rationale for the decision reached and
- information about the parent/carers' right to put the matter to the Local Government Ombudsman (see below).

## **Local Government Ombudsman**

There is a right of complaint to the Local Government Ombudsman, but only if the complainant considers that there was a failure to comply with the procedural rules or if there are any other irregularities in the way the review has been handled. Further advice is available on the Local Government Ombudsman website or on the Local Government Ombudsman advice line on 0300 061 0614.

If the complainant considers the decision of the independent panel to be flawed on public law grounds, the complainant may also apply for judicial review. However, it is recommended that independent legal advice is obtained before taking this step.

## **Travel assistance options**

### **Forms of travel assistance**

The Council will review the travel needs of all eligible children and decide the most appropriate form of assistance that will be provided. The form of travel offered will reflect the most appropriate use of public funds to ensure cost effective provision is in place, while also ensuring that any agreed specific requirements, such as medical/mobility or health needs are also taken into account where necessary.

### **Journey times**

The nature of transport congestion in Havering and the distances of many journeys means that travelling times can vary greatly. It is expected that children should arrive at school safely and fit to learn. Journey times should reflect this. Government guidance is that best practice suggests that the maximum each way length of journey for a child of primary school age to be 45 minutes and for secondary school age 75 minutes. In some journeys, the upper limit on planned journey times may be exceeded and in planning routes, the maximum time recommendations of 45 minutes for primary school children and 75 minutes for secondary school children will not be the overriding consideration. This would allow children and young people who could potentially share transport to do so.

However, if the Council departs from the national guidelines on journey times, it will ensure the planned route is not of such duration that the pupil is unable, because of stress or strain, to learn properly (whether at school or at home). The Council will take into consideration the pupil's age and stage of development. The 45-minute maximum planned journey time for primary-aged pupils contained in national guidance will be maintained and only exceeded in certain circumstances, such as journeys which enable a child to attend the setting which best meets their needs.

Where a child is eligible for travel assistance, the following types of assistance may be offered:

- Bus pass

- Train pass
- Training to cycle independently (reimbursement of bicycle and safety equipment), subject to agreement by parent/carer
- Independent travel training
- Personal Transport Budget including the reimbursing of mileage costs for parents or carers who are able and willing to take their child to school through a provision credited to a prepaid card and account
- Provision of a private bus, coach, or minibus
- Shared contract transport vehicle (coach, minibus, taxi) using collection point
- Shared contract transport vehicle (coach, minibus, taxi) using home collection
- Other bespoke travel options that enable travel and the development of travel skills and independence like a Travel Buddy
- Provision of taxis (single or shared) or licensed private hire car (in exceptional circumstances)

Where a bus or train pass is not appropriate, such as where a child is travelling to an out of Borough school, parents can receive a Personal Transport Budget and a Prepaid card to pay for the cost for their child to travel to school/college.

### **Personal Transport Budget (“PTB”)**

Where re-imbursement is the most cost-effective method of providing home to school travel assistance, for example where no public transport service or contracted vehicle is available, parents who take their child to school by car may receive a personal transport budget with a financial amount loaded to a prepaid card to use to take and collect their child to and from school. The amount loaded on the card in replacement of mileage claim will be mileage rates based on either Her Majesty's Revenue and Customs (HMRC) rates, or, agreed on an individual basis with parents where the alternative would be high-cost individual transport. Mileage will be calculated by the Council and will be costed based on two or four journeys per day (depending on circumstances) using the shortest road route from the home address to the school. For car users taking more than one child, only a single application will be considered per family.

Taxis will only be provided if there is no alternative mode of transport which provides a suitable journey to school or if a child's medical condition and/or disability means that he/she is unable to travel using the alternative modes of assistance that are available.

No bus/train tickets will be issued for part journeys of one mile or less unless that route has been deemed to be an unsafe walking route or unless a child cannot walk the distance due to special educational needs, disability, or mobility problems.

Provision will be reviewed periodically and if a more economical mode of transport becomes available then the parent will be given notice of a change to the mode of transport.

A parent or carer may choose to accept the personal transport budget instead of arranged travel assistance by the Council. This enables families to make their own arrangements to facilitate travel and access to education. A family can be supported to explore the various options available to establish the transport arrangements.



Any arrangements made by the parent using the personal transport budget are the responsibility of the parent. It is the parent/guardian's responsibility to ensure that the manner by which they choose to get their child/children to/from school is safe and their child/children are protected from harm.

Where there are two or more children living at the same address and attending the same school and the independent travel allowance has been agreed for one child, additional travel assistance will not be provided for the other children as all children would be expected to travel together.

If the parent transports siblings to different schools the allowance due would be based on the shortest road distance between home and school A, plus the shorter road distance between school A and school B for each journey.

The travel allowance is based on the child's attendance being over 80% for the full year. Attendance records will be requested from the school at regular monthly intervals. The PTB will be paid monthly in advance based on existing card balance and attendance. If the child's attendance shows poor attendance in the Autumn or Spring terms than the parent may be requested to review the current arrangements

If a parent is in receipt of the PTB but is temporarily unable to transport their child to school due to a short-term illness or medical condition, assistance may be provided. Any request will be considered on a case-by-case basis.

Mileage reimbursement may be offered to parents/carers of pupils who are entitled to free home to school transport, where this offers best value for money to the Council.

The number of Personal Transport Budgets has increased since 2023 as families are taking advantage of the flexibilities Personal Transport Budgets offer.

Personal Transport Budgets encourage children and young people to become more independent and resilient in their future lives.

Comments from families currently receiving and benefitting from use of a Personal Transport Budget are indicative of the assistance that this support can provide:

*"I can now leave home for work on time. I do not need to wait for Havering passenger bus to turn up anymore, as PTB allows me to pay my next door neighbour to drop my daughter at school, since she will be driving her own children to the same school"* - Parent of a student with special educational needs and disabilities in Havering.

*"As a result of my son's sensory needs, he struggles with sharing transport with other children, and this is causing stress in his daily routine. However, I also have to take his younger brother to a different school, but I cannot be expected to be at two different places at the same time. I now use PTB to pay for his sibling breakfast club, by dropping him earlier at school. Since then, my son now enjoys his trips to school, and it increases the quality time we spend together as a family"* - Parent of a student with special educational needs and disabilities in Havering.

There are many examples on how the personal transport budget can be used flexibly, including:

*A parent's vehicle did not meet the ULEZ compliance required in the borough and as a result the personal transport budget covered the ULEZ fees as well as the fuel reimbursement as a temporary solution until the parents could afford a compliant vehicle. Important to the parents was the ability to be able to have quality time with the children spend during travelling the journey.*

Another example:

*With work commitments it was difficult to drop their child off at school so this family used a personal transport budget to give their eldest child pocket money to escort his younger brother via public transport to school.*

Many parents have to work and start times conflict with their children starting school. A number of parents who felt it was their duty to take their children to school opted for a personal transport budget and through this were able to put their child into breakfast club and was still able to get to work in time.

## **Independent Travel Training (ITT)**

Local authorities have a duty to encourage, enable and assist the participation of young people in education and training. This includes mainstream pupils, people with learning difficulties or disabilities up to the age of 25. Independent travel training aims to achieve this.

Independent travel is a valuable skill for preparing for adulthood, an essential employability skill, and provides greater opportunities for young people, not least increasing confidence in their abilities and reducing their sense of reliance on family members.

In line with the Council's aims and objectives to support independence and prepare young people for adulthood, and where appropriate employment, ITT will be expanded as an option from June 2024. The Council will identify young people who could benefit from ITT and contact their families with a view to undertaking a travel assessment.

The Council may also contact young people and their families who will be transitioning from compulsory education into Post 16 and a travel training assessment will be carried out, with the support of the family, to confirm the suitability of the young person for the travel training programme, taking into account the following criteria:

- Existing level of independent travel skills
- The likelihood of the pupil being eligible for SEN transport under the 16 to 19 policy
- The age of the pupil
- The distance between home and school
- The SEND of the pupil
- The route which the young person would need to undertake
- Journey times using public transport and the complexity of the journey
- The frequency of the journeys required.

This assessment would take place before the pupil undertakes the ITT programme, which would last for approximately four to six weeks. During the programme, the pupil will travel to and from their education or training provision each day with their dedicated one to one ITT trainer.

During the period when a pupil is taking part in the ITT, this will be their travel assistance offer. At the end of the ITT programme, the Council will review the pupil's progress with the family to decide if it is appropriate for the pupil to continue to travel independently. If it is not appropriate for the pupil to travel independently, their travel assistance offer will be reviewed. Although it is expected that most young people

would benefit from ITT, it is however acknowledged that for some young people, due to the nature of their SEND, ITT will not be appropriate.

## **Collection points**

Collection points are similar to bus stops, where the Council identifies designated pick-up and drop-off locations for the pupil to meet the bus or taxi rather than offering a door-to-door service. This reduces the time needed for the route to pick up the pupils and supports children and young people to become more independent and better prepares them for adulthood.

The Council will assess individual needs to determine suitability of routes for collection points. In most cases, collection points will be considered for children attending mainstream settings. Where a route has been identified as suitable for collection points to be introduced, the Council will consult with the parents and carers of children already on those routes over a four-week period on the introduction of a collection point and to ensure that the proposed arrangements are appropriate; for example, the location of the collection point, which should be no more than a maximum of one mile from the home. The Council will also ensure that it is aware of any individual circumstances which may mean that a collection point is not appropriate for a pupil or pupils on that route due for example to their additional needs.

Achieving this level of independence will not be possible for some children and young people with the most complex SEND needs, and in some cases parents' own mobility or disability may impact on them being able to accompany their child to a collection point. Where this is the case, the ambition for the service is to improve the range of options available for families to take responsibility for their own children's transport where this is desired and appropriate. In such circumstances, the Council will carefully consider and assess the individual child's needs as well as the mobility and or disability of their parents.

Following a decision to introduce a collection point, the Council will provide not less than 6 weeks' notification to families (which includes any school holidays that fall in the 6-week period) before the collection point is established. If a collection point is implemented, parents and carers who disagree that the transport offer is suitable for their child will be able to appeal.

Where a collection point is allocated, it is the parent's or carer's responsibility to make sure that their child travels to and from the collection point and transfers to and from the vehicle safely.

For parents who are temporarily unable to take their child to a collection point, no temporary assistance will be provided in those circumstances. This is because the child's special educational need or disability has not changed and the transport service from the collection point is available.

All collection points will be assessed in advanced for their suitability.

- Wherever a bus stop can be legally used as a collection point, it will be
- Minibuses can stop to collect and drop off on yellow and double yellow lines; vehicles cannot stop on red routes, white zig zags (near a zebra crossing) or school keep-clear hatchings

- The driver always plans not to cause obstructions to other road users while making a drop off or collection and will try to stop in parking areas or bays
- Collections or drop-off are always made kerb side
- Each collection point is physically assessed before being used in service; a driver will go out and access to see if the location is safe (for example, a well-lit public location, not too close to a junction or on the brow of a hill)
- The drivers complete dynamic risk assessments at the time of collections or / drop offs in the eventuality of any changes (new road layouts, another road user in the stopping space) and will slightly adjust the collection point if it is unsafe to stop.

### **Concessionary seats**

The Council provides transport for children who have a statutory entitlement to free home to school transport, where it is best value to use this mode of transport. If there are any spare seats available on these routes, they are available for purchase by pupils who do not meet the statutory entitlement criteria. Spare seats will be allocated on an annual basis; however, a seat may be withdrawn at any time at short notice if it is required by a pupil with a statutory entitlement to transport. Places are offered according to published criteria.

## **Transport Standards**

This section sets out some of the operational standards that we will follow in delivering our statutory responsibilities for home to school transport. We want to make this transparent for all parents and carers so that they understand how the service operates.

### **Provision of contracted transport vehicles (coaches, buses, minibuses, and taxis)**

When a child is entitled to home to school transport under the Council's policy, the Council will provide suitable transport and seek to ensure this is as cost effective as possible. The transport provided may take the form of a bus pass, train pass, seat on a contract vehicle, for instance a hired coach, a minibus or shared taxi. A travel allowance through a personal transport budget can also be provided for children when requested by parents or carers and where it is more cost effective.

Provision of transport for part- time hours:

Home to school travel assistance will only be provided at the start and finish of the normal school/college day. The provision of transport for part-time hours does not fall within local authorities' statutory duties and will not be provided.

Schools/colleges and parents and carers should take this into account when bespoke hours are being set for a child. Where families wish to have more flexible travel arrangements, a personal transport budget can be requested.

## **Provision of transport for after school and non-educational activities**

In accordance with statutory guidance, home to school transport will only be provided at the start and finish of the normal school or college day. The provision of transport for non-statutory education or clubs does not fall within local authorities' statutory duties and will not be provided unless it provides flexibility through a Personal Transport Budget. Parents are expected to make travel arrangements for their children in these circumstances. Where families wish to have more flexible travel arrangements, a personal transport budget can be requested.

## **Home address and house moves**

In accordance with statutory guidance, home to school transport will only be provided from and to a single address at which the child or young person is habitually and normally resident. Where a child splits their time equally between addresses, transport will be assessed from the address which is registered with the school as the home address or, prior to admission, the address used on the relevant school admission application form. However, there can be some flexibility based upon individual circumstances and each case will be considered independently to achieve the best outcome for the child.

## **For children without an EHCP**

Assistance with travel will not normally be agreed to a child's existing school if a house-move results in the child living beyond the statutory walking distance from school but there are other nearer schools with an available place.

However, assistance may be agreed if the child is in years 6, 10 or 11 at the time of the move and if there are extenuating circumstances that the Council deem sufficient to provide assistance on a discretionary basis. Where parents wish their case to be considered on this basis, they should provide details along with independent evidence of their case.

Assistance with travel may also be agreed even if the school attended is not the nearest suitable with places in certain circumstances. If the move is an enforced temporary council move within Havering that is anticipated to last less than 6 months or where a parent has moved to a refuge in Havering, and the distance from home to school meets the agreed criteria, assistance with travel may be considered. Evidence of an enforced temporary council move/move to a refuge must be provided. Travel assistance agreed under this provision may only be agreed for a fixed period and will be subject to periodic review.

## **For children with an EHCP**

If a child with an EHCP moves address, the SEND team will review the plan to consider if the school being attended is still the nearest suitable school that can meet the child's needs. If it is, and the child continues to meet the criteria to be eligible for travel assistance then assistance will be offered from the new address.

## **Pick up and drop off timing**

Routes to and from school and pick-up and drop-off times are planned by the transport provider to be as efficient as possible for all students travelling on the vehicle. Because of this, it is not possible to accommodate the individual circumstances of each family, such as work commitments or taking other children to and from school. Where families wish to have more flexible travel arrangements, a travel allowance through a PTB can be requested.

## **Dual and link placements, inclusion, and alternative provisions**

Dual placements are where a child or young person attends more than one school or where a school arranges a college link placement for a pupil. Dual placements may require additional transport assistance, such as transport at earlier or later times of the school day. Schools are responsible for arranging and paying for the cost of such transport. Where a pupil is on the roll at one school but visits another school for inclusion or link purposes, the school where the pupil is usually based will be responsible for arranging and paying for transport in which the Local Authority can provide guidance and support in this matter. These arrangements also apply to alternative provisions.

## **Children attending residential placements**

Children who attend a residential school that has been named in their EHCP as their nearest suitable school will be entitled to travel assistance to take them to and from school as follows:

- Weekly/Fortnightly boarding placements – travel assistance will be provided for children to travel to school on a Sunday evening/Monday morning, as directed by the school, and to travel home at the end of each week/fortnight, or earlier as directed by the school for unplanned or planned earlier closures
- Termly residential placements – travel assistance will be provided for 12 single journeys to cover travel home at the start and end of each term and half term
- Permanent (52 week) residential placements – travel assistance will be provided for 12 single journeys each academic year. These are at the discretion of the parent and school but, where contracted transport is needed, this needs to be booked at least 10 days in advance through Havering's Transport Coordination Centre
- Any additional trips will be the responsibility of the parent.

## **Passenger assistants**

Passenger assistants (escorts) are not automatically provided. In considering whether a route needs a passenger assistant, the Council generally takes account of the following:

- A child's medical needs, particularly where rescue medication is required

- Where an individual child's needs create a clear danger or health and safety risk to themselves and other passengers on the vehicle
- Where the number of children travelling together necessitates the provision of a passenger assistant to help manage a group children and their specific support needs on the journey.

Passenger assistants for SEND purposes are assessed on a case-by-case basis. Provision of a passenger assistant at any one time does not guarantee that this will be an ongoing arrangement; the requirement can be reassessed at any time in the academic year, and in the event of any change in circumstances.

## **Shared travel**

Ordinarily children and young people travelling to and from school or college will be expected to share their transport with other children or young people. This promotes integration and independence, social skills as well as being more sustainable and cost effective. Conversely, travelling on their own may lead to social isolation of a young person and a delay in development of essential social behaviours and skills. It also impacts on an individual's ability to access other forms of travel and to travel with others.

In developing a travel assistance policy with a focus on enabling independence and preparing for adulthood such as employment or shared living away from home, individual transport will only be agreed in extenuating circumstances. This would normally be linked to other medical needs or where the child or young person is receiving funded one-to-one support at their educational placement.

## **Behaviour of children on transport**

Children, parents, carers, schools, transport operators and the Council all have a role to play in ensuring the appropriate behaviour of children on school transport.

While passenger assistants have a responsibility for safeguarding children and maintaining behavioural standards on the vehicle during the journey, schools will take whatever steps possible to ensure the appropriate behaviour of their students on home to school transport; and will take appropriate action should incidents of poor behaviour be reported. Appropriate action may include the use of sanctions, written warnings, and exclusion from transport. Parents are also expected to take responsibility for their child's behaviour while travelling.

Where a child's behaviour is directly as a result of a known and diagnosed medical condition or disability and it is agreed by medical advisors and teachers that the child is unable to control their behaviour, the Council will undertake a needs assessment and will consider making alternative arrangements, for example, providing the parent or carer with a personal transport budget to make their child's own travel arrangements.

The Council recognises that general poor behaviour, not directly attributable to a child's particular special educational needs and circumstances, cannot be taken into account when determining an appropriate safe travel plan. The Council will expect clear standards of acceptable behaviour in the interests of ensuring a safe journey for all pupils and staff as well as other road users.

Reasonable adjustments will be made in cases where behaviour problems persist, and it is judged that the safety of the other passengers is endangered. Where reasonable adjustments cannot be made to deal with behaviour, transport can be withdrawn in individual cases and the Council will provide resources for parents to make alternative travel arrangements.

Pupils exhibiting dangerous behaviour will be subject to two written warnings issued by the Council. If a third warning is given, the transport offer will be reviewed and may be withdrawn. This action shall only be taken as a last resort and is not considered punishment of the student but is for the safety of all concerned. In this instance the Council would provide a travel allowance through a PTB instead.

In consultation with schools, the Council may instigate permanent or fixed periods of exclusion from transport. Parents or carers will be responsible for transporting their children during any period of exclusion and ensuring their child's regular attendance at school.

## **Travel assistance agreed in error**

Travel assistance that has been agreed in error or as a result of incorrect, misleading, or fraudulent information, or as a result of an assessment error, will be withdrawn. Havering Council will seek reimbursement of any costs that have been obtained fraudulently and reserve the right to take legal action against any person who has made fraudulent application for free home to school transport.

## **How we use your data**

Havering County Council respects your rights and is committed to ensuring that it manages your data in accordance with the Data Protection Act 2019 and the General Data Protection Regulation (GDPR).

# **Travel Assistance Policy for learners aged 16 to 25**

## **Introduction**

The Council's annual Post-16 ensures greater consistency of practice and equity of provision of home to school travel assistance for pupils aged 16 to 25. It encourages the use of more environmentally sustainable forms of transport, supporting young people to walk, cycle and use public transport such as local buses and trains,



There are also national schemes that support young disabled adults who are in receipt of the higher rate mobility for the disability allowance/personal independence payment to [access funding for driving lessons](#).

Local authorities do not have to provide free or subsidised post-16 travel support but do have a duty to review, prepare and publish an annual transport policy by the 31st of May each year. This policy statement gives information about the schemes and support available within Havering for the provision of college travel assistance for learners aged 16 to 19 and 19 to 25. It outlines the transport schemes and assistance available for post-16 learners who live and study in Havering or those learners who live in Havering and attend an educational establishment outside of the county if it is the nearest provider offering the appropriate course.

In determining the Havering policy, we have taken into account all relevant matters including the Council's aims and objectives to support independence and prepare young people for adulthood, and where appropriate employment.

The full national Home to School Transport guidance is set out for reference on the link below:

[\*\*Post-16 transport and travel support to education and training\*\*](#)

## **16 to 19 travel assistance**

The Council will only provide travel assistance for learners of sixth form age where it considers that travel assistance has been demonstrated as necessary to enable the young person to reasonably access their education or training provision.

## **Assessment of Eligibility**

When assessing whether the need for travel assistance has been demonstrated, the Council will have regard to, amongst other things:

- whether the student is currently in receipt of any funding from the 16-19 Bursary Fund and to what value;
- whether the young person has received travel training, is able to travel independently and his/her ability to access public transport;
- the nature of the young person's special educational needs, disability and/or learning difficulty. This includes the physical ability of the young person to walk, accompanied as necessary by a responsible adult to the learning provision or a pickup point;
- distance and journey time from the young person's home to establishments of education and training;
- the cost of assistance and alternative means of transport;
- the nature of the route or alternative routes which the young person could reasonably be expected to take;
- the reasons why a young person wishes to attend one establishment rather than another;
- whether the establishment is named in the student's EHCP and whether there are alternative suitable schools or colleges that the student could attend;

- supporting evidence from professionals involved with the young person and their family;
- if there is a nearer education provision which is suitable and can provide the same or similar qualification(s) or course;
- the best use of the council's resources;
- transport links – the ease of access to public transport;
- the distance measurement between home and learning placement.

**This is not an exhaustive list, and requests will be considered on individual circumstances.**

When travel assistance is provided, it will normally only be provided at the start and end of the school/college day, for example in a Further Education college setting a shuttle bus service may be used, rather than individual taxi services. Pupils may have to wait for either the next shuttle bus or until the end of the school/college day to access homeward travel.

Only in exceptional circumstances connected to an individual's learning difficulties and/or disabilities and where no alternative mode of travel is available, will taxi travel be considered. This will normally be on a shared taxi basis. Solo transport provision will only be considered for those pupils in receipt of funded [Independent Personal Support Budget](#) (IPSB) funding or those that present with complex medical and/or health needs.

## **Forms of travel assistance**

Where travel assistance has been demonstrated as necessary, the Council will offer support to children and young people to travel to their educational placement. If entitled, travel assistance may be in place until the end of a course, in which case an application will not be required for each year of study. Support will be provided in the form of:

- Post-16 personal transport budget\*
- Bus / train pass
- Training to cycle independently (reimbursement of bicycle and safety equipment), subject to agreement by parent/carer.
- Independent travel training, fully funded and offered on a 1-2-1 basis.
- Other bespoke travel options that enable travel and the development of travel skills and independence, e.g., Travel Buddy.
- Driving lessons (age dependent)
- Provision of a private bus, coach, or minibus.
- Shared contract transport vehicle (coach, minibus, taxi) using collection point.
- Shared contract transport vehicle (coach, minibus, taxi) using home collection.
- Provision of taxis or licensed private hire car (in exceptional circumstances)

\*The Council will exercise discretion to provide travel assistance in the form of an post-16 personal transport budget to support families and young people to make their own transport arrangements to develop independence and prepare for adulthood pathways.

## **Financial Contributions**

Most Local Authorities have some form of charging put in place to contribute to the travel for Post 16 Students. However Havering Council have decided not to introduce any form of charging for Post 16 Students on the feedback received through the Home To School Transport Consultation and will continue to support the transport for this cohort of students in the most cost effective manner.

Havering Council will keep the contributions to Post 16 travel under constant review and have the right to change this depending on multiple factors including demand for Post 16 travel.

## **Bursary and Travel Support**

All students should discuss with their school or college student support service whether they may be eligible with transport costs from the 16 to 19 Bursary Fund. There are two types of bursary schemes highlighted in this policy statement for your reference and investigation:

### **The 16 to 19 Bursary Fund\***

What is a bursary?

A bursary is money that you, or your education or training provider, can use to pay for things like:

- clothing, books, and other equipment for your course,
- transport and lunch on days you study or train.

### **16 to 19 Bursary Fund Overview ([GOV.UK](#))**

The 16 to 19 Bursary Fund provides financial support to help young people overcome specific barriers to participation so they can remain in education. You could get a bursary to help with education-related costs if you're aged 16 to 19 and:

- studying at a publicly funded school or college in England - not a university (a publicly funded school is one that does not charge you for attending it).
- on a training course, including unpaid work experience.

### **There are two types of 16 to 19 bursaries:**

1. A bursary of up to £1,200 a year for young people in one of the defined vulnerable groups below:

- you are in or you recently left local authority care.
- you get Income Support or Universal Credit because you're financially supporting yourself.
- you get Disability Living Allowance (DLA) in your name and either Employment and Support Allowance (ESA) or Universal Credit.
- you get Personal Independence Payment (PIP) in your name and either ESA or Universal Credit.

2. Discretionary bursaries which institutions award to meet individual needs, for example, help with the cost of transport, meals, books, and equipment. Your education or training provider decides how much you get and what it's used for.

**If you're 19 and over you'll only be eligible for a discretionary bursary and could get this if you either:**

- are continuing a course you started aged 16 to 18 (known as being a '19+ continuer')
- have an Education, Health, and Care Plan (EHCP). Your school or college will have their own criteria for discretionary bursaries. They'll look at your individual circumstances - this usually includes your family income.

Ask student services at the educational establishment about their criteria and any evidence you will need. Schools and colleges are responsible for managing both types of bursaries. Young people who want to apply for support from the bursary fund should contact their chosen school or college to make an application.

**School Bursary Funding** - Contact your Head of Sixth Form or Bursar in the first instance.

For bursary support at colleges see 'College Contact Information' for specific contact details.

## Concessionary fares and travel schemes

### TfL Travel Mentoring

TfL offers free travel mentoring to support people using public transport so they can gain confidence to become independent travellers. They offer service such as advice on planning a journey using an accessible route and mentors to accompany travellers to practice the journeys a few times.

Mentoring can be provided Monday to Friday from 09:00 to 17:00. To find out more please contact:

**Phone:** 020 354 4361 (TfL call charge applies);

**Email:** [travelmentor@tfl.gov.uk](mailto:travelmentor@tfl.gov.uk)

### National Railcard discounts

There are different railcards that suits different ages and needs which provides 1/3 discount on off-peak pay as you go travel, usually **after 09:30am**. More information and how to apply can be found on the TfL website: [National Railcard discounts - Transport for London \(tfl.gov.uk\)](https://tfl.gov.uk/national-railcard-discounts)

TfL offer free or discounted Travel for schools if the school is registered with Transport for London, click on the link below

**TfL free-and-discounted-travel**

## **Traineeships and Apprenticeships**

If a young person is accepted onto an apprenticeship or traineeship and the Council assesses a young person aged 16 to 19 years as eligible for travel assistance under its policy, the assistance offered in the first instance will be in the form of a personal transport budget to support families and young people to make their own transport arrangements as they transition to employment.

## **Independent Travel Training**

In line with the Council's aims and objectives to support independence and prepare young people for adulthood, and where appropriate employment, ITT will be expanded as an option. The Council will identify young people, and those who will be transitioning from compulsory education into post-16 and above who could benefit from ITT and contact their families with a view to undertaking an ITT assessment. Families can also self-refer if they wish to access ITT for their child.

An ITT assessment will be carried out with the support of the family and/or school, to confirm the suitability of the young person for the 1-2-1 ITT programme, taking into account the following criteria:

- The likelihood of the pupil being eligible for SEN transport under the 16 to 19 policy.
- Existing level of independent travel skills.
- The age of the pupil.
- The distance between home and school.
- The SEND of the pupil.
- The route which the young person would need to undertake.
- Journey times using public transport and the complexity of the journey.
- The frequency of the journeys required.

This assessment would take place before the pupil undertakes the ITT programme, which would last for approximately four to six weeks. During the programme, the pupil will travel to and from their education or training provision each day with their dedicated one to one ITT trainer both in the morning and afternoon from the home to the school and vice versa.

During the period when a pupil is taking part in the ITT, this will be their travel assistance offer. At the end of the ITT programme, the Council will review the pupil's progress with the family to decide if it is appropriate for the pupil to continue to travel independently. If it is not appropriate for the pupil to travel independently, their travel assistance offer will be reviewed. We will always listen and support individuals through this process and give feedback on progress. Although the vast majority of young people are successfully supported to achieve and benefit immensely from becoming independent travellers it is however acknowledged that for some young people, due to the nature of their SEND, ITT will not be appropriate. Where a young person successfully completes the ITT programme, they will receive a Post-16 Travel Allowance or their public transport fares will be funded.

## **Collection points**

Collection points are like bus stops, where the Council identifies designated pick-up and drop-off locations for the pupil to meet the bus or taxi rather than offering a door-to-door service. This reduces the time needed for the route to pick up the pupils and supports young people to become more independent and better prepares them for adulthood.

The Council will assess individual needs to determine suitability of routes for collection points. In most cases, collection points will be considered for young people attending mainstream settings. The Council will also ensure that it is aware of any individual circumstances which may mean that a collection point is not appropriate for a pupil or pupils on that route due for example to their additional needs.

Achieving this level of independence will not be possible for some young people with the most complex SEND needs, and in some cases parent/carers' own mobility or disability may impact on them being able to accompany their child to a collection point. Where this is the case, the ambition for the service is to improve the range of options available for young people to take responsibility of their own travel assistance where this is desired and appropriate. In such circumstances, the Council will carefully consider and assess the individual young person's needs as well as the mobility and or disability of their parents/carers.

All collection points will be assessed in advanced for their suitability.

- Wherever an existing bus stop can be legally used as a collection point, it will be.
- Minibuses can stop to collect and drop off on yellow and double yellow lines; vehicles cannot stop on red routes, white zig zags (near a zebra crossing) or school keep-clear hatchings.
- The driver always plans not to cause obstructions to other road users while making a drop off or collection and will try to stop in parking areas or bays.
- Collections or drop-off are always made kerb side.
- Each collection point is physically assessed before being used in service; a driver will go out and access to see if the location is safe (for example, a well-lit public location, not too close to a junction or on the brow of a hill).
- The drivers complete dynamic risk assessments at the time of collections or / drop offs in the eventuality of any changes (new road layouts, another road user in the stopping space) and will slightly adjust the collection point if it is unsafe to stop.
- A collection point should not be more than one mile from the home address.

Where a route has been identified as suitable for collection points to be introduced, a further 4 week consultation will be undertaken with the families and young people on that route to ensure that the proposed arrangements are appropriate, for example the location of the collection point. Once a collection point route has been established, that route will remain a collection point and no specific consultation will be undertaken. This means that any young pupil joining the route will be informed that it is a collection point route, and they will be expected to use the collection point. Families will have the opportunity to make representations via the Council's appeals process.

## **19 to 25 travel assistance**

## **Assistance with transport for students over the age of 19 with learning difficulties or disabilities**

The Council's duty and powers in relation to post-19 (19 to 25) travel assistance apply to young adults and young people with special educational needs and disabilities aged between 19 and 25 inclusive who have an Education Health and Care Plan.

The Council is required to provide assistance where needed to students who attend a local authority maintained or assisted further or higher education institutions or an institution within the further education sector. The Council must also provide assistance where necessary to students with EHCPs where the Council has secured the provision of education or training at an institution outside the further and higher education sectors and the Council is providing boarding accommodation in connection with that education or training. In these cases, the Council will consider whether assistance with travel is necessary to enable the young adult to maintain attendance at their education placement. If it is identified that assistance is necessary, then there would be no charge/ financial contribution expected from the young adult.

The post-19 (19 to 25) Home to School Travel Policy is focused upon a needs-led approach in which the individual needs of each young adult are assessed to inform the appropriate form of travel support, as we move away from standard provision in favour of a policy which recognises that young people are, in many cases, more capable of achieving independent travel than pupils of statutory school age.

The overall intention of the adult transport duty is to ensure that those with the most severe disabilities with no other means of transportation can undertake further education and training after their 19th birthday to help them move towards more independent living.

For post-19 students starting a new course, you must evidence why it is necessary for the Council and not the student to make travel arrangements. To assess this and understand the individual circumstances, we would need to know:

- the nature of the route, or alternative routes, which the student could reasonably be expected to take to college.
- what other arrangements you have considered or tried and why they are not suitable.
- if there is a family member or carer who is willing and able to transport the student and if not, why it would not be possible or reasonable for them to do so.
- whether the student is in receipt of higher rate mobility component of the Personal Independence Payment or Disability Living Allowance, the purpose of which is to assist those who have mobility problems, with severe difficulty walking or who need help getting around outside. We would normally expect this benefit to be fully utilised and if there are any factors limiting its use you should provide details of them.
- whether there is a 'Motability' vehicle for which the student may or may not be the driver.
- whether the student has support from the Council's social care department to assist with travel.
- any other needs or circumstances that you consider need to be taken into account and the Council consider any recent supporting evidence that you provide.

If travel assistance is provided, contribution towards the cost of travel assistance will not apply.

The council will consider whether to exercise its discretion in exceptional circumstances to pay all or part of the reasonable travelling expenses of a young adult with an EHCP attending an institution outside the further education sector or which is not a council-assisted or maintained institution based on the individual circumstances including the factors set out above.

## **Appeals**

Parents/carers of children who live in Havering and who wish to appeal a decision that did not grant Travel Assistance regarding one of the following, may apply for their case to be considered at a Stage 1 appeal in relation to any of the following:

- their child's eligibility
- the distance measurement in relation to statutory walking distances and
- the safety of the route.
- the travel arrangements offered

During an appeal about an application for travel assistance, travel assistance will not be provided to the child/young person unless the appeal concerns the travel arrangements offered, in which case the offered arrangements will be available pending the appeal decision. Where the appeal concerns a change to existing travel arrangements, then the previously agreed travel arrangements will continue until the review is complete

### **Stage one: Case review by a senior officer**

The request for a review can be made either

- online at [www.havering.gov.uk/schooltravelassistance](http://www.havering.gov.uk/schooltravelassistance)
- or verbally via a telephone call on 01708 434785

All requests must be made within 20 working days of the original notification of a decision. The request must include the reasons for the review and any additional information that is felt not to have been considered when the decision was made.

Following the councils review, the outcome will be confirmed, in writing, within 20 working days of the receipt of the appeal. This will outline:

- The nature of the decision reached
- How the review was conducted
- What factors were considered
- Information about other departments and/or agencies consulted
- The rationale for the decision

### **Stage two: Case review by an independent panel**



If the parent/carer remains unhappy with the decision at stage one of the appeal, they can complete a 'Stage 2 appeal form' to request that their case is escalated for consideration by an independent panel.

The independent appeal panel will be independent of the original and stage one decision-making process (but are not required to be independent of the local authority) and suitably experienced. Panel members may include officers of the local authority along with Havering Council councillors and an Independent Lay Panel Member. Including officers on independent panels will strengthen the experience and knowledge of the panel and allow appeals to be heard more rapidly as there will be a larger number of panel members to draw on. Councillors will continue to be part of appeal hearings.

Requests for a stage two appeal must be made within 20 working days from receipt of the local authority's stage one written decision.

Stage two appeals will normally be considered within 40 working days of receipt of the parent/carers request for it to be escalated. Any additional supporting documents should be supplied by the parent at least 10 working days prior to the review hearing date. A copy of the paperwork that has been submitted to the stage two appeal panel will be sent to the parent at least seven working days prior to the review.

The stage 2 appeal panel will give equal consideration to all case reviews whether conducted in the presence of all parties or heard in the absence of one/both parties. If the panel considers that further information is required, the case will be adjourned so that the information can be made available.

The clerk at the stage two appeal will write to the parent/carer, normally within five working days of the review, setting out:

- the decision reached
- how the review was conducted
- information about other departments and/ or agencies that were consulted as part of the process
- what factors were considered
- the rationale for the decision reached and
- information about the parent/carer's right to put the matter to the Local Government Ombudsman (see below).

## **Local Government Ombudsman**

There is a right of complaint to the Local Government Ombudsman, but only if the complainant considers that there was a failure to comply with the procedural rules or if there are any other irregularities in the way the review has been handled. Further advice is available on the Local Government Ombudsman website or on the Local Government Ombudsman advice line on 0300 061 0614.

If the complainant considers the decision of the independent panel to be flawed on public law grounds, the complainant may also apply for judicial review. It is recommended that independent legal advice be obtained before taking this step.

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Name of Consultation			
Home to School Transport Consultation			
Service	Education	Owner	Paul Young
Date Consultation was Published	Main 12/10/23 OoB 09/02/24	Date Closed	Main 17/11/23 OoB 15/03/24
Repository	Citizen Space		
Analysed by	Sue Verner, Customer Insight Officer Engagement and Participation		
Date Analysed	19 March 2024	Analysis Sent to	Trevor Cook Paul Young
Overview	The public consultation was launched to gather views on the Council's draft Home to School Transport policy 2025/26.		
Responses Received	There were 575 responses to the consultation in total		
Responses Analysed	575		
Basis of Exclusion	There were no exclusions		

It should be noted that only comments made on the specific proposals will be taken into consideration when reviewing consultation responses. If we receive comments that are considered discriminatory, offensive or defamatory, these remarks will not be included in any reports or published. A discriminatory comment is one which could include words or phrases which are likely to:

- be offensive to a particular group
- be abusive, insulting or threatening
- apply pressure to discriminate
- stir up hatred or contempt of a particular part of the community

Comments should also not include any other offensive material or content which could be considered defamatory. Any discriminatory, offensive or defamatory comments may be returned to you with a request that they be resubmitted containing only material considerations or such comments will be redacted from the response. We reserve the right to not publish online comments or parts of comments which are not considered suitable for public view.

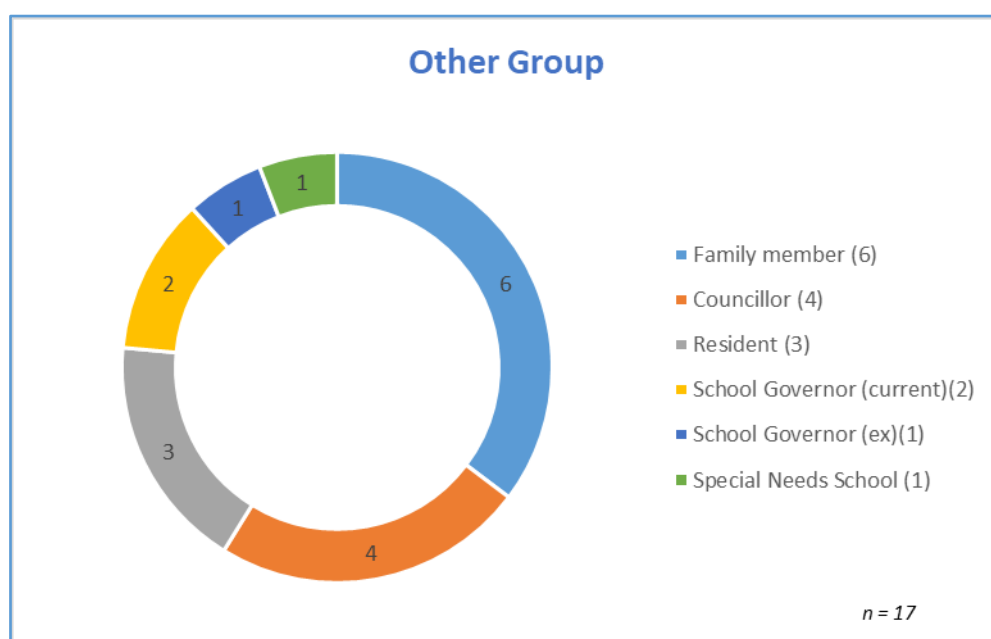
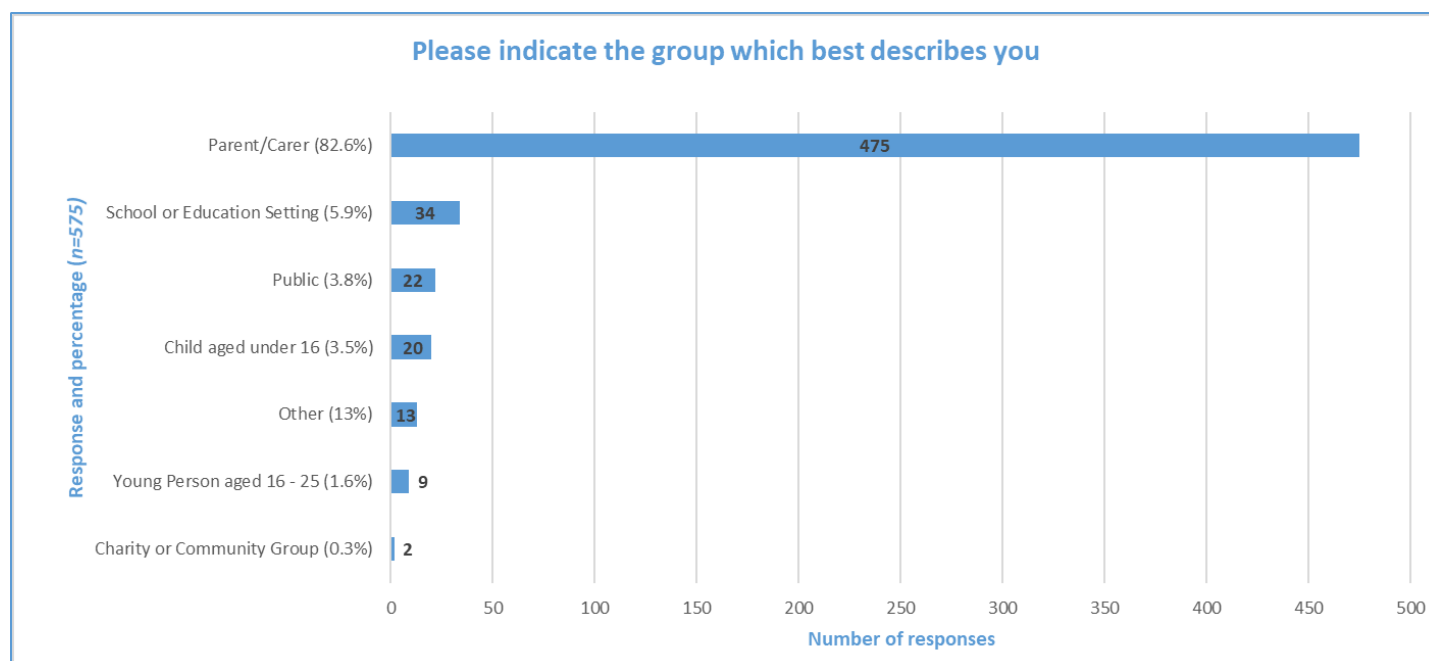
## Capacity

**Question: Please indicate the group which best describes you**

### Analysis

The majority of respondents were parent/carers (82.6%), followed by those representing a School or Education Setting (5.9%) and members of the public (3.8%).

17 respondents choose 'other' and stated the group which best describes them.



## Transport Assistance

**Question: Do you currently receive transport assistance, or have done in the past three years?**

### Analysis

223 respondents (39%) currently receive transport assistance, or have done in the past three years.

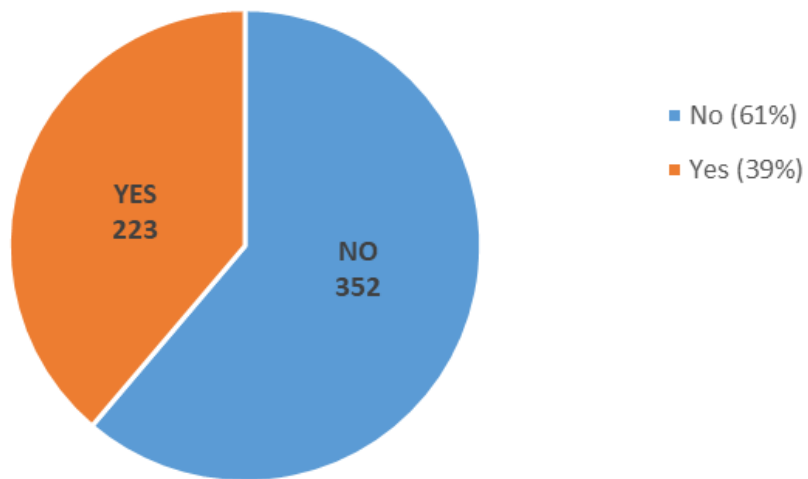
Of these 223 people, almost half (49%) receive a seat on a bus outside a dwelling followed by 50 respondents (22%) who receive a seat on a taxi outside a dwelling.

13 respondents choose 'other' and 21 people left comments in the specified box. Of these, many reiterated the transport assistance options they had already chosen, with 8 respondents stating a different option.

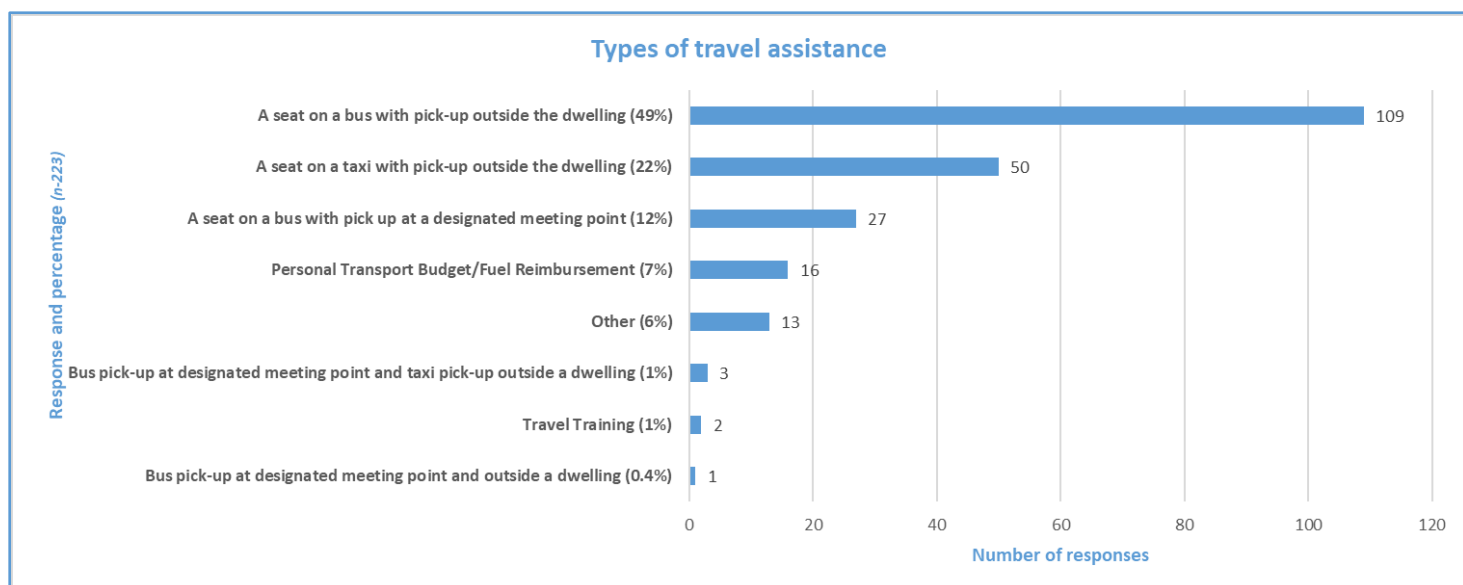
### Notes

5 respondents stated they did not receive transport but choose options to suggest they were receiving transport; analysis was adjusted to reflect this.

**Do you currently receive transport assistance, or have done in the past three years?**



*n=575*



Comments - other options	
Also chaperoned/with help	2
FIG transport	1
Took children myself	1
Traveller Gypsy school transport	1
Walking	1
Wheelchair accessible bus	2

## Travel Training

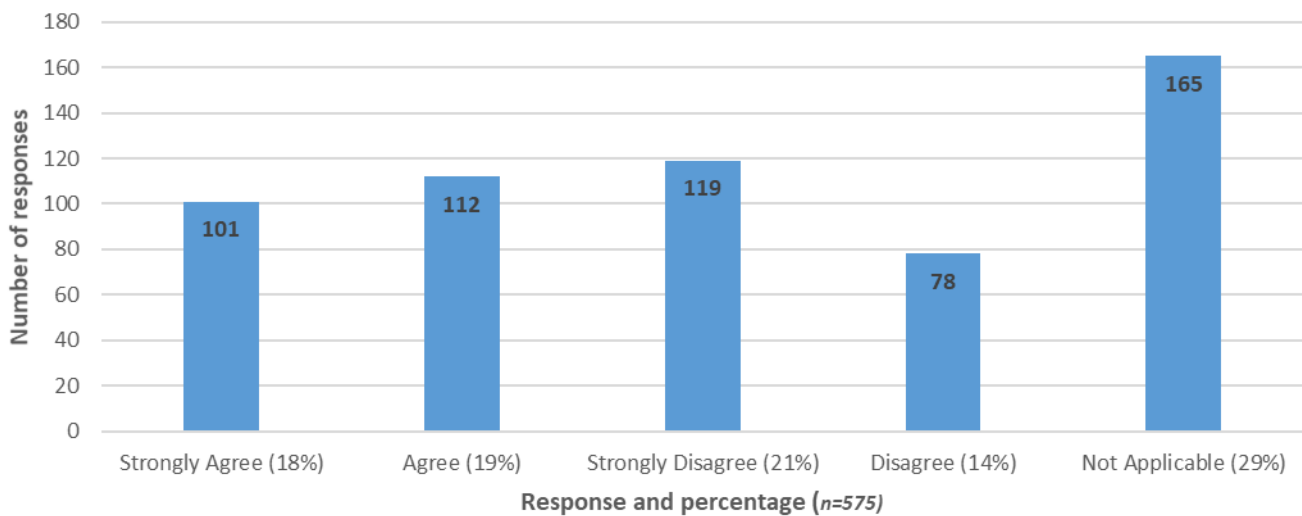
**Question: To what extent do you agree with the following statement:  
Undertaking travel training would support my own, or my child's independence.**

### Analysis

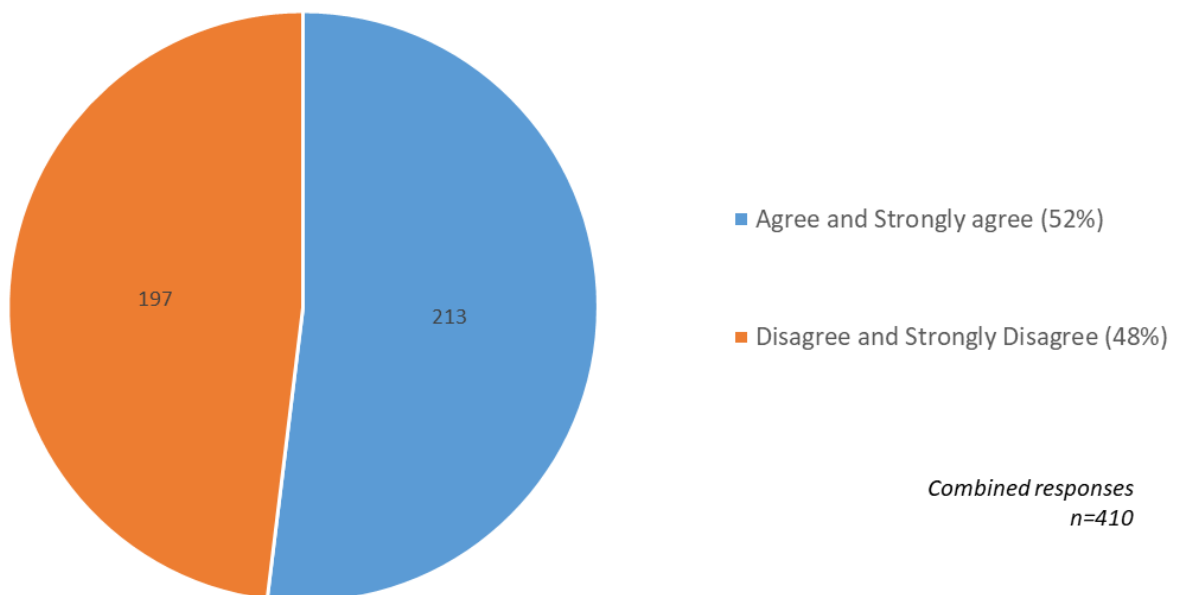
This question was not applicable to 165 people, almost a third of respondents (29%).

Of the 410 consultees whom it applied to, 213 (52%) strongly agreed/agreed with this statement, whereas 197 (48%) strongly disagreed/disagreed with this statement (see second chart).

**Undertaking travel training would support my own, or my child's independence**



**Undertaking travel training would support my own, or my child's independence**



## Travel Training

**Question: To what extent do you agree with the following statement:  
Undertaking travel training would not be suitable for me or my child.**

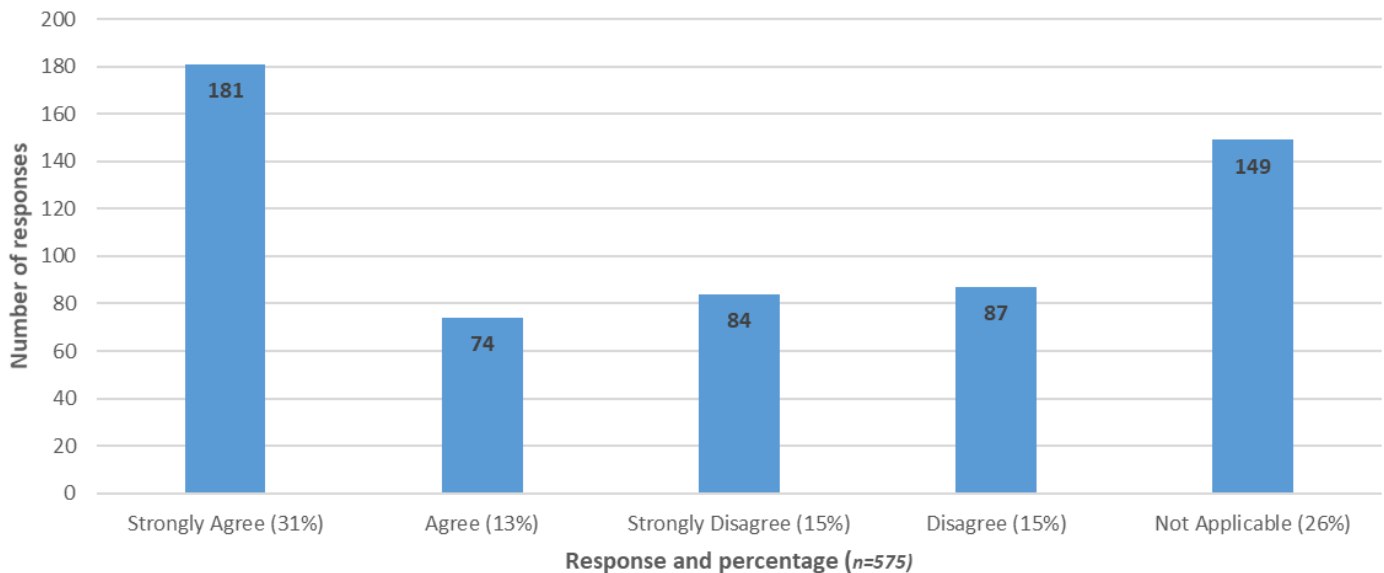
### Analysis

This question was not applicable to 149 people, approximately a quarter of respondents (26%).

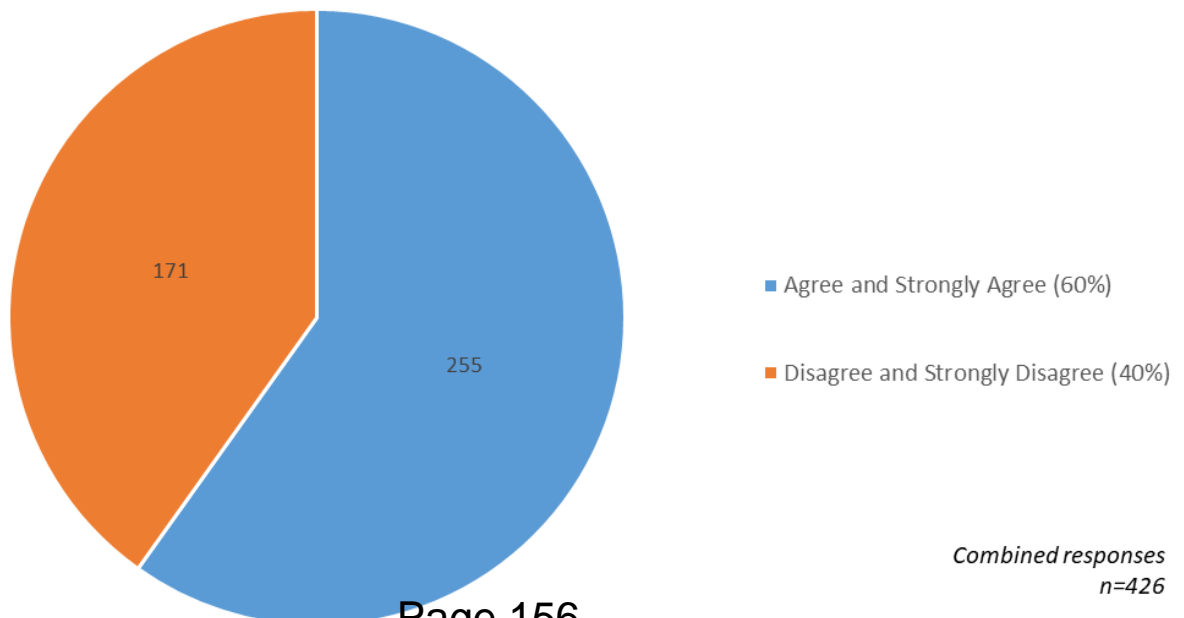
Of the 426 consultees whom it applied to, 255 (60%) strongly agreed/agreed with this statement. Of these respondents, 55 (22%) said they had a disability, impairment or health condition. 48 were parent/carers (87%), 2 were young people between the age of 16-25 (4%) and 5 were under 16 years old (9%).

171 (40%) strongly disagreed/disagreed with this statement (see second chart).

### Undertaking travel training would not be suitable for me or my child



### Undertaking travel training would not be suitable for me or my child





## Personal Transport Budget (PTB)

**Question: How much do you agree with the following statements:**

**Using a personal transport budget to arrange my own or my child's transport would...**

### Analysis

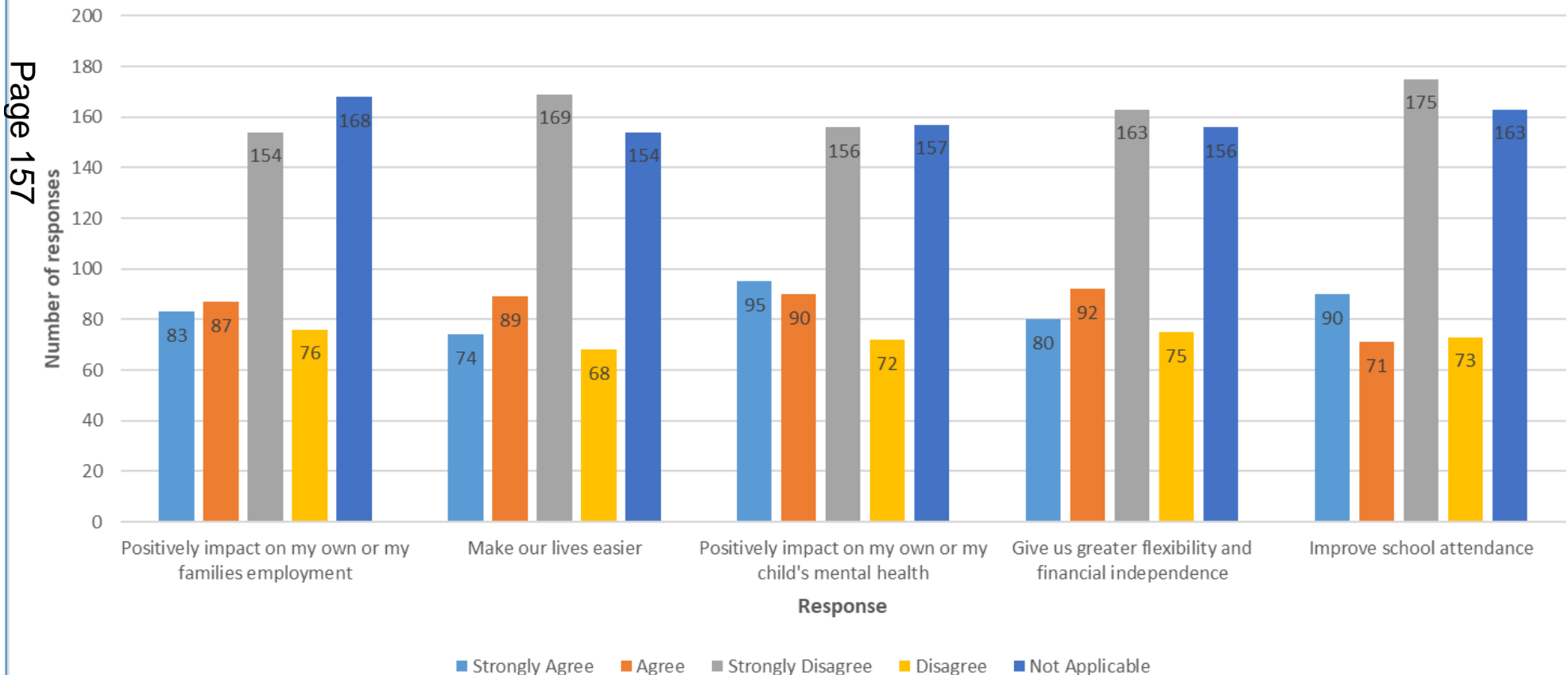
The response from those people whom this question applied to was overwhelmingly strongly disagreeing with all statements.

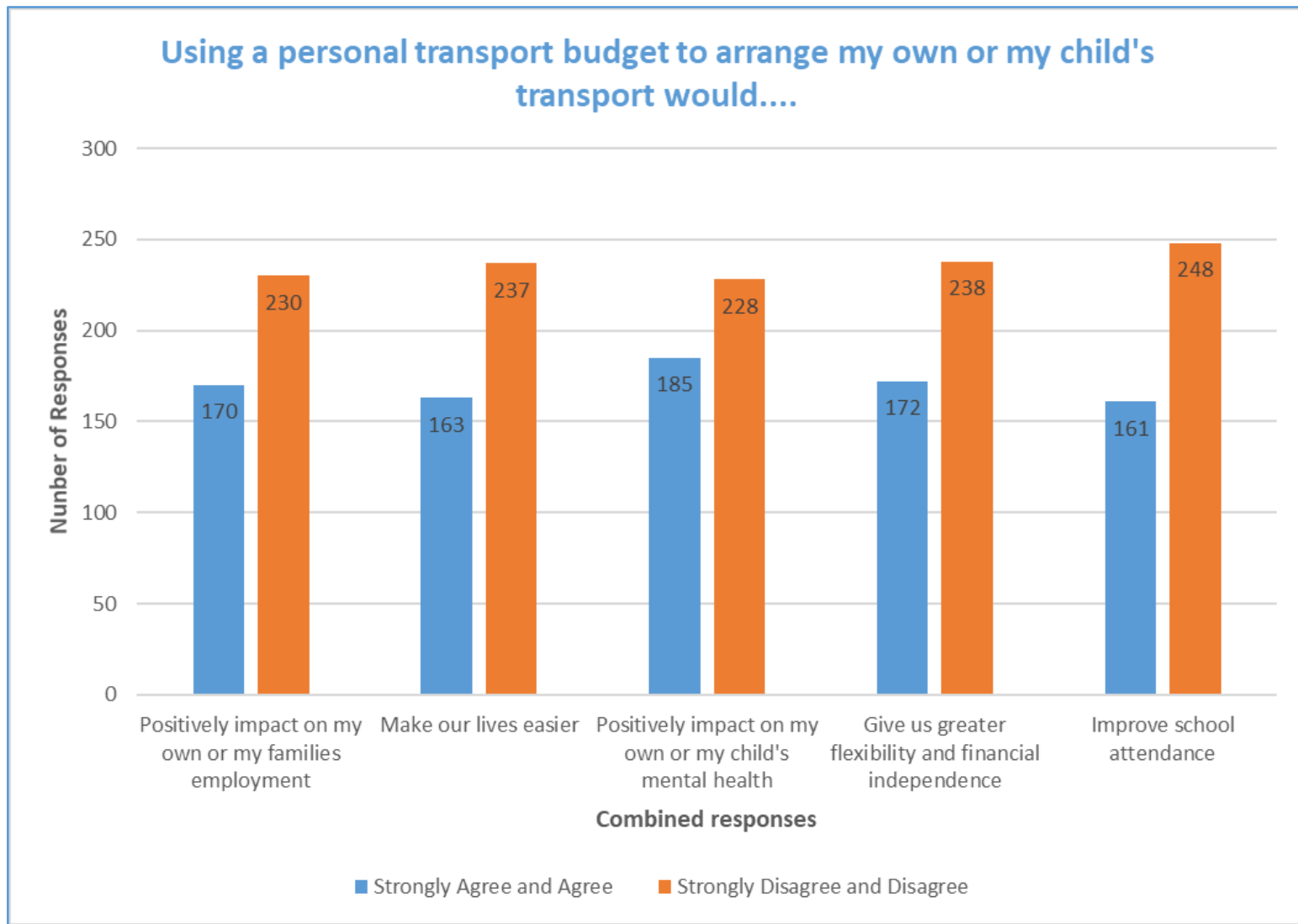
For those respondents whom the statement applied to, the chart following this one combines strongly agree with agree and the sentiment strongly disagree with disagree. There is a further table that illustrates the percentage of responses to each statement.

The highest response in disagreement was from 248 respondents who either strongly disagreed/disagreed (57.5%) that it would improve school attendance, with 161 (39%) strongly agreeing/agreeing with this statement.

The highest response in agreement was from 185 respondents who strongly agreed/agreed (45%) that there would be a positive impact on their own, or their child's mental health, however, 228 (55%) strongly disagreed/disagreed with this statement.

### Using a personal transport budget to arrange my own or my child's transport would....





Response	Strongly Agree and Agree		Strongly Disagree and Disagree		Number of Responses
Positively impact on my own or my families employment	170	42.5%	230	57.5%	400
Make our lives easier	163	41%	237	59%	400
Positively impact on my own or my child's mental health	185	45%	228	55%	413
Give us greater flexibility and financial independence	172	42%	238	58%	410
Improve school attendance	161	39%	248	61%	409

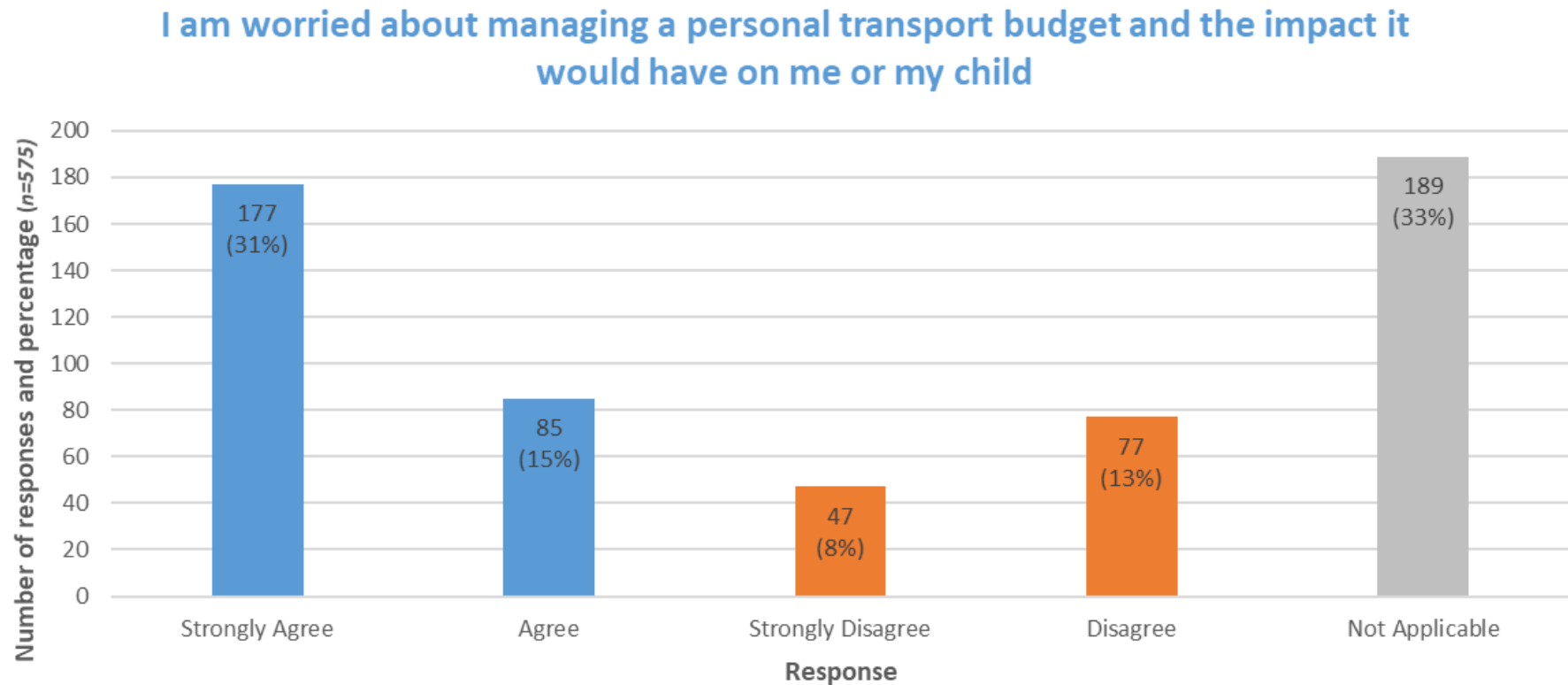
## Personal Transport Budget (PTB)

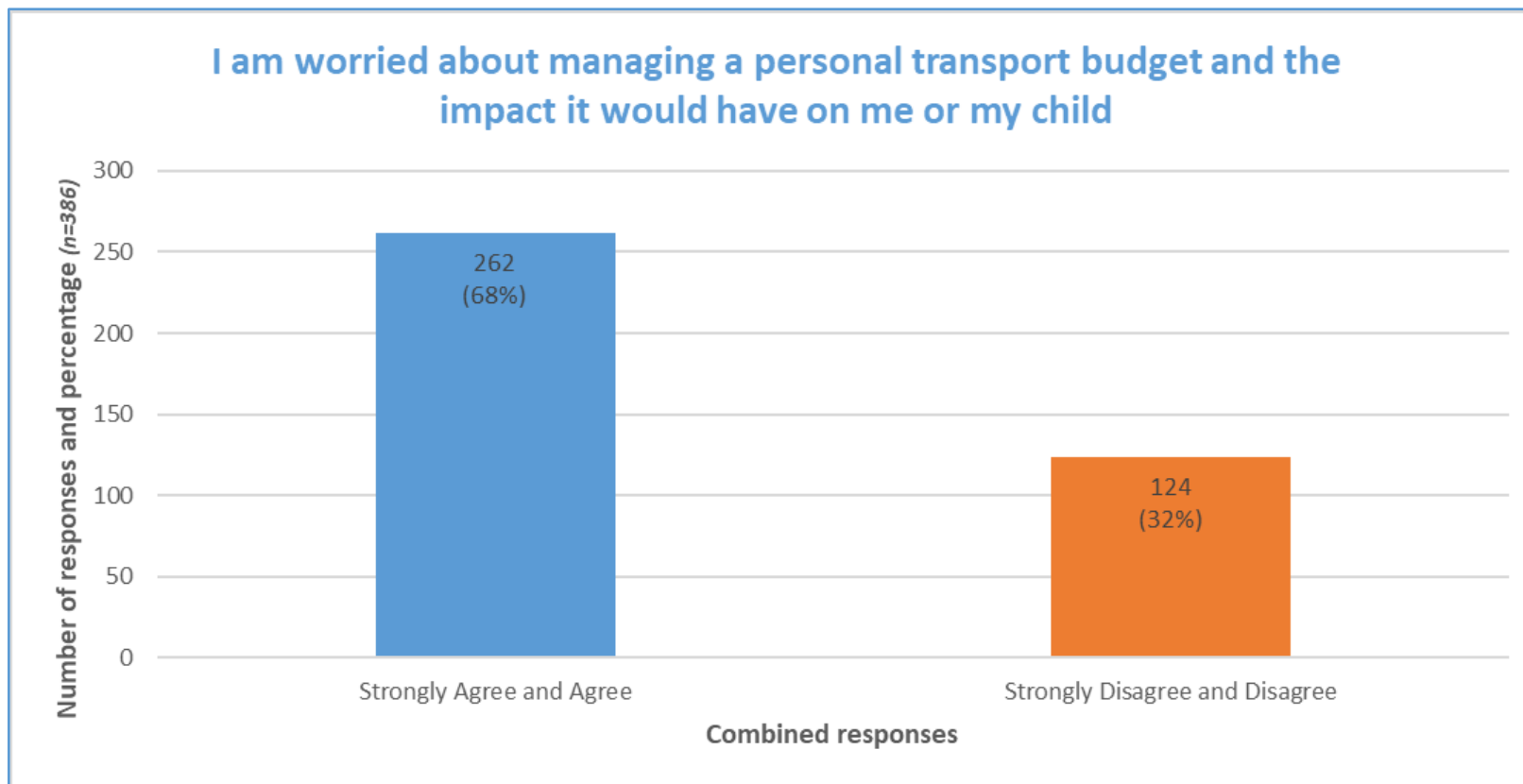
### Question: I am worried about managing a personal transport budget and the impact it would have on me or my child

#### Analysis

Of the 575 responses received, 177 (31%) strongly agreed with this statement and 47 (8%) strongly disagreed. The statement was not applicable to 189 respondents (33%).

When combining the responses of strongly agree with agree and then strongly disagree with disagree (see chart further below) for those 386 people the statement applied to, 262 respondents (68%) strongly agreed/agreed with this statement, which was more than double the 124 people who strongly disagreed/disagreed (32%).





## Post-16 Travel Assistance

**Question: How much do you agree with the following statements:**

**Any charges/contributions for post-16 transport assistance should be:   Capped at a maximum amount  
Means tested**

### Analysis

Page 161

The first chart illustrates consultees responses to each part of the question including those who said it did not apply to them.

For those respondents whom the statement applied to (471), the chart following this one combines strongly agree with agree and the sentiment strongly disagree with disagree.

#### **Charges/contributions being capped at a maximum amount**

There was 575 responses to this part of the question.

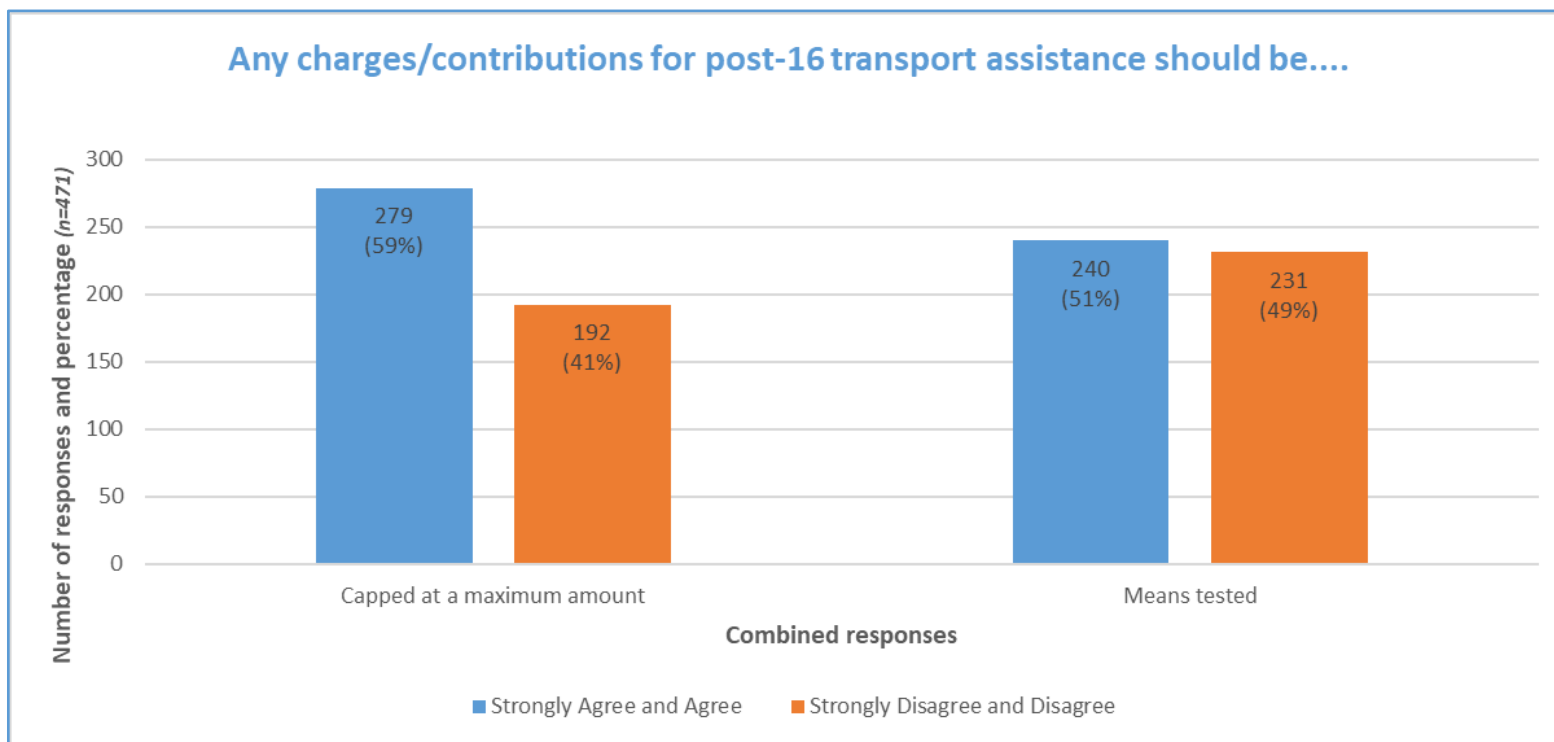
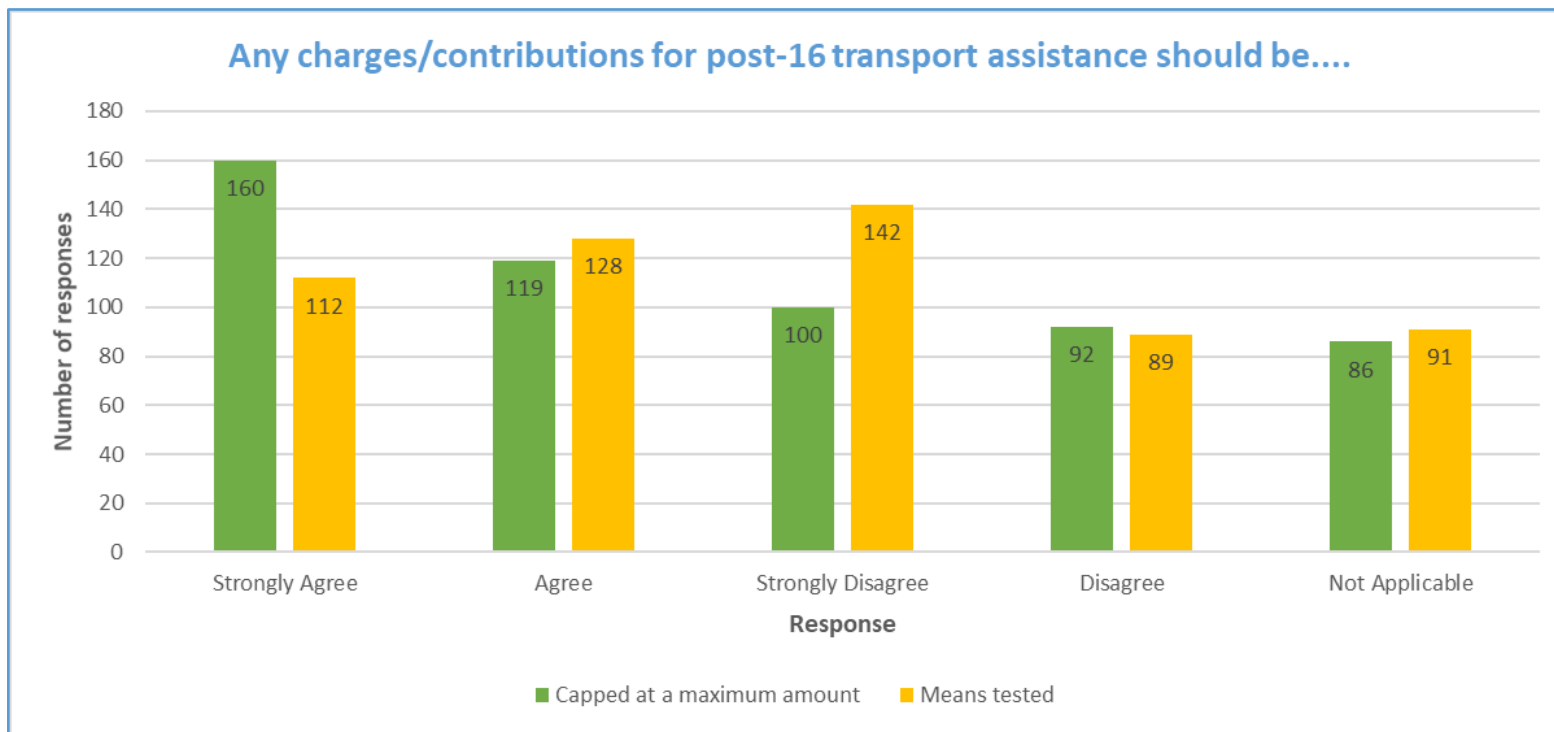
The highest response was from 160 respondents (29%) who strongly agreed to this proposal, however 100 people (18%) strongly disagreed.

This higher agreement rate is also reflected in the analysis of those 471 people to whom this proposal applied to, as the second chart illustrates that 279 people, (59%) strongly agreed/agreed, whereas 192 (41%) strongly disagreed/disagreed with this statement.

#### **Charges/contributions being means tested**

There was 562 responses to this part of the question.

The highest response was from 142 respondents (25%) who strongly disagreed that any charges/contributions should be means tested, whereas 112 people (20%) strongly agreed. However, response rates were very close when analysing the combined views of those 471 people to whom this proposal applied to, where 240 people (51%) either strongly agreed/ agreed to this proposal, and 231 (49%) strongly disagreed/disagreed.



## Tell us more - Impact

**Question:** Please detail the impact that you feel the changes in the policy will have on you or your child.

### Analysis

There were 589 comments. 181 respondents (31.5%) commented that the proposed policy would have a negative impact, with specific concern for young person's individual needs (23%), safety (11.8%) and their mental health (11.5%).



589 comments - Please detail the impact that you feel the changes in the policy will have on you or your child

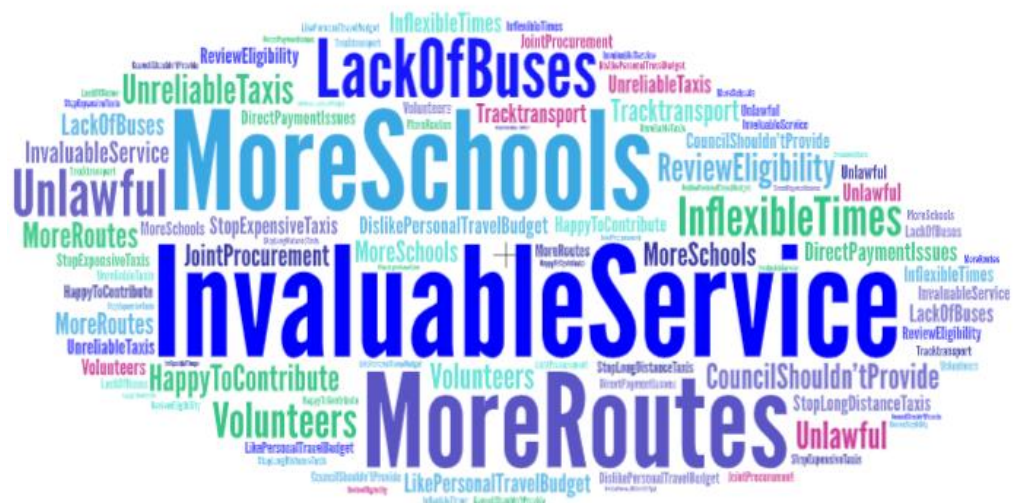
	Overall impact when stated			Impact on child			Time	Means Testing		Unsure
	Positive impact	Neutral impact	Negative impact	Concern for young person's individual needs	Unsafe for child	Impacts young person's mental health	Impacts time management	Positive Impact of Means Testing	Negative Impact of Means Testing	Not sure
Capacity										
Parent/Carer	25	31	153	116	63	61	50	2	4	8
Child aged under 16	2	0	7	6	3	3	5	0	0	0
Young Person aged 16 - 25	0	0	4	4	1	1	1	0	0	0
School or Education Setting	3	0	10	2	1	0	1	2	0	0
Charity or Community Group	1	0	1	0	0	0	0	1	0	0
Public	4	0	1	2	0	1	0	2	0	0
Other (please specify)	0	0	5	2	0	0	2	0	0	0
<b>Total</b>	<b>35</b>	<b>31</b>	<b>181</b>	<b>132</b>	<b>68</b>	<b>66</b>	<b>59</b>	<b>7</b>	<b>4</b>	<b>8</b>
<b>Percentage of total respondents (n=575)</b>	<b>6.1%</b>	<b>5.4%</b>	<b>31.5%</b>	<b>23.0%</b>	<b>11.8%</b>	<b>11.5%</b>	<b>10.3%</b>	<b>1.2%</b>	<b>0.7%</b>	<b>1.4%</b>

## Tell us more - Feedback

**Question:** Please provide any further feedback on how the transport assistance service could run more efficiently, or any further comments on the draft policy.

### Analysis

There were 123 comments. 24 respondents (4.2%) commented that they would not want to lose an invaluable service, with 22 respondents (3.8%) saying that more specialist school provision is needed in the borough. 12 people said more bus routes are needed (2.1%) and 9 people felt that taxis are not always reliable (1.6%).



123 comments - Please provide any further feedback on how the travel assistance service could run more efficiently, or any further comments on the draft policy

	Policy and Procurement						Personal Budgets				Buses				Taxis		
	Loss of invaluable service	More specialist school provision in borough is needed	Disagrees that Council should provide these services	Regularly review eligibility for these services	Council is acting unlawfully	Consider joint procurement and commissioning with other LAs	Willingness to contribute towards transport costs	Personal travel budget - negative	Personal travel budget - positive	Direct payment process issues	More routes needed	Lack of buses and inflexible times mean children are late for school	Recruit Volunteers for buses	Ability for user to track transport to be ready on time	Taxis are not always reliable	Remove expensive taxis to conserve budget	Stop taxis for long distances
<b>Capacity</b>																	
Parent/Carer	20	20	5	5	4	0	6	4	2	3	12	8	2	2	6	1	2
Child aged under 16	4	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Young Person aged 16 - 25	0	0	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0
School or Education Setting	0	1	0	1	0	0	0	2	1	0	0	0	0	0	3	0	0
Charity or Community Group	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0
Public	0	1	0	0	0	1	0	0	0	0	0	0	1	0	0	1	0
Other (please specify)	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>24</b>	<b>22</b>	<b>8</b>	<b>7</b>	<b>4</b>	<b>1</b>	<b>7</b>	<b>7</b>	<b>3</b>	<b>3</b>	<b>12</b>	<b>8</b>	<b>3</b>	<b>2</b>	<b>9</b>	<b>2</b>	<b>2</b>
<b>Percentage of total respondents (n=575)</b>	<b>4.2%</b>	<b>3.8%</b>	<b>1.4%</b>	<b>1.2%</b>	<b>0.7%</b>	<b>0.2%</b>	<b>1.2%</b>	<b>1.2%</b>	<b>0.5%</b>	<b>0.5%</b>	<b>2.1%</b>	<b>1.4%</b>	<b>0.5%</b>	<b>0.3%</b>	<b>1.6%</b>	<b>0.3%</b>	<b>0.3%</b>

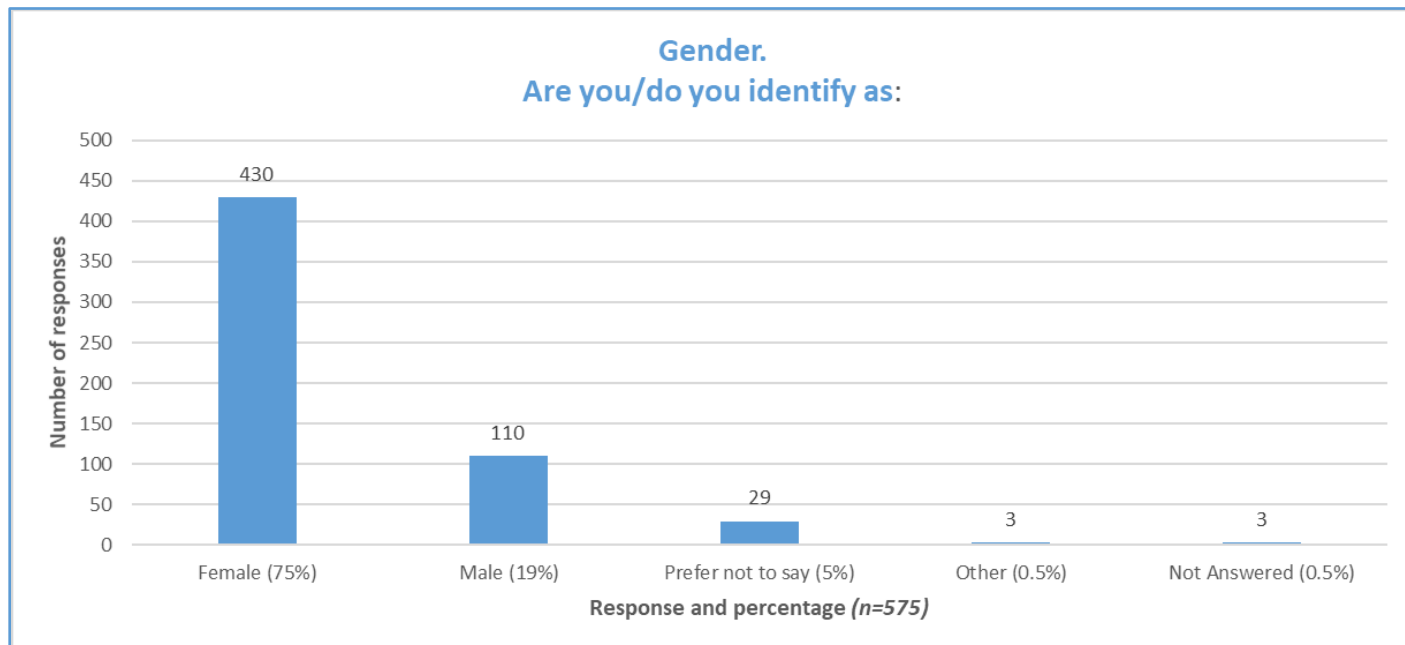


## Equalities Monitoring – Gender

### Question: Are you/do you identify as:

#### Analysis

The majority of respondents were female (75%) which is greater than the borough average of 52.6%. Responses from males (19%) was significantly lower than the borough average of 47.4%.



	Consultation responses	Havering average (age 18 or over only)*
Female	75%	52.6%
Male	19%	47.4%
Other	1%	Not available

\*Census 2021: <https://www.ons.gov.uk/datasets/create>

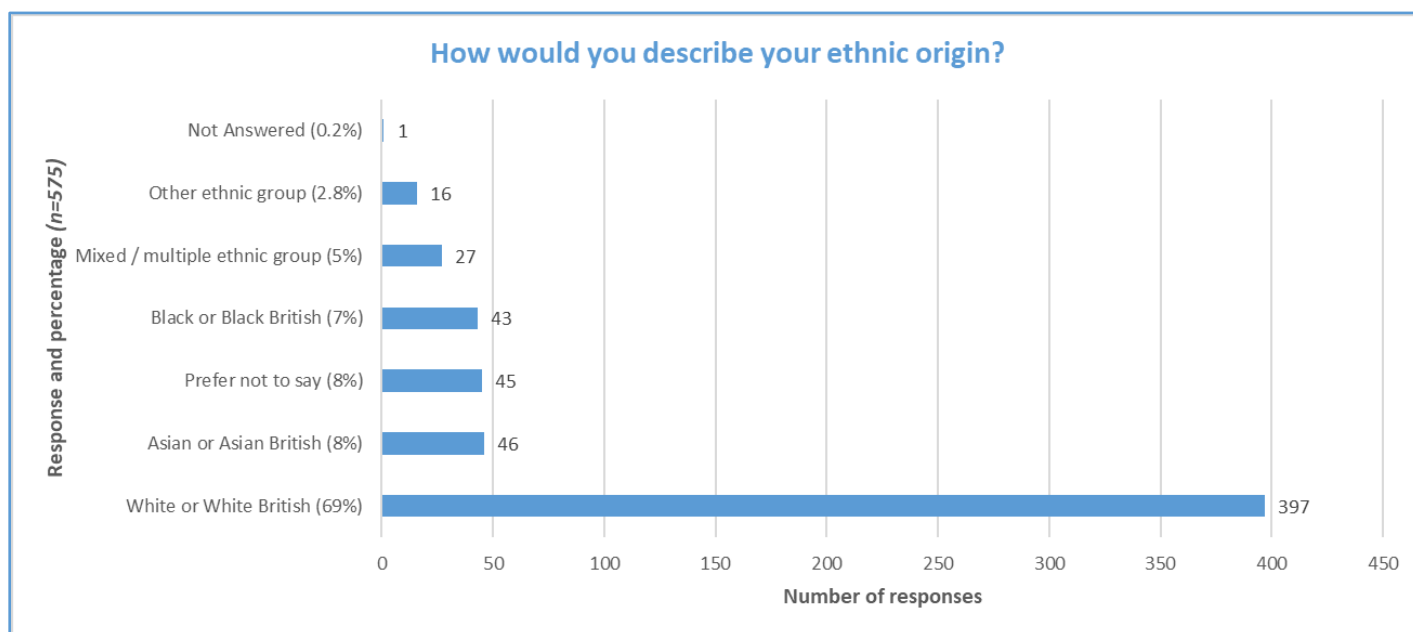
## Equalities Monitoring – Ethnicity

### Question: Are you/do you identify as:

#### Analysis

The majority of respondent's ethnicity was White or White British (69%) which is slightly lower than the borough average (79%).

Asian/Asian British was also slightly lower, Black/Black British was the same as the borough average, with Mixed/Multiple Ethnic Groups and other ethnicity higher.



	Consultation responses	Havering average (age 18 or over only)*
<b>White or White British</b>	69%	79%
<b>Asian or Asian British</b>	8%	10%
<b>Black or Black British</b>	7%	7%
<b>Mixed / multiple ethnic group</b>	5%	2%
<b>Other ethnic group</b>	2.8%	2%
<b>Prefer not to say</b>	8%	-

\*Census 2021: <https://www.ons.gov.uk/datasets/create>

## Equalities Monitoring – Disability

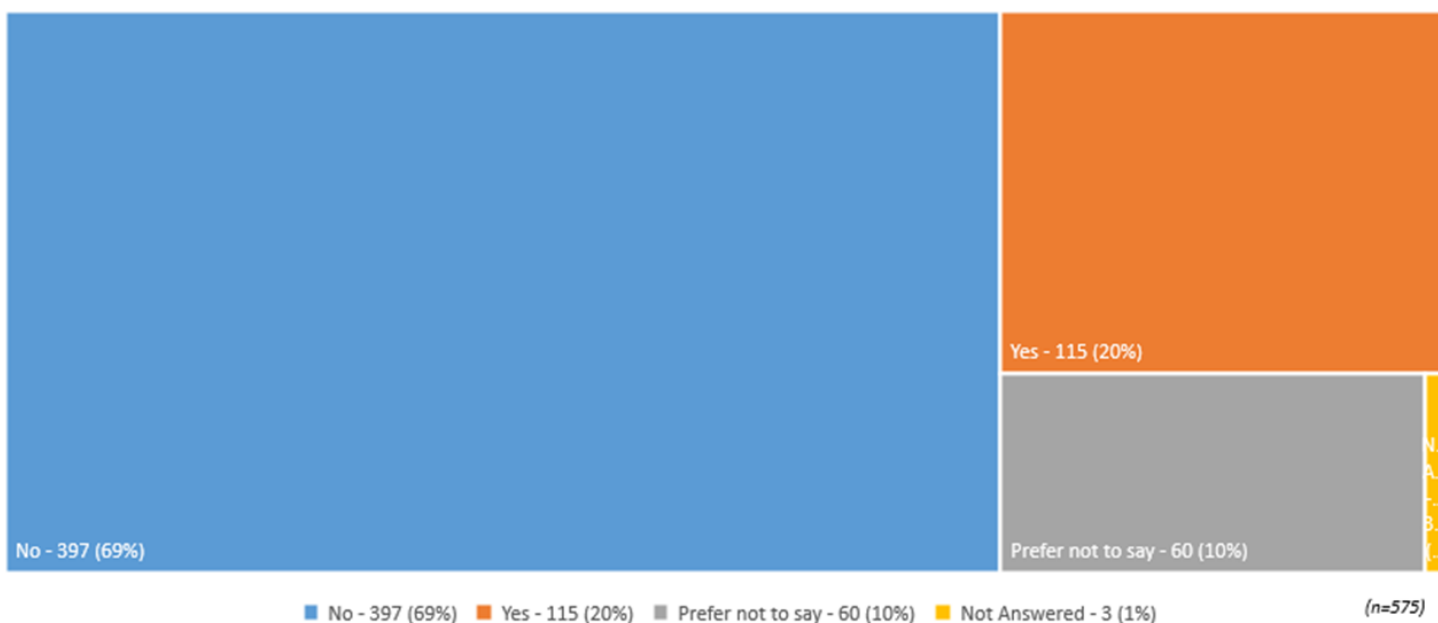
**Question: Do you consider yourself to have a disability, impairment or health condition?**

### Analysis

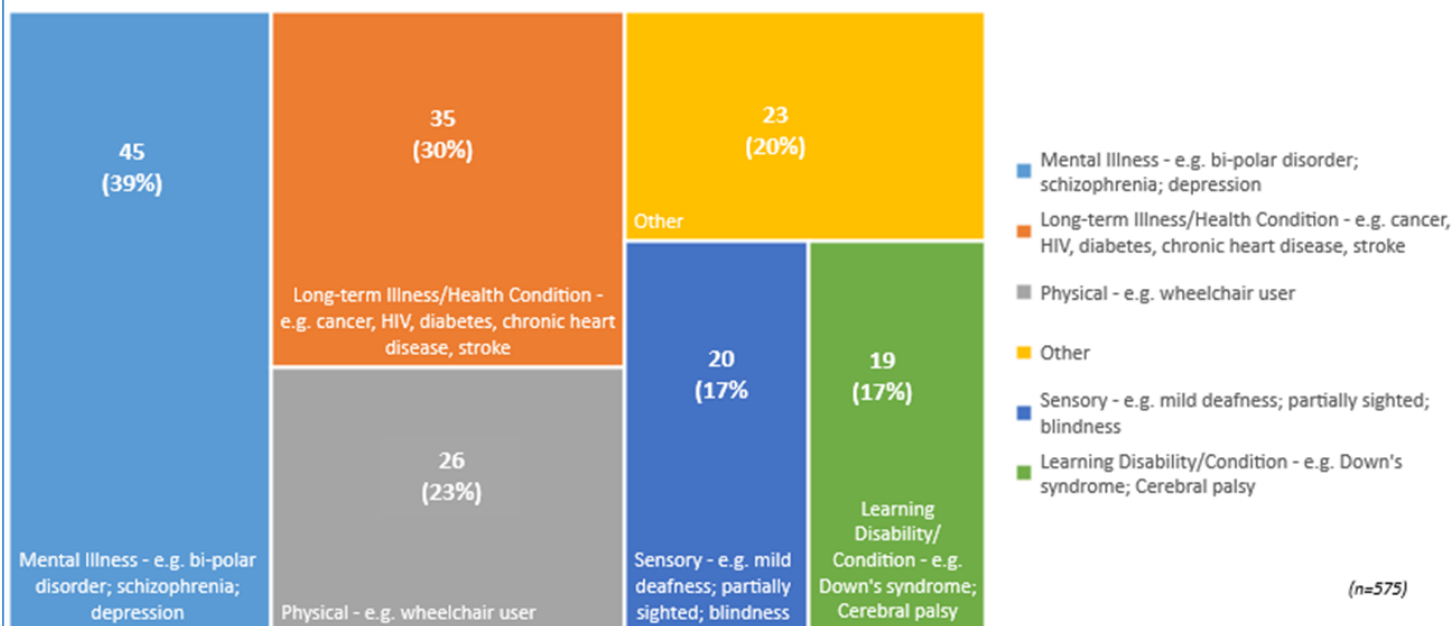
The majority of respondents do not consider that they have a disability, impairment or health condition (69%), with 115 (20%) considering they do.

Over a third of respondents consider they have a mental illness (39%), followed closely by a long term health condition (30%).

**Do you consider yourself to have a disability, impairment or health condition?**



**What best describes your disability, impairment or health condition?**



## Equalities Monitoring – Disability comments

**Question: Do you consider yourself to have a disability, impairment or health condition?**

### Analysis

There were 27 comments. Some respondents were unclear whether to answer this on behalf of themselves or for the young person they were responding on behalf of. Consequently, it is unclear whether some of these comments may relate to the responder or the young person.

## 27 comments

Other disability, impairment or health condition	Number of responses
ADHD	1
Our pupils have all of these conditions	2
Anxiety	1
Asthma	2
Body disability amputations	1
Cerebral palsy	1
Chronic pain in joints/back/fibromyalgia/osteoporosis	6
CMT Nerve condition	1
Deafness	2
Epilepsy	2
Global delay	2
Heart condition	1
Hemiplegia	1
High blood pressure	1
Hydrocephalus	1
Kidney problems	1
Learning disabilities	1
Light-headedness, poor balance	1
Lymphedema	1
Microcephaly hydrocephalus	1
Mobility issues	2
Womb problems	1

## Equalities Monitoring - Gender, Ethnicity and Disability

### Analysis

The tables below illustrate total ethnicity and disability by gender of those respondents who told us this information. The majority of respondents were White or White British females (55%), of whom, 11.5% said they had a disability, impairment or health condition.

			White or White British				Asian or Asian British				Black or Black British			
	Total by Gender	%	Total by Ethnicity	%	Total by Disability	%	Total by Ethnicity	%	Total by Disability	%	Total by Ethnicity	%	Total by Disability	%
Female	430	74.8%	316	55%	66	11.5%	31	5.4%	1	0.2%	35	6.1%	11	1.9%
Male	110	19.1%	78	13.6%	15	2.6%	15	2.6%	5	0.9%	8	1.4%	5	0.9%
Other	3	0.5%	1	0.2%	1	0.2%	0	0%	0	0%	0	0%	0	0%

			Mixed/Multiple Ethnic Group				Other Ethnic Group			
	Total by Gender	%	Total by Ethnicity	%	Total by Disability	%	Total by Ethnicity	%	Total by Disability	%
Female	430	74.8%	22	3.8%	5	0.9%	14	2.4%	2	0.3%
Male	110	19.1%	4	0.7%	1	0.2%	2	0.3%	1	0.2%
Other	3	0.5%	2	0.3%	1	0.2%	0	0%	0	0%

## APPENDICES

## **APPENDIX A - Direct Views of Policy by Groups - Uncensored**

Charity or Community Group	
<p>it should be cost effective and not just expected - this is a difficult situation and very emotive but running high transport costs when a more cheaper option is available should be explored especially if families can afford to do it themselves.</p> <p>Means testing is unfair and not the answer</p> <p>Possible small contribution at most</p> <p>Transparent is necessary</p>	
Child aged under 16	
<p>Employ more trained personnel</p> <p>I believe transport should be provided for school aged children needing support. So school is not effected.</p> <p>in gaining independence post 16 would be a good time to introduce travel training because this would no longer impact schooling and the person is more maturer to be able to deal will the problems that can occur with public transport and help become a independent adult.</p> <p>08 I feel the transport assistance I'd running fine. My daughter has been getting transport from the borough for 8 years now. She has thoroughly enjoyed going to school by bus and now taxi and has built up a great relationship with the Assistants who have been with her. They make her feel safe whilst travelling to and from school.</p> <p>00 Without this service xxxx would not have been able to attend the schools she has and get all the professional help that she needs.</p>	
<p>I wholly disagree that Transport Training will be an advantage for my child, as she will never have the capability to learn how to travel to school by herself, not only would this affect her mental health, she is unable to be in crowded places, due to anxiety attacks. I also worry for her safety in a bus full of kids, who could potentially abuse her with anti social behaviour from other children. She needs to have her routine, and she requires a specific way to be transported to school, where similar children are treated the same and the staff totally understand her needs.</p>	
<p>My would also not be able to self transport with an arranged budget, as you call, as for the same reason, she would not be able to travel on her own, via taxi, due to her disability.</p>	
<p>Therefore I can't accept that this service should be allowed to cease.</p>	
<p>it is good and convenient for us now</p>	
<p>My son is severe disabled and need the transport assistance mandatory.if the transport assistance is not there he will not be able to go to school</p>	
<p>Need 2 escorts for both school runs</p>	
<p>Need to be more available for parents to ciew</p>	
<p>Stop school kids getting on regular busses (especially when they only go one stop, the lazy little toe rags) just get school busses for them!!</p>	

Page 71	The travel assistance is great . The staff are very helpful and put my mind at ease . The special school has had a positive impact on my. Daughter. Traveling with the other children. Has helped before she was not social with anyone especially children.
	We are happy with the service knowing that our son is safe the driver and escort xxxx and xxxx really understand our child's needs.
	<b>Other (please specify)</b>
	Ensure that where a Motobility car has been provided for the child that it is used to provide transport for the child and not for parents work trips instead.
	Keep services as currently provided.
	Parents may welcome personal transport budgets
	The draft policy I thought was only going to be decided once this so called consultation is complete so at this time, this question is rather pointless. Or does this mean you have already decided on the policy is going to be which makes any consultation meaningless.
	The policy will need to work on a case by case basis as there is no one size fits all.
	The transport service would be improved if the drivers had the knowledge that the council would continue to give long term contract security.
Parent/Guardian	The transport system should be alleviated completely - make the parents take their own child under their own expense as hundred of responsible parents have done now and in the past. Just because a child cannot walk due to disability, that is the parent's responsibility to ensure their child gets to school not the council's - what do these parents want? why have a child if you are not going to take responsibility for it. Parenting is hard, very hard - but I don't know why these parents are being lazy and not taking the responsibility and financial strain themselves? It baffles me ?
	we need to keep costs down. Children should be encouraged (by parents) to walk more where possible to save costs in using Council buses.
	We would be prepared to contribute to the "collect from home" transport service. I should have thought the majority of parents/Guardians would.
	A bus going straight from Hornchurch station to upminster
	A person to monitor the passengers whilst the driver is driving would be a good idea specially when teenagers travel by bus during rush hour
	Add more buses so a child doesn't have to sit on a bus for two hours before school! And be picked up at 7am! That is absolutely ridiculous. Children fall asleep in class because of these arrangements.
	Alot of families will need the support with the money needed to pay for special education.
	Another bus
	Another thing to worry about
	Any consideration of this policy including using the budget to purchase the services of a driver to drive young people who have motability vehicles but cannot drive it themselves
	Any help benefits children well being
	arrange a bus that picks up on a route - no need for taxis
	As a under 16 school bus user I think the current systems works well.
	As more children are diagnosed every year with autism and other non visible disabilities. The demand for school transport will increase and Havering like any other London borough needs to make sure there are adequate provisions available for a reliable school transport. This is NOT a luxury but a must have facility for children and adults with non visible disabilities such as autism where non existent school bus service will mean these children and adults would NOT be able to attend school or college of their choice.
	As outlined above, we need to keep the community buses running. If it comes to it, then ask families who use the bus service to contribute towards the costs. We need to keep the cost effective transport running indefinitely and we need to stop the cases whereby it is costing the Borough thousands and thousands of pounds per

child to transport them either out of the borough or because the child needs assistance. There is already assistance on the community buses, so why does a child "need" two assistants? The parents should be given a choice of either using the community buses or they are responsible to transport their child themselves. I appreciate this is brutal but this is a very sensitive issue to families who only require the basic transport.
At the present time I am very happy with our child's transport to and from school. The only thing that could be improved is the route the driver has to take is sometimes strange. IE a driver will have to go 15 min out of his way to collect a child that another bus is closer to.
Base it with a reliable company that knows how to deal with children with certain needs, IE there use to be a transport company called Fox transport whom are trained for children with certain difficulties and parents that couldn't escort there children.
Build a new school, put on transport for those who need it in that school which won't be as navy so your costs will be reduced.
Buses could arrive in a timely manner and bus conductors should be present during school travel times to ensure safety.
By maybe running a bus at certain times for everyone from 1 pick up and drop off point that is central to people living in that area eg romford Station
Can you stop trying to cut services to our vulnerable. It's shockingly disturbing how they are always the first service to look to for a saving
Can't say now
Car sharing might be an option But not everyone owns a car Designated pick up points would be ok for those that could travels short distance independently If you have a contract with taxi firms challenge them as Uber is cheaper. Coaches barter for school contracts but do taxi companies? Ensure if there is a pick up booked - if it is not cancelled and the car arrives needlessly - charge the household. There is too much waste in nhs by people not turning up for appointments . I have heard of people with disabilities moving to Havering from Redbridge as we are a softer touch- just saying! This is a very difficult situation for you, good luck with your decision making
Children should attend schools most local to them where possible
Confusing
Contributions (means tested or not) are relatively sensible. People are saving money on petrol and vehicles anyway.
Car pooling is harder. Disabled children often have complex needs, are vulnerable and may have difficulty communicating. Are we going to DBS check everybody?
Current policy works for my child i.e. seat on a bus outside dwelling
Current transport service is great so continue
Currently, we are very happy with the transport services that take our child from home to school and bring her back. She is settled and happy while on the bus. The staff are very friendly and supportive. We prefer that any changes won't be made simply for the sake of change. If changes are considered, they need to be assessed based on the needs of all families with children who have special education needs and disabilities.
Cut down on individuals travelling on their own; encourage them to travel on transport buses which should be the main way to travel. Cut down on the use of taxis and Uber, these are very expensive and users should be asked to travel on transport buses. The buses are very efficient and cost effective. Do not charge to use these, as if a child was in full time education, then public transport is free, so these buses should remain free for those in full time education, a crucial cornerstone in human rights.
Direct school buses for the individual schools
Dobule decker busses, more busses, school buses, bike to school scheme for children.



Due to my son going out of the Borough for school the transport he is receiving is the best in my eyes and does not need changing.
Each child is an individual who all deserve the best, they deserve access and equality and this looks different for every family. I think you should work towards making everything more accessible not putting more barriers to children with disabilities and thier families
Efficiency needs to be balanced with practicality, not just drafted on paper - but drafted based on the real world situation.
Employees of transport services should allow all children students to travel free especially if they see they are in school uniform . Bus drivers should be more caring when they see children standing at a bus stop or approaching to catch the bus rather than driving by them or not letting them on cause they have lost their card , leaving them stranded and not able to get home safely . Seen on many occasions
Every child has a right to school and an education, funding the transport in getting children to school should be a high priority, if attendance drops the council fine the family, but if there is no mode of transport suitable to get the child to school how is that fair? There needs to be steps in place to allow families to ensure their children receive the education they need and also allow for families to carry on working and living a normal life around them with your help!
Everyone should accept this
Families with SEN children / young adults need support that's easily accessible and not added administrative burdens & stress that managing transport budgets would create. Having to re apply every year is enough of a burden on top of highly stressful life with a SEN child / young person.
Firstly the legality of it - the law surrounding Home to School Transport has not changed and local policy cannot trump law, so Havering will waste money in legal fees and lose because they are acting unlawfully and that will
<div data-bbox="91 730 145 914" data-label="Text"> <p>Page 173</p> </div> <p>cost Havering residents even more than before - legal fees + taxis and school buses.</p> <p>Secondly, the Direct Payments team cannot keep account of existing monies going in and out. A thorough forensic audit of this department would identify hundreds of thousands of "missing" pounds judging by the experience of anyone who has ever had to liaise with that Department. The only thing it will succeed in doing is ensuring a lot more lost school days because payments have not been made by the Direct Payments team - this is a common problem already.</p>
Thirdly, the parents of these children already have to jump through many hoops to qualify for transport so there really is no fat to trim here.
Fourthly, many of these children are non verbal, require medication, suffer from seizures etc. The safeguarding issues alone are endless. And is it realistic to expect an Uber driver to not only notice and recognise a myriad of different types of seizures, but then to pull over on the A12 or wherever and administer potentially life saving medication?
Its as ridiculous as it is inhumane
<p>Focus your energy in consulting parents on how to improve SEN services</p> <p>There are no schools or services</p> <p>So many SEN children don't use the transports</p> <p>It's the minority and those are the ones you are targeting</p> <p>You are setting off a time bomb for short term gain</p> <p>Other areas such as Social care, Hospitals, mental health are going to feel the impact of this</p>

Page 174	Think Longterm
	For a lot of families they rely on the current transport service as it provides a secure and safe option for transport. For us personally, the transport service has made it much more easier for both parents to work, as the schools my children attend are at different ends of the Borough to have to take both children to school would be very difficult as one would have to be running late often. Even with breakfast club this is costly and would not be a suitable option for a regular service.
	As the personal travel budget is based on attendance from the previous month this would seem a little unfair if my child's regular hospital appointments were to be in one month and impacting the next month with payments being smaller with no appointments.
	For it not to be taken away from such valuable children and young adults
	Free travel for all and designated buses for SEN pupils. Travel safety and run through from school/ outside agency ideal....
	Have more mobility buses available to reduce cost of the need of a taxi service.
	Having less children on each bus and buses working correctly including air con for in summer months
	Help independence
	How about doing better checks when parents apply, for example: are parents at home, is there a car sat idle on the driveway, do parents work
	However, the change in policy needs to take a whole-family approach and individualised support planning as 'no one size fits all'. This should include family friendly policies across all levels and organisations.
	The transport assistant service could run efficiently by perhaps (1) reviewing eligibility for these services every few years (2) being firm but fair with the families that may have a sense of entitlement towards the proposed change (3) drawing from the experience of other local authorities home and abroad to create a bigger picture of the opportunities and pitfalls on this subject (4) be creative, don't think about the here and now, think sustainable travel that is applicable long-term.
	I agree if a young person's family don't work or they live near the school or college they should be taking them. But for us that both work it is unacceptable.
	I am happy with the school bus transport that my child has at the moment.
	I am happy with the transport he receives and he is happy with the travel he gets now
	I am pleased with the service provided by the borough for my sons transport. It can be more efficient by not cutting it at all and by not stressing parents and Guardians and children and young people by doing so.
	I am very happy with the current transport but feel the routes could be looked at to make it easier for drivers for example they may have to drive 15 mins out of their way for one child when another bus also passes their pick up point.
	I appreciate that havering needs to cut costs, but it needs to be looked at on a child by child bases, and not a blanket programme which could effect people's lives significantly
	I believe that there are parents who can transport their children to school but just take advantage of the fact that transport is available .

	I met a lady whose daughter I taken to school by transport, goes for breakfast club, stays for after school club, has tea at school, is given transport home and then bath and bed. This is not parenting and absolves the parents of responsibility.
	Transport needs to be properly assessed and re assessed to see whether parents truly need it. I drove my child to school in brentwood every single day. Spending time with him the car, chatting was great for our relationship
	I believe the service is already run efficiently
	I believe the transport assistance service is excellent, and does not require any adjustments I believe the transport assistant should take into consideration pupil needs...it should be needs tested..we have children that cannot cope in confinement with other children because of the noise shouting and screaming. I think the transport should speak with family and find out what works for their loved ones..
	I can't use it so I don't know
	I cannot comment as I have not used the service so far.
	I do not have enough knowledge on this area to give any comments
	I do understand why mobility and severe SEND is rightfully supported by Council Transport services; but any extension or use of this service by lower needs SEND children would be a mistake. What happens when these children turn 18 and need to take up employment with the council? Will you lay on transport for them then? Or....Will they have been robbed of the last 5 to 10 years of gaining familiarity with self sufficiency? Any thoughts on pupils without SEND receiving free transport?
1696	I don't have any experience of transport assistance
175	I feel that the council should have managed their finances better and thus be able to fund a child's right to an education in a setting that supports their needs. There is very little information on post 16 and the council are making the lives of the most vulnerable people in society worse with the proposed changes.
	I feel that there could be an easier way to claim back fuel payment. Having to send emails and attachments every month or term is a lot of times spent by parents that don't have spare time so maybe some sort of portal could be set up so u could just log on and add proof of petrol receipts to it each month etc.
	I feel the main agenda here is to save the council money, but why pick on the most vulnerable in the community to achieve this? Because its thought their voices wont' be heard as loud? Never under-estimate the SEN community!
	As a parent of a post-16 student, I am particularly angered by the suggestion that they should pay for assistance - why? This effectively wipes out the whole concept of providing assistance in the first place.
	I found it very strange that you were resorting to private hire taxi's as a solution - they are inherently expensive.
	I believe those children in year 9 upwards if they can, should have travel buddies to assist them with transitioning from the school bus to public transport. This of course is subject to TfL bus options for the individuals.
	I have always been satisfied with the bus service Havering has provided my son and hope that it continues because of-course changes will also cause unnecessary stress due to xxxx Autism
	I have no experience so cannot provide feedback

<p>I note from the initial email sent on this subject highlighted that in one case the taxi fare is £200 oer day.</p>
<p>I think it should be looked into why that is the case. Logically, the rationale for that suggests to me that the person being transported has to go a considerable distance to get to their provision. Why is that? The answer is possibly suitable provision for that person is not available within Havering and such provision is outside the borough.</p>
<p>If that is the case I think for each indiviual case should explored a lot deeper.</p>
<p>This transport assistance is provided to some of the most vulnerable people in the borough. Should time and energy be spent on saving money with respect to this group?</p>
<p>I question how Taxi drivers can have responsibly for SEN children, many of which have unpredictable behaviours or medical needs when their sole focus is to drive rather than care for the child?</p>
<p>On the busses there is a driver and an additional carer to specifically look after the children.</p>
<p>I think a blanket free public transport for all children in full time education needs to be implemented. Times are hard enough for children, free public transport I feel is essential for them. Children will then use public transport more and get used to it. They will then adopt the mentality of using public transport in their adult life and realise how easy it is, rather than drive. This will not only help reduce pollution but also reduce accidents on the road.</p>
<p>I think Havering should lose the ulez cameras and use that budget for children with special educational needs and their transport</p>
<p>I think having a half day afternoon service or more times would be more efficient</p>
<p>I think in my opinion that instead of the havering transport bus going to individual destination stops that are costly and longer journeys how about all passengers meeting at one destination where the bus will be waiting then driving straight to the school saving money and time .</p>
<p>i think it would be helpful to do a pickup spot near the house as we are unable to take xxxx to a far away spot</p>
<p>I think it's better already but charges should be lower</p>
<p>I think offering any children including sen children a bus to school is a terrible waste of tax payers money. Firstly, every school offers sen support now so there should be no need for parents to send their sen kids miles away to school. Secondly, since when did it become the government's (and tax payers) responsibility to pick these kids up from home and take them to school!? That should be a parents responsibility especially as most of them dont work as they get Guardians allowance. And thirdly, these kids get DLA which is to help any costs associated their disability. If the parent chooses to send their child to a school not close by then that DLA should be given to the local authority to help pay towards the coat of the bus.</p>
<p>I think that this is terrible. Children and Adults with additional needs deserve compassion, love, respect and dignity. You are taking this way and making the most vulnerable of society even more isolated. You should be ashamed even considering this policy. Everyone deserves an education</p>
<p>I think the idea of taking the school transport away is totally unacceptable. You'd be putting lots of vuneralble children in unsafe situations.</p>
<p>I think the personal budget is very helpful as some children may not be able to travel on public transport alone - it could be used to cover the cost of a parent / carer travelling with them, or go towards petrol or taxis.</p>
<p>i think this policy is appalling. the impact it will have on disabled child and their family's lives will be huge. As if SEN parents don't already have enough problems. I am very worried and upset about the policy and the massive negative impact it'll have on our lives.</p>
<p>I think we need more buses</p>

<p>I understand that money needs to be saved, but I feel that cutting transport for disabled &amp; vulnerable children is going to cause no end of problems for families, &amp; extreme distress &amp; upset, I really don't understand why Havering council are targeting disabled &amp; vulnerable children.</p>
<p>I understand the budget pressures Havering face, however it cannot be allowed to negatively impact our most vulnerable sections of society, including those with significant disability.</p>
<p>I would be prepared to pay £50 per month for school transport. And I think it's ridiculous that Havering Council has never asked before!!</p>
<p>However just because Havering Council has recently got itself in a financial mess I think it's disgraceful that you expect disabled children to dig you out of this hole by losing school buses. SHAME ON YOU!!! Perhaps you could get rid of some of your so called "managers" earning over £100,000 a year. No one working for any council, anywhere in this country should be getting that. Nor head teachers. It is council tax payers money. You are paid way too much.</p>
<p>I would never allow my 10 year old son with communication issues in an Uber taxi where the driver potentially changes daily and I as a full time working single mum as expected to arrange this myself daily.</p>
<p>My son would not be able to use a mobile phone if he was in danger and I am essentially sending him off with strangers in an Uber each day.</p>
<p>I'm over the moon with the transport service provided for my son which I'm totally reliant on to get him to attend school each day. We have a driver called xxxx and the assistant is called xxxx who are totally amazing and Understand the needs of the children which is vital. I'd like to say a huge thank you to this service it's very much appreciated.</p>
<p>I'm glad your asking for parents views that helps we often feel unheard and we are the ones exhausted from no sleep and then having a fight to get our child dressed and to a pick up point or to school or on a taxi. So listening helps but each child is different and needs different things dependent on the family also</p>
<p>Ideas about car pooling are flawed.</p>
<p>What happens if another child causes damage to my car? Who is going to pay for the repairs.</p>
<p>What is the logic of replacing 1 bus in the road with upwards of 5 cars.</p>
<p>If Havering education authority/transport assistance service makes better use of its school bus facility this would reduce the need for taxi services &amp; escort personnel. I.e taking children to Corbetts Tey could also transport children to Warren.</p>
<p>If it's cheaper to send children by taxi then do so</p>
<p>I'm sure the taxi service could run more efficiently.</p>
<p>We feel the bus service is very efficient as many students take the bus which in turn saves money! In our case, there are not enough kids to take them on a bus apparently (Clockhouse school). Not sure what can be done but we need something we can count on. I have no overview on the situation at our school. If I was left to take my child to school, I would worry about my backup, who I could turn to in an emergency??</p>
<p>Include more buses</p>

Page 178	Increased provision of specialist school places within the borough would reduce the need for lengthy journeys out of borough in order to meet the needs of Havering residents. The transport assistance service would then have less demand.
	Individual taxis at consumer pricing is surely not the way! Worse from a cost and safety perspective.
	Introduce more buses.
	It is working very well right now
	It could be efficient if we have volunteers on the bus
	It has good service
	It is running fine already.
	It runs perfectly as it is for my family
	It should be looked at on a personal basis of the person but then again I would have thought that people who need it would have no way of being able to get there without help and in that case can't work or anything like that. This borough should be looking at what they can to provide equity, diversity and most importantly stability to those that want to have a life and help with supporting them a manner that will help with independence.
	It should be made affordable for everyone..
	It should be open to children not only with an EHCP but also IEP
	It would be helpful to be able to "track transport" - so you can ensure your ready for the pick up & drop off - saving wasted "waiting time"
	It would keep children safe
	It would be great for it to be added as per of ehcp so they can have it until 25 for severely disabled children
	It's already at the bare bones of operating. It takes an hour for my son to get home a distance just over a mile away.
	Hes already on a coach that cannot fit down most residential roads... which is unsafe for many of the children that use the service.
	I've never had a problem with Havering Transport. I rely on this service so much each day my daughter couldn't go to the Avelon without it.
	Keep families updated with changes as soon as possible. Do not implement changes to a child's transport without reason. This makes families feel ignored and devalued. Working towards a reasonable standard of life for our children means challenging services and behaviours. We expect more from the local authority.
	Keep it as it is and stop using the SEN children's money on other departments
	Also my child only able to walk short distances
	Do you expect a Uber driver to pick him up off the floor from a meltdown to get him into school?
	My child's school attendance would drop due to anxiety of a different driver twice a day
	Also if a Uber driver was to take my child to do how can you guarantee my child's safety in the back of a car alone or the driver to understand his needs?

Do you really expect me to put my child in a Uber with different strangers, twice a day, 5 times a week?
This whole thing is ridiculous
The problem is not ensuring enough appropriate SEND provision
Taking away transportation means taking away my child's school and forcing him into mainstream which is what
the whole mess of this unlawful delivering better value is all about
Keep it up
Keep us up to date with your thoughts and opinions with new plans of this service
Make sure Havering transport to to and from schools and holiday clubs remain well staffed and high quality. Nothing else needed.
Maybe children that live within a mile of their school can look at other ways to travel there. Those that live further out are in an impossible situation.
Maybe have more support staff to help some individuals use public transport
Maybe the pick points. Not not out of reach ones. That way maybe bigger busses could be used and every child is also collected around the same time on that route and get to school on time. The one my son goes on he only just makes it each day. So it isn't just about money but it is all about the service being more efficient.
More buses more flexible and that buses run on time the 651 leaves bus stop to early at children finish school 2:55pm and the 1 and only bus leaves at 3:00pm plus same in the morning it's not fair that students are late due to lack of transportation
More funding in general and less cut backs for children with sen. Sen children are equally as important as more typical children and deserve the same opportunities!
More funding should be put in the assisted transport because those our children with disabilities life depend on it
More money should be used for this as is imperative for children with disabilities (physically and mentally) to have free access to Education
more school buses
More staff are needed on the buses in order for them to run everyday, as there are days when buses are having to be cancelled due to staff shortages, meaning children are missing out on their education.
My child cannot be left alone never mind make his own way to school. School cannot cope with all parents dropping and collecting kids. Due to high staff children ratio car parks at sen schools are full without parents cars.
My child does not use or need a transport system to attend school.
My child has recently started travelling to school in a havering bus ( the last 3 yrs it was a taxi ) this has worked really well and must be more cost effective.
My son currently gets bus train to school. Reduced travel on trains would be appreciated or more school buses available.
The route from rainham to Upminster is 1 bus and doesn't arrive in time.
Additional buses in the morning would help to reduce the over packed buses in the local area which are 165//365/372.
Often kids are getting on the bus for 1/2 stops because they do not want to walk 5 minutes, often for a commuter not being able to board My son gets the treetops bus and it's helped me immensely without it I would be lost and my son wouldn't be able to go to school. xxx and xxx are brilliant

Page 180	My sons bus is efficient
	On my perspective, the transport people should have the basic training to support children with special needs and every year a refresher training program should be organised for them. They would be able to understand better and support these children with special needs.
	On time
	Parents could be charged for school transport.Of course it should be reasonable and manageable amount.
	Parents of SEND/EHCP children are already under strain from reduced public services such as CAMHS and we have to adapt our lives around our children more than those with non SEND children. This is expensive as it limits working hours. Please do not impose further costs or challenges on us and our families at this time.
	Payment to be made more quickly or on a daily / weekly basis via a set up with the schools to see when the child attended rather than us having to fill forms in and waiting weeks for the money.
	People need to stop taking liberties
	Perhaps an 'oyster' type card where it is scanned and monies taken directly without having to file receipts etc.
	Physically disabled students like my son with a brain injury cannot take part in travel training and use public transport. School transport is his independence and ONLY independence !!! He should not have to travel to college with his Mum !! This bus provides Inclusion and socialisation that he needs !!
	<p>Please note these question about the policy from an open letter to the Cllr in charge:</p> <p>What follows are important questions in response to what I'm sorry to say feels like an unimaginative, uncreative reaction to financial pressure, with ableist implications.</p> <p>The council is facing a section 114 notice – bankruptcy – which must be inordinately burdensome. Cuts need to be made, and I appreciate that. But why target a necessary service for a marginalised group of only 600 children and young people out of over 77,500 in the borough?</p> <p>2. As governor at Corbets Tey School, Jeff Stafford rightly pointed out to you recently that this fragmented approach to essential school transport 'could have some serious safeguarding issues'. To what extent do you acknowledge the safeguarding concerns that accompany disabled children travelling in Ubers, for example?</p> <p>3. You responded to Jeff Stafford's interest in 'the exact implications to our pupils and their families' – given the disruptive impact on children this will have, and 'the distress this would cause to our parents and Guardians' – with an out of date report that was published in 2019(<a href="https://www.local.gov.uk/understanding-drivers-rising-demand-and-associated-costs-home-school-transport">https://www.local.gov.uk/understanding-drivers-rising-demand-and-associated-costs-home-school-transport</a>). What reasons do we have to suppose this report is fit for purpose currently, and will do justice to our children and what they need?</p> <p>4. I'm curious as to what makes you think we need 'flexibility'? From my perspective, what parents and Guardians need for the children in our care is not flexibility, but rather stability and consistency; a robust, reliable, joined-up system in which continuity of care is delivered with appropriate training, and our children's safety and wellbeing is protected.</p> <p>5. How much will the 'assessment process' cost, who's doing the assessing and what qualities make them suitable for such a task?</p>



6. Is this a move to outsource the current contract to private companies? If so – and if the primary aim of this move is to cut costs – we simply will not get the current level of integrated assurance we need that care is being provided to the high standards we expect and deserve. Regardless of what might be being recorded on paper by private companies, we have seen examples of systemic failure in refugee services, mental health services and more, putting marginalised people at greater risk of stigmatisation and harm.
7. You suggest carpooling, and offer ‘trusted friends’ as a possible way around this disruption to trusted provision. In addition to the glaring safeguarding concern, a lot of assumptions are being made here: What makes you think that people have trusted friends at all? Not least those who aren’t struggling with their own families during a cost of living crisis? But more to the point, why are disabled children expected to car-share, but non-disabled children are not? At present, regular car-sharing would represent a sizable cultural shift that would make this a much bigger request than is implied. The expectation on parents and Guardians to depend on the good will of others in more privileged situations is deeply disempowering and unjust.
8. Have you considered that more vehicles on the road could lead to more pollution and parking needs?
9. There will be a consultation about this, but how meaningful will it actually be? When you think about it, it is unlikely that exhausted parents and Guardians giving 24 hour care to their loved ones will easily be able to access the time or energy for such a meeting, especially given the level of anxiety this is causing in so many of us already. We need nondisabled people to understand that disruption to care services has a knock-on effect: to parents’ ability to work and to pay taxes; and to health, wellbeing and the subsequent pressures on the NHS. It takes loving attentiveness, openness, responsiveness, creativity and more to care for people. Investment in time, money, and training are some of the more basic conditions that are necessary to create integrated support networks for disabled children that can even begin to safeguard their rights and opportunities. Ultimately, care is always primarily about people, not revenue. Disabled children are already systemically oppressed at all levels of society, including travel and education; at the very least we must mindfully refrain from actively disadvantaging marginalised children and families further.
Please test budget and verify who really need the assistance. However length or arduous the process because a lot of people claim such benefits when there’s no need for it. Taking money from families who do really need it.
Pooling system can work well. In pooling you only need one escort for more than one children. More ARP in the borough so that they don’t need to travel far and save the cost. School buses on different routes.
Provide more school buses. A bus linking Brentwood to Upminster would be helpful. Or an organised car-pool service to opt in to lifts.
Provide the correct support and education in borough for all children that travel outside the borough to gain an education. More specialist schools/provisions are greatly needed. You will then save on outer borough taxi/bus contracts.
Reliable, Working, Communication, keeping commitments, responsibility, relationship management, and what is the responsibility.
School buses I believe are cost-effective because they are used by several people.
See above for my comment!
Shorter transport times would encourage people to use transport
Should be able to help specially children who have additional needs and who need lots of support. They have no awareness of safety or dangers.
Should be efficient, mostly cost-effective, and frequent.
So far the pick up and drop off is all running smoothly.

<p>So many people rely on transport. Even the older ones that are not safe travelling on public transport or have anxiety and it's too busy and noisy it just wouldn't work and would definitely have an impact on attendance</p>
<p>Sorry, I can't comment on something that I was only made aware of today.</p>
<p>Stay as it is</p>
<p>Thank you for the initiative, May consider how school transportation is arranged in other boroughs or developing countries..</p>
<p>That makes life easy The Borough appears to have sought to apply a cookie-cutter view of a child with an EHCP - whether that child attends a special needs school, ARP or mainstream environment.</p>
<p>Indeed one councillor has commented openly and unwisely that their child with an EHCP attends a mainstream school and doesn't require transport; therefore child X with an EHCP shouldn't require transport either.</p>
<p>This is not acceptable and is frankly archaic.</p>
<p>The needs are very different, every child's needs are different - and what support each parent/carer requires to help their child attend and access the education they are entitled to, are different.</p>
<p>Perhaps LBH should have considered building more SEN provision in-borough when it noticed diagnosis and request for EHCP assessments rising; and the cost of providing transport would have been lower. Whilst *that* failing is not necessarily the fault of the current administration; the punitive policy it now purports to implement under the guise of flexibility and efficiency is nothing short of cruelty to those who are the most vulnerable in society.</p>
<p>Your impending bankruptcy may come, but you need to find some other wastage to hack at.</p>
<p>The Council should be looking to provide increased suitable local places if they want to reduce transport costs.</p>
<p>The draft policy shows a clear lack of understanding of the needs of SEN children.</p>
<p>And because the consultation has failed to start with assessing the need, it has failed to meet the requirements set out by government, and therefore is unlawful.</p>
<p>There may be one or two children who could perhaps go to school on a bus, or perhaps do travel training, but the vast majority have been assessed as already travelling using the most suitable transport arrangements. This is a completely pointless exercise for the majority, and it is has stirred up huge anxiety for parent Guardians, who are already under-supported and pushed to their limits. The worry caused by the council in the way this has been done is inexcusable and shows just how little understanding the author of this exercise has of SEN children and their needs.</p>

I have a needs assessment that sets out exactly why my son travels in a taxi. The assessment is done. There is nothing to do be changed. Any proposed changes will result in me going straight to see a solicitor and challenging the council on legal grounds. And don't even get me started on the proposed changes to 16-18 transport. I absolutely will not hesitate to fight for my son's legal right to access education, and many , many parents feel the same.

This exercise is a gross folly that ultimately will result in increased costs to the council by having every single child assessed in person, and yet the majority are already being provided the most cost-effective transportation option, and so the savings will be minimal.

Council should instead do the following:

- Properly assess the transport needs of the children
- Do a full cost/benefit analysis of whether transport can be brought fully in-house, so you are not needlessly paying for a private firm to make a profit (although I have found the taxi firm to be extremely reliable and professional, and i have no complaints.) Current Guardians should be TUPE'd across to the council so that there is no detriment to the children.

- In-house taxi could be an asset for the council in other ways - for example, in between school runs, the driver and car could be supporting others in the community for whom transport must be provided.

- Prevent the most vulnerable children in our society from being abandoned by the service that is supposed to support them - instead get together with other councils countrywide, and take central government to court for

year on year reducing funding for local government.

Children should not be made to pay for the mistakes of central government, and anyone with a basic sense of right and wrong can tell this.

The new style buses that have been bought in are now too big to get down most of the roads and so the service isn't home to school and back again

The only suggestion I can give would be to change the routes so that the coaches and buses do not end up travelling from one end of the borough to the other just to pick up children keep all the children in close proximity on the same buses. Working out the most efficient route so that the travel distance and fuel used would be the least amount alternatively invest in electric buses/coaches.

The option to opt out of any changes to existing policies should be available to any individual/their family who currently receives the service, and if this is the case it must be mandatory that their initial service remains as it was.

The policy also needs to look at the school of attendance and whether the school can accommodate the changes in transport whilst adhering to a full school day attendance, for instance there maybe a need to hire more staff at the school to account for the staggered starts and the staff having to take the children to and from the class from the car at the start and end of each day. Would this with the cost of adding more admin staff at the council to process the personal budgets really make a huge saving overall? Have these factors been considered?

Routes and bus sizes could be re-evaluated to see if they are the most effective routes.

Is advertisement an option on school buses to help fund the transport costs?

The PTS service works and is environmentally friendly but there is a shortage of vehicles and staff because they are on 0 hours contracts for staff.

It also provides jobs in the community rather than to UBER.
Personal Budget assessment will add unnecessary delays many users have a blue badge and will have already has a rigorous assessment.
The shortbreaks service is a great example of how DP doesn't work ridiculous assessment times and complex process.
<p>There is a current stigma around using PTS service. If you offer money to parents instead of the bus. There will be many parents that will likely qualify increasing the amount of users take up of the service in the long term and have the opposite effect on the budget.</p>
<p>The taxi service and the bus services last year are/were exceptional.  The staff have all treated my son extremely well, with dignity and respect at all times.  They have got him to school on time every day and I think he really enjoys the journeys. It offers him some independence away from us as his parents and Guardians, which we think he enjoys and is giving him a bit of freedom.  Using this service will be a real shame and will directly impact my sons education and freedoms.</p>
<p>Page 184 The training would work for some children but it is not suitable for all children. We do not want a budget to manage in order for our child to get to school via a taxi or another route, she would not be able to travel via taxi, she would not be safe enough. Our child does attend Corbets Tey School via the bus and we cannot express enough how brilliant the service is! If necessary and if it came to it, we would help towards the cost of the bus. For example, if funds are so short, can we not ask parents to put forward and contribute a certain amount each month or year to keep the bus service please? By all means, look at extreme cases where travelling costs are so excessive eg: £45,000 per year, as stated above but please do not take away the core bus service, we should not be penalised as a family for this because other people in the borough are costing too much! We pay so many taxes, it is unfair to take away this service, it is vital to families. It is a safe, efficient and cost effective way for</p>
<p>special needs children to travel to and from school and the staff who are on the bus are second to none! If you need more information, please contact me on xxxx.  Thank you very much!</p>
The transport assistance service should run more efficiently.
The transport assistance service support the morale and challenges that children and families face in meeting attendance and punctuality targets
<p>The transport service of school buses is run well. The taxi service is not always reliable and safe. However, there have also been 'near miss' safety incidents due to 1-2-1 support when boarding being reduced. As I do not work for the SEND transport team I would not be in a position to comment on how it should be run. However, if the council are unable to think of ways to manage the funding, then perhaps they should consider passing it to someone who can and understands the needs of SEND families in Havering.</p>
<p>The transport which is in place now doesn't need to be changed as it's used for children with additional needs and gives them enough freedom and independence to get to and from school</p>
<p>the use of taxis at £200 per day is ridiculous. for that money you could fund the purchase of a fleet of vehicles and drivers. £1000 a week to get 1 child to and from school does not make sense in any situation. The schools are always looking for donations of pens and paper for the majority when the minority are taking all the funds. Council tax is extortionate as it is but still you can't balance the books and with spending like that i can see why. This is not good financial management.</p>

Page 185	The use of taxis was not our preference or expectation when our child moved settings as we would of been happy for them to continue using a school bus. To us, this seems like both the more cost effective and environmentally friendly option as it would significantly reduce the cost of multiple taxis and reduce the number of journeys required as it would be a single bus on one route.
	I would give consideration to the legality of removing/adjusting access to transport to an educational setting for SEN children as I believe this is a protected right.
	there is a shortage of provision of SEND provision and pupils will have to travel and they should be supported and provided free of charge
	There is no one size fits all in transportation in our case single use taxi would be more beneficial and would be more cost effective to the council than current provision
	There needs to be 2 bus service in place of current 1 bus service
	They could have a photo card pass, ensure it is available to all so no one misses out
	This is not the place for the council to cut costs. Attend drop off and pick up at Corbets Tey school and see how even with busses it is hectic.
	This should be capped so that parents aren't using the most expensive means. Maybe by having an account with a particular taxi firm could keep costing down, with agreed tariffs set in advance.
	To have a few routes so that all catchment area is covered and not only rely on 1 route.
	To run more effectively - stop the taxis for long distances - I do agree with this and cannot believe the amount that costs. Pay the parents to use Uber etc. Any children that have been travel training at school and it has been successful look into them utilising that training. Any children that live less than a mile from a school within walking distance take them off the bus and seek alternative. Physically disabled should be able to remain on the Havering Buses !
	Transport assistance it's a great and it's safe
	transport picks my child up in her wheel chair and takes her to school and drops her of in her wheel chair when school finishes
	Transport SHOULDK be focused on each individual basis.
	Each family and child have DIFFTERENT needs that need to be listened to and supported
	Transport should depend on the needs of the child and if there is no suitable school for them
	Unreasonable change and demands, children with sen often need to have continuous support with little change or disruption, families need the support of others for independence.
	Most children it's the transition into school that becomes difficult by asking the parents to step back in the transition from home to school becomes stressful/dangerous
	Kids are on the waiting list now for transport so the need is there
With ulez inplace now if a family doesn't have a car already then they certainly won't get one for this at any reasonable price	
Unsure	
Up to date Ulez efficient reliable buses to collect children. Just because the council is in financial ruin does not excuse the responsibility the borough has to support it's disabled young people and their families.	
Use Council vehicles and staff	
Vehicles to be less broken down.	
More supports given to most vulnerable child on buses.	
More understanding to the parents/Guardians as sometimes dealing with disable child is stressful enough, the extra pressure from the transport people on parents when there is a delaying, is the last thing the parents want.	

Page 18 of 85	<p>We all need to care for vulnerable and my son is 1 of them. Both me and my partner work full time but are not in high paying jobs it's a struggle. But we rely on this service he is in a routine and chaperone ensures his safety and others , he has violent outbursts which if he travelled otherwise would lead to bad situations ie someone being violent to him, taking advantage of his naivety and innocence as he is young in his way. People will react and without protection of current system ie know com p any are safeguarded and where he is also chaperone assistance we know he is safe. Take this away your taking away his rights , what he knows works fir him and all the vulnerable kids. Please do not change current system it's tough enough with kids with needs as my son has adhd without additional worry of them arriving safe at school.</p>
	<p>We are not current users of the transport service so cannot comment on how efficiently (or inefficiently) it is run.</p>
	<p>However, I do not agree with the over 16 service being charged for at all - this will be penalising parents/Guardians of young adults that have medical/emotional/educational issues of some kind, through no fault of their own, and no-one that will be using this service will be using it by choice or where there are other realistic options. I realise the council is under pressure to save funds and make cuts due to increasing social care costs, but all this will do is affect parents already under financial pressure and will ultimately lead to fewer young adults with additional needs being able to continue into further education to maximise their potential.</p>
	<p>We could stop voting for local politicians who do not support the most vulnerable in our community, or we could get rid of senior officers who make recommendations without any real understanding of the issues</p>
	<p>We get a great school bus service. I don't see how it could be improved.</p>
	<p>We have had almost no issues with our current transport service in three years and would like it to stay the same.</p>
	<p>We have not had any issues with the service over the years, it has been very good for us, but if you are looking at cutting this service you would be punishing the people that need it most.</p>
	<p>We have only been using the service since September when my daughter started year 7. It has been such a blessing and help in knowing that my child is safe in getting to school, it would be impossible for her at this point to use public transport. And as her school is a considerable distance away, because it was the only school available to meet her needs locally, the bus service has been invaluable and we are truly grateful for it. I honestly can't imagine coping at this point without it. Please consider cutbacks elsewhere, away from the children, young people and vulnerable adults who have the greatest needs.</p>
	<p>Who knows, I'm guessing you have been as efficient as possible?</p>
	<p>You can not use these ch l'ldren as a cost cutting except use, they are entitled to an education, many in a special provision and it is the councils job to get them there in a safe and supported manner.</p>
<b>Public</b>	
<p>A maximum amount of funding per child per day is the only way forward. Havering should never being paying figures of £200 per day for transport af any child.</p>	
<p>Budgets should be realistic and no over spend. As other school child have pay to travel to school a fee should be applied to help with the cost. Taxis if used should have more than one person to average the charge.</p>	
<p>Coaches and mini busses run by council drivers, or even volunteers.</p>	
<p>I think the proposed review c ould be very helpful in avoiding such a wasteful system as at present.</p>	
<p>It is unreasonable to expect the council and tax payers to provide this provision.</p>	
<p>means test all families and if their income falls below a certain threshold then assist if really needed. Many people can make their own arrangements and have been to long in receiving transport even though they have their own means of travel.</p>	
<p>My godson is a blind disabled child who has to travel from hornchurch to london any change in his retouine effects him greatly also his mum is a single mum who has another child she has to get to school in hornchurch. Ive personally had to get this kind of transport to my own health needs. They need to provide transport for children with special needs children should not have to suffer.</p>	

Page 1 of 7	<p>Not on transport but who is scrutinising Adults expenditure and their processes. Why are adult and children's services allowed to overspend again why haven't they been more proactive and frugal with finances. An approach to their governing body or consulting other authorities to consider joint procurement and commissioning should have taken place years ago. It's not too late start now. Get some of those accountants and improvement managers into these directorates and don't let them hide behind the risks to children and adults if spending stops. Get the skills in the right place.</p>
	<p>Providing a school time bus or coach to do pickup and drop offs, instead of using black cab and all other viable taxi services, would save the budget.</p>
	<p>Most of the time I have heard from parents it saves them having to go out. Parents who do not work can - as has been in the past - have always been able to get their child / children to school. There are breakfast clubs, after school clubs and so on.</p>
	<p>All children are vulnerable, and all children can be affected by social media.</p>
	<p>Should stay the same if it's not broken then don't fix it.</p>
	<p>Stop your drivers tooting their horns before 8 am every morning whilst waiting outside homes and disturbing all their neighbours.</p>
	<p>There are only a limited number of special needs schools within the borough. Surely a bus with assistants on board could collect children within a radius of that school and drop them off. This may mean that the children have longer travelling times, but would be substantially cheaper than individual taxis. The staff on the bus could over time work out a rotation to avoid collecting the same child first and dropping them off last.</p>
	<p>I used to be the assistant on a mini bus run by PHAB club to take and drop off children attending summer activities at Stubbers. ie I would ring the house and wait for the child, whilst the driver would drop the wheelchair ramp, other children would walk to the bus and I would ensure the seat belt was on - before setting off again. The kids on the bus became friendly and would sing songs and tell jokes. They could often tell if a child arrived anxious, upset or sad before we did.</p>
	<p>If a parent chooses to send child a long distance, when available schooling is closer - surely they should contribute to the additional cost</p> <p>When changing the Fleet choose Smaller people carriers and insure their used more than a couple of hours a day 5 days a week, Hire them out to Residential Homes School Clubs at a nominal charge ( as once the Gatwick Flyer did )</p>
	<p><b>School or Education Setting</b></p>
	<p>At the moment, we have children at our school having transport to school who, I believe, do not need transport. Their parents are able to drop them off, but it is more convenient to have transport, so they take advantage of this, just because their child has an EHCP, rather than because of the need. More consideration needs to be in place for distance and setting, as I believe it is wasteful at the moment.</p>
	<p>Buses into schools are key to a transport service which is climate responsible and accessible for all.</p> <p>Buses should be used to transport students into school and driving should be minimised/discouraged</p>
	<p>I feel this is a broader topic ie government funding for building schools .</p> <p>One possibility is for the La to give schools funding to provide transport.</p>
	<p>I think personal budgets and parental contributions based on a means tested system could work well.</p>

Page 18	<p>Personal budget would give children the opportunity to be brought and collected from school by people they know. Parents would be able to have more flexibility when getting transport, if some class friends are going to the park with parents or an after school PTA activity they could go and get transport home after allowing children to have that social input they miss when rigged transport times are applied. Cannot stress the importance of teachers/ TA's being able to hand over a child to someone who is able to report back to the parent with enthusiasm or is a loved one for the child at the end of the day. The mental health and behavior of children could benefit from this. The relationship between school and home is extremely important and sadly lacking for some children who are transported in. Children with ASD or Social Communication issues are missing out on valuable</p>
	<p>socialising experiences by being placed on a bus at the end of the day and not being included in parties, trips to the park and even a little bit of play in the playground while parents chat.</p>
	<p>The existing service needs more reliable busses and standby drivers</p>
	<p>Use current LA transport more effectively/efficiently. Avoid outsourcing provision to private companies.</p>
	<p>Working in a SEN setting for children with severe needs, I feel that individuals should be assessed. There are parents that claim a disability vehicle for their child, who doesn't work yet expect PTS to collect their child on a daily basis, and then use the car for their other children or for personal use.</p>
	<p>However there are some families who do rely on transport. I think hovering should be flexible for families so this allows them to be able to drive all their children to different settings and not be penalised for being late.</p>
	<p><b>Young Person aged 16 - 25</b></p>
	<p>Better communication/ planned absence delays</p>
	<p>Disagree</p>
	<p>I feel they parent/Guardians should have more of a say and recommendations be considered as we know first hand what our young person/persons need and more options that suit our situation and most importantly our family members needs</p>
	<p>I personally feel that the buses work well. We have minimal time on them meaning that she's not tired when she gets to college</p>
	<p>I do though feel that SOME of the taxi's need looking at. Some need them whereas others, with training, could be more independent.</p>
	<p>I understand the need to look at cheaper ways to run transport within the borough, but I feel targeting the 16-18 age group is discriminatory as they need to attend college to at least 18. In my daughter's case, she has an EHCP till 25. Her disability severely limits her ability to travel on public transport without someone with her, which then takes away her independence. These are factors that are not being taken into consideration relating to the child.</p>
	<p>I do not feel it is in my or my daughter's best interest to have a personal budget and this is not something I would be willing to take on. My daughter's transport works for us and that is what we would like to be continued.</p>



I would be unwilling for my child to car share (not that this is an option as she has an electric wheelchair) and surely there are a number of risk factors with this option. I also have no family to support me in these circumstances.
In terms of the actual policy document, I would like to raise the point that in relation to the "how your application will be assessed" section, I believe that access to the use of a Motability vehicle can not be used as a reason to deny transport and I fail to see the relevance for the assessment. I also fail to see the relevance of whether a parent can drive as the assessment should relate to the child. Surely it is discrimination that a child whose parent can't drive can have transport over for argument's sake my child because I drive.
I am led to believe that I do not have to agree to take responsibility for my child's transport and I will be looking for the borough to continue to arrange this on my daughter's behalf.
if it is no broken, why fix it? leave it the way it has been running please.
My son weelchair user need help to do everything. He have cerabarelpalcy
Strict qualification criteria and also means testing

## **Direct Views of Impact on Children**

<b>Responses by Groups</b>
<b>Charity or Community Group</b>
I feel it should be means tested as some families can afford to transport their own child but rely on services for a quick fix - of people can drive they should take their own child or make their own alternative arrangement's this will free up funds and time for those with less support or resources
This will take away independence from those not able to do transport training. This will cause distress to parents and their children It will prevent children from attending school and college which will in turn have a detrimental effect on them
<b>Child aged under 16</b>
Agree with all conditions
Because my daughter needs assistance to go to school she wouldn't manage traveling to school by her self. The travel assistance put my mind at ease. Because of mental health and safety. Her school very far . Even if it was nearer I still wouldn't let her travel alone. I haven't got a driving license. I also have to take my. Younger child to school .
car pooling not a good idea. Don't think you can expect others who don't know your child to be responsible for them. What if you have to work?
I am not able to take my child to school daily. First, I don't drive. Second, it is much easier for me and my other little kids when the bus comes and picks him up
I think all children in full time me education should receive free travel to school, college or universities or any place that provides education
Inconsistent and it will not be subject to inflation or economic changes. Also as working parents it will severely impact our jobs as organisations are not flexible to the needs of caring parents.
It is everyone's responsibility to safeguard children, protecting them from harm and promoting their wellbeing
Make it easier to work out a travel plan and reduce traffic on the roads

My child doesn't take public or funded transportation to school, he's 10, so I take him myself & pick him up. I'm all for the children that genuinely need assistance & the parents too. But there are far too many grown ups taking advantage as it is. So make sure it's not just given out willy nilly!
My child gets a black taxi to the local special school. She is 2 on 1 support & requires 2 escorts. She is unable to travel on the bus as been banned over 2 years ago. She cannot travel by mini bus as needs a black taxi as has protective glass from attacking the driver. Currently Havering cannot fund 2 escorts so dad gave up work to support mornings & 2 Guardians escort on way home from school. This works for my daughter. The black taxi is a must. We also have another school run for her mainstream sister.
My child is autistic and she gets collected from home by a havering bus and taken to school and the same in the afternoons. She is very happy as this gives her independence away from me travelling with her but I also know she is safe and looked after. I would not want this to change.
My child needs bus transport to get to school. He is unable to manage public transportation independently or with travel training at this current time. He is 12 years old. If I had to take my son myself it would negatively impact on my employment. If this is taken away it will have direct impact on his attendance or my ability to continue to work
My daughter and I are already mentally challenged to a near exhaustion to prepare for travel in the mornings by bus.
I am unable to extend myself more by having additional stress with arranging transport myself, I am almost at break down point now.
We need this service to be continued, as my child gets older the stress level increases, by removing the service, it will greatly affect my child's mental health, as she struggles already, and I worry that this will result in larger melt downs than she currently has daily.
She needs the bus, it's built in over a number of years, and to change that routine now, in my opinion would be catastrophic and a major life change to my daughters, and my, own wellbeing.
My daughter is profoundly deaf and has only just settled into year 7 at her new school, which she has to attend as it has a special provision catered for her needs.
Ava gets a shared taxi with 3 other children from her school. She would not cope being in a taxi on her own, she wouldn't feel safe, and I as her parent would not feel she would be safe also by herself with an adult. She is profoundly deaf, so If anything would happen to her cochlear implants she wouldn't hear anything or be able to communicate to the driver her needs. This is way she needs an assistant with her at all times whilst travelling to and from school.
Her new school is a long way from where we live. That would mean I would have to give up my job to escort her to school everyday, which would be a 1 hour 30 mins journey twice a day by bus as I can not afford a car.. There is not a local school that can cater for her needs as there is only one school in the whole of the borough which caters for deaf children.
I would have to pull her out of school as i cannot afford to leave my employment. Which would then affect her education, which is not fare at all. My son is severe disabled and need the transport assistance mandatory.if the transport assistance is not there he will not be able to go to school
None. My children have an 8 minute walk to school.
The changes for my children will help our family

We feel that it will affect our son's mental health. Our son would struggle to use public transport and it would be unsafe for him.
<b>Other (please specify)</b>
As a Governor at Corbets Tey School, any changes to the home school arrangements for our pupils, parents and Guardians will cause disruption to school's start and finish times each day. The use of the Havering Transport system (buses) is vital for our pupils and will be detrimental to their education and welfare.
Our pupils are the most vulnerable children in Havering and should at least be able to receive education without the threat of not being able to get to school, on time. Their families are also vulnerable and any cuts in the home to school transport will be devastating for them.
At a time when we, as a family, are coming to terms with a medical diagnosis of a three year old and making plans for her starting school, this is all unsettling. She has been assured a place for September 2024 - she will be 4 - in Upminster but is the youngest of 3 children. The older two are taken & collected from school in Romford by their mother. It will be impossible to take or accompany the youngest with needs to school at Upminster & it has been agreed she cannot attend mainstream school.
I do not have a child requiring this service.
I don't have a child requiring transport to school, because as their parent I took this responsibility on myself - I feel that parents who rely on the Council to take responsibility to getting their child to school are lazy - the new policy should not impact, other than making the parents take on the responsibility of their own child which they should have been doing already. It's annoying to see parents not take their responsibility on this - this is an excellent proposed policy and should be implemented asap.
If the proposed measures had been in place when my son was attending special needs school and college it would have caused great distress. With younger siblings also needing to get to school there is no way I could have got my son to school. Due to the nature of his difficulties I could not have car-shared or let him travel without an escort. I'm sure there are many families that would have these same difficulties now and taking away even this small support would be detrimental to all.
If the transport to schools is stopped this will majorly effect my nephews wellbeing and education. As a child with special needs he needs to attend a different school his brother and my sister would be unable to ensure he could travel to school safely.
My three autistic grandchildren would have their full time education curtailed if the funding for the transport service is in any way limited as they are unable to use public transport independently
<b>Parent/Carer</b>
A budget to support the cost of travel should be made available to all not means tested.
A huge change in my sons trusting and feeling safe issues
A personal travel allowance is very unlikely to be adequate to pay for road-based vehicle transport should our child be unable to cope with public transport. As a result we as a family would incur the additional expense or have our career impacted owing to school journey times infringing on our contracted hours of work. This would also be environmentally damaging as the economy of scale (both financial and environmental) conveyed by group (school bus) transport would be lost, and many families move towards private vehicles/taxis to transport their children to school. This is also a risk as using private hire vehicles does not guarantee safeguarding as taxi drivers may not be adequately trained/DBS checked the same way as the school bus staff.
A stupid policy choice
Although my child has an EHCP, we have not required transport provision and use our personal car and at our own expenses.
It is empowering to be able to do this thanks to some reasonable adjustments at work and having a blue badge.
Any means testing should be on the individual aged 18 and NOT on household income. This should be in line with social care's financial assessments. Parents of 18 year olds are not legally responsible for them !!!! We have a duty to send them to education until 19 but why should we pay for the much needed transport !

Page 192	As for me I drop my grandson off at school in the morning, but for other Children the changes in the policy will have an impact on other children.
	As I understand it, none of the changes would affect my child.
	As long as xxxx can get to school safely
	At the moment my child is only 5 and we live near to his school so do not use transport. However think it will help many others and think it's important to help children get to school safely
	Been disabled makes it hard for me to take my son to school as the road has restrictions and my son's attendance is suffer from this and I can not afford transport
	Both my children travel on transport they're unable to travel on public transport in peak time such as school run due to the amount of people and noise on public transport in this time and also due to the distance it would mean then being on bus nearly 2 hours
	Changing a structured routine to my daughters travel arrangements, will have a serious impact on her mental health. At the moment she travels by bus with trained staff that we trust and we know they can support her with her needs. Changing something as big as this, especially as it's the first part of the day, will set her back years. To even think that as a borough you are willing to do this to save money is disgusting.
	Charging for post 16 should be no more than a typical child would pay on public transport. Why should we pay more because my child is disabled If transport was taken away my child would not be able to attend school Managing our own budget would add more stress to an already stressful situation & put extra pressure on those who definitely do not need even more stress in their lives.
	Children and Parents should be given the option of LA provided transport or Transport Allowance Personal Budget, families should not be forced to use the Personal Transport Allowance as such does not take into consideration the increased cost of Taxis/Cabs, and the fact that an escort would be needed in a form of the parent or the parent would need to pay for an escort to support their child in that Journey. The Personal Budget Transport Allowance simply avails the LA from responsibility, and of course we know that it'll work out mathematically cheaper for the LA.
	Children and young adults in education should be able to travel to and from school/education place free of charge
	children who need support to attend educational provision should be provided and this should be provided free of charge and to meet their needs
	Children with mobility issues should not be the target of budgetary cuts as they are already an extremely vulnerable group. Considering this as a way forward for saving money feels very uncomfortable and an injustice.
xxxx is diagnosed with Autism ADHD Oppositional Defiance Disorder Sleeping Difficulties Coordination difficulties For the diagnosis xxxx has he goes to a specialist school out of the borough to accommodate his high level of needs.	
I'm a single mother of 4 children which 2 of them I still take to school and pick up from school myself, I would have no other means to get xxxx to school if it wasn't for the London borough of Havering transport service. xxxx needs to be accompanied when travelling with another adult due to him getting out of his seat belt which can cause harm to himself and others. He wears a 5 point harness to keep him and others safe. xxxx is not an independent child and doesn't have the level of understanding or awareness to travel independently at all.	
CURRENT ARRANGEMENTS ARE OKAY FOR MY CHILD.	

Current I don't use this service due to living within close proximity to the school. However as my child progress or when I move I potentially may have to. This service would allow me to work, knowing that my child is able to safely be transported to school by transport booked by myself and not eating not my already stretched finances. Taxi/lift sharing etc is not always practicable for all disabilities and should be based on individual needs/used where suitable. Consideration should be given that in particular days changes may be required due to sickness or melt downs in children with ADHD etc.
Currently none
Currently none, as my child walk / cycles to school
Currently we do not have transport provided however this may be becoming a need. Arranging private transport would be more costly and a personal budgets for things such as this never covers the costs. I believe this is veiled cuts in service. Please find somewhere else to make your cuts other than vulnerable children.
Cutting down funding for assisted transport will have a negative impact on my child's education
Depends what kind of changes it will be. If they help well it have a good impact. If not it will have bad impact.
Difficult getting disabled child to school
Do not currently use transport, but have 2 children both with an EHCP and currently both in separate schools, I am currently getting help from friends to collect and take one child as cannot be in 2 places at once when my youngest starts secondary this help will no longer be available which will mean I will need transport as currently not one of my children can go to school alone as it is not safe for them to do so. If transport is not available then one of my children will not be able to attend school as I cannot be there to take and collect
Does not apply to me. The council cannot be expected to pay for everything
Does not apply to myself... Due to the amount of taxis being used to transport children, I do feel this needs addressing as I feel these are not acceptable
Don't really impact
Due to the very specific needs my child has he requires specialist transport in a 9 seater with a chaperone. This is for his safety and that of the driver and chaperone. He is too much of a risk to use public transport and I would not know where to start looking for suitable taxi staff and chaperones. It should be left as it is, organised and funded by the council who are trained for this.
Enable flexible travel arrangements once my daughter attends college next year
Everyone in our household works and we depend on the bus to take our daughter to school. She is fully wheelchair dependant but sociable and enjoys her time on the bus chatting to her escort driver and peers. Socially and emotionally my daughter will regress if she does not have her "bus time" with her friends. I will also have to
give up work as I work in a local school and will not be able to drop her off and make it to my own job and my husband works in London from 7am-6:30pm.
Everything will run smoothly
Families with multiple children with only one attending specialist provision (i.e. kids in different schools) wouldn't be able to use a personal transport budget as a parent cannot be in two places at once
Feel that the children's trip to school is safer
Firstly I feel this will impact us in so many ways.
My children's behaviour will need to be managed on the transport to and from school. They won't be able to travel without someone being there to support them.
A change in their transport will definitely impact their attendance because they are comfortable with the way things are now.
Travel training is irrelevant to us because my children are only 7 years old.

	My children's mental health will be negatively impacted and mine and my husband's working hours will be impacted if we have to take them to and from school ourselves.
	<p>I also concerned about managing a personal budget and managing the availability of transport that I would have to arrange. The new proposed transport changes are vague and not clear enough.</p> <p>Firstly, it will be incredibly difficult for her to cope with the routine changes, which will have an impact on her emotional well-being.</p>
	Secondly, as we are both working parents, we have already made changes to our employment, and that will have a negative effect on our financial situation, pushing us to limits where the basic needs are barely met.
	For working parents like me, the changes might have a negative impact on my life and might result in working parents working fewer hours or leaving work in order to provide or manage their child's transport to and from school. Working is what helps me unwind and keeps me sane in my daily caring responsibilities. I cannot afford to lose my job or reduce my working hours because this would have dire financial consequences for me and my family. This would be very stressful for me and definitely have a negative impact on my mental health.
Parent ID 194	Likewise, my autistic child has been taking the school bus for years, and therefore used to this and now part of his routine. Any change in routine would be stressful and distressful for them and will result in anxiety, and challenging behaviors, and also affect his mental health negatively.
	Free travel should be for all students , this would enable them to get to school/college without the worry or stress on how to afford it . Also stop them having to carry money or card to pay, eliminating theft and harm caused by those who rob students for monies etc...
	Getting my grandson to school would be very stressful for all involved if it changes. He is happy and it works.
	Getting travel finance support will help us / family economically
	Good
	Greater flexibility for suitable to needs transport
	Greatly help with attendance as I struggle to get him in with lots of health issues
	Harder
	Having autistic non verbal twins who need routine any changes to their daily travel arrangements would have serious repercussions to their mental health. There is no way they could cope getting on public transport. As a single parent my days are already very hectic not only caring for the twins special requirements, but also working part-time to help make ends meet. To then have to find transportation and manage a "travel fund" would pile greater stress and strain on me, which in turn would negatively impact the twins.
	<p>Having more than one child at different borough schools makes it physically impossible to be able to get them to school on time. Havering borough education authority DO NOT have a school that is able to meet my child's needs which is why she attends an out of borough school &amp; needs transport to get there.</p> <p>Having to manage the transport independently would change my child routine which she loves being on the bus and being surrounding by other children on her journeys to and back from school.</p> <p>Having transport to and from school will cut traffic In half, and public transport will have less congestion than now.</p>
	Help independence
	Help with my sons disability's and build more social confidence
	Hi
	I am a single mum living with 2 children and they both have individual needs because son had medical condition

<p>and my daughter had ADHD which is under going investigating so I can't pick up and drop of both on time .I don't have any family support or help.</p> <p>Huge as we need more school buses on route ie 651 as 1 bus for a school of over a 1000 students is not enough plus it will make school attendance better especially in winter seasons</p> <p>I am a mother and I would be very happy to be a transport for children from school.</p> <p>I am a single parent to 4 children. 3 of these children attend a SEN school out of borough, and 1 attends a mainstream setting.</p>	
<p>My children have multiple appointments at various hospitals and clinics, all at different times. To have transport taken away from us would mean my children would not be able to attend school on a regular basis, as they would all have to attend appointments for their siblings, as I would not be able to travel to and from school twice per day, as well as attend appointments. I do not have anyone else who would be able to take my children to school, or attend appointments with them. Having school transport removed is not an option for us.</p>	<p>I am disabled and have asked for help in the past for transport for my children to get to school and was refused, Most boroughs offer this service by the council but Havering doesn't due to there budget but seem to fail the impact it takes on families and and children with there attendance and not all family vehicles now are ULEZ compliant, The council doesnt offer no help in any way but are happy funding other organisations that are pointless, and as a havering tenement I belive there should be more help from the council and be up to date with what's going on in the real world and shouldn't be based on means tested, but maybe PIP or DLA or EHP</p>
<p>I am not impacted but many young people I know could be</p>	
<p>I am strongly agree with pooling system.</p>	
<p>I am not agree with travel training as it is not easy for disabled children to learn due to learning difficulties. And the travel system can change any time due to unforeseen circumstances e.g stike , road works etc and some children cannot cope with change in system.</p>	
<p>My personal situation will not allow my kids to travel as well because both of us mum and dad are working during their school times and my parents look after my children. They both cannot speak English that's the reason I can't take risk of leaving my autistic child with them travelling in the bus.</p>	
<p>I applied for this for my son and didn't even get a reply. Support with getting him to school would have and would be really helpful as having to rely on his older brother causes massive issues at home and on his attendance</p>	
<p>I applied for this for my son and no one even had the decency to reply. My son misses days at school when there is no one available to support him on the bus.</p>	
<p>I be worried about their safety and the upset they will feel has they can't handle change to well it well affect then physically and mentally</p>	
<p>I believe any change would be personally detrimental to me and my child.</p>	
<p>I can't afford a personal transport</p>	
<p>More boring</p>	
<p>I can't say until I know exactly what the changes to my child will be.</p>	
<p>I could not afford to fund any travel help for my child as already living on the breadline for the basic needs also my child would not be able to go to the school he is at and thriving without the taxi provided as he can not travel independently or with help as he as anxiety issues and also could end up in trouble as he often says things tht would get him in trouble</p>	
<p>I currently claim fuel allowance, and transport my child to college. Please remember this is not just about school age children, but also post 16, college etc. These do not seem to be getting much mention.</p>	

<p>I have had to fight to get, and then keep, my fuel allowance, in the past, although my son more than meets the criteria, which is so wrong.</p> <p>If I were to lose the assistance, it would mean having to absorb the petrol costs myself, as he still needs to get to college each day and there is no other way.</p>
<p>I currently don't use transport. My son has autism but not an EHCP as yet. He is due to start secondary school next year. He will not be able to get a bus to school on his own due to his lack of understanding and how busy buses are in the morning. This will ultimately cause a meltdown and I will have no way of knowing where my son is or if he even got on the bus. I will have to take him to school everyday and my other children who will still be in</p>
<p>primary school. This will make someone late for school everyday. I was planning on applying for transport to get him to school. I find the whole process confusing as it is already. To hear this might be included in the budget cuts is a massive worry for me especially as school is such an important part of his development. Having the transport take him to school will ease his anxiety about getting to school and will ultimately make his day alot easier. I fear if he doesn't have this he won't be in school at all in an incredibly challenging time in his life where change will be the contributing factor on his mental health. I appreciate more children have special needs these days compared to 10years ago. But our children's safety and education needs to be a top priority. In my opinion the council should make cuts to the contractors they use, plumbers and electricians for example as they will visit a home on a call out charge and will then go back at least 3 times and charge call out fees when no work has actually been attempted or the problems fixed. I feel if you opened them jobs out to other companies you would get a more competitive price and work would actually get completed. Or employee staff that work directly for the council to do the work rather than subcontractors as the cost would be significantly less. I feel penalising families that are already struggling with special needs children is the wrong route to go to save money. You only need to look at the invoices from contractors and see how many times they have gone to one site to know that they are ripping the council off with fees they charge.</p>
<p>I currently take my child to and from school however he is going into sixth form next year and needs independences as he becomes a man, so would expect him to go by transport. This will also mean I can return to work full time, making the Financial strain on my family better.</p> <p>If he was unable to get transport this would affect not only his independence but also the mental health of the whole family living in a cost of living crisis.</p>
<p>I currently take my son to his sen provision and claim fuel reimbursement however I know this will affect other parents in very different ways. Especially those who work.</p>
<p>I do not agree with charging children for bus or train transport to go to school. It is a legal requirement that they attend school and charging them a fare each time will result in loss of school attendance.</p>
<p>I don't get any even though my son has special needs</p>
<p>I don't think we require any changes as a family</p>
<p>I don't drive a car</p>
<p>I don't feel the changes would have a huge impact on me and my child other than possibly giving more confidence travelling independently.</p>
<p>I dont have any details</p>
<p>I don't really understand what this is</p>
<p>I don't think it will affect our family.</p>



<p>I don't think it would have much of an impact.</p>
<p>I feel Havering Council are trying to save money by targeting the most vulnerable children and young adults in our communities. Your cabinet report highlighted huge safeguarding concerns such as 'carpooling' which is a complete lack of awareness for disabilities and learning difficulties. A school bus school not be a last resort. Travel training is not suitable for vulnerable children unless that child is extremely able and even then it's a risk. Also, some schools such as Corbets Tey specialist school is located within country lanes and is dangerous for a vulnerable person to walk down from a bus. Expecting parents to make their own taxi arrangements and claim back the costs during a cost of living crisis is ridiculous. Not even mentioning the amount of stress this will put on a parent who already leads a very stressful life. I personally feel that Havering Council are bending rules and regulations and are not taking the Education Act of 1996 seriously or basic human rights of a person with a disability. Maybe cabinet members can take a pay cut so our children can get to school safe and calm.</p>
<p>I feel that all children should be able to benefit from free travel using buses if necessary and that no child should be means tested. Parents situations vary greatly throughout a child's lifetime regardless of their care needs. If this survey is being done to make some parents pay for costs then I think it's totally wrong.</p>
<p>I feel the amount of funding cuts and lack of support for disabled children and their families in this borough is already a huge issue that needs looking into. Limiting the transport for special schools will hugely impact disabled children and their families. Unlike other children who attend local schools. Our special needs children attend schools all over the borough and beyond. I think it is ableist to take away even more of the services we currently access.</p>
<p>I feel the changes will have a negative impact on myself, my son and my family.</p>
<p>I feel this would help children that's beneficial too help.</p>
<p>I gave up my job to take my disabled children to school and did this for two years as there is no accessible afterschool club support.</p>
<p>They were late every day, we were all traumatised by the school drop/pick up which is at a very busy mainstream school one trip home resulted in a cracked windscreen. They would attack each other and me from behind on the ten minute drive. Sometimes I would get stuck in the carpark till everything shut because it wasn't safe to drive. Sometimes it would take two staff to get me to the car.</p>
<p>In February this year I applied for transport. They are on time every day, we are safe. I know longer have anxiety attacks sitting on my driveway. I'm looking at returning to work. My children have made friends on the bus and its given them safe independence.</p>
<p>The PTS service works not only that but it's given me back my life.</p>
<p>If you were to remove this I have no friends or family nearby that can support me taking my children to school, I wouldn't be able to return to work, my children would go back to having violent meltdowns outside of school and their attendance would be effected.</p>
<p>Transport is propping up the broken SEND school system, the no afterschool system.</p>

<p>We don't want benefits (which is what this will become) we want services that work that enable our children to get safely to an education. That allow us the freedom to earn a living and have our dignity back.</p>
<p>I have a child with additional needs and is due to start full time at reception in 2024. I feel that I do not know enough about transport arrangements or facilities should I wish to send my child to another school that is further from me. At the moment I plan to send my child to a school that is a 10 minute walk but should I decide to work, send to another school further away or if my child is in high school, there is not enough information available to help me make these types of decisions.</p>
<p>I have considered using transport for my son who has been bullied on the way to school and I'm concerned the changes would remove that option.</p>
<p>I have no idea. I accompany my child who uses a scooter, so not surfe this is applicable to us.</p>
<p>I have transitioned my child to local transport and no longer use the service</p>
<p>I have two children that have transport to and from their schools one attends Corbets tey at the avalon who has serve medical and mental health needs and the other attends a semh school out of havering if either of them were not to have transport it would servilely impact both of their education</p>
<p>I have two children who receive transport one to the Avalon in south Hornchurch which is Sen collage and the other goes to a semh in a taxi out of borough this possible changes could massively impact both my children and would result in them not being able to go to school</p>
<p>I have two other young children that I take to and collect from primary school. I rely heavily on the transport bus to take my child to school as I can't be in two places at once. He is also severely disabled and needs an adult with him so a taxi is not an option. We rely heavily on the transport bus to help him get to school. I also believe where he stays in full time education that transport should be free and not charged or means tested otherwise he will have to stay at home and miss school which is crucial for his mental and physical well being.</p>
<p>I hope that my child will be allowed to use the school transport soooon.</p>
<p>I just hope it would be simple, as long as my child gets to and from school safely.</p>
<p>I know people with disabled children who are horrified by this news.</p>
<p>I may not be able to avoid the payment</p>
<p>I rely on transport to get my daughter to the Avelon every day for school and on time. My daughter has several health conditions and mobility problems. Public transport is a no.no. And I cannot drive it is a big issue in our lives. Im her full time career and her dad has to work 24/7 to keep a roof over our heads.</p>
<p>I strongly believe that transport provided by the borough is essential for SEN children. The positive impact of sharing a school bus with his peers has been highly beneficial dealing with social interaction in a controlled environment. The bus is less noisy and much more reliable than TfL buses which would increase his anxiety levels. In my son's particular case he is classed as a vulnerable child specifically around a lack of awareness in how dangerous the roads can be and his impulsiveness can cause a detriment in his cognitive decision making. Transport assistance has been a real confidence booster to him knowing that he is seeing the same driver/PA everyday and that he is with the same travel buddies</p>
<p>I struggle to get him to go school has it is with out the added pressure of getting two buses to school and he wudnt be able to do that alone so I would then have to take up hour getting him there then get back my self to the. Re do that again on pick up</p>
<p>I struggle with the cost of petrol. We applied for transport last year but never got it Our son uses a walking aid which he would struggle using independently on public transport, also his mental health would suffer without myself getting him to college</p>
<p>I take my child to school because I do not work at the moment so it works for me but I would think if u have to work and r moved to having to sort out your own transport for your child would be extremely hard and stressful. Also some family's find budgeting their own money extremely hard.</p>
<p>I think all children in full time education should have free transport</p>
<p>I think having added pressure on families to maintain responsibilities for transport and allows for abuse of trust. Families use transport as a means to a must. They do not need extra stress and worry. No parent wants to be in a situation where they are dependent on transport. Having this area managed by the local authority is better. I do think the transport by the local authority is more concerned about expenditure rather than the best interest of a child. Every child is different and should be case by case. I have recently have had a negative experience with transport for my child. Making decisions without consulting families lead to undue stress.</p>

I think it will be a positive consultation
<p>I think it would depend on how far the school was in distance.</p> <p>Also if the budget covers the full cost.</p> <p>If they tried it and got worried, anxious or it wasn't working is there flexibility for it to go back to how it was</p>
<p>I think the changes are disgusting. If my daughter didn't have the bus to take her to Corbet's Tey, she wouldn't be able to attend. I would have to get buses and walk as I don't drive as a single mum this is unacceptable and my daughter wouldn't have an education, which she couldn't access in mainstream education. The council should be ashamed, our children deserve love and patience and respect not to be discriminated against because they have special needs. I won't be voting for the Hornchurch residents association, they should be ashamed especially XXXXXX who claims to support First Steps which is a special needs group but is punishing those who she is meant to help.</p>
<p>I think this is largely an unnecessary initiative for any London Borough as the bus network is extensive and all students are eligible for Oyster Zip cards. The bus is free for our students, any family who does not appreciate this or finds it unsuitable can make their own arrangements at their own cost. If the DfE has spare funds they should be directed at schools and not training students on how to get on a bus.</p> <p>I do however understand that in a small number of cases the borough will need to make provision for those with disabilities that means accessing public transport is problematic. This is an acceptable use of public funds, but the DfE and local councils need to remember these are public funds and should not be wasted on giving extra travel budgets to students when buses are already free. Or training students on how to use public transport which should be a parental responsibility.</p>
<p>I think those changes will make parents life more complicated. We have lots of things to think about. And thinking about arranging a taxi or travel 2 hours per day will simply impact my working day. It would be good to have more sen school so kids will not need a transport.</p>
<p>I think yet again your penalising, attacking and discriminating against disabled people and thier families. It is hard enough navigating life with a disability without putting more barriers in place. Disabled people have the right to access school and care and be treated equally. They have and should have the same rights as everyone else. It costs more to have a disability and the support for disabled children in the Borough is already horrendous. For example you have no accessible parks. You want to put more charges and barriers in they way of support, respite care and independent living, all children have the right to learn and all families requite different support. Please find a different thing to attack / tax. Havering is completely lacking and really behind with the care and support of sen children and any one with a disability. You are discriminating against these families which will be mine at some point. You treat people with disabilities as a burden and the support you provide is already sub par. You intend to make it even worse for families who are already struggling emotionally financially and physically.</p>
<p>I wasn't aware of the policy. My youngest child walks the short distance to his secondary school. My eldest child travels by train to Victoria every day to her sixth form. It has never occurred to me that travel expenses could be funded by the council.</p>
I will be calm for my children .That they can safely travel .
I will have less time for work and other involvements
I worry that my child wouldn't be safe travelling alone.
<p>I'm not in a position to get my daughter to school as I have other children to get to school. Any change will be detrimental to our routine and have a knock on affect on our lives.</p>
If he does not have transport he will be unable to attend college
<p>If i am to be able to work i would need a place on the school bus. A budget is not the answer. It is not going to cover the transport and escort that is needed. I also feel that post 16 transport should not be charged. The young people using this service are not able to work. If anything financial support through child benefit and tax credits reduces or ends and the government has made it extremely difficult for disabled students to claim universal credit in their own right. Our young people should be able to access education without causing financial hardship.</p>
<p>If I had a personal budget I don't feel I would be able to get my children to school. My daughter has drug resistant and uncontrollable epilepsy and would be extremely dangerous for me to drive with no other adults in the car to supervise her. Both my children are special needs and will fight without an adult between them again how would this be possible if I am driving the car especially on big fast roads. There is no way on earth that I would be able to book a cab to take them for obvious reasons like</p>

Page 200	safety but also for there mental health not knowing who the driver would be every day. Also with an hour and half round trip twice daily how would I be able to pay my mortgage as I wouldn't be able to work. It's very short sighted to save money on transport costs only for me to then have to claim benefits as I'm no longer able to work let alone the stress it would cause on top of the every day struggles we already have
	If it is free then easy
	If it was taken away he wouldn't be able to go to school
	If my child needs transport in the future this will have a negative impact
	If my son couldn't get the bus he wouldn't be able to go to school
	If my son doesn't go on the school bus, I wouldn't be able to get my other son to school on time, as I cannot get to 2 schools for drop off and pick up at same time. This would obviously have a big impact on my children's attendance.
	If school bus is stopped will be more time needed to get to school so this would disrupt whole household
	If the changes are brought in this will have a massive effect on my child's education as she will be unable to attend school and will miss out on her education.
	If this is stopped my child will need to be moved to another school which will impact her mental health badly she is settled and receiving lots of help from the school with her disabilities aswell as myself we do not use this service as of yet but are undergoing the routes to receive this due to my daughter being partially sighted and having mental health with cahms I myself am unable to take her to and from school due to logarithm and being registered blind Thai has impacted all of us and now we are dependant on peoples hesp so this service will take the burden of our careers and our self's to keep her in the school she continues to revive help from
	I'm a mum of of 5 and I struggle to get her to school on a bus I'm 5months pregnant and it's hard because sometimes it's hard getting both kids on a bus with all the older school kids haveing a buggy and being pregnant it's horrible I think this school bus would help alot of people and I suffer from anxiety and sometimes blackout on a bus so I think this would be ideal
	I'm not sure
	Impact on their well-being
	Increase stress and anxiety for both parent and child. Expecting a contribution will impact on support I can provide for my child and to the detriment of other family members. Already my family is struggling financially with living costs rising dramatically. If the council is facing financial challenges, so are it is Havering families and especially those families with dependents with SEND.
	Increased levels of stress and anxiety leading to seizures
	Independence & reassurance for my daughter
	xxxxx would not be able to keep herself safe on public transport. She would get overwhelmed and panic. She suffers with lots of sensory issues. Isabella is a very vuneralble child and could easily be taken advantage of. I have 2 other children I have to get to school plus a job I have to get to. The best option is for xxxx to get the school transport.
	It does not affect we live 2 minutes from the school
	It makes him more independent and get him prepared for secondary school
	it makes sense not to waste money
	It may help by child in in school on time and more regularly
	It seems so wrong to make parents of disabled children aged 16 plus to pay for transport to school when they legally have to be in education until they are 18 and when mainstream young people aged 16-18 get free travel to school via TfL Oyster cards. However the majority of our 16-18 Sen children are unable to travel independently on public transport and are reliant on transport provided by the borough
	It will take away my child s independence so no
	It will affect my childs attendance and also his mental being
	It will allow my child to go to and from school without any issues regarding mobility. It will help us a lot as our work attendance is suffering due to continued lateness

PS 96291	It will be an additional expense
	It will be stress free for my child and myself because at the moment we are going through stress of waking up at 6am to get on the train in order for them not to get late to school as the school is far away from our temporary accommodation .
	It will give him more structure and routine and cause less meltdowns.
	It will help out families who are working and no time to drop or pick them up, if they live far from school.
	It will help with independence and it will keep them safe
	it will improve my childs attendance as my partner is unwell and i work in london most days so i dont have the time to do drop off and pick up
	It will lead to absence from school
	It will make life a lot easier especially for some of us that do not drive. There's this peace of mind that comes with you knowing school transport is picking up your child so you don't have to worry or run helter skelter about morning school runs.
	It will make us happy and it will make life easier
	It will provide freedom for my child to get to school safely with somewhat some independence
	It will severely impact on her mental health if a seat on the bus was taken away from her. Since going on the bus she has felt more confident and "normal" as she is getting to school by herself without being accompanied by a parent. My child has asd and dyspraxia as well as severe mental health issues which makes it impossible to travel independently on public transport, she would be a danger to herself and others. We are also not willing for random taxi drivers to pick her up each day as this would hinder her too.
	You need to seriously reconsider your options here as you are talking about messing with the boroughs most vulnerable children, not regular school children. They need support not made to feel like an inconvenience because they are costing too much money. It is ridiculous that one of the proposals is to "car pool" where 1 parent takes several Sen children. Do you know how hard it is to look after your own Sen child and keep them safe all the time let alone 2 or 3 others who could all have different levels of needs.
	It won't help the majority of children at all. You've raised the volume of children in each class in each year meaning more kiddos with needs. Then realised that that's potentially 120+ kids for each year group compared to what it was before and now realise that because of the cost of living both parents need to work and are struggling with getting their kids to school and to a school that's overcrowded and having parking issues. Then blaming the parents for making the area busy and now your backpedaling and trying to fall in line with Khan's next idea and the complaints of a few residents that funnily enough purposely bought a house next to a school. There are multiple reasons why your new policy doesn't even touch the surface with a solution to getting kids to school and getting them there on time. Parents are doomed what ever do, they have to work and yet they have to worry about stupid rules and school policies and encouraged to carpool when they just need to get to work after dropping kids off instead of running around like a headless chicken to get other kids in school that's going to be busy anyway. What needs to happen is a new school being built for the borough that can cater to the overspill of kids to the area that has adequate parking for parents. You've got a 'sports centre' in lower Bedfords road , wouldn't that of been the perfect spot for a school???? Everyone is fed up of the policies and pointless ideas when everyone has asked for a new school in Harold hill but instead you'll spend millions on building on every spot or another policy that's not achieving anything but instead parents having more pressure to carpool is your solution. No thanks, I'm not going to be trying to sort car seats out everyday and check my schedule with someone to get othe loss to school. So many people are having enough with the amount of money schools and the stupid policies like this are taking out of the boroughs budget with no solutions. Build a purpose built new school once and then you won't be spending extra over the years on bizarre ideas.
	It would be a disaster for parents, Guardians and children with ableism at its core.
	It would be a massive improvement to my child's travel as well as mine as I work in a different area and have to travel back and forth 4 times a day without counting the travel I do for work
	It would be huge. We rely heavily on transport. I don't drive and getting him on public transport would be to dangerous and I doubt we would actually get there. I have had to stop getting taxis as his behaviour is bad and that makes it dangerous for the driver. The only thing that works is the bus.

It would cost us more money and would probably decrease attendance of loads of children.
It will put children in volnurable position carrying money around and can lead to theft and violence amongs children.
It would enable me to return to work full time
It would greatly make it difficult to get both children to school on time as the schools are at different ends of Havering. At least one parent would need to give up work to be around for at least one of our children for school. There is a safeguarding concern as my child lives too far away from the school he currently attends for him to safely take public transport regardless of how much travel training he would be given. I would also not feel safe for my child to be in a different car on each school day to travel to school, there is no one who lives close enough that could take him to a school for us. My child would become anxious and insecure with changes to the current system in place and would not be comfortable not knowing who he is travelling with.
It would have a detrimental affect on my mental health, as well as my children. I have 2 children with sen, both have very different needs, neither child understands the need of the other. Having a seat on the bus has relieved a lot of the stress that previously came with me driving them to school. Meltdowns in the car were a daily occurrence, i had no one to help me while driving, I often had to pull over to avoid an accident, as the children would be lashing out at each other. I have many health issues and i am on medication for chronic pain. At present i do not have a car as it was not ulez compliant, but over the last few years i was not driving often as my medication or the pain i was in prevented me from being able to drive safely. My children having a seat on the bus has been positive for them, it has also improved our relationship. Having the transport taken away would only have negative consequences and severely disrupt my children's learning. I am a single mum with two children with disabilities and health issues myself, just knowing that transport could be taken away is already causing me enormous amounts of stress and anxiety, as it would be impossible for me to be able to get them to and from school without putting my health at even more risk.
It would impact on my son's mental health,his daily structure and input in class. Also I work from home sometimes and with early morning start. It would also impact on siblings going to other schools...
It would mean that as I in Upminster and there is no suitable SEN provision here that my child would not be able to go to a suitable school
My other child goes to the local mainstream and it is impossible for me to do two school runs at the same time
There is not one primary school in Upminster with a ARP
My child can't go in a taxi without a escort.
How would this even work with the school parking restrictions?
It would take longer and cost more to use public transport. He would have to think of other ways to get around.
It's really good
It's saves time. During winter and raining it's really good
Less money
Make our lives easier
Make people more accountable
Make sure you child arrives safe at school
Take pressure of parent money worrries
xxxx can not travel by him self and is classed by law as not mentally capable. I have arthritis of the spine and there will come a point where I can not drive at all. Our life is busy at the moment and our money is stretched beyond what it should be due to Havering refusing to support xxxx in the way that they do with other men his age and

Page 208	<p>I know that as a fact. I have more than just my two children that I have to deal with and my husband works. In order for us even be able to change our life style would mean that he would have to stop working which means we would then be a none working household just to do another job on top of what we do already. xxxx has not had any support other than transportation since turning 18 years old and no respite. What you are basically showing as a borough is that disabled should not be supported in xxxx case and don't have the same rights to a decent life compared to other people.</p> <p>May not be able to attend a suitable college with a sen department for his needs due to distance and complex travel changes</p>
	More independence
	More pressure added to the pressure special needs parents already face.
	<p>More stress on the family</p> <p>Most SEN parents do not have time to make these arrangements. My child will likely never be able to travel alone for the rest of his life, I do not see the benefit of "gaining independence" in this instance. It is another attempt to save money by a local authority that do the absolute bare minimum, and do it very badly already. Managing a budget is *easy* I do not understand why people we literally pay to do these things cannot wrap their heads around this?</p>
	Mr child has been getting the bus to school for years and this would greatly upset him
	My child has received a seat on a bus since starting special school from year 7, she is now in year 12 and still has the same arrangement. The bus gives her a sense of independence and she enjoys the social aspect of mixing with a wider variety of students. I feel that having a personal budget would take away the independence as it would be likely to be a family member doing the transporting.
	My child and i relies on the transport as we have no means of travel and cant afford or manage to travel by local transport as many times there is no chance to get transport as always full at that time of the morning
	my child as a lot of needs which she would not be able to make her way to school the only way she would be able to go to this school is by transport
	My child benefits from the continuity of the bus pick up and feels independent with out a parent or family friend present. Having to manage our own budget would have a detrimental effect on him attending school .
	My child could not access education in this borough through no fault of our own and due to lack of placement funding. Removing transport to his out of borough school would impact his life massively. It would also impact the family who already had to fight so hard to get a placement to start with. This is unfairly penalising families who have to accept a place at a school which meets the needs of the child and who do not have their choice of mainstream places.
	My child currently received a seat on a coach he does not cope well with close proximity to other children so being on the coach at least allows him some space as he does not have a student sit next to him. He could not be sent to school on his own as he is non-verbal and has no understanding of travel due to his severe mental impairment. I feel safe putting my child on the coach with the escorts in the mornings and letting him travel to school. I think if this service was terminated my child would then struggle to attend school because he would not want to sit in a car in close proximity to others and I would be unable to take him to school due to my own working commitments. I work as a special needs learning support assistance which means that my job would adversely be affected and so with the student I care for. My child has received transport on a coach for the past eight years and I also feel that a change would not have a positive effect on him.
	My child currently travels to school by bus with several other children and an escort. This has worked well for my child as he is unable to make his way alone but he does get a sense of independence not travelling with a parent /carer and is still kept safe.
	My child does not like change as he is blind and can not talk and is o a wheelchair
	My child does not need transport assistance
	My child doesn't rely on public transport to get to school so it will not impact her directly
	<p>My child enjoys the school bus and looks forward to going to school it could make him feel he has done something wrong and anxious if he cant travel that way it makes life easier for me as he is motivated to get up and ready for school</p>

<p>My child even though 14 wont travel anywhere alone, so its either with myself, or older Brother or both. My child is Autistic, learning disabilities and selective mute. They are still seeking a special needs school for him as the one we wanted we didnt get as no spaces. We have waited 6 years for his diagnosis. He doesnt like public transport.</p>
<p>My child gets free bus travel which is very helpful as I am single parent</p>
<p>My child had ME , which meant he lived with flu 24/7, muscle aches, tiredness and high temperature at times. This went on for 3 years. It took the school 6 months to arrange a home tutor, after 6 months I felt my son was too much influenced on a personal level by this older man and asked that he be allowed back to school on a limited timescale. I could take him to school on way to work but had no way of picking him up until was advised the school could arrange a taxi. This was a game changer for my then 14 year old. It meant he could socialise with kids his own age but it also meant he was exhausted so a bus home was out of the question. Am so grateful that this service was available. He should have been the only one in the taxi but often was taken to another school to collect someone else. That needed to be reviewed ?So am now making you aware.</p> <p>This all happened a long time ago but is still relevant. I was most grateful for this help at a time of great need. Then ME was thought to be a way of getting off school- which was totally wrong. Please help those in most need it's awful to see your child suffer</p>
<p>My child has a learning disability he could not find his way around, he goes to a school in Grays so I would not be able to take and collect him each day as I work , I would have to give up my job and become a full time carer, this would impact on our family financially. Also for us to pay for his travel wouldn't be worth us working as I fear it would cost us too much, we are hardly surviving as it is.</p>
<p>My child has a rare and degenerative form of epilepsy and is registered blind. He has autism and delayed development, and over time his ability to do things for himself is reducing due to the epilepsy.</p>
<p>He currently attends Joseph Clarke school in Waltham Forest, which is the closest school for visually impaired children. He travels by taxi, with a carer who is trained in managing his seizures, and also administering his emergency medication if necessary. He has previously been assessed by transport as to his suitability for a bus to school and the decision was his epilepsy means he is not suitable (for a number of reasons).</p>
<p>I will not accept a personal budget. I do not legally have to do this and the council cannot require me to do so. I will not accept it for the following reasons:</p> <ul style="list-style-type: none"> <li>- Change affects my child very badly, so having an 'uber', with a different car and driver each day will be very detrimental to him, because it will cause anxiety, which in turn triggers seizures for him.</li> <li>- Ubers are unreliable in availability and would cause my son to be late to school. I tested availability at the time an uber would be needed for us in the morning, and there was nothing available until 20 mins after he was picked up by our regular driver. This lateness would be picked up on by my son, and would cause anxiety.</li> <li>- Ubers wont necessarily be cheaper. My son travels to school on the A13 and A406. This route is notorious for travel delays and about 2-3 times a month I am informed the taxi is stuck in traffic. Ubers charge for time not distance and this would drive up the cost significantly. I would be extremely worried about having sufficient funds to cover costs like these.</li> <li>- In 2022 I managed to find a job that allows me to work and be at home for my son when he returns from school. I am proud to be a taxpayer and not be reliant on Guardians allowance. However I am now juggling normal family life with a job and the anxiety and extra time and care my son needs - just because I do not claim Guardians allowance does not mean I have stopped being a carer. The very last thing I need is to be worrying about budgets for taxis and Jake's carer, and paying invoices and salary. Much of the time my mental health is 'on the edge' as I struggle with the stress of constantly worrying about my son having a seizure that he cannot recover from, and I am on the waiting list for psychotherapy. It won't take much more stress to push me too far and I would have to give up my job if this were to happen.</li> <li>- Finding a carer to travel with my son is extremely difficult, because most taxi Guardians do not want the responsibility of taking care of him if he does have a seizure. I have found the most wonderful person, who my son trusts and loves, but there is no back up. Being a taxi carer is a very challenging role - Your day is split into small chunks of time, and doing anything meaningful is very challenging in just the few hours between the morning and afternoon run. I do everything I can to show her how much we value and appreciate her, but she may decide that the impermanence of changed arrangements isn't worth the hassle, and my son wouldn't be able to get to</li> </ul>



school without her.

In summary the following would be affected:

- our health and wellbeing
- my ability to work and contribute to society
- my son's ability to get to school on time, or at all

My child has always used school transport and taxi. To be honest the bus always been our first choice because it's more practical, less stress for us to on finding suitable and reliable PA, taxi companies to accompanying my child to school. With the school bus my child enjoys because it's the same driver, same PA. We create a good relationship between ourselves and the transport people and they know my child, my child knows them and my child transitioning when he starts the beginning and the end of the year is less stressful for all of us especially my child that takes long to adapt to the changes of his routine. The communication is always very good, always on time to pick and drop my child, they support my child through is good and bad days. Our opinion is we would prefer the school bus transport.

My child has ASD and ADHD with a few mental health issues. I would not be able to take him by public transport because of safety issues. I also couldn't take him in a taxi due to behavioural problems. He has to go to a special needs school and I would have no way of getting him there.

My child has difficulties going to school without me

My child has Downs syndrome, and severe learning needs. He would not be able to cope navigating to school by himself.

My child has extreme special care needs that would deteriorate under new proposals.

My child has no awareness of danger and when he was getting a escorted bus to school he wrapped the seat belt around his legs and neck once so tight his leg went blue.

He would also strip naked and many times he wouldn't walk to the pick up point meaning we would miss the bus. I also have a young daughter who needs walking to school. He becomes aggressive and has put me in hospital hurting my back so trying to get to any pick up point doesn't help. He has lung disease and needed to be alone during covid in a taxi pupil wise. He could share a taxi but again this would depend on the child and him being settled with it

My child has no danger awareness or area awareness so travelling on anything other than the school bus would be hazardous to her.

As I have severe health issues myself taking her to and from school is not an option for me so without transport by the bus she would most likely miss a lot of school time

My child has no other support he can count on other than myself (his mother). I have different health problems including osteoarthritis that can disable me from driving for longer journeys, especially in slow traffic on a regular basis. Only the school journeys currently take about 2.5 hrs daily. My only respite is when he is at school. Having ASD and ADHD, looking after him is full on. Tried shared taxi with him at the beginning, the PA could not handle him with the other kids. We also had several taxi companies and PAs, which was not ideal and did not get him to school on time, found very stressful but I cannot see how I could organise him getting to school if anything happens to me.

My child has severe behavioural needs and self harming behaviours which requires him to have constant assistance. He currently receives the most adequate travel assistance for his needs and any changes would greatly impact his emotional wellbeing as well as his increasing his self harming behaviours.

My child has to attend school and as the local school can not meet his needs I have to travel to access his care needs petrol prices have increased but my payments have not

My child has to have taxi transport as he is in a wheelchair and he also has to have a medically trained (to his individual needs) person to escort him.

	<p>Havering are unable to provide this person so I have to accompany him to and from school and I do not have a WAV</p>
	<p>Being a single parent I also have to work so having this taxi service plays a vet positive impact on my mental health removing the stress of worrying about how he gets to and from school</p>
	<p>My child is 3 years of age almost 4 and he currently gets transport only in the mornings. I think it would be a good idea to address the need for transport for children who attend nursery and only do half days</p>
	<p>My child is currently in primary school, but I am extremely concerned for how my child will travel to and from school when he goes to secondary school, especially if these changes are made.</p>
	<p>My child is currently undergoing psychiatric help with his behavioural issues and transitioning into adulthood At this stage in his life he is unstable. Any change would have detrimental impact on his mental health, well-being and safety to himself and others around him.</p>
	<p>My child is extremely vulnerable in many ways. She's is registered severely sight impaired/ blind. She also has almost no stranger awareness and would extremely easily distracted and manipulated. Also due to her visual impairment she would be unable to cope with the busyness or public transport and would be unable to find her way to school.</p>
	<p>My child is in a wheelchair and attends school daily. She enjoys travelling on the bus, and the staff are excellent. If we were to drop her off and pick her up from school one of us would have to give up work, there is no other way to work around it</p>
	<p>My child is mentally / emotionally not ready to travel alone and unsupervised - He would be considered a vulnerable member of society.</p>
	<p>As a family we would be willing to contribute towards the financial cost as without the assistance we simply would not be able to get our child to school.</p>
	<p>My child is non verbal and has autism and cannot travel on public transport alone. The current school bus with dedicated person to keep an eye on him at all times is very important as otherwise he won't be able to attend his current school. Also the local TfL bus service is not convenient as the school he attends does not have a bus stop close enough to the school and there is no single bus which can take him to school.</p>
	<p>My child is non verbal and loves getting on the bus everyday. I've had to take him myself on occasion due to dentist appointments and this has cause my son and myself chaos and unnecessary drama. This would be a daily occurrence if I had to take him to school. Also I own a diesel and this would become very expensive to the council.</p>
	<p>My child is non verbal autistic, any changes to his routine impacts on his wellbeing.</p>
	<p>My child is only just getting to grips with getting the taxi we had to appeal for. Still has a hard time if the taxi is a different colour to normal or the taxi is late.</p>
	<p>Please don't take this option away.</p>
	<p>My child is SEN so this will truly affect his independence</p>
	<p>My child is severely disabled and is in no way ready, nor will they be before the end of their education, for travel training. As evidenced by their recent PIP claim, they are unable to participate in any travel without significant supervision and so travel training would be pointless, as it would be for many of their peers. My child is happy and confident using the Havering bus as they have been for the past 10+ years and sees it as a vital extension of their school day. We would have absolutely no interest in changing the method in which my child attends school nor would we be interested in managing a personal budget. This is because we have always used the same method, it has always worked well for us, and it sets my child up well for a day in school. On some days, the bus is actually their favourite part of the school day. We would have no interest in making it more difficult for our child to attend school. We would be happy to make a small contribution towards travel costs to continue to use the bus.</p>

<p>My child is severely mobility impaired and non verbal. School transport is the best option for his safety and mental health.</p>
<p>My child is taken to school by mother and father any sort of help when starting college in September with transport would be appreciated</p>
<p>Kind regards</p>
<p>My child is unable to learn how to public transport, due to significant learning disability. I'm a single working parent. My mother helps out with childcare in the afternoon in order to keep me in employment. She does not drive and cannot escort my son home that distance or in a safe way.</p>
<p>I'm a Community nurse within the borough. It will greatly negatively impact our family and many others without transport service.</p>
<p>My child is unable to take up travel training due to the complex nature of his multiple disabilities. By providing a personal budget for home to school travel would cause us more stress and anxiety and in turn simply be 'another job for us to do' when we are already stretched to capacity in working/caring responsibilities/running a home/financial pressures etc</p>
<p>If my child was not able to access his school transport in the form of the school bus it would massively impact my job and I would be deemed unemployable due to the very restricted working hours that I would be beholden to. Already I use all of my annual leave entitlement per year to leave work early to ensure that I am home for the</p>
<p>school bus. I do not use it on luxuries such as holidays. Therefore loosing my job/wage will ensure that I loose my house as I will be in financial ruin which not only impacts myself/family but that of my disabled child. Car sharing or relying on friends/family is not an option. All of my family and friends work and to employ a carer to take my child to school/pick up is not an option due to the high nature of his needs and safeguarding issues that it would bring. And that's not even touching on the extra pollution caused by parents/Guardians individually providing transportation when the bus service reduces that. After all was that why ULEZ was brought in to reduce the amount of pollution caused by car emissions? The very idea of limiting/stopping home to school transport is disgusting and will massively and negatively impact on the mental health and well-being of parent/Guardians/siblings to which you also have a duty of care towards.</p>
<p>My Child is unable to use public transport alone. He currently gets transport to school via the Havering supplied bus. He is registered disabled with learning difficulties and is unable to travel alone. Should transport be removed, I would have to give up my current employment to ensure I could help him get to and from school every day.</p>
<p>My child is way behind his peers some 4to 5 years and travel training would put his safety risk. Fuel reimbursement works and would be preferred.</p>
<p>my child needs the school bus to be able to access school safely and attend school everyday, getting a wheelchair on a bus at school times is virtually impossible</p>
<p>My child needs transportation from home to school,as me and my wife work. He travels aproximetley 10 miles each way monday to friday, something we would not be able to do.</p>
<p>my child received travel training which gave him independence. limiting or stopping this for other children would be terrible</p>
<p>My child travels to a Special Needs School on the other side of the borough. This is the closest school that can meet his needs. He is a wheelchair user who is autistic and currently has a place on a bus collected and dropped off at home. He is unable to use public transport, especially at peak times due to his autism as he finds this extremely difficult. He would not cope with the 1.5 hour journey with people close that he does not know and the stop/start of the bus. He also doesn't cope well with young children around him.</p>

Page 208	He also has a younger sibling who attends a mainstream school and it would be impossible for me to be in two places at once. If he loses his place on school transport I would have no choice but to look at home schooling.
	My child travels to school by bus and sometimes the buses are very busy
	My child travels to school on a bus with support staff with other children with needs. This has given him a better sense of independence as well as keeping him safe.
	My child walks to school
	My child will be happy.
	My child will feel discriminated and helpless as he couldn't possibly travel independently and I wouldn't be able to keep my job as I will have to physically help my child getting and coming back from school, by using 2 trains and 1 bus for each journey. This will put a big strain on myself and my family
	My child will need assistance too and from school, if he doesn't I'll have to give up my job in the emergency services to be able to get him to and from school. Taxis aren't reliable, I don't drive so a personal budget for me wouldn't work.
	My child will not need special education.x
	My child would not benefit in anyway if he never received transport to and from school he wouldn't understand how to travel by himself and would be dangerous as he has no awareness of dangers around himself
	My child would struggle to get to school as he knows the bus comes and gets him and as a lot of trust in the bus drivers and thier escorts. It could lead to his anxiety getting to high that he may not want to go school or he may get to school and become very challenging for the school to deal with him which means he would not be learning very much as they would have to deal with the violence outburst. If the day does not run as normal right from morning it will have a profound effect on his learning. Not to mention the fact that my child as no road safety understanding . I would have no way of getting my child to the school if it was not for the bus as thier is no direct bus that runs to my child's home to the school which would mean lots of changes and take to long to get thier .
	My child's school cannot be accessed easily via public transport. I have to work and cannot get him to and from school without this affecting my working hours. My son accesses the closet school that meets his needs Any changes to his transport arrangements especially those that incur extra costs will have a detrimental effect on our lives both financially and mentally. My son struggles with change
	My children are on the school bus for havoring as we have no footpaths and way to school this has helped me so much as there attendance is great and due to my disability's and living in the lanes access is very poor
	My children do not have additional needs and attend closest schools to us so they walk.
	My childs attendance would be a lot better ,
	My daughter has a diagnosis of Autism and has severe high anxiety. She likes routine and the system of the school bus picking her up and dropping off works for us. It encourages her to go to school and the routine works for her. If drastic changes were made involving her transport, it would cause severe problems for my daughter and our family. My son's schooling would also be affected if the transport system for my daughter was to change.
	My daughter needs her own personal escort, a special harness on a bus. She can't be close to anyone due to her aggression/behaviours. A cab wouldn't be suitable as she would. E too close to other people.
	My daughter would be unable to travel on other transport , she is autistic with learning disabilities, and processing and retaining information disorder, also suffers with anxiety and panic attacks , so is too vulnerable , also i have 4 other children who i assist to school and back , so it would be impossible to get to another school and have all the children in school on time , having my daughter picked up and dropped off each day is a great help and piece of mind she is safe , and for her this eases her anxiety as its also children from her school , not having this support would have a great impact on us as a family .
	My SEN son has been in receipt of travel assistance since starting at school. He is completely non-verbal and has severe mobility issues. "Travel Training" is completely unsuitable due to the nature of his disabilities. The travel assistance he currently receives is a huge part of his routine and would negatively impact his desire to go to

<p>school, and his mental well-being. Furthermore it is completely impractical to have multiple vehicles dropping off a single child (as would be the case in home or taxi transport) - the school is on a narrow country lane with insufficient parking. You can't just drive up, drop a SEN child off, and speed away - there are safeguarding issues. The child needs to be accompanied to their teacher or school rep. I would advise the council to visit and observe drop-off and pick-up at my son's school, Corbets Tey, and base their policy on the practical aspects of changing what has worked for years.</p>
<p>My SEN son who is non verbal and has severe mobility issues has always had transport to school and this is part of his routine. His school is down a country lane with no parking space make drop off by parents dangerous and impractical.</p>
<p>My son although 17 cannot travel to college or work placement independently abd because I'm his carer I'm unable to work full time to support all our needs. The fuel support is invaluable to our family</p>
<p>My son enjoys going on the bus to school he feels safe and looked after by the staff. He has been using the bus for approximately 4 years and depends on the routine that this service provides. He would find any changes difficult to cope with.</p>
<p>My son enjoys the bus journey to school, it is one of the very few opportunities he has to be independent. I know he is safe, happy and looked after on the bus. The school is too far away to use public transport and is not a straightforward journey unless in a car. Public transport would cause significant stress and anxiety for my son. I have shared access to a car, it could mean my son would not be able to attend school when I do not have the car. It wouldn't be straightforward to ask a friend/relative to drop him off, the change of routine would upset him significantly. The school could also not accommodate the additional cars dropping off and picking up, it would make traffic on the surrounding areas a nightmare. I would be prepared to contribute to the cost of the travel rather than have it reduced or removed.</p>
<p>My son has ADHA and on the spectrum of autism. Getting him to school can be very challenging as if someone else was to take him would help with my mental illness</p>
<p>My son has ASD and has huge problems with concentration.His school is 2 buses and over hour aways from our home.He wouldn't be able to change buses at the right buss stop and get off at the right time. He wouldn't be able to stand up for himself if harrassed at the bus. I cant see any travel assistance solving this problem. No one would look out for him in public transport and that worries me a lot.What if he didn't get to school on time or is being attacked on the way??Who would take the responsibility for that? People with special needs are special for a reason. I don't think budget savings are worth their life and safety. If the Borough finds it hard to pay for transport I am willing to pay reasonable amount for my son to be able to get to school every month. Although I think wellbeing and safety of our children must be priority to decision makers.</p>
<p>My son has diagnosed ASD and will be attending school next September. I would like the opportunity to apply for an ARP setting for him, which in this borough, are far and few between, so transport is something that I would have been applying for, for my son. As full time working parents, neither myself or my husband would have the ability to take my son to school at the given times and therefore, access to transport assistance would not only</p>
<p>help us remain in full time work but allow my son the independence to travel to school without us. The council paying us money to do this ourselves does not resolve either of those scenarios</p>
<p>My son has EHCP and ASD, going to school using public transport will be extremely stressful and even impossible, there will have to be one of is parents with him, which again it is not possible as we both work full time. This will effect his mental health severely and might result of being late or even missing first lessons at school.</p>
<p>My son is 10 years old and travels in a taxi with a PA. He has the same people daily which for a child that struggles with changes is critical.  The PA engages with him throughout the journey and they read stories and play games.  My son is academically around a 3 year old and for security purposes could not travel unassisted in a car - he will sometimes undo his seatbelt and also if he requires a drink needs support to stop him chocking if he drinks too quickly.</p>

<p>My Son is Autistic almost non verbal uses an iPad for communication and would not cope with travel training.</p> <p>Xxxx gets the Havering bus to college it is in he's mind independence, as he is doing it without me!</p> <p>I currently work, trying to get xxxx to college through rush hour traffic and then get to work in time would cause anxiety to my day and xxxx</p>
<p>My son is autistic and pre-verbal. In order to support his many needs both parents need to work. He currently takes the school bus and leaves home at 7.15am (the bus meets him at home) and drops him back around 4.30pm. It's a long day for him, but it allows for both parents to get to work on time. Any change in this process would affect our family income AND disturb the routine that he enjoys.</p>
<p>My son is autistic and unable to comprehend normal social interaction and has no awareness of danger. Travelling by car is the only safe means of getting him to school.</p>
<p>My son is currently waiting for transport I think this is important to him because of getting into school</p>
<p>My son is severely autistic. Travel training is not suitable for him. Other options were not viable for us. Having a safe seat on the bus has meant I am able to go back to working which has a positive impact on my well being and my families.</p>
<p>My son is wheelchair dependant and also has an acquired brain injury as a result of a brain tumour (diagnosed). He cannot use public transport and for him, now using Havering bus to his special needs college gives him safe independence that he cannot have any other way. Children like my son need this independence away from their parents to feel valued and the same as their peers. I do not agree that any post 16 transport is means tested - only if you use the income of the child not the parents !! It should be all or nothing ! Why should we have to pay when others don't ? My son has only started using Havering bus since September and he is benefiting from it so much. I hope he can continue to be able to use this service for his mental wellbeing and independence that he can only have this way !....fully reliant wheelchair users who require full assistance can not do travel training especially when they have an acquired brain injury that affects their capacity ! If this goes ahead I hope you take into account the struggles for the physically disabled and the need for them to feel socially included with their peers on the bus !!</p>
<p>My son needs 1:1 support at all times and will never be able to travel independently.</p> <p>Going to his daycare centre by taxi with an escort in attendance has helped to keep him calm , because if he is stressed or anxious he hits himself or puts his fingers down his throat to make himself vomit. Also, having a 1:1 stops him from putting his hand down his trousers if he has soiled, which he would then try to eat or flick it anywhere.</p>
<p>I know havering are trying to put him on a bus to his daycare centre, but this is also unsuitable for him as the escort cannot be with him all the time.</p> <p>If he manages to soil and flick, then there is a strong possibility that other people will be affected and the bus taken off the road for deep cleaning, which surely defeats the objective.</p> <p>I am very strongly against him going by bus as I feel he will never get the support he needs without a 1:1 escort.</p>
<p>My son needs transport to school. He is in post-16 education. We were offered a personal budget for this school year, but I had to appeal against it (and won). I am also disabled and it would be physically impossible for me to take him to and from school. I do not drive, we do not have a car. My husband works full time (and doesn't drive). No one else we know would be able to take my son to and from school as our only family members live too far away and are elderly. The personal budget was nowhere near enough to cover the cab fare.</p> <p>Travel training would be useless for my son. we often travel by bus as a family, so he is used to travelling by bus</p>

	<p>with us, but he cannot be trusted to get himself to and from school safely as he doesn't like school, and would much rather go somewhere else. He also gets very anxious, so needs someone with him to keep him calm and deal with problems.</p> <p>I am completely against the idea of car pooling with other parents. obviously i cannot drive, so wouldn't be able to take other children. But my son has massive social issues and so would be extremely anxious about having to go with other people, especially other children. I would not expect another parent to be able to deal with him if he had a meltdown in such a situation (which is likely). I also would not feel comfortable with him going in a car with a complete stranger.</p> <p>I know the council needs to make changes to budgets, but why is it hitting those who need it the most? without school transport (as in a cab directly between home and school) my son would be unable to attend school.</p>
	<p>My son self harms when stressed and anxious. We have tried him on a school bus but the driver had to stop 4 times for my son to be restrained and made safe again. He arrived at school with his harness around his neck almost asphyxiating him. His GP and functional neurologist have both gone on record to say that my son needs the most direct route to school and to be accompanied at all times and to travel in a safe adapted way - ie in his wheelchair. He has an adapted wheelchair that only a black cab is large enough to accommodate. Due to his visual impairment combined with his brain injury he finds comfort in listening to a familiar voice throughout the journey, someone who can anticipate his needs. With his familiar travel escort he is able to go to school and arrive in a calm state ready to learn. This would simply not be possible without the travel assistant. My son is also non verbal so needs a companion who is able to "read" him and identify the early signs leading to an anxiety attack and meltdown. Havering's Direct Payments team are not fit for purpose and have a long track record of non payment and late payment. For this reason as well as safeguarding issues this proposal simply cannot work.</p>
Page 2 of 7	<p>My son travels out of borough via a shared taxi/bus to a special needs school because havering could not provide him with a space in any special school in the borough, he wouldn't be able to manage the 3 buses by public transport to get him there if this was taken away from him, havering need to look at school placements in special schools before trying to reduce who gets help and who doesn't on travel assistance</p>
	<p>My son would be late for school every day because of overcrowded public transport. Forest Approach Academy is on the same road as 2 primary schools and a senior school. I would have to wait until the number of passengers died down as my son needs a lot of personal space and cannot stand loud noises. He is scared on public transport.</p> <p>In the afternoon I would struggle to get out of work at a time that would allow me to make the journey, using public transport, to his school for 3pm.</p> <p>I do not drive. My son is nearly a foot taller than me and can be difficult to control.</p>
	<p>My son would struggled and make school days a nightmare as my son suffers with a social phobia.</p>
	<p>Myself &amp; my child would suffer significantly, I would greatly struggle to get him on public transport, it would raise his anxiety immensely &amp; he would refuse to get on the bus, at busy times, due to noise etc, &amp; there is no way I would be able to get my son to school,</p> <p>This would greatly affect his attendance &amp; I feel he would start refusing to go to school,</p>
	<p>Myself and my husband are disabled and our daughter has autism, we also have an able bodied son that due to his age uses the buses with his sister without this service it would of had such a negative impact on our family and our children's primary school attendance. But as my daughter moves in secondary school I feel travel training would be much better. As we have an older son that only ever used the bus this stopped him progressing and now at 22 he still needs assistance as he is unsure and has no confidence. The problem is the services you offer are virtually important I feel they need to be assessed better with more detail so the children can progress do and those who can achieve more independence get help and it's not just parent drive as accessing the social workers the help takes to long and the assessment should take a year in advance to make any transitions seem less</p>
	<p>Needs the routine and structure without change</p>
	<p>none as we wouldn't be in receipt of any of the additional support</p>

Page 242	None at present, as not currently needing home to school transport support as my child is in reception year and the school is within walking distance, but this may become an issue in future, due to my health and potential travel distance for secondary school.
	None on us.
	Make parents take more responsibility
	None to my child, but certain people who use / receive this service do not necessarily need it or have other modes of transport, claim where it is necessary
	None. Greater use of public transport would be more likely if trains, railway stations and buses were cleaner, safer and more frequent.
	Not sure right now as anything can change in the time that these changes are planned.
	Of all the places to think of cutting! For young people who do not go anywhere and urgently need the assistance. This is terrible and I strongly oppose any cuts. Our council tax costs over 200 pounds a month! How can you turn around and tell me the council is bankrupt and therefore you are possibly considering cuts to transport of vulnerable children? I am beyond shocked. Its a very callous move. I am pretty sure with better management, you could go further with funds. Not going to risk my child's well being for a council that has failed....penalising my child and children like him is just wrong.
	On top of the existing struggles with getting from school home this will create more burden on families of school age children where some are restricted on assisting themselves due to lack of own transport and work commitments
	Our child currently has a seat on the bus which works extremely well for all of us as a family. She has her independence of travelling to and from school without her parents but she is also very safe and well looked after. She would be unable to go to school via taxi or public transport, even with training because she is too vulnerable to be able to do that. The bus is an excellent service, it is cost effective as up to 10 or 12 children can travel together. The assistance on the bus is excellent, we would strongly recommend keeping it. We are a family who do not require a personal assistant to travel with our child and we do not expect a high expense paid out for her to travel to and from school. Please do not take away the bus service. We understand the example in the newspaper recently that listed someone who has £45,000 spent each year getting their child to and from school. These extreme cases should be removed from the system allowing more money for other people who require the basic bus transport system. The example in the paper is too excessive and we would not expect any borough to pay out for this. Thank you
	Our child has complex needs and will need 24/7 care for the rest of his life we have only had transport since September 2023 and it has really helped us without this support we would be attacked on a daily basis and most of our day would be spent travelling to and from school as his school is out of borough our son was home schooled for 2 years so was always with us the transport gives us that little bit time to relax
	Our child is currently using a taxi to get to school. He was taking the transport bus last year but his new setting does not have a bus route. He carpools, and shares a taxi with another child for half the cost which works well.
	We would be happy for him to take a bus or a taxi to school.
	We cannot use uber, or public taxis, due to his needs and behaviour. Too much change and stress in the mornings is unsettling.
	We have no family members or friends that can do the school run, and the special ARP he attends is far away from our home.
	The only logical, safe and fair mode of transport is a transport taxi or bus.
	We as parents are concerned about the personal transport budget, as we are not sure what that would entail in terms of booking our own taxis/Ubers.



<p>We don't have enough money to cover a month's taxis and wait for reimbursement.</p>
<p>In respect of safety for my son, yesterday after getting out of the taxi to be dropped home he bolted and ran into the road. Luckily the transport chaperone was trained well and managed the situation and nothing bad happened. However, the behaviour has worried us as he has no danger awareness and our concern is that if this taxi/bus service is to stop we will have no safe way to get him to school.</p> <p>We do have family, but they do not have any first hand experience of caring for our son and he wouldn't be safe in their care due to his needs.</p> <p>We have concerns as well, as our son is still in nappies and longer journeys could mean he will be uncomfortable if he goes to the toilet which leads to meltdowns. This will put a lot of pressure on the staff at his school or us as parents.</p> <p>Our son is currently doing very well in the ARP setting, we have seen a dramatic change in his behaviour for the better and we do not want this placement jeopardised due to these changes.</p>
<p>Our child is non-verbal, autistic and attends a special needs school slightly outside of the Havering borough - because there is such an inadequate supply of SEN school spaces within Havering.</p>
<p>Routine and familiar faces are part of the requirement.</p>
<p>Travelling via public transport daily would be traumatic because of the din and the issues around how his condition impacts his autistic traits/behaviours and how that comes across in public.</p>
<p>Frankly, we are exceptionally happy with the current arrangements. We know the routine. We know that the driver and chaperone have been vetted and crucially they have good liaison with the school during the handover and pick up processes.</p>
<p>Having to rely on the availability of willing fellow parents or arrange our own transport reliably each day is incompatible.</p>
<p>Our neurodiverse child who is Non-verbal and considered severely mentally disabled attend an Autism Resource Provision in the Borough that is far away from our residence.</p> <p>Our child has to attend this setting as it is the best and one of the only limited places in the Borough that supports their needs and development.</p>

<p>If our child cannot be afforded transport to the setting by the local authority, they would be unable to attend due to both parents working full time. Can companies or Uber is not a viable option due to ensuring the safeguarding of our child and we have no family members or friends who can physically manage our child's needs. Our child used a LA provided bus last year to attend their previous setting which they thoroughly enjoyed and built up a great relationship with the chaperone and other children, this to use seemed cost effective and safe.</p> <p>Our child will now share a taxi with another child at their new setting as there isn't a bus route for the new school and would assume that they and the other child are the only ones from our area who need to travel to the provision.</p>
<p>Overall, we feel that the SEN community in Havering is being unfairly targeted with this review as it seems to be seeking to take away a method of providing freedom and independence to SEN children to attend the limited appropriate settings to hide the children the best opportunity for development, and given that there is very limited, almost non-existent support for SEN parents and children in the Borough, this feels like a big step backwards.</p>
<p>From a personal perspective, if our child's access to transport was removed or replaced with a taxi card or other financial option, we would not be able to afford to send our child to school every day at his current setting due to the distance between home and school. The LA placed them at this setting and so if this change goes ahead and we are affected, the LA would need to move them to a ARP setting closer to their residence.</p>
<p>Our son currently uses Havering school transport (bus). We applied when our financial situation changed and it was no longer possible for one of us to remain a carer. We both had to work.</p> <p>work shifts (12 hour nights and days) for an emergency service and my wife is able to work from home sometimes. On night shifts I come home and get our son ready for the bus which comes at 8.20am. I then sleep and wake at 2.50pm to be ready for his return. I can just about function on the next night shift on 6.5 hours sleep. On my day shifts my wife either arranges to work from home or my 17 year old son helps out. We just about manage. But this is an enormous improvement on the alternative.</p> <p>We were both working prior to the application being approved and that is an indication of the alternative. I was</p>
<p>driving our son to school after the night shift, getting back at 9.30am, sleeping for 4.5 hours then driving to pick him up. Then looking after him before going to work.</p>
<p>I fell asleep at the Upminster traffic lights on multiple occasions. Thankfully we have an automatic car. I don't know how long that would have been possible without transport. We are both getting older.</p>
<p>School holidays are a patchwork of annual leave and respite.</p>
<p>If our son were not disabled this would just not be a problem. But he always has been. He cannot get the bus on his own. He would just wander off into traffic.</p>

	<p>School transport means we can both work. This is not only vital for us. It is important for Havering. Our son will realistically need support for his entire life. If we both have careers we will be better able to support him as a disabled adult. When we are gone we will leave behind pensions and savings that he will inherit. Or that a trust will administer for him.</p>
	<p>The worst situation for everyone is parents who are obliged to give up work and become full time Guardians for a decade during the most productive years of their lives. If that is damaging for our generation who are mostly homeowners, consider the impact on the next generation who mostly rent.</p>
	<p>That is a social care time bomb in the making. Where will Havering accommodate all these elderly parents caring for disabled adults when they can no longer afford their private rented accommodation? People need to be able to work.</p>
	<p>We are not averse to making a contribution to the school bus. But it is vital. Our son is severely autistic, attends a special school and is totally unable to travel to school in his own or with any other mode of transport except the supervised environment of a school bus. The journey to/from school is also a central part of his weekly routine and any change would have a profound impact on his anxiety levels and ability to learn.</p>
2020	<p>Parents should be responsible to paying for their children</p>
2020	<p>Planning, timetable, pickup time and understanding the process of each other information. There is many students in needing of free bus. There would be build good quality communication between the havering,school and prenatal ideas.</p>
2020	<p>Positive</p>
2020	<p>Positively</p>
	<p>Providing education to gain independence on transport I believe is a good idea but it has to be done at a time and in a way that is suitable for each individual child. Therefore, I agree that it's a really good option, but presently and for the next few years, would not be a suitable alternative for my daughter because of her high needs.</p>
	<p>In terms of being provided finance to source or support transportation to school I feel is extremely unhelpful. It would not enable increased independence for my daughter (which travelling by school bus does) or help me, as I am also a carer to my father who is blind, on top of being a single parent who works. I feel strongly that this is a very poor option.</p> <p>For those over the age of 16, the government says they must continue in education, however for many of our children this means finding the right provision which often is not nearby. It is wrong for parents and children to be charged to be able to access the appropriate education that they need. I disagree strongly with means testing or charging for children who are still having to access education, particularly those for whom education is difficult to start with.</p>

Page 216	<p>I understand the need for cutting costs but I struggle that it is always the poorest people who suffer the most. To change the access to transport directly from home for children whose lives are already difficult and complicated, and for families who are often finding themselves at breaking point, feels extremely unfair. their lives are already very difficult and removing transport provides another extreme hurdle in their lives. Parents with disabled or neurodiverse children are often already working to their absolute limits to provide the support and care that their children deserve, they didn't ask for their children to have these additional needs, and they need the support of the local council to enable our children to have access to education in ways which are appropriate for each individual child, part of which is providing a bus service which has proved invaluable to my daughter and I.</p>
	<p>Reduction of basic services like transport - the veins to the life blood of special peoples existence is not the way to build a better society. Cuts elsewhere cost rises elsewhere but not to undermine those whom can't speak for themselves</p>
	<p>Restrictions on child's independence</p>
	<p>Routine is essential for xxxx. Taking the bus to and from school has massively increased his independence and confidence. It keep him calm knowing what to expect Monday-Friday each week and has enabled him to establish deeper relationships with his peers on the bus.</p>
	<p>He would not be able to travel independently. For 8 years my husband did not work so we could accommodate school runs so we only applied for transport assistance this past year when for financial reasons we both had to work.</p>
	<p>To have this service removed would not only have a major impact on our financial situation as one of us would have to give up work to take XXX to school but just as importantly it would upset xxxs routine and damage his confidence. Routine is very important part of my sons day to day travel and general lifestyle on a day to day basis (even on a weekend). He is severely visually impaired, dyslexic and has other learning difficulties so would find it extremely difficult to commute on his own and would not be safe on the busy roads. School bus picks up my child from Gidea Park for school at Hall Mead in Cranham. Public transport really isn't an option as would involve considerable walking, major road crossing and multiple bus or train and bus routes. He literally can't tie his own shoe laces, so this commute would be dangerous. They cram 13 kids on his school bus. How can that not be cost effective?</p>
	<p>see answers</p>
	<p>SEN child / young adults generally fair better with consistency- change can impact behaviour massively &amp; therefore cause added stress to families &amp; Guardians Have 'easily' managed options to suit the child If demand is higher get better funding &amp; manage budget holistically. I know there's budget of SEN facilities that are not utilised.</p>
	<p>Should be more school buses plus ne on time. The buses in Havering are overpacked , full of noisy kids, their behaviours are bad , should be more control on them in the buses ( like cameras or person who will control them)</p>
	<p>Thank you for the initiative, if it is possible to arrange a safe, secure and economical transport assistance service for our little angels, I would appreciate it very much. That would be disruptive to my son's routine and orientation.</p>

<p>The bus that takes my son to school (Corbets tey) is such a strong support I cannot put into words how helpful it has been for my family of 3 children</p>
<p>with additional needs (two with severe additional needs and EHCP which both require special educational placements in special schools in different schools due to different needs) I would be extremely worried that the borough would make any kind of cuts to this service. Not only would it stop me from continuing my employment it would cause a lot of stress and I strongly disagree with the plan in place</p>
<p>The changes are not positive for my family. My daughter is vulnerable and taking to and from school will not enable her to be independent and will cause a change to routine that's not nessasary. She WILL NOT be able to use public transport independently and having another sibling to take to and from school will be ridiculously Early starts Hanging around for her Or Being late It's not manageable when the transport bus works perfect for her routine safety independence giving her space to grow.</p>
<p>Personal budgets cause more strain upset stress on the child that's not nessasary but having to endure on another school journey before her own which causes anxiety upheaval, unregulated to her day and also at the end of the day.</p>
<p>Thus will be said for a lot of families. We fight for everything When we have routine and help you want to remove it...</p>
<p>Go and see for yourself what the transport gives to the families of Havering</p>
<p>The changes in the policy could impact my child's attendance, punctuality and academic achievement</p>
<p>The changes in the policy would have a detrimental impact on our family as it would cause financial difficulty. We both work full time, the changes in the policy would cause upheaval to our day to day living. It would impact my child's independence.</p>
<p>The changes won't make a difference to me or my child as we don't have a need for the service provided.</p>
<p>The changes would not affect my child a lot right now, but could affect him after he turns 16.</p>
<p>The child could get in touch with other students</p>
<p>The impact on my child would affect his day. He does not handle loud noises well or overcrowded places. Like public transport at rush hour.</p>

He has passes at school to allow him to leave lessons before other children to avoid the crowds in corridors. Other kids with similar issues to him will have the same. Their ECHP is tailored to their needs in order to help them. This includes how they get to and from school.

In my personal situation, I do not drive, or that is what we have been doing all along. I also do not have someone I can ask to take him to and from school. My child needs security, and likes his routine to stay the same every day so his transportation needs to be a kind he can trust.

The impact will be huge on my child. My child has been taking transport to school since he started at the school (for over 9 years.) He uses objects of reference to support his understanding of the world and the school bus represents school and when he sees it he knows it's time for school. Routine and structure is vital to his mental health and changes in this can affect his mental health and behaviour which in turn would impact his school day. Going by car will confuse him as he associates the car with days off school and therefore would find it hard to structure his week causing him to have anxiety and behaviour. The school itself would have major problems with an influx of single car transport every day. Corbet's Tey school is down a cut through road and there is nowhere to park right outside the school and parking further away is not possible due to behavioural and road safety issues as he has No danger awareness and can have challenging behaviours. There is certainly not room for all the cars to turn up at the start time for school as weather does not accommodate parking in the school field for most of the year so the car park will be full with the staff cars leaving little room for car drop offs. Furthermore, the school does not offer a breakfast club or after school club and therefore to accommodate this change in transportation they would need to have staggered starts and finishes which would mean my child and other children missing out on their education which is so important to him and this would have a significant impact on his mental health and learning, not to mention my own mental health in the stress of getting stuck in traffic at the school every day. As

evident in the past with the disruption caused by the pandemic and the huge impact it had on my child's mental health the last thing he needs is a big change to his routine. Furthermore, as a parent of a child with special needs every day is a challenge and to add even more responsibility of managing a personal transport budget would only add to the stress already experienced daily. In addition to this I have other children too that need my attention and support. Managing the communication and admin from all the different schools as it is can be overwhelming at times especially when there are deadlines etc, the council priority should be how can we give the right support to these families so that they can cope with the stresses and challenges of raising a child with special needs.

The question assumes:

- 1) I know what the current policy is.....I do not....why would I?
- 2) I and you know what the changes to the existing policy will be.....you do not.....or at least you shouldn't if you are consulting using the variables in the answers in this survey to try to determine the policy.

What's going on?

The reason my child uses this service is that it's for his own safety as he has no danger awareness, so being pick up from home and dropped to school is a big part of his safety he doesn't understand to stop and wait for traffic and this is his life line to get to school safely, taking this away would be the worse possible outcome for my child

Page 219	<p>The stress levels att transporting my son to and fro his center is beyond description. He has motability vehicle but cannot drive it himself hence doubles as the main vehicle the family uses. Transporting to his center at 9am to be collected at 9:30am, rush to get to work for 10:30am, leave at 2:15pm to collect him at 3pm and get home for 3:45pm (if traffic lucky) and return to work and close at 8pm because I've got to work in the hours.</p> <p>Why this hustle?</p> <p>He has motability vehicle so no assistance can be offered.</p> <p>Daily I'm stressed to the eyeball and its no wonder my son is stressed too. I can say it but he cannot so he imbibe it and his stress levels manifests in the downward trend of his health. His immunity suffers and mental wellbeing suffers too.</p>
	The stress of having to deal with personal budgets and the administration of them is too much when having to deal with a number of competing priorities and cost of living pressures
	The transport (seat on a bus) that my child currently has is a very important part of his school day and he enjoys it immensely. It allows him to have a certain amount of independence in a controlled environment. As with a lot of SEN children, change and disruption can cause a great deal of stress. I also do not feel that the introduction of paid travel post 16 is fair as we are required to send our children to school/college by law so why should we pay for that?
	The travel training would help my child understand things better.
	These would have a enormous detrimental impact on my child's and our families mental health, my daughter would not attend school, would become more violent, would not receive an education, we would not be able to work, we do not have people trained and able to take our child to school, all of which would have an awful negative impact on our daughters future.
	They will improve my child's safety. They will improve attendance.
	They will not impact me or my child
	This change is discriminating against families with SEN children. These families are already vulnerable. They struggle get their children ready for school. Children who hate the texture of clothes, may hate water. Children who cannot eat or this who have so many sensory needs.
	You are now punishing them by saying after 16 there's Increased pressure on parent. Non SEN Children over 16 do not have to pay to go to school
	Yet you want ours to
Those who cannot have to stay home	
As a result the parents cannot work	
Child and parent become mentally l'll with anxiety and depression as they cannot go out and access what they need	
Social care now has to use ITS budgets to cater for non working parent and child	

This is going to put more pressure on a mental health service that's on its knees
As a result- a Sen child becomes non functional adult
You are not empowering them
You are taking away their independent and choice further disabling them
Also you want to commiwon Private companies to train children to use transport- have you been to a special needs school/ it takes years- you are setting yourself up for failure
You cannot train special needs children in the short term- you only had 9 do this this year. It's a money pit. Who ever wants to make money off the council has no experience working with our children. They don't learn through training- THEY ARE NOT DOGS. ABA IS CRUEL
This is a lifeline to people
This is about cost cutting and nothing to do with independence or supporting families at all. The pretence that it is anything else is disingenuous in the extreme and eats parents and Guardians as idiots.
This question is completely pointless.
This will greatly affect my child and family.
My son is currently uses a wheelchair, has a tracheostomy and is peg fed.
He requires 24 hours care and has a separate 1-2-1 for education and 1-2-1 for his health care needs
This will positively impact on attendance, weather related issues, employment, etc
This would impact me and my child massively!
He would not be able to cope with public transport on his own. He would not of grown in confidence and would more than likely refuse to go to school. This is a piece of mind for me not to worry about him.
By my son getting transport set him up for the day in a positive way. If he had a good start in the morning this will continue. This would not happen on public transport.
Transport has such a big impact on a child's independence and their ability to get to their educational facility. Having an aid/ support is also important based on the child's needs, taking this away would be a risk to both the child and driver
Travel is now easy. Any kind of personal budget would potentially lead to lower school attendance and more admin for families.
Travel training doesn't help my child as she isn't able to travel independently. Not aware of dangers and also using a public transport where you have to wait for the bus to come and also the noise and a lot of people will
make it be unbearable for my child.
Can not use own transportation either and to get to the suitable school will have to travel with 2 buses .



Under 16 policy - no impact at all.
Post-16 - travel should be free if done for education.
use of independence and help to families
Very negative impact
We are lucky enough that any changes would have minimal impact on us so I am looking at the bigger picture on where council money is spent.
We both work full time and live far from school. We also do not drive. He gas pick up from grandparents and at home, with a chaperone to ensure safety of himself and others. He is much younger In his way ie he is 11 but mentality of a 7 year old. He is vulnerable as he will tryst everyone and not see dangers. Also he will have anger outbursts which go from 0 to 100 in seconds when he deems an injustice or rudeness. A look a tone of voice will also trigger this.
We currently live within walking distance of our primary school, but are now considering what secondary school's are the most suitable for him, but many which are better at supporting SEN are further away. He is high scoring impulsive ADHD with DLA mobility, because he is not safe to travel on his own and we have no car. Knowing that there was council provided trasport scheme available, where I didn't have the overhead of managing a budget throughout the year and knew that there would be consistent, trained and safety checked staff would make me much less anxious and allow me to make the right choice for him school's wise.
We currently pay for two of our children to use the school bus arranged by Campion. Although best efforts have been made to reduce costs, the price is still high. The bus has enabled the children to get to school safely and on time; something which was not guaranteed when using public transport. Without the bus service, my husband and I had to drive them to school in the morning which impacted our working day. Suggesting that parents car pool therefore is unrealistic as, especially in this time of financial crisis, many parents are unable to spare the time from work.
We do not need transport as we live round the corner from the school.
<p>We do not use the transport service yet, as my daughters primary school is close to our home, but may have to use the transport within the next year as my child will be starting secondary school next year, and our local schools are not necessarily the best equipped to be able to offer her the support she requires. She has complex medical needs as well as educational, and due to medical equipment needing to go with her, would not be able to travel unaccompanied on public transport, and also needs to travel with an adult that is trained in her medical condition. Car sharing or going on public transport by herself are therefore not realistic, as is a taxi if she is unaccompanied. The choice of school will primarily be made dependant on the support they can offer her. However two of the schools we have been recommended by her Primary school SENCO are not local to us (but still in Havering), so travel to &amp; from school will have to be a major consideration as we both work full time, and these schools would likely involve a one hour round trip twice a day for us to take her ourself - both of our employers have been very understanding and flexible over the years, but in this situation it would not be realistic for us to continue in full-time employment.</p>
<p>We do not want a travel budget, it would not work for our special needs child, we would be surprised if the travel budget would work for most special needs children. There is also the aspect of safety. It is not safe to put a vulnerable child into a taxi alone, we would not trust anyone to do this. It would open up all sorts of issues and would only be a matter of time before a child was abused/harmed in some way. That would not help with keeping our children safe. The same goes for public transport and a child travelling on their own, it is just not feasible for most special needs children. This also applies to travel training for all the same reasons outlined above. We currently use the borough transport buses, these are cost effective and safe and a great way for children to travel. The buses should NEVER be taken away, these are essential. The Borough should be looking at the cases that cost a lot of money to transport children. The cases whereby a child has one or two assistants travelling with them and costing £40,000 etc., that is ridiculous and costs us as tax payers a lot of money each year! Do not take away the</p>
community buses please, it is unfair on families who use the service and do not abuse the travel budgets. Means testing travel is also unfair to the parents who work and already pay their taxes and then potentially giving travel money to the families whose parent(s) do not work, and who do not pay taxes, that is very unfair!

We have two children aged 15 and 17 needing to use buses and trains to get to school, and with the rising cost of living we couldn't afford transport costs without help. Children under 18 in school, shouldn't have to pay for buses or trains.
We live 5 minutes walk away from the school but use the breakfast and after school club. If the policy provides some help towards the cost of this and we are eligible it would be useful.
We really need travel assistance as we have a child with a EHCP , and a 23 year old who also has needs and goes to a day center . Neither can independently get them selves ready for school / day center . During the consultation would it be taken into consideration about parents / Guardians who have two or more children/ young adults who have needs
We strongly rely on transport to and from school and FIG. Any changes that could affect this will have a deep impact on my son being able to get to school on time, which in turn will lead to anxiety and or meltdowns. It could have an impact on their punctuality and attendance. I have medical issues myself which will mean I will struggle to get him to and from school. He doesn't have the capability to make his own way to and from school due to his disabilities
While children are in education they should not pay for travel on buses or trains. I currently pay approximately £20 a week in travel for my daughter to attend sixth form. This is unacceptable.
Whilst a child is in full time education I feel that free public transport is essential to all.
Why don't you cap all councillors wages before implementing a budget on disabled children. Havering council is a joke!!
You don't even provide any schooling for half of the disabled children living in the borough, they have to go out of borough for their education and now you want to take their transportation away.
I guess we know where all of Havering councils pennies are going, you must have shares in Horlicks/ovaltine because that is how you sleep at night after spending your working day trying to shaft the disabled children of the borough again.
Will disturb me mentally as my child is wheelchair user and other is autistic so any change is not easy to carry out.
With a child attending mainstream primary and a child attending special school, it would be impossible to undertake two school runs in different directions. Any ceasing of the current service (seat on bus from dwelling) would unsettle my autistic child and mean that one child would be late for school. The special school has no before and after school provision and the mainstream child has provision but at a cost. We already have one parent working certain hours to manage school runs.
With a family of 6 children. It is difficult to transport one child to a different school. Attendance will be decreased due to lateness. It would break his routine as well
With autism no 2 days are the same and having a structured routine is SO important. Knowing when the bus comes at what time and who are the drivers and assistant is on that bus and the seat they sit in and the route they take are SO important for my young person so as not to cause any unnecessary anxiety and meltdowns. My young person would not be able to handle the sensory issues of what public transport entails.
With personal budget,we will be happy as now.
Without the borough bus transport it would be impossible for my son to attend his specialist college. Public transport is not an option as he wouldn't be able to travel independently due to his level of needs even with adult support. We are both working parents and cannot get him to college any other way than by the bus transport provided by the borough. I have already had to cut my working hours to accommodate my sons needs. If you cannot provide this service I would have to give up working which would have a massive financial impact on us as a family. I am sick and tired of our children being penalised because of their needs. Our children never asked to be this way. How about making other cuts to services and stop depriving our children.
Without transport my children will not be able to attend schools 5 SEN children over 3 settings with 1 out of area
Won't have any impact on myself or my children as I take them to school and pick them up everyday in my own car.
Won't have any impact on my children, as I don't expect the local authority to take them to school for me!
Would be financially beneficial to us as a family and would ease my sons anxiety about travelling alone to school
X2 children whom eventually I will need to apply for school bus for as they get older travel is becoming more stressful and worry over attendance.

Yes, it will improve my child child attendance and have positive impact on the family.
<b>Public</b>
Any changes to save money for the council are important.
Huge impact
I do not have a child
I do not have a child who needs this service but I have been watching friends children being ferried about and I was shocked to see what the overspend is although it is not surprising without a more oordinated approach.
It will save me money as a council tax payer. £5.5 million a year, and £200 per day, per child, is outrageous. Where is the school; Newcastle? And what cars are they using; Lamborghinis? What happened to good old fashioned council run school transport for groups of kids going to schools in close proximity? It might mean some children having to be picked up slightly earlier, or dropped off home slightly later, but so be it. I'm sure some children need individual transport, but surely with a bit of lateral thinking, the least demanding children can be grouped together.
My godson wont be able to get to school and this will affect his physial and mental health.
Remove expensive taxis as an option to conserve the budget left
The Council should develop a cost effective contract with Uber or the like to provide individual transport services.
<div data-bbox="91 730 134 922" data-label="Page-Footer"> Page 203 </div> That coupled with a basic means test linked to benefits is the best way forward in my view. The eligibility criteria needs to be evidenced as well.
This will hopefully improve the child's independence.
True Nothing's Free, There's Family Allowance, Free School Dinners for Parents that work Blue Badges for Two car Families and other things, make All Charges a little lower and Charge every one, not a higher increase for those that DO Contribute.
will provide more independence
<b>School or Education Setting</b>
A more efficiently budgetedvway of doing sonething is a positive way forward for all
<p>Families of pupils who require transport because of their SEND, do not make this choice they require support as they are the most vulnerable in society. There are a lack of special school places due to governments lack of investment in schools. Parents of SEND children are often financially disadvantaged due to the needs of their child. The challenging demands of parenting a child with SEND can prevent both parents from working or being able to hold a full time employment.</p> <p>Pupils who use single taxis is typically because the child is unable to manage using transport with others due to Sensory difficulties.</p> <p>My belief is that asking parents to find their own transport will further disadvantage families.</p>
<p>Give children the opportunity to have the social interactions with after school. Parents and Children being able to build friendships and relationships with other children and parents. Parents becoming more involved with school and having the flexibility of being able to use the budget for a later leaving time if child has after school activity or meetings for parents. Building relationships between staff and home, some children who come by transport do not have parents who will attend school activities. Children being included and feeling part of the school community. Children being able to be in school till the bell rings at the end of the day instead of leaving early to get on to the bus and missing out on the social side of leaving with the class. Developing relationships for children and their parents, being there at the end of the day to collect a child and be told face to face in front of the child of their achievements has a massive impact on the mental health of both parents and children and behavior of the child in school. For parents being able to speak to someone if they are worried or concerned, teachers can see better if parents are needing help if they speak to them face to face instead of a catch up email at the end of the day.</p>

Page 224	Helps gives children more independence and preparing for adulthood
	I work as an attendance officer so any help getting the children into school is greatly welcomed.
	I work in a school and the children that come on the Havering transport bus simply would not come to school. Their attendance was down around 70% but has picked up significantly since travelling on the bus. More school support workers would have to go out every day and pick up these children because the parents cannot manage to get them into school
	I work in education. I feel poor attendance would deteriorate even worse.
	Increased financial commitments. Impact on working pattern.
	It is good
	It is important that any change enabled parents and young people to access education settings in the simplest most helpful supportive way that keeps the child's needs and the families needs at the centre of the process. The changes must make it easier simpler and more supportive to families.
	Our school very occasionally uses home to school transport, a self managed taxi option would work best for our students and parents
	<b>Young Person aged 16 - 25</b>
	Disagree
	In my view I feel the transport services, need to assess every young person's individual needs and also the parent/ Guardians'. Due to my son's reluctance to exit the transport bus, I have to ferry him to college 4 mornings a week, which means I rely on another parent to take my 8 yr old son to school as it's impossible to do both runs. I have not been offered an alternative option, I would consider a travel buddy system where I don't have to transport my young adult son, and be able to take my youngest child to school.
	My child we'll chair user he needs help to do everything
	My daughter has traveled independently in a taxi since the age of 11. More recently this has moved to a black taxi due to using an electric wheelchair. She loves the independence that the taxi provides her and you would be taking away one of the only sources of independence she has. She arrives and comes home from college on her own in a taxi, like any other child her age who has the ability to go via other means of transport, walk, bus, etc. My daughter is unable to travel independently on the bus due to her disability and the need for a carer to be with her to support her needs. This will have a huge impact on her independence, self-esteem, and mental health as it is one of the only things she does without me being with her. Please note that she also takes a walking frame as well as her wheelchair to school and the equipment would not be easy to transport on public transport.
	In terms of the impact on our family, this would be massive. With my daughter already moving from school to college and the impact on my time with the reduced timetable of a college environment, she is now at home with me requiring care more than whilst she was at school. We are both working parents and as my daughter's main carer, I already juggle working around my children's appointments (both children have EHCP's) along with her reduced timetable, numerous hospital appointments and surgery and the additional support she requires at those times. For me to take my daughter to school would also have a very negative impact on my son who's additional needs require a lot of emotional support especially in the mornings before school.

In honesty, if we lost the transport provided it would probably be the final straw and push me to have to give up work. I am physically unable to do everything and the constant struggle and juggling of all the tasks and roles that I need to carry out already play a part in my mental health and my ability to have some time of my own.

I would have to look to give up work as it would no longer be feasible for me to work.

My daughter is unable to use public transport on her own due to her disability and safety. Using transport buses means that she can be as independent as she can possibly be. She travels with her peers and is able to interact with them safely meaning she's as 'normal' as possible at her age.

Negative Impact accessing an education and community

these changes will totally disrupt my child routine and everything she is now used to as her attention span is less than 2 minutes, she cannot go anywhere without support/carer, cannot recognize danger.

Too many parents take the xxxx to be honest! I know some parents that don't work have another child that is old enough to take themselves to school, have a vehicle but they get transport. Why?



## **APPENDIX B - External comments to the Consultation Process**

Dear CAD Team

We have completed the consultation link and have expressed our views.

We cannot express enough, the high importance of keeping the bus service. It is an excellent service that makes a massive positive impact on us as a family and we are grateful for the service. Please do not take it away. We do not want to be penalised for this wonderful core travelling service that is cost effective and safe for our child to use, because a few people in the borough are insisting on extreme travel options such as the one that was mentioned in the local paper recently which is costing £45,000 per year which is an outrage really.

We pay so many taxes, we are older parents and have worked all our lives, and continue to work and pay for taxes. It is unfair to take away the core bus service because some people might have "abused" the system as in the example above.

We would also be open to pay a cost each month or year towards the bus service, this has been mentioned in the link that we completed.

Travel training will not work for our daughter, she has down syndrome and with all the training in the world, she would be too vulnerable to travel from Romford to Upminster on her own, it cannot be done.

A travel budget would not work for the same reasons, we would not put her in a taxi on her own.

If you think it would be helpful to speak to a family who do not insist on draining budgets from our local authority and who really, really need the bus service, please do not hesitate to contact me via phone xxxxx or via this email address.

Please, please consider keeping the bus service, it really is a lifeline for us and we are presuming many other families!

Thank you and kind regards

Dear Mr Young,

As the project manager of Havering Council's unlawful attempt to bypass the Home to School law, otherwise known as its SEN transport consultation, I would like to give you the opportunity to breakdown how, at the end of the consultation paper you have arrived at the overall impact assessment as "Positive", given that the consultation process has just begun its quite perplexing how such a conclusion has been reached.

Please explain the metrics you used to arrive at this conclusion.

Also please stipulate the number of disabled or SEN people who worked on this consultation and who contributed to the assessment of "positive".

As there is such an extensive deficit of lived experience of disability among council representatives, it's ablelist paradigm informs and infects the policy making process to its core. Describing the impact of this unlawful attempt to take SEN's children's transport away from them as "positive" is surely another example of this.

Without exception, the feedback from SEN parents and the children affected that I have spoken to about this proposed cut, has been overwhelmingly negative.

**The reason for this overwhelmingly negative response is seven fold:**



Firstly the huge issue of safeguarding our most vulnerable children.

Many of these children are non verbal, require medication, suffer from seizures etc. The safeguarding issues alone are endless. And is it realistic to expect an Uber driver to not only notice and recognise a myriad of different types of seizures, but then to pull over on the A12 or wherever and administer potentially life saving medication? Please share the risk assessment that has been conducted concerning this situation.

Secondly an inevitable disruption of school attendance for our SEN children. Based on your risk assessment, please share the projected increased usage of Uber and the local Uber capacity to absorb the additional journeys. Please also share any analysis you have regarding the number of accessible Uber vehicles available in the Havering area. Please also share Uber's corporate policy on the safe transitioning of disabled users from their vehicles to the school grounds. School policies are in place to prevent staff from lifting or getting children out of vehicles, has Uber ensured that its drivers are able to perform this task and have the necessary insurance in place? Please also provide details of this and how Uber ensures all drivers CPS checks are up to date.

Thirdly, please specify how travel budgets can ensure enough flexibility to accommodate extraordinary circumstances that result in a journey taking for example 3 times as long as it should. This week alone my son has been stuck in traffic for over 2.5 hours on three occasions. Twice due to accidents on the road and another time due to an oil spill on the road. The current black cab provision has to absorb the extra costs of such eventualities but that would not be the case with an Uber driver. Has any cost analysis been done based on existing traffic flow on school routes and the number of incidents on that route and alternative routes? Again, SEN parents would be eager to see this analysis.

Fourthly, dovetailing on from this problem, what steps have been taken to ensure that once an Uber driver takes a job and he then gets stuck in a traffic jam, he cannot abandon the job and leave the child waiting to get to or from school? This is currently the case with Uber, so one assumes that conversations have been had on a corporate level to safeguard against this eventuality because failure to do so would be to abandon our SEN children to market forces.

Fifthly, the Direct Payments team cannot keep account of existing monies going in and out. A thorough forensic audit of this department would identify hundreds of thousands of "missing" pounds judging by the experience of anyone who has ever had to liaise with that Department. The only thing it will succeed in doing is ensuring a lot more lost school days because payments have not been made by the Direct Payments team - this is already a common problem with many services that have to be paid by this Department. Please share with SEN parents the proposed increase of staff in the DP department needed to be able to take on this extra workload.

Sixth, please outline how you have assessed the increased stress and negative impact on mental well being that the changes will have on the children and their families. Change is difficult for many SEN children, travel and school attendance being particularly difficult, therefore please share what metrics you are using to assess this as well as the additional stress that will come with dealing with the Direct Payments department and the necessary chasing and follow ups that will be required when liaising with that department.

Seven, the legality of it - the law surrounding Home to School Transport has not changed and local policy cannot trump law, so Havering will waste money in legal fees and lose because they are acting unlawfully and that will cost Havering residents even more than before - legal fees + taxis and school buses.

As you can see from the above, Havering will need to provide a lot more detailed information if it wants SEN parents to consider a change in transport provision. Without these additional risk assessments and pre-planning steps in place, we will see you at tribunal, and as the law is on our side, we will win.

Yours sincerely,

A Parent

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Why not take over a school or centre like the co-op and next door and build something, Apart from really disabled people, this would be central to the mini buses at the town hall, with various starts after main school time for the mini buses to go round, include workshops and social. (motel on the 127).

My brother moved to Braintree so this could be done - look at Park( Center).

Regards

Same for homeless use the motel or build a dormitory Center they can or cannot move on from.  
Sent from my iPhone

Dear Cllr Oscar Ford,

Every morning parents and Guardians like me in Havering say goodbye to their beloved children as they are assisted onto their school transport with great care and attention. From the moment I wheel my daughter to her minibus, I am reassured that she is receiving exemplary care by the wonderful Lee and Gill from our council's trusted school transport service.

Parents and Guardians like me are feeling the weight of uncertainty as to exactly how the proposed cuts to school transport in the borough will impact individual children and young people, and reading your recent comments in The Havering Daily (<https://thehaveringdaily.co.uk/2023/10/11/havering-council-reviews-the-way-children-with-special-educational-needs-and-disabilities-travel-to-school/>) about this has left us feeling anxious and incredulous.

What follows are important questions in response to what I'm sorry to say feels like an unimaginative, uncreative reaction to financial pressure, with ableist implications.

1. The council is facing a section 114 notice – bankruptcy - which must be inordinately burdensome. Cuts need to be made, and I appreciate that. But why target a necessary service for a marginalised group of only 600 children and young people out of over 77,500 in the borough?
2. As governor at Corbets Tey School, Jeff Stafford rightly pointed out to you recently that this fragmented approach to essential school transport 'could have some serious safeguarding issues'. To what extent do you acknowledge the safeguarding concerns that accompany disabled children travelling in Ubers, for example?
3. You responded to Jeff Stafford's interest in 'the exact implications to our pupils and their families' - given the disruptive impact on children this will have, and 'the distress this would cause to our parents and Guardians' - with an out of date report that was published in 2019 (<https://www.local.gov.uk/understanding-drivers-rising-demand-and-associated-costs-home-school-transport>). What reasons do we have to suppose this report is fit for purpose currently, and will do justice to our children and what they need?
4. I'm curious as to what makes you think we need 'flexibility'? From my perspective, what parents and Guardians need for the children in our care is not flexibility, but rather stability and consistency; a robust, reliable, joined-up system in which continuity of care is delivered with appropriate training, and our children's safety and wellbeing. How much will the 'assessment process' cost, who's doing the assessing and what qualities make them suitable for such a task?
5. Is this a move to outsource the current contract to private companies? If so - and if the primary aim of this move is to cut costs - we simply will not get the current level of integrated assurance

we need that care is being provided to the high standards we expect and deserve. Regardless of what might be being recorded on paper by private companies, we have seen examples of systemic failure in refugee services, mental health services and more, putting marginalised people at greater risk of stigmatisation and harm.

6. You suggest carpooling, and offer 'trusted friends' as a possible way around this disruption to trusted provision. In addition to the glaring safeguarding concern, a lot of assumptions are being made here: What makes you think that people have trusted friends at all? Not least those who aren't struggling with their own families during a cost of living crisis? But more to the point, why are disabled children expected to car-share, but non-disabled children are not? At present, regular car-sharing would represent a sizable cultural shift that would make this a much bigger request than is implied. The expectation on parents and Guardians to depend on the good will of others in more privileged situations is deeply disempowering and unjust.
7. Have you considered that more vehicles on the road could lead to more pollution and parking needs?
8. There will be a consultation about this, but how meaningful will it actually be? When you think about it, it is unlikely that exhausted parents and Guardians giving 24 hour care to their loved ones will easily be able to access the time or energy for such a meeting, especially given the level of anxiety this is causing in so many of us already.

We need nondisabled people to understand that disruption to care services has a knock-on effect: to parents' ability to work and to pay taxes; and to health, wellbeing and the subsequent pressures on the NHS.

It takes loving attentiveness, openness, responsiveness, creativity and more to care for people. Investment in time, money, and training are some of the more basic conditions that are necessary to create integrated support networks for disabled children that can even begin to safeguard their rights and opportunities.

Ultimately, care is always primarily about people, not revenue. Disabled children are already systemically oppressed at all levels of society, including travel and education; at the very least we must mindfully refrain from actively disadvantaging marginalised children and families further.

Yours sincerely,



Dear Cllr. Ford and Mr Young,

Julia Lopez MP has been contacted by her constituent, Ms xxxx, regarding the Council's consultation on Home to School Transport and her concerns about the proposed changes.

Ms xxxxx has shared the below email which she sent to Cllr Ford and Mr Paul Young, which outlines her worries about the proposed changes and how the Council have calculated they will have a positive impact on SEN children.

Ms xxxxx has raised further specific concerns regarding:

- the safeguarding of vulnerable children
- a disruption of school attendance
- how budgets can ensure transport options for journeys which may become much longer owing to extraordinary circumstances (like a road blockage)
- what steps will be taken to ensure that Uber and minicab drivers do not leave children stranded
- the direct payments and the monitoring of funds
- the impact of proposed changes on the wellbeing of families and children affected
- the legality of the proposed changes

Within the above bullet points, Ms xxxxxx has raised further subqueries which you can view in full below.

It would be greatly appreciated if you could advise further on Ms xxxxx queries.

With best wishes,

Please find below our final thoughts as forum steering group. Some of this has been raised before but we thought it would be useful to pull it together and amend following all the discussions.

We would like to stress that we feel communication and collaboration could have been better handled on this project and a lot of unnecessary distress has been caused to our community.

We would like to thank you for working with us following initial concerns raised and hope moving forward we can be more effective working together taking lessons learned.

We have included the following:

- Advice from the Head of Policy at Contact
- Open Letter from a parent member
- Feedback from Steering Committee
- Questions from members following the face-to-face consultation (Survey Monkey attached). - We feel a future Q&A doc would help benefit parents and we are happy to help support this where we can.

#### **Advice from the Head of Policy at Contact**

Hi Louise

We have major concerns about policy. Firstly, the section on eligibility says to qualify for free travel arrangements a child must they fall within all the criteria (nearest suitable school, unable to walk, FSM). This is misleading to parents (and illegal). The DfE statutory guidance says if a child cannot reasonably be expected to walk to school because of a special educational need, disability or mobility problem, they will be entitled to free school transport regardless of the distance they live from the school. (See para 13 page [Travel to school for children of compulsory school age \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/671112/Travel_to_school_for_children_of_compulsory_school_age.pdf))

We feel the whole policy is outrageous. There is a huge emphasis on cost cutting and sustainable travel and transport. This is at the price of transport that is based on individual need. It places all of the burden on families.

These are a few of the headline points that are deeply concerning:

- Any assistance offered will look at what is efficient and effective, both in terms of sustainability and cost.
- Communities will be encouraged to work together and support each other, and parents/guardians will be encouraged to work with relatives, friends, parents at the same school as their children, neighbours, childminders and others to support them with transporting their children to school where possible and appropriate
- The use of free travel on public transport will be encouraged wherever possible
- Students who are able to travel independently will be encouraged to do so. It is reasonable to ask parents and young people to consider travel training, but it should not be a blanket policy. It should be based on individual assessment and tailored to the young person's needs. Some young people may never manage



independent or supported travel by public transport. There may be issues in rural areas if times of courses for young people with SEND don't fit in with bus times.

- Students who have additional travel needs will be offered the most independent and personally enabling solution for their situation

More information: [Challenging school transport policies in England | Contact](#)

Good luck with the consultation event.  
Head of Policy & Public Affairs



### **Feedback from Steering group.**

We have yet to view appropriate data on the journeys impacted by these proposed changes. We believe that transport is the 'sticky plaster' that parents use, due to lack of services and that naturally there will be a correlation between the below:-

- Lack of suitable provision in Havering means parents have no option but to travel out of Borough with lengthy journeys. These parents will have already been through a significant trauma to obtain this school place and forcing them to arrange their own transport seems somewhat unethical and in conflict with the intentions of the act.

- Working parents utilise the service because childminding, breakfast and afterschool clubs are not available to be able to support their children. In addition, their children would not cope with the extended school day.

- Blue badge users (who become triggered by PTS or have mobility aids that do not fit on the bus)

It is still very unclear where the proposed savings of £1.4 million pounds would be obtained from(?) It is highly unlikely that delivering this service following the guidance legally would result in a £1.4 million saving and the cost to implement changes would be disproportionate.

### **Further workings on PTS Service or Taxi Framework**

The Cabinet document detailing the "Proposal to Consult", states that the expansion of the PTS service or Taxi Framework is cost prohibitive, however there are no workings that have been presented on this(?)

We have been informed that some PTS current vehicles have been impacted by ULEZ. If so, what impact will this have on bus seats available? We feel the PTS service is a successful form of environmentally friendly transport and alternatives are often offered because PTS route is not available (due to staffing or limit in the fleet). We feel this service should be invested in rather than being reduced.

Also, poor communication was a factor often noted as a reason why the PTS service did not work (resulting in single use taxi services). Surely investing in improving said poor communication, through staff training where necessary, would be a better use of resources as opposed to adding to the payroll (within a budget you are already trying to reduce) i.e. Assessment Staff.

Further Risks to be highlighted as part of this consultation

- Children using this service often have difficulties with school attendance/refusal. Have you considered the impact that changing these journeys and paying their parents directly will have on school attendance for them and their siblings?
- SEND Working parents rely on this service. Have you considered the impact on parents having to give up paid jobs because they cannot get their children to school and return to work within a reasonable time period? The document notes consideration should be given to just the child and not the wider family. This seems a little close-minded and lacking common sense to not consider the knock-on effect/wider impact on our community.
- Have you established a criteria process for assessment of this service going forward? And the cost and time impact of running that? Does a lot of this not already happen via a Blue Badge assessment? Therefore, in our view, face-to-face assessment would be considered a waste of resources.

Based on the new guidance, have you looked at what percentage (%) of children currently access this service versus those who could access it? For example, parents currently use this as a last resort. I know many parents who could be eligible under new guidance but there is often a stigma around attending school on a big white school bus or one with an unfamiliar taxi driver. On this basis if your first port of call is to offer personal budgets for children who are eligible there, surely a natural consequence could be to open up an increase in applicants to your service who previously would not have used it? And, whilst failing parents and families in who really have no choice.

- Please note that transport training must be taken on a case-by-case basis and not the default as stated. It is not suitable for all individuals and an assessment must take place as part of this before putting children and families at risk. It may be a better use of resources to offer this service rather than imposing it on children and their families.
- The document discusses "carpools" - What impact will this have on the safety of children, parents and insurances? The children who often use this service can become violent, climb out of their seats, attack parents, throw items at windows. Will safeguarding training/insurance advice need to be given to parents who undertake such "carpools"?

## **16+ Charging Concerns**

Councils can charge for services provided to children 16 + due to a loophole in the law that needs addressing.

They must not however charge a user in the instance where Adult Transport services would be provided at 18.

The guidance also states charges must not be in excess of costs to that of a non-disabled transport user of this age. So this can be applied in cases such as Thurrock or Essex.

However, in London a unique set of circumstances is present whereby TFL provide all young people with free travel.

Therefore, to charge for this service would be unequitable and the equality assessment provided as part of the cabinet would not stand, as in charging for this service it would disproportionately disadvantage disabled children and families who cannot use the TFL service to travel to education due to their disability.

We wondered if it would also be possible to share the Adult assessment process so we can understand what the current assessment entails.

We hope this finds you well,

Kindest Regards



Hello Mr Young,

Unfortunately I was unable to submit my views via the link for the consultation. I don't know whether this will be taken into account at all, but I wanted to email through to you anyway.

Prior to receiving School Transport help from Havering, our trips to and from school were unpredictable and caused everyone involved high anxiety. My youngest daughter has a diagnosis of ASD, delayed speech as well as delayed understanding. Our walk to and from school would involve refusal to walk and sitting down on the footpath for extended periods of time, her bolting in different directions (quite close to Hacton Lane, a very busy road) and her becoming emotionally distressed. This also caused my eldest daughter to become distressed too.

To try and eliminate the anxiety and stress of walking to and from school, we then tried ordering a Taxi every morning and afternoon from a local Taxi Company. This did not provide the solution we were hoping for. We were unable to secure the same driver for the mornings and afternoons, so there were many different people throughout the week picking up and dropping off. There were mornings where the Taxi did not turn up on time or sometimes at all. The cost of this service was also very expensive, costing £18 a day, that's almost £400 a month. The drivers for this local company were also not equipped to deal with situations where my youngest daughter became distressed and went into crisis mode (which in turn would cause my eldest daughter great distress).

School Transport has changed the unpredictability and anxiety of travelling to and from school. The routine and repetitive nature of catching the bus to school has meant that our morning and afternoon trips to and from school are calm and both children are happy.

The ladies (who are the same everyday) on the bus are brilliant with the girls and are always kind, welcoming and full of smiles when the girls go out to catch the bus in the morning and when they depart the bus in the afternoon. The ladies are also equipped to deal with behaviour difficulties or emotional distress that may occur on the journey to and from school. The fact that the same children are on the bus and they sit in the same seats everyday provides consistency, routine and familiarity which is so important for both my children.

The bus to and from school provides an essential service for our family and many other families within our borough. For many children with additional needs consistency, routine and familiarity are so important in ensuring they are successful in their day to day lives. Support for children (and adults) with additional needs is an area that needs more thought, services and funding. By taking the buses away and giving each family an allowance, this will not provide more choice and flexibility for families. If anything it will cause upset and be disruptive to an already well established routine that works for our children.



With an increase in the numbers of children and adults needing support with additional needs, this is not an area where cuts should be made. I do hope you think carefully about the children who this will affect and their individual needs. After all, they are not just numbers on a piece of paper, they are children who need extra help and support to be able to achieve and succeed in life. Catching a bus might not seem like a big deal to the people proposing the changes to this service, but it is a huge deal to the children who benefit from this service.

Thank you for taking the time to read my email.

Kind regards,

## Appendix C - Face to Face Consultation Event

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Car pooling - safeguarding agencies / parents

Costs - legal requirement to send our kids to school.  
Mainstream children don't pay on their transport.  
Unable to work + earn money so parents will have to pay.

- Cost info with slides to show
- The methodology of the Policy
- Process + Follow from today's meeting → Draft → Cabinet - what does that look like. - When will we be informed -
- Quality impact assessment - Equality Act  
Statement for assessment -  
To have positive impact to Empower  
- What does that look like for this Policy -

1.

- Means Testing = Post 16  
Based on individual not the Family Circumstances -
- Ignore legislation + Give moral support + change -
- Are other Budgets being cut -  
- what cuts are being made + what % -
- New bases on some routes -  
So why Purchase New to the service.
- How will the meeting be summarised and communicated back with 'How' the Policy will be Positive + what changes.

2.

Will 'Shadowing' families be  
an option to show How daily  
transport is a BIG Part of our children's  
lives

- No agency staff - is Needed -  
- Don't need to be  
strangers - / PA

- Communication - The transport  
Policy - This meeting should have  
been before knowledge of the change  
of policy -  
communicate to us - clearly -

- Children 'other' - between 16-18 don't  
pay why should 'our' children.

- Q's - <sup>consultation</sup> Not fit for information about 'our'  
individual family - Pre Q's should have been draft 3

- planning for change  
WITH us as Parents / carers

ie Q's → Meetings → Follow ups -

Not  
- 'Presentation' meetings which  
don't give the desired outcome for  
us or you!

- Q - Consultation to get ideas on  
how + what we want as desired  
Outcomes before the 'Real' confusing  
consultation comes out

PREPERATION FOR US

4  
3.

Changes only for 16+

Travel training not suitable for everyone

Criteria to be entitled to bus

Infrastructure for running transport service needs improvement

Don't take into account complexity of child's needs

Complex physical

sensory

Getting a child ready for school

Changes to transport make changes to child routine which impacts their outcomes, mental health, ability to lead as normal a life as possible.

More assessment needs inflicted on families already struggling.

Takes away independence

Forces parents to give up jobs to provide transport.

Mental health impact on parents could result in more cost to social care

- PB will only work for stay at home parents

- Will make a difficult arrangement prove more difficult for parents

- Discriminating against vulnerable parents

- Increasing anxiety + depression in a cohort of parents already suffering - giving up of their independence, jobs, friendships etc as they have to become carers to their 16+ children.

Once a transport offer has been made - is there an option to change it if it isn't working at some point in the year?

PTB's, will ~~offer~~ need PAs - none available now. Training for PAs to be able to manage a child on the way to school.

DES costs? - who - many extended family + friends will afford the wider family + friends relationships

More assessment needs inflicted on families already struggling.

Takes away independence

Forces parents to give up jobs to provide transport.

Mental health impact on parents could result in more cost to social care

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Don't take into account complexity of child's needs

Complex physical

" sensory

Getting a child ready for school

Changes to transport make changes to child routine which impacts their outcomes, mental health, ability to lead as normal a life as possible.

More assessment needs inflicted on families already struggling.

Means testing Post 16 - Education is compulsory for 18 year olds. Neurotypical children do not have to pay to get an education. Many families with SEN children are on a lower income due to being a full time carer or working reduced hours.



- Must be case by case
  - at the moment feels we must fit into the available options

## → Travel Assistance

- What is the process for resolution + appeal where LA and parent disagree on what's <sup>reasonable/fair</sup> right?
- Any new process must not add to the pressure parents already carry?
- What about safeguarding? Vulnerability? Risk Assessing?

- The PTB may be suitable for some, but not for ~~the~~ others
  - cognitive age 3 → Out of Borough → single working parent
  - non-driver → what about safeguarding?
- Escorts mean a meaningful, safe journey, that could be unsafe without an escort → it's not like for hire
- A PTB adds to the 'load' that parents of CYP w/ SEND carry
- Inconsistency, unsustainability of current service
  - untrained drivers, unreliable PTs,
  - affects children's education
- DLA is used to give children <sup>with SEND</sup> access to what typical children get for free/cheaper
  - Should it not be 18+, as 16-18 = statutory transport
- FAQ - clarification on what timescales mean for 4.7 in September 2024
  - Relevant to question of contribution to post-16

## • Means Testing: Post 16.

Means test individual not household income in line with Social Care.  
Why should parents have to pay for travel for post-16 / especially 18 year olds that we are not legally responsible for. Our children are entitled to a education the same as others who get free school meals.

Why should the charges only apply to households who are not on benefits and when the travel is for a young adult - it should be on their finances (individual) as parents are legally required to send our young people to education - YET AT A COST!

- Individual/young adult not likely to be able to fund their own transport as will not be working or limited benefits available to them under 18. Why should parents?
- Independence: Young adults that cannot do travel training or physically disabled in wheelchairs - cannot then travel independently. Ever! THEY NEED SAFE INDEPENDANCE
- Young adults with cognitive impairments will NOT be able to travel independently
- 1:1 Escorts: Necessary training? - 1 escort on bus is not enough for support.
- THIS IS THE ONLY INDEPENDANCE OUR YOUNG PEOPLE HAVE FOR INCLUSION AND SOCIALISATION AND SAFEGUARDING.
- WHY ARE YOU CONSIDERING CUTTING THIS! IT NEEDS TO BE FAIR + PRIORITY!! IT IS A

- 1) Post 16 → Independence of child based on disability  
 → Details need to be provided of exact policy that will be in place.
- How will assessment work?
  - How will charging & decisions be made? How much will that be as some families will need advance notice to plan.
  - Current draft policy doesn't include this, so how can we consult on it at this stage.
  - Whether a post 16 child would qualify for adult transport needs to be considered during an assessment under guidance.
  - Consideration should be given to social cost. Budget as in circumstances parents will ask for advice.
- 2) Disabled parents/careers - access to terms and details, feel unable to contribute to consultations at times.
- 3) If where to invest in borough education wouldn't have to go out of borough reducing transport cost.
- 4) Personal budget is not going to work for most (95%). It's also a way of differring responsibility. Then
- 5) There cannot be a blanket approach, not one size fits all in school.

- 1) Post 16 → Independence of child based on disability  
 → Details need to be provided of exact policy that will be in place.
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  - How will charging & decisions be made? How much will that be as some families will need advance notice to plan.
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include this, so I can be  
consult on it at this stage.

- Whether a post 16 child would qualify for adult transport needs to be considered during an assessment under guidance

- Consideration should be given to social care budget as in circumstances parents will ask for services

2) Disabled parents/careers - access to forms and details. feel unable to contribute to consultations at times.

3) If where to invest in borough education wouldn't have to go out of borough reducing transport cost.

4) Personal budget is not going to work for most (95%). Its also a way of differing responsibility. This

5) There cannot be a blanket approach, not one size fits all in SEN.

6) Impact of SEN children & parents. Mental health (isolation, work issues & other family issues)

7) Independence for all children along with supporting needs should

8) Invest to save - Stop outsourcing and invest in our borough to make long term savings.

9) Lack of escorts (some children require 2 escorts). Lack of buses. - ~~etc~~

10) Lack of knowledge of escorts and bus drivers (seizures)

11) ~~There~~ Multiple transport runs - more than one child - different school times

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2 escorts). Lack of buses. - ~~etc~~  
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2 escorts). Lack of buses. - ~~etc~~

10) Lack of knowledge of escorts and  
bus drivers (seizures)

11) ~~There~~ Multiple transport runs -  
more than one child - different  
school times

Safe  
guard  
(concern  
to child  
and staff)

Safe  
guard



✎ Taxi service black taxi  
Versus normal taxi - Reason for  
cost different.

Details on post 16 charges.  
Means testing, multiple children examples?  
To consider if child would qualify for  
transport.  
Suitable provision cannot be  
provided in borough at 16  
Should parents be penalised for  
charging.

Surveys ~~the~~ cover the different  
languages, brail etc.

Can we have a break down of  
costs of services not just numbers.  
and also compare with other areas  
in borough and services

Concerns around staffing on buses

Suggestion of having schools assist  
transport and assessments.

Schools

more communication from transport.  
more Bus drivers and escorts  
↓  
Training      sign language.  
Seizure charges.

More consultations  
↓ include working parents.

Family needs to be of assessment  
not just child.

Can bus service planning be looked  
at. - communication, other children, families.

Electric Buses.  
Environmental - if bus convert to PTB service  
Schools logistics - Can a separate questionnaire  
go out to schools.

Car pooling - Insurance, First training  
per child needs.

Personal Budget - Clarity on how it will  
work. - How it will be paid.

Bus exceptional circumstance? But majority  
of children use bus for travel.

Please provide evidence  
on travel training success/failures.

Please provide range criteria of those who  
would be suggest / offer training

# Equality & Health Impact Assessment (EqHIA)

## Document control

<b>Title of activity:</b>	<i>Home to School Transport Policy and protocol</i>
<b>Lead officer:</b>	<i>Jodie Gutteridge   Corporate Policy &amp; Performance Lead</i>
<b>Approved by:</b>	<i>Trevor Cook   AD Education</i>
<b>Scheduled date for next review:</b>	One year after when the policy is reviewed.

<b>Did you seek advice from the Corporate Policy &amp; Diversity team?</b> Please note that the Corporate Policy & Diversity and Public Health teams require at least <b>5 working days</b> to provide advice on EqHIAs.	Yes
<b>Did you seek advice from the Public Health team?</b>	Yes
<b>Does the EqHIA contain any confidential or exempt information that would prevent you publishing it on the Council's website ?</b> See Publishing Checklist.	No

Please note that EqHIAs are **public** documents and unless they contain confidential or sensitive commercial information must be made available on the Council's [EqHIA webpage](#).

**Please submit the completed form via e-mail to [EqHIA@havering.gov.uk](mailto:EqHIA@havering.gov.uk) thank you.**

# 1. Equality & Health Impact Assessment Checklist

Please complete the following checklist to determine whether or not you will need to complete an EqHIA and ensure you keep this section for your audit trail. If you have any questions, please contact [EqHIA@havering.gov.uk](mailto:EqHIA@havering.gov.uk) for advice from either the Corporate Diversity or Public Health teams. Please refer to the Guidance in Appendix 1 on how to complete this form.

## About your activity

1	Title of activity	Home to School Transport Policy and Protocol			
2	Type of activity	Policy			
3	Scope of activity	To explore the impact of the Home to School Transport Policy on the various domains. This is sourced from the HTS Transport consultation, parents/guardians feedback of the service through the transport team and complaints service.			
4a	Are you changing, introducing a new, or removing a service, policy, strategy or function?	Yes	If the answer to <u>either</u> of these questions is 'YES', please continue to question 5.		
4b	Does this activity have the potential to impact (either positively or negatively) upon people from different backgrounds.	Yes			
4c	Does the activity have the potential to impact (either positively or negatively) upon any factors which determine people's health and wellbeing?	Yes	Please use the <a href="#">Screening tool</a> before you answer this question.	If you answer 'YES', please continue to question 5.	If the answer to <u>all</u> of the questions (4a, 4b & 4c) is 'NO', please go to question 6.
5	If you answered YES:	Please complete the EqHIA in Section 2 of this document. Please see Appendix 1 for Guidance.			
6	If you answered NO:	N/A			

Completed by:	Jodie Gutteridge/Paul Young
Date:	11/09/2023 revised March 2024

## 2. The EqHIA – How will the strategy, policy, plan, procedure and/or service impact on people?

### Background/context:

This policy outlines the support and assistance available for children and young people travelling between home and school/college. Support and guidance may be provided by the council based on the different [eligibility criteria](#), which is dependent on the age of the student.

Most children and young people will access school/college supported by their family /carer without additional assistance from the Council. Where assistance is given, it should be part of a plan that encourages children and young people to become more independent and resilient in their future lives, while encouraging sustainable forms of travel, including walking, cycling, scooting and the use of public transport.

The purpose of the home to school transport service is to enable eligible students to get to and from school for free.

*There is no statutory obligation to provide free travel assistance to those who are Post 16*

The child is entitled to free school meals as a guide to low-income families (such as parents are in receipt of maximum working tax credits) and their nearest suitable school is:

- Beyond 2 miles (for children over the age of 8 and under 11)
- Between 2-6 miles (if aged 11-16)
- Between 2 and 15 (if the nearest school is preferred on the ground of religion or belief (aged 11-16))

*\*Expand box as required*

### Who will be affected by the activity?

Those Children, young people and their families, with special educational needs and who are eligible for home to school travel arrangements.

*\*Expand box as required*

**Protected Characteristic - Age:** Consider the full range of age groups

Please tick (✓) the relevant box:		<b>Overall impact:</b>
<b>Positive</b>		The number of people that live in Havering has increased over the last decade from 237,232 in 2011 to 262,052 in 2021. This is a 10.5% increase compared to a 7.7% increase across London and a 6.6% increase across England.
<b>Neutral</b>	✓	
<b>Negative</b>		<p>The population of Havering is anticipated to grow by 15k (5.6%) from 266k in 2022 to 281k in 2032.</p> <p>The number of children aged under 18 has seen an increase of 15.2% (from 50,827 to 58,550), greatly outpacing the 4.8% and 3.9% increases in London and England, respectively. Havering now has a higher proportion of children aged 0-17 (22.3%) than 80% of local authorities in England. This increase is slightly lower than the latest ONS projections (2018). The ONS predicts that the 0-17 population will grow to 61,350 by 2031. The demand for transport has grown significantly and within the last year has increased from 600 to 800 requests</p> <p><a href="#">Create your own tables, Table Tool – Explore education statistics – GOV.UK (explore-education-statistics.service.gov.uk)</a></p> <p><i>*Expand box as required</i></p>
<b>Evidence:</b> <p style="text-align: right;"><i>*Expand box as required</i></p>		
<b>Sources used:</b> <p>Census 2021 Home to School Transport Statistics on Requests</p> <p><a href="#">Joint Strategic Needs Assessment 2022</a></p> <p style="text-align: right;"><i>*Expand box as required</i></p>		

**Protected Characteristic - Disability:** Consider the full range of disabilities; including physical, mental, sensory, progressive conditions and learning difficulties. Also consider neurodivergent conditions e.g. dyslexia and autism.

Please tick (✓) the relevant box:

**Positive**

✓

**Neutral**

**Negative**

### Overall impact:

In Havering an estimated 38,449 residents reported having a disability in 2021. This is an age-standardised proportion (ASP) of 15.3%, which is slightly lower than London (15.6%) and lower than England (17.7%). In Havering, an ASP of 6.6% reported that their day-to-day activities were limited a lot and 8.7% reported their day-to-day activities were limited a little, due to a disability.

29,742 households in Havering had at least one person with a disability. Of these households, 6,181 had two or more members with a disability.

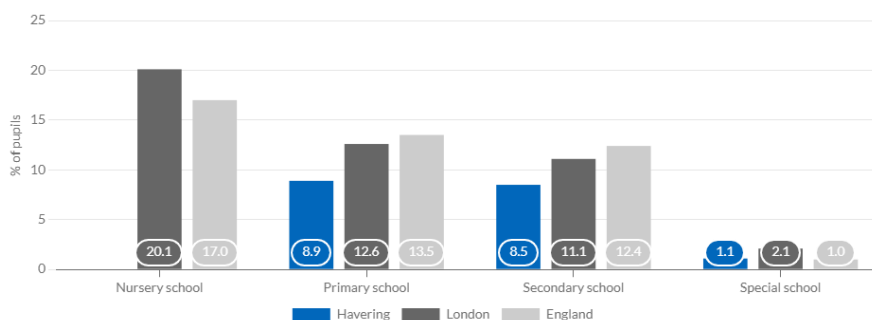
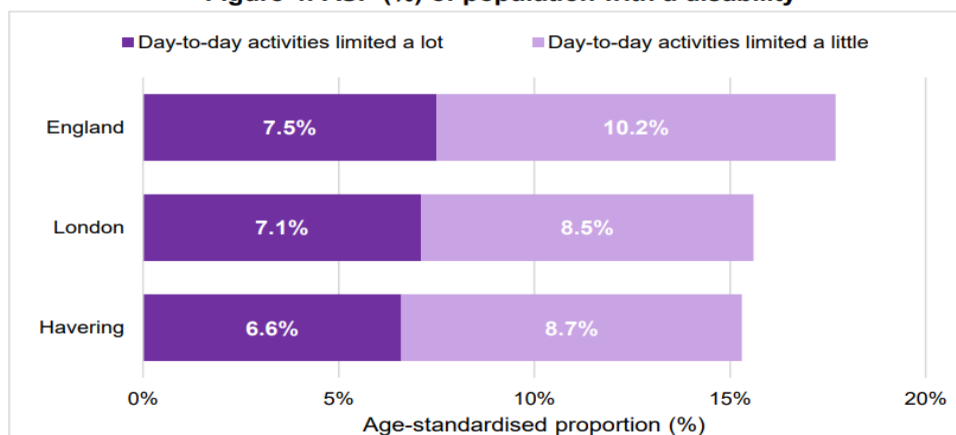
Children have special educational needs if they have a learning difficulty which calls for special educational provision to be made for them. An Education, Health and Care (EHC) plan details the education, health and social care support that is to be provided to a child or young person who has Special Educational Needs (SEN) or a disability. Havering has 8.9% primary school age children, 8.5% Secondary school children and 1.1% Special School children who are getting SEN Support.

By implementing this policy, it is anticipated that those children, young people and their families with special educational needs will have a positive outcome. This is because their needs will be looked at and the appropriate measures will be put into place to accommodate them.

*\*Expand box as required*

### Evidence:

**Figure 4: ASP (%) of population with a disability**



\*Expand box as required

**Sources used:**

Census 2021

<https://www.haveringdata.net/wp-content/uploads/2023/02/Census-2021-Topic-Summary-Health-Disability-and-Unpaid-Care.pdf>

Home to School Transport Consultation Analysis 2024

<https://www.haveringdata.net/children-and-young-people/#/view-report/07853ccb32274062987962b7d4e602b3/iaFirstFeature/G3>

\*Expand box as required

**Protected Characteristic – Sex / gender: Consider both men and women**

Please tick (✓)  
the relevant box:

**Positive****Overall impact:**

Havering has 135,668 females (52%) and 126,384 males (48%) in the borough. 93.67% of Havering residents identify as the same gender as when they were born.

**Neutral**

✓

49% of pupils in Havering schools are female and 51% are male. This falls in line with the makeup of the borough.

**Negative**

The policy sets out the council's policy to offer free travel to their place of education for those children with special educational needs. It is not considered likely that there will be a disproportionate impact of these proposals on this protected characteristic group.

\*Expand box as required

**Evidence:****All persons**

Havering (2021)

**262,052****Females**

Havering (2021)

**135,668****Males**

Havering (2021)

**126,384**

Population by sex for Havering (2021)

Females



52%

Males



48%



Gender Identity	Number	Percentage
Gender identity the same as sex registered at birth	196,462	93.67%
Gender identity different from sex registered at birth but no specific identity given	528	0.25%
Trans woman	228	0.11%
Trans man	212	0.10%
Non-binary	60	0.03%
All other gender identities	39	0.02%
Not answered	12,201	5.82%
Total	209,730	100.00%

Source: Office for National Statistics (ONS), Census 2021; Produced by: Havering PHI

*\*Expand box as required*

## Sources used:

<https://www.haveringdata.net/wp-content/uploads/2023/03/Topic-Summary-Sexual-orientation-and-gender-identity.pdf>

Home to school Consultation Analysis 2024

[www.Haveringdata.net](http://www.Haveringdata.net)

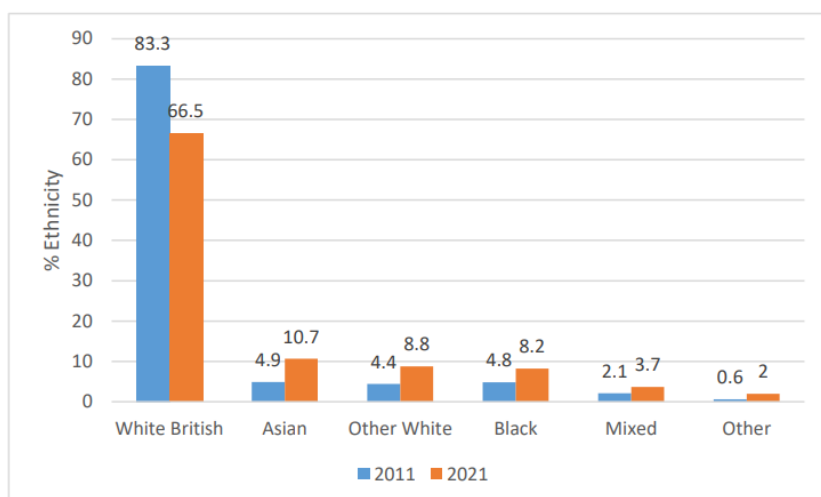
Census 2021

School Census

*\*Expand box as required*

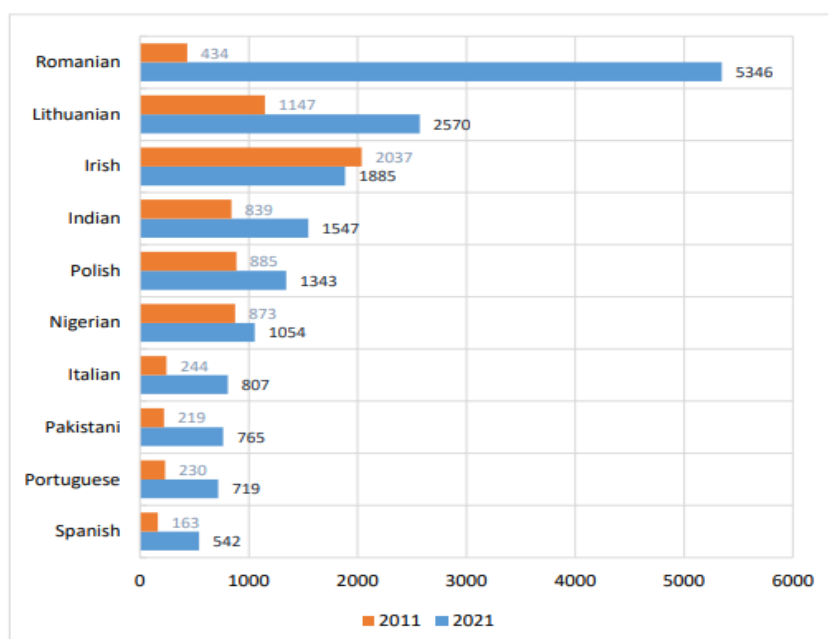
Protected Characteristic – Ethnicity / race / nationalities: Consider the impact on different minority ethnic groups and nationalities		
Please tick (✓) the relevant box:		<b>Overall impact:</b>
Positive		<p>Havering is becoming more diverse. In 2021 census, White British remains the most common ethnic group in Havering, with 66.5% (174,232) of the population, down from 83.3% (197,615) in 2011. The next most common ethnic group is Asian, accounting for 10.7% (28,150) of the population, up from 4.9% (11,545) in 2011.</p>
Neutral	✓	
Negative		<p>In 2021, 87.8% (230,091) of usual Havering residents identified with at least one UK national identity (English, Welsh, Scottish, Northern Irish, British and Cornish). This is a decrease from 93.6% (222,066) in 2011. The figure for London in 2021 is 73.1% and England 90.3%. People who identified with at least one UK and one non-UK identity accounted for 1.8% (4,843) of the Havering population in 2021; this is an increase from 0.7% (1,680) in 2011. Those selecting a non-UK identity only accounted for 10.3% (27,118) of the Havering population in 2021, which is an increase from 5.7% (13,486) in 2011. Among those who described a non-UK national identity, the most common response was those describing “Romanian” as their national identity 2.0% (5,346) up from 0.2% (434) in 2011. The most common responses in 2011 were Irish 0.9% (2,037) and Lithuanian 0.5% (1,147).</p> <p>Looking at the latest School Census, 74.36% of all students in Havering Schools spoke English as their first language. Romanian (4.10%), Urdu (2.04%) and Lithuanian (1.70%) were the next 3 common languages spoken in Havering schools.</p> <p>90.1% of residents aged 3 and over describe their main language as English, next main languages Romanian 2.3% and Lithuanian 0.9%. 4.8% of households have no members where their main language is English.</p> <p>Although there are a number of residents who identify as non-uk, it is not considered likely that introducing this policy will have a disproportionate impact on this protected characteristic group, as the policy sets out the council's policy to offer free travel to their place of education for those children with special educational needs. We do offer a translation service within Havering through ‘The language shop’ so the policy will be able to be interpreted should it be required.</p>
<p style="text-align: right;"><i>*Expand box as required</i></p>		
Evidence:		

**Figure 1 – Havering population in 2011 and 2021 by main ethnic group**



Source: Office for National Statistics (ONS), Census 2011 & 2021; Produced by: Havering PHI

**Figure 6 – Top 10 national identity excluding British**



*\*Expand box as required*

### Sources used:

Census 2021  
School Census

*\*Expand box as required*

Protected Characteristic – Religion / faith: Consider people from different religions or beliefs, including those with no religion or belief		
Please tick (✓) the relevant box:		<b>Overall impact:</b>  The religion question is voluntary in the Census, but 94.5% of usual residents answered the question in 2021. The most commonly reported religion in Havering is Christian, with 52.2% of the total population in 2021 describing themselves as Christian. This is a reduction from 65.6% in 2011. No religion was the second most common response, with 30.6% identifying in this category, up from 22.6% in 2011. Other religions accounted for 11.7% of the total Havering population, which is an increase from 5.1% in 2011.  The policy sets out the council's policy to offer free travel to their place of education for those children with special educational needs. It is not considered likely that there will be a disproportionate impact of these proposals on this protected characteristic group.
Positive		
Neutral	✓	
Negative		
*Expand box as required		
<b>Evidence:</b>		
*Expand box as required		
<b>Sources used:</b>  Census 2021		
*Expand box as required		

Protected Characteristic - Sexual orientation: Consider people who are heterosexual, lesbian, gay or bisexual		
Please tick (✓) the relevant box:		<b>Overall impact:</b>  The Census question on sexual orientation was a voluntary question asked of those aged 16 years and over. The number of people responding was very high with 93% (195,099) of Havering residents answering the question. In total, 91.07% (191,007) of Havering residents identified as straight or heterosexual. In total, 1.95% (4,092) Havering residents identified as one of the LGB+ orientations ("Gay or Lesbian", "Bisexual" or "Other sexual orientation"). In total, 6.98% (14,631) Havering residents did not answer the question.  The policy sets out the council's policy to offer free travel to their place of education for those children with special educational needs. It is not considered likely that there will be a disproportionate impact of these proposals on this protected characteristic group.
Positive		
Neutral	✓	
Negative		
*Expand box as required		
<b>Evidence:</b>		

**Figure 1: Detailed breakdown of sexual orientation in Havering for residents aged 16 and over**

Sexual Orientation	Number	Percentage
Straight or Heterosexual	191,007	91.07%
Gay or Lesbian	1,993	0.95%
Bisexual	1,540	0.73%
Pansexual	436	0.21%
Asexual	56	0.03%
Queer	21	0.01%
All other sexual orientations	46	0.02%
Not answered	14,631	6.98%
<b>Total</b>	<b>209,730</b>	<b>100.00%</b>

Source: Office for National Statistics (ONS), Census 2021; Produced by: Havering PHI

*\*Expand box as required*

### Sources used:

Census 2021

<https://www.haveringdata.net/wp-content/uploads/2023/03/Topic-Summary-Sexual-orientation-and-gender-identity.pdf>

*\*Expand box as required*

**Protected Characteristic - 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**

**Neutral**

**Negative**

✓

### Overall impact:

The Census question on gender identity was also a voluntary question, asked of those aged 16 years and over. It was added to provide the first official data on the size of the transgender population in England and Wales. The question asked was "Is the gender you identify with the same as your sex registered at birth?" The number of people responding was very high with 94.2% (197,529) Havering residents answering the question. In total, 93.67% (196,462) Havering residents answered "Yes" and 0.51% (1,067) answered "No". 5.82% (12,201) Havering residents did not answer the question.

The policy sets out the council's policy to offer free travel to their place of education for those children with special educational needs. It is not considered likely that there will be a disproportionate impact of these proposals on this protected characteristic group.

*\*Expand box as required*

### Evidence:

**Figure 3: Detailed breakdown of gender identity in Havering for residents aged 16 and over**

Gender Identity	Number	Percentage
Gender identity the same as sex registered at birth	196,462	93.67%
Gender identity different from sex registered at birth but no specific identity given	528	0.25%
Trans woman	228	0.11%
Trans man	212	0.10%
Non-binary	60	0.03%
All other gender identities	39	0.02%
Not answered	12,201	5.82%
Total	209,730	100.00%

Source: Office for National Statistics (ONS), Census 2021; Produced by: Havering PHI

*\*Expand box as required*

### Sources used:

Census 2021

<https://www.haveringdata.net/wp-content/uploads/2023/03/Topic-Summary-Sexual-orientation-and-gender-identity.pdf>

*\*Expand box as required*

### Protected Characteristic – Marriage / civil partnership: Consider people in a marriage or civil partnership

Please tick (✓) the relevant box:

Positive

☐

Neutral

☒

Negative

☐

### Overall impact:

The policy sets out the council's policy to offer free travel to their place of education for those children with special educational needs. It is not considered likely that there will be a disproportionate impact of these proposals on this protected characteristic group.

*\*Expand box as required*

### Evidence:

*\*Expand box as required*

### Sources used:

*\*Expand box as required*

Protected Characteristic - Pregnancy, maternity and paternity: Consider those who are pregnant and those who are taking maternity or paternity leave		
Please tick (✓) the relevant box:		<b>Overall impact:</b>  The policy sets out the council's policy to offer free travel to their place of education for those children with special educational needs. It is not considered likely that there will be a disproportionate impact of these proposals on this protected characteristic group.    <i>*Expand box as required</i>
Positive		
Neutral	✓	
Negative		
<b>Evidence:</b> <i>*Expand box as required</i>		
<b>Sources used:</b> <i>Expand box as required</i>		

Socio-economic status: Consider those who are from low income or financially excluded backgrounds		
Please tick (✓) the relevant box:		<b>Overall impact:</b>  59.5% of residents in Havering have a job, an increase from 58.9% in 2011.  3.6% of residents are unemployed, which is
Positive	✓	
Neutral		

<p><b>Negative</b></p>		<p>the fourth lowest rate in London but an improvement from the rate of 5.0% in 2011.</p> <p>21.0% of residents are retired - the highest rate in London, which is in line with or high older person population.</p> <p>Median gross weekly pay of people living in Havering (£705pw) is below the London average (£728pw) but significantly higher than the England average (£613pw). However, earnings of people who work in Havering (£614; who may or may not actually live in the borough) are very similar to the England average. This suggests that residents who work outside the borough, e.g. commute into central London, attract a higher rate of pay than peers who work locally.</p> <p>27,000 adult residents in the borough are income deprived overall, and there is significant variation across Havering.</p> <p>19.72% (8371) of Havering pupils receive free school meals.</p> <p>The proposal to not charge for Post 16 travel will benefit those on low income and still ensure their child continues to attend college. This makes Havering different to neighboring boroughs who do charge and will only be a positive impact on families</p> <p>Being on a low income or financially excluded doesn't necessarily mean those eligible children will be disadvantaged by this policy, in fact being eligible for a personal transport budget could assist the family by offering the means to purchase a family vehicle. However, they may not have access to a computer or smart phone in order to complete all the necessary forms and the family would need to ensure that their family budget doesn't compromise the ability to ensure the child is in attendance at school.</p> <p><i>*Expand box as required</i></p>
<p><b>Evidence:</b></p>		



**Table 1 Reasons for economic inactivity, Havering, London and England, 2021**

Reason for economic inactivity	England and Wales	London	Havering
Economically inactive: Long-term sick or disabled	4.2%	3.6%	3.1%
Economically Inactive: Looking after home or family	4.8%	6.0%	5.1%
Economically inactive: Other	3.1%	4.1%	3.0%
Economically inactive: Retired	21.6%	12.9%	21.0%
Economically inactive: Student	5.6%	7.2%	4.6%

Source: Office for National Statistics (ONS), Census 2021; Produced by: Havering Insight Team

Phase (All)

FSM	Pupils	%
-1	8371	19.72%
0	34081	80.28%
<b>Grand Total</b>	<b>42452</b>	<b>100.00%</b>

*\*Expand box as required*

### Sources used:

Census 2021  
Cabinet Report May 2024  
School Census

<https://www.haveringdata.net/wp-content/uploads/2023/02/Topic-Summary-Economic-Activity-and-Travel-to-work-Final-Version.pdf>

[\*Joint Strategic Needs Assessment\*](#)

**Health & Wellbeing Impact:** Please use the Health and Wellbeing Impact Tool on the next page to help you answer this question.

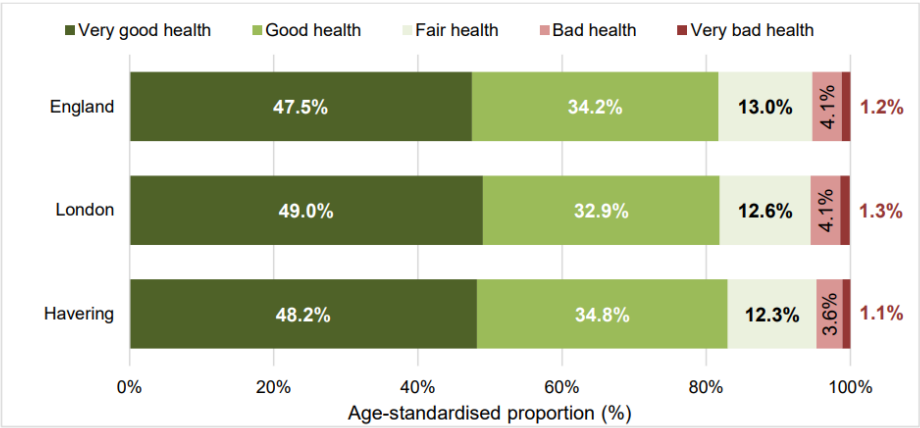
Consider both short and long-term impacts of the activity on a person's physical and mental health, particularly for disadvantaged, vulnerable or at-risk groups. Can health and wellbeing be positively promoted through this activity?

Please tick (✓) all the relevant boxes that apply:		<b>Overall impact:</b>  In Havering an estimated 219,777 residents had 'good' or 'very good' health in 2021. This is an age standardised proportion (ASP) of 83.0%, which is higher than London (81.9%) and England (81.7%). However, in Havering, an ASP of 48.2% residents had 'very good' health compared to 49% in London.  22.78% of those residents who completed the ONS
<b>Positive</b>		
<b>Neutral</b>	✓	
<b>Negative</b>		

		<p>annual population survey in 2020/21 self-reported their wellbeing as high anxiety.</p> <p>The process to gain free travel for those children with special educational needs is long, this may impact upon some families with high anxiety to ensure the process is in place before the school starts.</p> <p>The policy sets out the council's policy to offer free travel to their place of education for those children with special educational needs. It is not considered likely that there will be a disproportionate impact of these proposals on this protected characteristic group.</p> <p style="text-align: right;"><i>*Expand box as required</i></p> <p><b>Do you consider that a more in-depth HIA is required as a result of this brief assessment?</b> Please tick (✓) the relevant box</p> <p style="text-align: right;">Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
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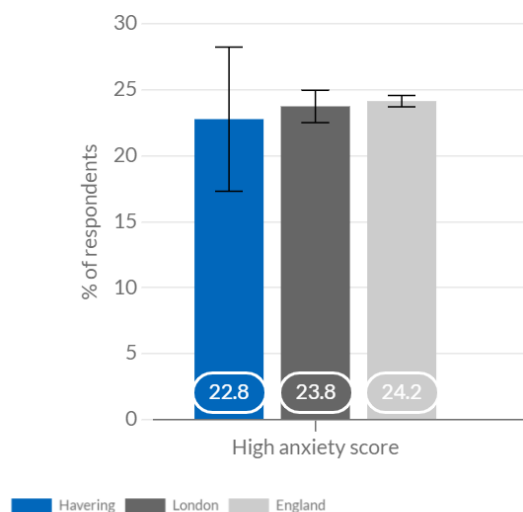
**Evidence:**

**Figure 1: ASP (%) reported health of the population**



Source: Office for National Statistics (ONS), Census 2021; Produced by: Havering PHI

### Self-reported wellbeing (2020/21)



*\*Expand box as required*

### Sources used:

<https://www.haveringdata.net/wp-content/uploads/2023/02/Census-2021-Topic-Summary-Health-Disability-and-Unpaid-Care.pdf>

*\*Expand box as required*

### 3. Health & Wellbeing Screening Tool

Will the activity / service / policy / procedure affect any of the following characteristics? Please tick/check the boxes below

The following are a range of considerations that might help you to complete the assessment.

Lifestyle YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	Personal circumstances YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	Access to services/facilities/amenities YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
<input type="checkbox"/> Diet <input type="checkbox"/> Exercise and physical activity <input type="checkbox"/> Smoking <input type="checkbox"/> Exposure to passive smoking <input type="checkbox"/> Alcohol intake <input type="checkbox"/> Dependency on prescription drugs <input type="checkbox"/> Illicit drug and substance use <input type="checkbox"/> Risky Sexual behaviour <input type="checkbox"/> Other health-related behaviours, such as tooth-brushing, bathing, and wound care	<input type="checkbox"/> Structure and cohesion of family unit <input type="checkbox"/> Parenting <input type="checkbox"/> Childhood development <input type="checkbox"/> Life skills <input type="checkbox"/> Personal safety <input type="checkbox"/> Employment status <input type="checkbox"/> Working conditions <input type="checkbox"/> Level of income, including benefits <input type="checkbox"/> Level of disposable income <input type="checkbox"/> Housing tenure <input type="checkbox"/> Housing conditions <input type="checkbox"/> Educational attainment <input type="checkbox"/> Skills levels including literacy and numeracy	<input type="checkbox"/> to Employment opportunities <input type="checkbox"/> to Workplaces <input type="checkbox"/> to Housing <input type="checkbox"/> to Shops (to supply basic needs) <input type="checkbox"/> to Community facilities <input type="checkbox"/> to Public transport <input type="checkbox"/> to Education <input type="checkbox"/> to Training and skills development <input type="checkbox"/> to Healthcare <input type="checkbox"/> to Social services <input type="checkbox"/> to Childcare <input type="checkbox"/> to Respite care <input type="checkbox"/> to Leisure and recreation services and facilities
Social Factors YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	Economic Factors YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	Environmental Factors YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
<input type="checkbox"/> Social contact <input type="checkbox"/> Social support <input type="checkbox"/> Neighbourliness <input type="checkbox"/> Participation in the community <input type="checkbox"/> Membership of community groups <input type="checkbox"/> Reputation of community/area <input type="checkbox"/> Participation in public affairs <input type="checkbox"/> Level of crime and disorder <input type="checkbox"/> Fear of crime and disorder <input type="checkbox"/> Level of antisocial behaviour <input type="checkbox"/> Fear of antisocial behaviour <input type="checkbox"/> Discrimination <input type="checkbox"/> Fear of discrimination <input type="checkbox"/> Public safety measures <input type="checkbox"/> Road safety measures	<input type="checkbox"/> Creation of wealth <input type="checkbox"/> Distribution of wealth <input type="checkbox"/> Retention of wealth in local area/economy <input type="checkbox"/> Distribution of income <input type="checkbox"/> Business activity <input type="checkbox"/> Job creation <input type="checkbox"/> Availability of employment opportunities <input type="checkbox"/> Quality of employment opportunities <input type="checkbox"/> Availability of education opportunities <input type="checkbox"/> Quality of education opportunities <input type="checkbox"/> Availability of training and skills development opportunities <input type="checkbox"/> Quality of training and skills development opportunities <input type="checkbox"/> Technological development <input type="checkbox"/> Amount of traffic congestion	<input type="checkbox"/> Air quality <input type="checkbox"/> Water quality <input type="checkbox"/> Soil quality/Level of contamination/Odour <input type="checkbox"/> Noise levels <input type="checkbox"/> Vibration <input type="checkbox"/> Hazards <input type="checkbox"/> Land use <input type="checkbox"/> Natural habitats <input type="checkbox"/> Biodiversity <input type="checkbox"/> Landscape, including green and open spaces <input type="checkbox"/> Townscape, including civic areas and public realm <input type="checkbox"/> Use/consumption of natural resources <input type="checkbox"/> Energy use: CO2/other greenhouse gas emissions <input type="checkbox"/> Solid waste management <input type="checkbox"/> Public transport infrastructure

## 4. Outcome of the Assessment

The EqHIA assessment is intended to be used as an improvement tool to make sure the activity maximises the positive impacts and eliminates or minimises the negative impacts. The possible outcomes of the assessment are listed below and what the next steps to take are:

Please tick (✓) what the overall outcome of your assessment was:

	<p>1. The initial screening exercise showed a strong indication that there will be no impacts on people and need to carry out an EqHIA.</p> <p>2. The EqHIA identified <u>no significant concerns</u> OR the identified <u>negative concerns</u> have already been <u>addressed</u></p>	➔	<p><b>Proceed with implementation of your activity</b></p>
✓	<p>3. The EqHIA identified some <u>negative impact</u> which still needs <u>to be addressed</u></p>	➔	<p><b>COMPLETE SECTION 5:</b> <b>Complete action plan</b> with measures to mitigate the and finalise the EqHIA</p>
	<p>4. The EqHIA identified some <u>major concerns</u> and showed that it is <u>impossible to diminish negative impacts</u> from the activity to an acceptable or even lawful level</p>	➔	<p><b>Stop and remove the activity or revise the activity thoroughly.</b> <b>Complete an EqHIA on the revised proposal.</b></p>

## 5. Action Plan

The real value of completing an EqHIA comes from identifying the actions that can be taken to eliminate/minimise **negative** impacts and enhance/optimize positive impacts. In this section you should list the specific actions that set out how you will mitigate or reduce any **negative** equality and/or health & wellbeing impacts, identified in this assessment. Please ensure that your action plan is: more than just a list of proposals and good intentions; if required, will amend the scope and direction of the change; sets ambitious yet achievable outcomes and timescales; and is clear about resource implications.

Protected characteristic / health & wellbeing impact	Identified Negative or Positive impact	Recommended actions to mitigate Negative impact* or further promote Positive impact	Outcomes and monitoring**	Timescale	Lead officer
Disability	Positive	Individual needs will be looked at and the appropriate measures will be put into place to accommodate them.			
Socio-Economic	Negative	Potential to not have access to internet, computer or phone so we should look to accept applications through other means other than online I.e. provide paper copies as and when required	Applications can be accepted through any means		

## 6. Review

In this section you should identify how frequently the EqHIA will be reviewed; the date for next review; and who will be reviewing it.

**Review:** This EqHIA will be reviewed within a year from launch of the new Policy

**Scheduled date of review:** May 2025

**Lead Officer conducting the review:** Jodie Gutteridge

*\*Expand box as required*

**Please submit the completed form via e-mail to [EqHIA@havering.gov.uk](mailto:EqHIA@havering.gov.uk) thank you.**

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Appendix 1 to this report is exempt by virtue of paragraph 3 of the Access to Information Procedure Rules set out in the Constitution pursuant to Schedule 12A Local Government Act 1972, as amended in that it contains information relating to the financial or business affairs of any particular person (including the authority holding that information). The public interest in maintaining the exemption outweighs the public interest in disclosing the information.

CABINET	15 May 2024
<b>Subject Heading:</b>	Award of Heating Maintenance and Replacement Contract
<b>Cabinet Member:</b>	Councillor Paul McGeary
<b>SLT Lead:</b>	Neil Stubbings – Strategic Director of Place
<b>Report Author and contact details:</b>	Ian Saxby – Assistant Director of Housing, Property and Assets ian.saxby@havering.gov.uk 01708 433529
<b>Policy context:</b>	The statutory requirement to maintain our homes to a decent standard
<b>Financial summary:</b>	This contract provides a vehicle that will enable the Council to comply with its statutory requirements as well as invest in new sustainable technologies in the future as set out in the body of the report.
<b>Is this a Key Decision?</b>	Key on the grounds that this report involves  (a) Expenditure or saving (including anticipated income) of £500,000 or more
<b>When should this matter be reviewed?</b>	The contract duration is up to ten years if working well plus an option to extend for up to six years. Continuation of the contract each year is subject to annual review.
<b>Reviewing OSC:</b>	Place
People - Things that matter for residents Place - A great place to live, work and enjoy Resources - A well run Council that delivers for People and Place.	X X

## SUMMARY

As part of the Council's responsibility as a landlord, the Council has a duty to undertake repairs and maintenance works to its HRA housing stock. This report presents to Cabinet details of the tender process undertaken to re-procure this service and seeks approval to award of contract.

The current HRA annual revenue budget for heating works is approximately £1.5m/annum, with a further £2.2m in capital budgets. The primary purpose of this contract is to allow the necessary statutory compliance works to be carried out, whilst ensuring the Council's Decent Homes standards are met.

In addition to this, the Council has set a target of 2040 to achieve net zero carbon and for Council homes the replacement of existing gas heating systems will be critical in meeting that target. In order to achieve this, it will be critical for the Council to have the agility to change or adapt its approach, if necessary, and this will only be possible with a long-term strategic partner in place. Therefore, it has been decided to include initiatives such as low carbon heating systems, photovoltaics and BMS systems within this procurement exercise, to provide maximum flexibility going forward.

Although there is no contractual commitment to procure these items under this contract, this approach does provide the Council with a degree of flexibility going forward, which will be key as both technology and future carbon reduction policies evolve over the lifetime of the contract.

Monies have been identified within the HRA 30-year business plan and contract spend will be aligned with business priorities and approved budgets on an annual basis

<b>RECOMMENDATIONS</b>
------------------------

For the reasons set out in the report and its appendix, Cabinet is recommended to;

Approve, the award of a contract to K & T Heating Services Limited for a period of ten years' subject to continued good performance, with an option to extend for a further six years to deliver the heating repairs, maintenance and replacements, including low carbon technologies in respect of HRA properties.

It should be noted that Leaseholders were consulted prior to tender. A Stage 2 notice will be issued after Cabinet has approved the award of contract. A 30 day notice period will then need to be observed, which can run concurrent with the mobilisation period.

<b>REPORT DETAIL</b>
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**1. Background**

- 1.1 Heating and Hot Water maintenance and servicing to HRA owned and/or managed properties is currently divided between two contracts which commenced in 2018, one for domestic properties and one for communal or commercial installations.
- 1.2 In order to comply with statutory requirements for annual safety inspections, and in order to maintain installations in their best condition and so prolong their life expectancy, it is necessary to re-procure these services.
- 1.3 Soft market testing has indicated that combining the Domestic and Commercial works in a single contract is more appropriate and in addition to the maintenance and safety inspections, the new contract will include installation of new heating and hot water systems.
- 1.4 Further to the pre-procurement approval of 18 April 2023 the Council decided to procure a flexible and potentially long-term contract to facilitate a partnership between the Council and the contractor at a time when existing gas fired systems will be phased out and new low carbon, sustainable systems will be installed on a rolling programme.
- 1.5 The Council has set a target of 2040 to achieve net zero carbon and for Council homes the replacement of existing gas heating systems will be critical in meeting that target. It will also be critical for the Council to have the agility to change or adapt its approach, if necessary, and this will only be possible with a long-term strategic partner in place.
- 1.6 There is provision in the contract for replacing existing domestic (individual property) systems with communal systems where that is the most appropriate approach.
- 1.7 The full scope of this contract is as follows:
  - Service and maintain gas installations and infrastructure
  - Carry out annual Landlord Gas Safety Record inspections
  - Install new and replacement gas boilers and heating systems
  - Provide a 24/7 out of hours Breakdown service
  - Service and maintain non-gas installations and infrastructure
  - Carry out annual Landlord Safety Record inspections on non-gas systems
  - Install new and replacement non-gas boilers and heating systems
  - Flexibility to adopt new low-carbon technology quickly
  - Flexibility to change tack on new low-carbon technology quickly, if necessary.

## **2. Evaluation Process**

- 2.1 This procurement is above the threshold for works procurements which have to be conducted in accordance with legal requirements set out in the Public Contracts Regulations 2015.
- 2.2 A Contract Notice was published in respect of this procurement on 26 April 2023 Ref. no 2023-502446.
- 2.3 The Council followed a Competitive Dialogue procedure as set out within the Public Contracts Regulations 2015.
- 2.4 The reason for adopting Competitive Dialogue is that the potential long term nature of the contract and the changing technology which will be installed throughout the duration of the contract warrant discussion with bidders in relation to how they will continue to develop their delivery models and assist Havering with the 2040 zero carbon target.
- 2.5 Whilst some alternative solutions exist, the anticipation is that over the next few years' technology will advance and there is a need to understand how the bidders will work with the Council to ensure that the most efficient systems will be installed, and the best way to manage the changing landscape under a long term contract.
- 2.6 The Council undertook the procurement through a staged procurement approach. This included:
- An initial SQ stage (Selection Questionnaire) which was completed in June 2023, 10 compliant bidders were reduced to 7 through an evaluation panel and Customers scoring their returns.
  - A second RCP Stage (Request for Contractors Proposals) which was completed in July 2023. Of the 7 bidders invited to the RCP stage, three withdrew so bidders were reduced to 4 through technical returns which were combined with cost proposals
  - A CD stage (competitive dialogue) at which the Council and the four contractors could discuss the project to determine areas which require clarification. This stage was not scored and did not affect the outcome. This was completed in August 2023.
  - A final RFT stage (Request for Tenders) which ended in October 2023. One bidder elected not to submit a final tender.
- 2.7 Further details on the procurement and scoring is contained in exempt **Appendix 1**.
- 2.8 Bids were evaluated on price and quality on the basis of a 40% Price, 50% Quality and 10% Social Value. A portion of the quality score related to how the contractor will work with Havering to ensure best value for money for any new technologies.

- 2.9 It should be noted that the above price / quality split was discussed and agreed with strategic business partners including colleagues from Corporate Procurement and was agreed at Gateway Review Group meetings GRG1 on 7<sup>th</sup> December and subsequently at the GRG2 post tender stage review meeting on 31<sup>st</sup> January 2024. As the contract is more long term and complex in nature this Price/Quality split is also in line with the Councils agreed procurement matrix. The decision to award the contract on a 40% Price, 50% Quality and 10% Social value split was highlighted in the Pre-Procurement Executive Decision Report published on 18<sup>th</sup> April 2023. This issue was also discussed and agreed by a panel of Cabinet Members at the presentation of the Strategic Procurement Proposals 2024-2040 on 15<sup>th</sup> December 2023.
- 2.91 The tender required bidders to set their preliminaries, overheads and profit and agreement on future technology rates will be on an open-book basis. In addition to works to HRA properties, a number of options were included in the contract for works to Private Sector Leasing (PSL) properties and Houses in Multiple Occupation (HMO's) which are funded through the General Fund.

### **3. Proposed contract**

- 3.1 The contract is anticipated to commence on 8th July 2024 and the core contract will be for up to ten years' subject to continued good performance, with a provision to extend the contract for a further period of six years to end on 15<sup>th</sup> June 2040.
- 3.2 The contract form is the Term Alliance Contract TAC-1 which is a form of partnering contract developed from the TPC2005 contract and which is a form recommended for use by central and local government to achieve supply chain collaboration.
- 3.3 As a "measured term" contract, works orders are raised for projects or programmes (typically one year at a time) but the contractor is not guaranteed all or any work under the contract, and has no claim to compensation if orders are not forthcoming or do not meet the indicative contract value.
- 3.4 Along with the typical termination clauses for breach, the contract also contains no-fault termination clauses allowing either party to end the agreement upon service of the requisite notice, after the first twelve months.
- 3.5 The Council will be required to give 13 weeks' notice, and the contractor to give 36 weeks' notice, and if invoked by the contractor in one of the first five years will incur a compensation payment to the Council on a sliding scale (£200K in yr2, £90K in yrs 3-6).
- 3.6 Whilst the contract is being procured primarily to address the specific requirements of HRA Housing properties, non-Housing properties will be included within scope and the indicative contract value over its lifetime includes an allowance for their use on Corporate buildings.

- 3.7 The contract contains elements of work or services for which leaseholders may be charged, so the requirements of Section 20 of the Landlord and Tenant Act 1985, as amended by the Commonhold and Leasehold Reform Act 2002, will apply.
- 3.8 Leaseholders have been consulted prior to tender. A Stage 2 notice will be issued after Cabinet has approved the award of contract. A 30 day notice period will then need to be observed, which can run concurrently with the mobilisation period.
- 3.9 The contract is in the form of a Qualifying Long Term Agreement (QLTA) and so prior to any works orders being raised, those leaseholders affected will be consulted again, with estimates of cost.

#### **4. Procurement and project risks**

- 4.1 Minimum standards for sub-contractors will be introduced by the Council in order to improve the quality of the supply chain and the key service and quality requirements were emphasised in the invitation to tender documents and will be closely monitored throughout the duration of the contract.
- 4.2 The pricing structure takes account of the transition from existing gas systems to new sustainable fuel systems where the market is still immature and technologies are developing rapidly. It is recognised that the move away from gas is not instantaneous and that at any time over the next 16 years there will be a requirement to install and certainly maintain both gas and sustainable heating and hot water systems simultaneously across the Housing stock.
- 4.3 It is important that the contract requires the installer of new and possibly less well understood systems to be responsible for their maintenance, at least for the early years whilst best practice is still to be established across the sector.
- 4.4 An open-book approach will be adopted to establish a base line for both new installations and their subsequent maintenance, which will then convert to agreed contract rates.
- 4.5 Council officers will carry out regular checks against the market to ensure that the contract rates continue to deliver value for money and, if they do not, the option to end or reduce the use of the contract can be considered.
- 4.6 The contract includes a price adjustment mechanism, based upon CPI, which has obviated the need for tenderers to over-estimate the risk of cost increases in their tenders.
- 4.7 The contract will be managed and monitored by staff within Housing Services and the contractor will be obliged to meet a set of Key Performance targets, with profit at risk if targets are not met.

**5. Added social value**

- 5.1 The contract contains a requirement for the contractor to deliver Social Value, but it is simplified to a requirement of 1% of the contract value each year, with the initiatives delivered to be agreed by a stakeholder group annually.
- 5.2 This gives the opportunity for the social value deliverables to be identified by residents and councillors and to change over time.

<b>REASONS AND OPTIONS</b>
----------------------------

**6. Reasons for the decision:**

- 6.1 The Council has a statutory and contractual obligation as a landlord to provide repairs, maintenance and compliance works to its properties, and therefore must have a provision in place to deliver this.
- 6.2 Following an extensive procurement exercise in accordance with the Public Contract Regulations 2015 (as amended), supported and validated by external consultants, K & T Heating Services Limited were successful in their bid and approval is required to appoint.

**7. Other options considered**

- 7.1 Existing frameworks – The scope of work included within the contract (Heating maintenance, safety checks, planned replacement and transition from Gas to low carbon systems, for both Domestic and Commercial systems) is not found within any known frameworks and a Competitive Dialogue tender process is felt to provide the Council with access to a far wider range of potential bidders.
- 7.2 Open tender – Both current (gas) and new low carbon technologies will be in place in different Council homes simultaneously during the term of this contract but there will be a transition from one to the other. The Council would like to appoint a partner which can provide market-leading service during that transition. The competitive dialogue element of the procurement is to identify a bidder who will best manage that transition.
- 7.3 Shorter term for contract – Procurement is expensive and resource intensive for public sector employers and contractors. The preference in the market is for longer term contracts as these spread the cost of procurement over a longer term and give more scope for the stakeholders to create a true partnership. A longer term contract shows commitment and gives bidders the incentive to develop staff to deliver the new technologies, within the partnership.

- 7.4 Do Nothing – Maintenance of heating systems in a safe and operational condition is a legal requirement for social housing provision and doing nothing is not an option. The existing contracts currently providing the service need to be re-procured.
- 7.5 Therefore, the above options were considered and rejected at pre procurement stage.

<b>IMPLICATIONS AND RISKS</b>
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**8. Financial implications and risks:**

- 8.1 The contract will be funded from the HRA and General Fund from existing budgets and costs have been incorporated into the HRA business plan.
- 8.2 As a “measured term” contract, works orders are raised for projects or programmes, but the contractor is not guaranteed all or any work under the contract, and has no claim to compensation if orders are not forthcoming or do not meet the indicative contract value.
- 8.3 The contract has been procured primarily to address the specific requirements of the HRA properties, but options were included for works to non-HRA Housing and non-Housing properties, should those services wish to use it.
- 8.4 Funding could be from both the HRA and General Fund revenue and capital budgets. With it being a “measured term” contract, funding specifics will need to be identified during the project/programme design stage.
- 8.5 The current HRA annual revenue budget for heating works is approximately £1.5m/annum, with a further £2.2m in capital budgets. However, low carbon heating systems, photovoltaics and BMS systems will require substantially higher investment during the later years of the contract, if it is decided to procure these systems through this contract. This will need to be costed and approval sought during the annual cycle when the time arises.
- 8.6 In addition to the above, the Council has set a target of 2040 to achieve net zero carbon and for Council homes the replacement of existing gas heating systems will be critical in meeting that target. In order to achieve this, it will be critical for the council to have the agility to change or adapt its approach, if necessary, and this will only be possible with a long-term strategic partner in place. Therefore, it has been decided to include initiatives such as low carbon heating systems, photovoltaics and BMS systems within this procurement exercise, to provide maximum flexibility going forward.
- 8.7 As set out in the Pre-Procurement Executive Decision Report published on 18<sup>th</sup> April 2023, the overall maximum contract value procured through this contract could be up to £140million, although it should be noted that there is no contractual commitment to do so.



This includes up to £75million of works over the 10-year period of the contract and a further £65million of works could also be delivered, should the contract be extended for a further 6-year period. A further breakdown is set out in the table below:

	10 Year period	16 Year Period
Revenue (including gas safety, servicing and compliance checks)	Up to £15million	Up to £9million
Capital (including gas boiler replacements, heating system replacements)	Up to £22million	Up to £1million
Alternative Technologies (including renewable heating systems, Photovoltaics and BMS systems)	Up to £38million	Up to £55million
<b>Total</b>	<b>Up to £75million</b>	<b>Up to 65million</b>

**Table 1 – Possible Forecast Expenditure**

#### 8.7 Cost Avoidance

The award of this contract will help the Council to keep the stock in good order; clearly failure to keep the housing stock in serviceable condition could lead to further financial liabilities being incurred.

#### 8.8 Financial Stability

As required by the Council's Contract Procedure Rules a financial check has been undertaken using Experian and they rate K&T as being "Low Risk".

### **9. Legal implications and risks:**

9.1 The Council has statutory requirements to undertake repairs and maintain its HRA housing stock under the Landlord and Tenant Act 1985, Housing Act 2004 and the Secure Tenants of Local Housing Authorities (Right to Repair) Regulations 1994.

9.2 The Council has a general power of competence under Section 1 of the Localism Act 2011 to do anything an individual may generally do subject to any statutory limitations. The arrangements now sought are in accordance with these powers.

9.3 The Council is a contracting authority for the purpose of the Public Contracts Regulations 2015 (as amended) (PCR). The total contract value is estimated up to £75million over the 10-year contract period and could be up to a further £65million should the contract be extended for a further 6-year period. The value of the procured contract will be above the works threshold for the purposes of the PCR 2015 of £5,372,609 (inc of VAT). Therefore, the contract is subject to the full rigours of the PCR.

9.4 Leaseholder consultation is required under Section 20 of the Landlord and Tenant Act 1985 (as amended) and as stipulated by Section 151 of the Common hold and Leasehold Reform Act 2002. This decision is subject to the consultation concluding to notify leaseholders of the preferred bidder.

- 9.5 For the reasons set above, the Council may award the contract to K & T Heating Services Limited

**10. Human Resources implications and risks:**

- 10.1 The preferred bidder is the incumbent contractor for the Domestic Heating service and as such there are no TUPE implications.
- 10.2 The incumbent contractor for the Commercial Heating service has provided information about staff which it believes will be subject to TUPE and this information was included in the tender information provided to bidders.

**11. Equalities implications and risks:**

- 11.1 Under Section 149 of the Equality Act 2010, the Council has a duty when exercising its functions. This includes outsourcing services by awarding a contract to an outside body, to have “due regard” to the need to eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act and advance equality of opportunity and foster good relations between persons who share a protected characteristic and persons who do not. This is the public sector equality duty. The protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 11.2 “Due regard” is the regard that is appropriate in all the circumstances. The weight to be attached to each need is a matter for the Council. As long as the council is properly aware of the effects and has taken them into account, the duty is discharged.
- 11.3 The awarding of this contract will enable the Council to maintain its housing stock to a high standard and improve the quality of the customer services that the tenants receive. Tenants with protected characteristics are over-represented in social housing so this new contract will have a positive impact on their well-being.
- 11.4 An Equalities and Health Impact Assessment is included as **Appendix 2** to this report

**12. Health and Wellbeing implications and Risks**

- 12.1 Provision of an effective housing repairs service is essential to ensure residents are able to safely and comfortably use their homes, being provided with good quality services which support promote good health and wellbeing.
- 12.2 Poor quality housing can have a serious negative impacts on individual’s health and wellbeing and a significant negative impact on communities.
- 12.3 The council is responsible for improving and protecting health and wellbeing of local residents under the Health and Social Care Act 2012.

- 12.4 The installation of new energy efficient heating systems and low carbon technologies will help to reduce heating bills for residents, which will ease current cost of living pressures.
- 12.4 These contracts will support the aims and delivery of the Housing Asset Management Strategy ensuring that the Council provide the right homes for our resident which are affordable, safe and of high quality, provide good communities in which to live and work, whilst meeting the challenges of zero carbon and building safety across the estates.

### **13. ENVIRONMENTAL AND CLIMATE CHANGE IMPLICATIONS AND RISKS**

- 13.1 A significant contributor to the Council's progress towards the target of net zero carbon by 2040, and as set out in the Havering Climate Change Action Plan, is the move away from existing gas heating and hot water systems in the Council's stock of approximately 9,200 rented, and 2,500 leasehold properties.
- 13.2 This contract is designed to manage that transition in a controlled manner as and when existing systems require renewal, without placing an undue burden on budgets by artificially shortening asset life.
- 13.3 The contract has the flexibility to adopt new sustainable technology as it develops, so ensuring that the best systems, and best practice, are progressively delivered.
- 13.4 The work delivered under this contract is critical in addressing climate change but equally, tenderers have been evaluated upon their proposals to reduce the environmental impact and carbon footprint of how the work is delivered, such as local supply chains, electric vehicles, waste reduction and recycling and so on.

#### **BACKGROUND PAPERS**

1. HRA Business Plan update, Budget 2024/25 & Capital Programme 2024/25–2028/29.
2. Housing Services Asset Management Strategy 2021-2026.

#### **APPENDICIES**

**Appendix 1** – Tender Returns and Evaluation (Exempt not for publication)

**Appendix 2** – Equality and Health Impact Assessment

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

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# Equality & Health Impact Assessment (EqHIA)

## Document control

<b>Title of activity:</b>	Heating and Hot Water Contract for HRA
<b>Lead officers:</b>	Mark Howard – Major Works and Direct Delivery Manager
<b>Approved by:</b>	Paul Walker - Director of Housing and Property
<b>Date completed:</b>	January 2024
<b>Scheduled date for review:</b>	January 2025

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

## 1. About the activity

1	<b>Title of activity</b>	Heating and Hot Water Maintenance and Replacement Contract		
2	<b>Type of activity</b>	This is re-procurement of a contract for the delivery of inspection, maintenance, repairs and renewals of heating and hot water systems to HRA properties		
3	<b>Scope of activity</b>	This is re-procurement of a contract to fulfil statutory duties regarding building safety compliance and maintenance of decent homes		
4a	<b>Are you changing, introducing a new, or removing a service, policy, strategy or function?</b>	No		
4b	<b>Does this activity have the potential to impact (either positively or negatively) upon people (9 protected characteristics)?</b>	Yes		
4c	<b>Does the activity have the potential to impact (either positively or negatively) upon any factors which determine people's health and wellbeing?</b>	Yes		

<b>Completed by:</b>	Mark Howard – Planned Works and Direct Delivery Manager, Place
<b>Date:</b>	January 2024



## 2. The EqHIA

### Background/context:

The activity is the procurement and then running of a contract for heating and hot water system maintenance and renewals. As a long term contract it will straddle the move from Gas powered systems to alternative sustainable and low carbon systems.

### Who will be affected by the activity?

All Council tenants and some leaseholders.

### Protected Characteristic - AGE

		<b>Overall impact:</b> The majority of council tenants in Havering are of working age.
<b>Positive</b>	<b>X</b>	30% of all council tenants in the Borough are of pension age, compared to 18% of the general population.
<b>Neutral</b>		
<b>Negative</b>		Of the over 65s, 74.9% of tenants are on full or partial benefits, compared to 68% of all tenants.  The very young or old are likely to benefit more than other groups from the provision of efficient heating and hot water systems.

#### Evidence:

The estimated population of Havering is 260,651<sup>1</sup> is the twelfth smallest population in London. It has a median age of approximately 39.2 and the highest percentage of people aged over 65 (18%) out of the London boroughs, although this is below the proportion of over 65's for England as a whole.

Table 1: Population by age range in Havering, London and England including percentage of the population

Age	Havering	%	London	%	England	%
0 - 4	17,167	6.6	595,799	6.6	3,239,447	5.7
5 - 9	17,251	6.6	606,333	6.7	3,539,458	6.3
10 - 14	15,719	6.0	550,753	6.1	3,435,579	6.1
15 - 19	14,105	5.4	474,456	5.3	3,115,871	5.5
20 - 24	14,117	5.4	556,594	6.2	3,472,522	6.1
25 - 29	17,407	6.7	757,848	8.4	3,771,493	6.7
30 - 34	18,900	7.3	822,084	9.1	3,824,652	6.8
35 - 39	18,698	7.2	779,934	8.7	3,738,209	6.6
40 - 44	16,677	6.4	677,463	7.5	3,476,303	6.2
45 - 49	15,913	6.1	598,535	6.7	3,638,639	6.4

50 - 54	17,227	6.6	569,938	6.3	3,875,351	6.9
55 - 59	16,644	6.4	508,722	5.7	3,761,782	6.7
60 - 64	14,308	5.5	405,576	4.5	3,196,813	5.7
65 - 69	11,672	4.5	318,142	3.5	2,784,300	4.9
70 - 74	12,035	4.6	280,432	3.1	2,814,128	5.0
75 - 79	8,509	3.3	196,419	2.2	2,009,992	3.6
80 - 84	6,833	2.6	150,980	1.7	1,449,189	2.6
85+	7,469	2.9	152,480	1.7	1,406,410	2.5

Household types in Havering are mainly composed of pensioners or married couples with dependants<sup>2</sup>, with the highest proportion of one person households occupied by a persons aged 65 years and over, at 48% of one person households. 32% of the over 65 population live in a one-person household.

It is projected that the proportion of people aged 0-15 and over 65 will increase, with a slight decrease in the proportion of working age population <sup>3</sup>.

In relation to Havering tenants, 30.4% of main tenants are aged 65 and over<sup>4</sup>. When we look at the proportion of over 65's as part of the Havering adult population, this is almost 7% lower, at 23.7%.

Table 2: Age range of Havering Council's main tenants and the percentage of these as part of the main tenant population.

Age	Main Tenant (Havering)	%
15 - 19	1	0.01
20 - 24	134	1.59
25 - 29	365	4.32
30 - 34	652	7.72
35 - 39	702	8.31
40 - 44	752	8.90
45 - 49	725	8.58
50 - 54	889	10.52
55 - 59	871	10.31
60 - 64	784	9.28
65 - 69	674	7.98
70 - 74	616	7.29
75 - 79	505	5.98
80 - 84	361	4.27
85+	415	4.91

For people at a working age in Havering (16–64), approximately 83% are economically active <sup>5</sup>.

Data is limited in terms of the working age population who are Havering tenants, as this is ongoing gathered at the time of applying to the housing register, then at the time of offer if needed.

Most tenants receive a form of benefit (housing benefit or universal credit), an estimated 68% of all tenants. The proportion varies amongst age groups with the lowest proportion at age 55-59 (59% of this age group) and over 65's at 74.9% of tenants. Whilst the highest percentage is in the 15-19 age range, this relates to only one tenant.

As the taper that is applied to UC takes away from the housing element in the first instance, the data received from DWP and uploaded on to the system does not distinguish between those that are in receipt of this element and those that are not, only whether the receive UC.

Table 3: Proportion of tenants within each age range who receive either Universal Credit (UC) or Housing Benefit (HB).

<b>Age</b>	<b>Percentage of main applicants in receipt of UC or HB within each age group (% , rounded)</b>
15-19	100.0
20-24	79.9
25-29	66.3
30-34	71.8
35-39	69.4
40-44	66.2
45-49	61.1
50-54	63.6
55-59	59.0
60-64	64.3
65-69	70.8
70-74	70.8
75-79	79.0
80-84	78.7
85-89	82.3
90-94	73.0
95-99	83.7
100 and over	75.0

### **Life Expectancy**

A new-born male baby in the UK today can expect to live for 79.2 years and a girl to 82.9 years, with 22.6% of new-born boys and 28.3% of new-born girls projected to live to 100 years.

The life expectancy at age 65 years in Havering is 19 years for males and 21.7 years for females. The life expectancy at birth for people living in Havering is 80.2 years for males and 83.9 years for females.

### **Sources:**

- 1 - Mid-year population estimates (Office for National Statistics (ONS))
- 2 - Office for National Statistics (ONS)

- 3 – Projected population growth by age by 2043 (ONS)  
 4 – Current tenancies, E&D (Open Housing)  
 5 - <https://www.haveringdata.net/business-and-employment/#/view-report/e20793b6fb0647e4980a5868fa1d817c/iaFirstFeature>

## Protected Characteristic - DISABILITY

		<b>Overall impact:</b>
<b>Positive</b>	<b>x</b>	There will be some disabled people on low incomes who may find that may struggle with heating bills.
<b>Neutral</b>		It is likely that those with a disability will benefit more than other groups from the provision of well maintained, efficient heating and hot water systems which will ensure that their homes are warm and that bills will be reduced through more energy efficient heating systems.
<b>Negative</b>		

### Evidence:

At a national level individuals with a disability aged 16-64 were less likely to own their own home (40.9%) than non-disabled people (53.4%), and more likely to have rented social housing (at 24.9% compared with 7.8%).

The following shows the estimated prevalence of various disabilities in Havering in 2020 for working age people<sup>2, 3</sup>.

Table 4: Number of people aged 18-64 with disabilities in Havering by age band, 2020

Age band	Number with learning disability	Number with impaired mobility	Number with serious visual impairment	Number with moderate or severe, or profound hearing impairment
18-24	519	192	12	347
25-34	911	366	24	791
35-44	882	1,790	23	1,652
45-54	792	1,685	22	4,271
55-64	721	4,438	21	8,143
18-64	3,824	8,471	102	15,204

Table 5: Number of people aged 18-64 with mental health problems in Havering, 2020

<b>Mental health problem</b>	<b>Number</b>
Common mental disorder	29,906
Borderline personality disorder	3,796
Antisocial personality disorder	5,184
Psychotic disorder	1,100
Two or more psychiatric disorders	11,327

Table 6: Number of people aged 65 & over unable to manage at least one mobility activity on their own in Havering, 2020

<b>Age band</b>	<b>Number</b>
65-69	1,023
70-74	1,642
75-79	1,506
80-84	1,740
85 and over	3,410
65 and over	9,321

It is also worth mentioning that research on the impact of COVID-19 shows that the coronavirus pandemic has increased psychological distress both in the general population and among high-risk groups.

Behaviours such as physical distancing, as well as their social and economic impacts, are worsening mental health consequences. Research on the psychological impact of mass trauma (e.g., natural disasters, flu outbreaks) suggests that the pandemic might particularly harm the mental health of marginalized populations who have less access to socio-economic resources and supportive social networks (Galea S, 2020).

There are unique stressors and challenges that could worsen mental health for people with disabilities during the COVID-19 crisis. Research on past pandemics shows that disabled people find it harder to access critical medical supplies which can become even more challenging as resources become scarce (Goldmann E, 2014).

Some people with disabilities report higher levels of social isolation than their non-disabled counterparts. They may experience intensified feelings of loneliness in response to physical distancing measures.

Data on disabilities in Havering council stock is limited. The Housing Services diversity report in 2017 led to 18% of tenants self-declaring that they had a physical and/or mental disability, and 3% a sensory disability, albeit without any measurement of disability related benefit or medical evidence. Data extracted from Open housing indicates that 21.5% of council tenants have identified themselves as having a disability at some point during the process of applying and holding a tenancy.

In terms of demand, of the live applications on the housing register at this time, the primary reason is medical for 77 applicants meaning that they have a severe health condition that is significantly impacted by their current housing situation.

**Sources:**

1. Outcomes for Disabled People in the UK report
2. Projecting Older People Population Information:  
<https://www.poppi.org.uk/index.phpProjecting> Adults Needs and Services Information:
3. <https://www.pansi.org.uk>
4. Housing Service Diversity report (Open Housing)
5. Housing Waiting list report (Open Housing)

## Protected Characteristic – SEX/GENDER

		<b>Overall impact:</b> The installation of new energy efficient heating systems including low carbon technologies are likely to have a positive impact on all regardless of gender.
<b>Positive</b>	<b>x</b>	
<b>Neutral</b>		
<b>Negative</b>		

**Evidence:**

Of the estimated 260,651 people in Havering, 48.2% are male and 51.8% are female <sup>1</sup>.

Working aged women are less likely to be economically active in Havering (78%, compared to 86% for men) and when they are in work, they continue to earn less than men because of a gender pay gap in Havering (15.4%).

Women are also more likely than men to live in poverty. As a result, women are more likely to be eligible for social housing with 58% of social rented homes nationally are headed by a female.

In terms of demand for local authority housing in Havering, of the main applicant's active on the housing register, 84.3% (of 1502 applicants) identify as female.

Within current housing stock, 64.5% main tenants identify as female and 35.48% identify as male, with one tenant identified as "other". A slightly higher proportion of female tenants (70%) receive either UC or HB than men (64%). Only one lead tenant identified as "other" and in receipt of a benefit.

**Sources:**

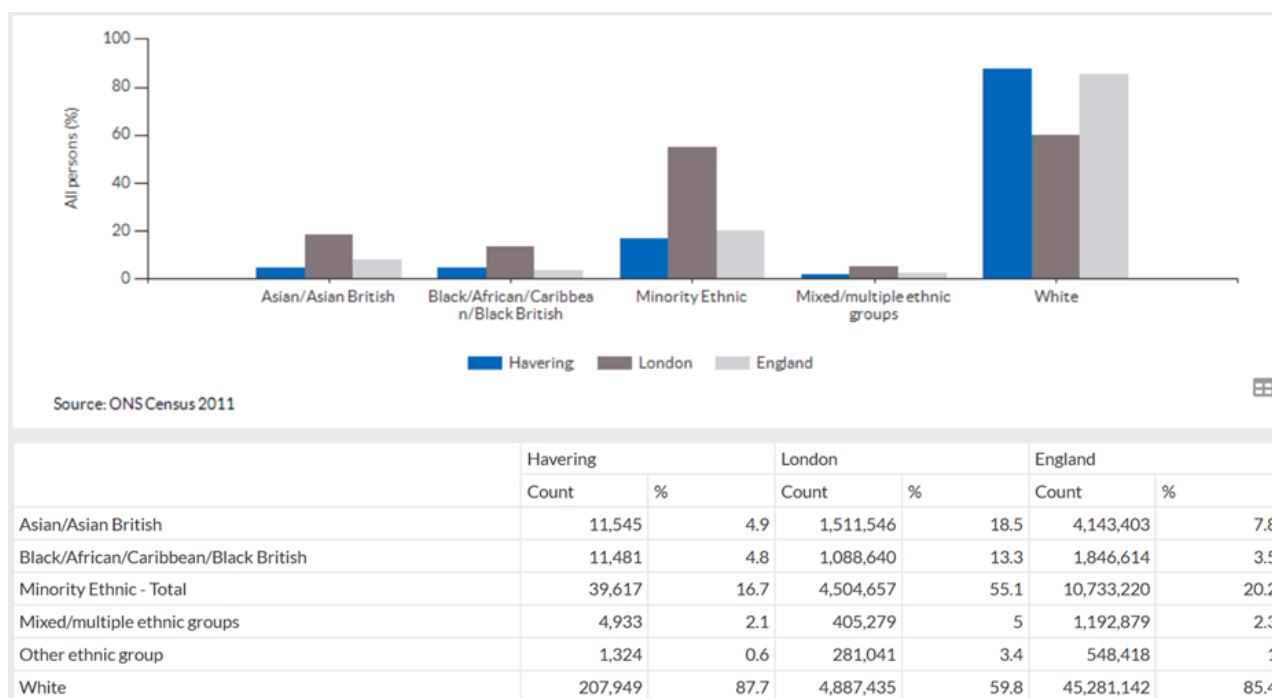
- 1 - Mid-year estimates of population (Office for National Statistics)
- 2 - <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/annualsurveyofhoursandearningsashegenderpaygaptables>
- 3 - Housing Waiting List (Open Housing)
- 4 - Current tenancies E&D (Open Housing)

Protected Characteristic – ETHNICITY/RACE		
		<b>Overall impact:</b> 17% of Havering's population is from an ethnic minority.
Positive	X	For those tenants who have provided us with the information only 8.3% are from ethnic minorities. However, 22.0% of households on the Housing Register are from ethnic minorities so it is anticipated that the proportion of tenants from ethnic minorities will grow in future years.  The installation of new energy efficient heating systems including low carbon technologies are likely to have a positive impact on all regardless of ethnicity/race.
Neutral		
Negative		

### Evidence:

Havering continues to be considered one of the most ethnically homogenous places in London, with 83% of its residents recorded as White British in the 2011 census, higher than both London and England.

Table 8 – Population of Havering, London, and England by ethnicity<sup>1</sup>



It is estimated that the ethnically homogenous characteristic of Havering is gradually changing due to its growing cultural diversity. In this regard, the Borough's white population is projected to decrease from the current 84% to 78% in 2032.

The BME population, notably those from Black African heritage (though many of whom are likely to be British born) is projected to increase from 4.1% in 2017 to 5.3% of the Havering population in 2032. The number of Black & minority ethnic group residents in the borough is expected to rise from 18% currently to 22% by 2032.

This is further highlighted in the GLA ethnic projections (2020) There are approximately 40,500 (18%) people from BAME (Black Asian Minority Ethnic) groups living in Havering, the majority being of a Black African ethnicity (11,700, 4.5%).

The UK poverty rate is twice as high for black & minority ethnic groups as for white British groups. Nationally, ethnic minority groups are more likely than white British households to spend a high proportion of income on rent, regardless of whether they live in social or private rented housing.

However, the housing they live in tends to be of lower quality, especially among households of Pakistani origin, and overcrowding is more common, particularly among households of Bangladeshi origin.

Within Havering Council stock, we see the current population by ethnicity where the tenant has made the decision to provide this information:

Table 10: Ethnicity of Havering Council main tenants as a percentage of the tenant population <sup>3</sup>

<b>Ethnicity</b>	<b>No. Tenants</b>	<b>Proportion of tenant population (%)</b>
Asian or Asian British Bangladeshi	14	0.2
Asian or Asian British Chinese	10	0.1
Asian or Asian British Indian	16	0.2
Asian or Asian British Other	38	0.4
Asian or Asian British Pakistani	11	0.1
Black or Black British African	262	3.1
Black or Black British Caribbean	86	1.0
Black or Black British Other	52	0.6
Mixed Other	33	0.4
Mixed White & Asian	15	0.2
Mixed White & Black African	41	0.5
Mixed White & Black Caribbean	53	0.6
Other Ethnic Group: Other	4	0.0
Refused	595	7.0
White British	6658	78.8
White Irish	74	0.9
White Other	206	2.4
(blank)	279	3.3

Most tenants are White British as would be expected with a homogenous population and secure tenancies, followed quite distantly by Black or Black British African.

There is, however, quite a notable change in ethnicity based on housing demand. Housing needs, based on the housing register data, see an increase in the proportion of Black or



Black British African applicants, making up 9% of households, with White British households at 59.3% of applicants.

Table 11: Ethnicity of applicants with an assessed housing need <sup>4</sup>

<b>Ethnicity</b>	<b>Percentage (%) with an assessed housing need</b>
Asian or Asian British Bangladeshi	0.7
Asian or Asian British Indian	0.7
Asian or Asian British Other	1.3
Asian or Asian British Pakistani	0.6
Black or Black British African	9.7
Black or Black British Caribbean	2.4
Black or Black British Other	1.0
Mixed Other	0.7
Mixed White & Asian	0.4
Mixed White & Black African	1.5
Mixed White & Black Caribbean	2.3
Other Ethnic Group: Arab	0.1
Other Ethnic Group: Other	0.1
Refused	4.9
White British	59.3
White Irish	0.5
White Other	4.3
(blank)	9.6

**Sources:**

- 1 - Office for National Statistics/Havering Public Health Intelligence
- 2 - [Ethnic group population projections - London Datastore](#)
- 3 - Current tenancies E&D report (Open Housing)
- 4 - Housing Waiting List report (Open Housing)

**Protected Characteristic – RELIGION/FAITH**

		<b>Overall impact:</b> The installation of new energy efficient heating systems including low carbon technologies are likely to have a positive impact on all regardless of religion/faith.
<b>Positive</b>	<b>x</b>	
<b>Neutral</b>		
<b>Negative</b>		

**Evidence:**

Most recent available data shows that most Havering residents are Christians:

Table 12: Religion and Belief, Havering

<b>Faith</b>	<b>Number</b>	<b>%</b>
Christian	155,597	65.6%
Buddhist	760	0.3%
Hindu	2,963	1.2%
Jewish	1,159	0.5%
Muslim	4,829	2.0%
Sikh	1,928	0.8%
Other Religion	648	0.3%
No Religion	53,549	22.6%
No Response	15,799	6.7%
<b>TOTALS</b>	<b>237,232</b>	<b>100%</b>

However, data is lacking in relation to Havering tenants, with many tenants either refusing to provide this information or the field in Open housing has been left blank, meaning that this may not even have been an option for most tenants to answer. The limited information is as follows:

Table 13: Religion/belief of Havering Council main tenants

Agnostic	6
Another Religion/Belief	49
Atheist	12
Buddhist	6
Christian	459
Hindu	2
Jewish	2
Muslim	35
No religion	565
Prefer not to answer	90
Sikh	2
(blank)	7219

However, the Service recognises that as the demographics of the borough and London are changing, the variety of religious beliefs and faiths among our tenants will widen.

**Sources:**

- 1 - Office for National Statistics (ONS)
- 2 - Current tenancies E&D report (Open Housing)
- 3 - Diversity Report (Open Housing)

Protected Characteristic - Sexual orientation		
		<b>Overall impact:</b> The installation of new energy efficient heating systems including low carbon technologies are likely to have a positive impact on all regardless of sexual orientation.
Positive		
Neutral	X	
Negative		
<b>Evidence:</b> There remains a deficit in the data held on the sexual orientation of residents within the Borough. The data held has empty fields for over 85% of tenants.		
Table 15: Sexual Orientation of main housing tenants		
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Protected Characteristic - Gender reassignment		
		<b>Overall impact:</b> The installation of new energy efficient heating systems including low carbon technologies are likely to have a positive impact on all.
Positive	x	
Neutral		
Negative		
<b>Evidence:</b> There is a deficit in the data held on residents who have undergone or are undergoing gender reassignment. In a similar vein to the protected characteristic of sexual orientation, there is a reticence among residents and tenants to disclose this information.  We recognise that this is an elective process on the part of the tenant and Housing Services will respect the confidence given to our officers when a tenant discloses this information to us.		
<b>Sources:</b> No data is currently available concerning this protected characteristic.		

Protected Characteristic - Marriage/Civil partnership		
		<b>Overall impact:</b> The installation of new energy efficient heating systems including low carbon technologies are likely to have a positive impact on all regardless of their marital/civil partnership status.
Positive	x	
Neutral		
Negative		
<b>Evidence:</b> We do not collate data on the marital status of council tenants, only at the point of entry on to the Housing Register and for the purposes of succession of a tenancy.		
<b>Sources:</b> No data is currently available concerning this protected characteristic.		

Protected Characteristic - Pregnancy, maternity and paternity		
		<b>Overall impact:</b> The provision of efficient heating and hot water systems may benefit those who are pregnant or who have a young child more than other groups.
Positive	x	
Neutral		

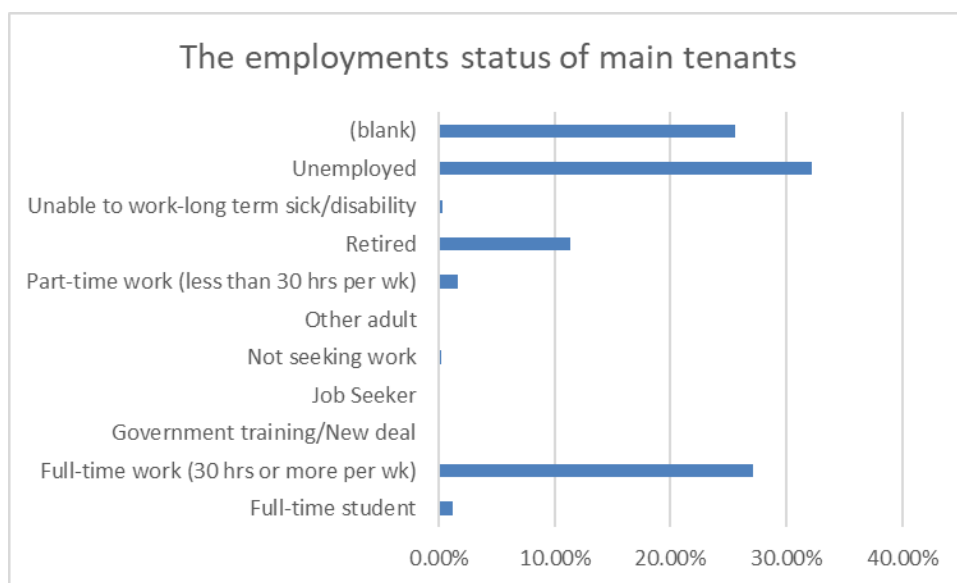
<b>Negative</b>		
<p><b>Evidence:</b> The only data which Housing Services collects for this protected characteristic is due dates for pregnancy, usually collated at the point of entry to the Housing Register.</p> <p>This data is used to ascertain the size of property/ the number of bedrooms a tenant is requires under the 'bedroom standard'.</p> <p>However, due to the nature of the protected characteristic, it would be difficult to collect accurate and up to date data.</p>		
<p><b>Sources:</b> No data is currently available concerning this protected characteristic</p>		

Socio-economic status		
		<b>Overall impact:</b> The provision of efficient heating and hot water systems may benefit those of low incomes more than other groups.
Positive	x	
Neutral		
Negative		
<b>Evidence:</b> Across London, the raw number of households in poverty in socially rented properties sits at 950,000. Whilst this is similar to the total number of private renters in a similar position (870,000) the actual rate of poverty is higher, at 51% (PRS 33%).  As one of the least deprived boroughs in London, it still has over 8500 (16.6%) of children in households with a relatively low income, and almost 7000 (13.4%) children with absolute low incomes <sup>1</sup> . After housing costs, 30-33% of children would be living in poverty, with the most deprived areas including Gooshays and Heaton. The map below shows deprivation patterns in Havering based on the IMD 2019 child poverty index by Lower Super Output Areas (LSOAs). <sup>2</sup>  Gooshays is the most deprived ward, with an IMD average score rank of 50 out of 633 and 2165 out of 32844 LSOAs, making it amongst the 10% most deprived neighbourhoods in the country. Upminster is the least deprived with an IMD average score rank average of 615 out of 633, and ranked 32563 out of 32844 LSOA's, meaning it is in the top 1% of least deprived neighbourhoods.  Despite generally low deprivation scores and high employment rates (economic activity 83%, 16 – 64), the median full time annual salary in Havering is £33,836, as measured in 2021, is low in comparison to the London median of £41,017 and slightly higher than the England median of £31,777.  The proportion of working age residents in Havering claiming out-of-work benefits (7.0%) is significantly lower than England (8.6%).		

The employment rate within the Borough is higher than the London and England averages. About 79.4% of working age residents in Havering was employed in 2021, compared to 73.8% and 74.7% in London and England respectively.

The proportion of working age residents claiming out of work benefits (12.3%)<sup>4</sup> is significantly lower than England (13.8%).

**Table 16: Employment Status of all Council Tenants**



Data held on current Council Tenants demonstrates that 28.8% of all Council Tenants are employed on a full-time or part-time basis, while just over 30% are unemployed. The number of tenant's whose employment status remains unrecorded will change as the process of reviews takes place over time.

It is worth adding once more that this data is not reliable in that this data is only picked up at the point where a tenant accepts an offer of council home, and individual circumstances can change over time.

**Sources:**

- 1 - HM Revenue and Customs - Personal Tax Credits: Children in low-income families local measure
- 2 - [Indices of Deprivation \(communities.gov.uk\)](https://communities.gov.uk)
- 3 - Annual Survey of Hours and Earnings (ASHE), ONS and ONS CPI series
- 4 - People on out-of-work benefits, by London borough (Trust for London)
- 5 - Current tenancies E&D (Open Housing)

**Health & Wellbeing**

**Overall impact:**

<b>Positive</b>	<b>x</b>	The provision of efficient heating and hot water systems will benefit all groups.
<b>Neutral</b>		<b>Do you consider that a more in-depth HIA is required as a result of this brief assessment?</b> Please tick (ü) the relevant box <b>Yes</b> o <b>No</b> X
<b>Negative</b>		

#### Evidence:

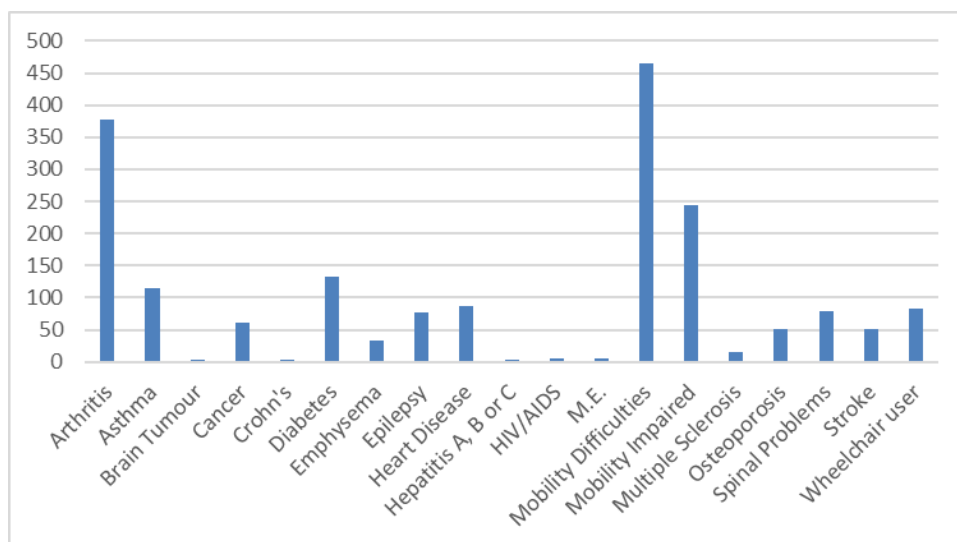
Average self-reported wellbeing in Havering has declined slightly from 2019/20 to 2020/21, decreasing from 7.7 to 7.5 out of 10 for Life Satisfaction, which is still high.

For anxiety, we see a continuation of this increase, seen from 2015/16 (2.6 out of 10) to 2020/21 (3.1 out of 10), albeit this is still in the low category. “Happiness” saw a slight increase to 7.5 in 2020/21 from the previous year and “worthwhile” remained around the same at 8.

Equalities data from the current Housing Register, (as at 2018), shows that 5.1% of applicants accepted on to the Housing Register have a sensory or physical disability which may necessitate the allocation of a property with a level of adaptation to meet their need.

Where the tenant continues to have an ongoing housing need and continues to meet the eligibility criterion for social housing according to the Council’s Allocation Scheme, the Council will offer the tenant a new tenancy for an appropriate property.

**Table 17: Council Tenants who have identified a health issue**



Data extracted from Open housing indicates that 21.5% of council tenants have identified themselves as having a disability. This is, however, a figure reliant on the self-reportage of tenants and does not necessarily mean that all instances of physical disability require an adaptation or change in housing.

#### Sources:

- 1 - [Personal well-being in the UK - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)
- 2 - Current tenancies, E&D (Open Housing)

## Action Plan

Item	Identified Negative impact	Recommended action/s	Outcomes and monitoring	Timescale	Lead officer
Age	Positive	No additional actions	N/A	Reviewed annually	Mark Howard
Disability	Positive	No additional actions	N/A	Reviewed annually	Mark Howard
Sex / Gender	Positive	No additional actions	N/A	Reviewed annually	Mark Howard
Ethnicity / Race	Positive	No additional actions	N/A	Reviewed annually	Mark Howard
Reigion / Faith	Positive	No additional actions	N/A	Reviewed annually	Mark Howard
Sexual orientation	Positive	No additional actions	N/A	Reviewed annually	Mark Howard
Gender reassignment	Positive	No additional actions	N/A	Reviewed annually	Mark Howard
Marriage / Civil partnership	Positive	No additional actions	N/A	Reviewed annually	Mark Howard
Pregnancy, maternity, parenaty	Positive	No additional actions	N/A	Reviewed annually	Mark Howard
Socio – economic	Positive	No additional actions	N/A	Reviewed annually	Mark Howard
Health & wellbeing	Positive	No additional actions	N/A	Reviewed annually	Mark Howard

## Review

The assessment will be reviewed on an annual basis.

**Scheduled date of review:** January, 2025





## CABINET REPORT

15<sup>th</sup> May 2024

**Subject Heading:**

Housing Allocation Scheme (2024)

**Cabinet Member:**

Councillor Keith Darvill, Lead Member for Climate Change and Housing Demand

**SLT Lead:**

Patrick Odling-Smee, Director, Living Well

**Report authors and contact details:**

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**Policy context:**

This is a comprehensive revision of the Council's Housing Allocation Scheme (2021) to ensure that all available Council housing is allocated consistent, fair and in compliance with all current legislation and regulatory requirements.

**Financial summary:**

It is anticipated that the implementation of this scheme may involve minor financial implications.

**Is this a Key Decision?**

Yes. It will significantly affect all wards in Havering.

**When should this matter be reviewed?**

One year from implementation.  
People.

**Reviewing OSC:**

**The subject matter of this report deals with the following Council Objectives**

People - Things that matter for residents      X

Cabinet 15<sup>th</sup> May 2024

Place - A great place to live, work and enjoy. X

Resources - A well run Council that delivers for People and Place. X

## SUMMARY

- 1.0 The Housing Act 1996 Part VI requires local authorities to publish an allocation scheme that sets out their policy for allocating affordable housing provided by the council or housing associations in the borough. Councils are required to give reasonable preference to certain categories of applicant and have due regard to statutory guidance and the law.
- 1.1 Demand for social housing in Havering significantly exceeds the number of properties available. In the financial year 2022-23, only one in every 5 households on the Council's Housing Register had a realistic prospect of securing social housing.
- 1.2 This scheme (see appendix 1) proposes a number of revisions to the current Scheme (dated 2021) to set out how Council housing is prioritised to ensure that it is fairly allocated to households in the greatest need.
- 1.3 It also sets out how the Council will enable access to other forms of affordable housing, such as shared ownership and intermediate rented housing.

## RECOMMENDATIONS

- 2.0 To approve the Housing Allocation Scheme 2024 attached in Appendix 1, and delegate the implementation date to the Director Living Well in consultation with the Cabinet Member for Climate Change and Housing Demand.

## REPORT DETAIL

- 2.1 Following a review of the current housing allocation scheme, approved in 2021, the proposed scheme, attached in appendix 1 was subject to statutory public consultation between September and November 2023. The outcome from the public consultation is attached as appendix 2.
- 2.2 **The key changes to the Scheme are as follows:**
- 2.3 Removal of Housing Banding structure to a Points Based System
- 2.4 It is proposed that the existing banding structure is replaced with a points based-system that is primarily related to housing need. This does however give additional points for time waiting on the housing register. The point-

based system is categorised under eight headings that allow applicants to accumulate points relative to their housing needs.

- 2.5 Introduction of a housing needs-based points system to prioritise households on the register. This replaces the former date and band prioritisation. The full new point structure is set out in the table below.

	Points award (weighting)	Housing Register	Existing Social Housing Tenants	Accepted Homeless Households
<b>A. LOCAL CONNECTION</b>				
Time waiting points for each year on the Housing Register	10	✓	✓	✓
<b>B. HOMELESSNESS</b>				
Homeless – owed a full housing duty	75			✓
Homeless – Relief Duty	50			✓
Threatened with Homelessness - (Prevention)	25	✓	✓	✓
Parental eviction – sons and daughters	30	✓	✓	✓
<b>C. INSANITARY, OVERCROWDED &amp; UNSATISFACTORY CONDITIONS</b>				
Lacking - each bedroom	20	✓	✓	
Lacking facilities (bathroom, kitchen, or WC)	25	✓	✓	
Sharing facilities (bathroom, kitchen, or WC)	10	✓	✓	
Lacking cold or hot water supplies, power or heating	30	✓	✓	
HHSRS Cat 1 Hazard (disrepair)	40	✓	✓	
<b>D. WELFARE / HARDSHIP</b>				
Welfare points	30	✓	✓	
Move-on from supported housing projects	60	✓		
Move-on from care	60	✓		
Fostering & Adoption	35	✓	✓	
Hardship	20	✓	✓	
Social Tenant “Right to Move”	10	✓		
Key workers	30	✓		
<b>E. MEDICAL</b>				
High Medical Need to Move	75	✓	✓	
Medium Medical Need to Move	50	✓	✓	
Low Medical Need to Move	25	✓	✓	
<b>F. MANAGEMENT TRANSFERS</b>				
Social tenants under-occupying current home by one bedroom	45		✓	

Social tenants under-occupying their current home by two or more bedrooms	90		✓	
Decants	80		✓	
Management Transfers – Immediate threat to welfare / life	150		✓	
Management Transfers - “Best Use of Stock” / Other urgent need to move	80		✓	
<b>G. SHELTERED HOUSING</b>				
Eligible for Sheltered Housing only	10	✓	✓	
<b>H. ARMED FORCES REGULATIONS 2012</b>				
Eligible under Armed Forces Regulations 2012 *	60	✓		

- 2.5 A full explanation of the categories within the points scheme is provided in the allocation scheme (Appendix 1).
- 2.6 Increasing choice - the proposed allocation scheme will increase the choice that applicants have of their home by not limiting the number of bids permitted and allowing tenants to view a number of properties before making their final choice. This will reduce or eliminate the number of properties refused.
- 2.7 Additional priority will be given to current social housing tenants who want to downsize. This will free up larger properties for families in housing need on the register.
- 2.7 Administratively more efficient - the proposed scheme will be simpler for applicants and more efficient for the council. Applicants' information will only be verified when they reach a high level of priority on the housing register. Applicants will be required to confirm annually that they wish to remain on the register however they will not have to provide all the documentation required for verification at the point of application. This will save time and money for both applicants and the council.
- 2.8 The new scheme will enable households in the private rented sector to apply on the housing register and have their housing needs assessed. They are currently excluded from the register unless they are in severe housing needs or threatened with homelessness. This will support the homelessness prevention strategy and reduce demand for temporary accommodation by encouraging applicants to remain on the housing register while taking up options in the private rented sector, rather than go into temporary accommodation.
- 2.9 Housing Register Qualification Criteria  
Change in residency criteria - It is proposed that the existing six-year continuous residency criterion is amended to four out of the last six-years criterion. This will enable the residence criteria to comply with the law without having a significant number of exemptions, make the criteria more consistent

with the homelessness and social care legislation and simplify the scheme for applicants.

Income cap - no threshold, save when it is apparent applicant has sufficient income or capital to meet their own housing need – the £36,000 per annum for singles/couples and £50,000 per annum for families will be guidelines for informing decisions and will be reviewed on an annual basis.

2.10 Removal of Community Contribution Band - Under the current scheme this gave priority to applicants who were working or doing voluntary work regardless of their housing need. It is proposed that the community contribution band will be removed, however, existing applicants who were previously placed under the Community Contribution banding will not lose priority and instead their respective housing needs will be reflected in the new points-based system as well as retention of their effective date.

2.11 Introduce Parental Eviction – Sons and Daughters

These points will be awarded to the single adult children of existing Havering council tenants who are threatened with homelessness but they are able to remain in the parental home until a suitable property is available.

2.12 Integration of the Opportunities Register into the main housing register to simplify the application process for residents.

## REASONS AND OPTIONS

3.0 The recommendations throughout this report have been made so that the Council's Housing Register more accurately reflects the level of housing need in the borough, ensuring that those with the greatest need continue to be prioritised.

3.1 Table 1 shows the number of successful allocations for each band, under the current scheme, for the last four years:

Table 1

Financial Year	ER	CC1	CC2	H	RP	Total
19/20	203	171	30	48	3	455
20/21	103	242	71	130	15	561
21/22	170	144	47	126	7	494
22/23 (Apr-Aug)	50	41	17	38	5	151

Table 2

Current Scheme	1	2a	2b	2c	3	Total
22/23 (Aug-Mar)	152	99	7	13	76	347
22/23 (Total)	202	140	24	51	81	498
Total	678	697	172	355	106	2008
% of allocations	33.8	34.7	8.6	17.7	5.2	100

### 3.2 Reasons for the decision:

- 3.3** The current allocation scheme is not serving its primary purpose of supporting applicants most in need and given the prevailing housing climate, it is incumbent upon the local authority to allocate its scarce resources in the right way and meet our legal obligations.
- 3.4** The existing scheme awards a “community contribution” priority to households who were, for example in employment; they were prioritised as band 2. Giving applicants additional priority for working does not reflect their housing need and therefore households who were in less severe housing need were prioritised over those in severe housing need. This is particularly so for overcrowded households.
- 3.5** Table 2 shows that applicants in the current Community Contribution 1 and 2 (CC1-CC2a-c) bands make up the majority of allocations, accounting for 1249 (61%) of total allocations. Applicants in employment Band 2a benefited most from the scheme accounting for 343 (17 %) of total allocations from the housing register.
- 3.6** Comparatively, applicants unable to work on medical grounds fair less well in securing social housing with only 82 (4%) of applicants successfully finding social housing. The proposed scheme will support the council’s commitment to allocate its scarce resources in the right way and meet our legal obligations.
- 3.7** The residency criteria in the current scheme is based on a continuous residency for six years. This had been challenged legally and as a result, a series of exemptions introduced to comply with the law. In total there were 10 exemptions which rendered the residency criteria impractical and incoherent.

These exemptions are:

- Members of the Armed Forces and former Service personnel, where the application is made within five years of discharge, Bereaved spouses and civil partners of members of the Armed Forces leaving Services Family

Accommodation following the death of their spouse or partner; Serving or former members of the Regular or Reserve Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service.

- People who are under-occupying their current social housing tenancy.
- Persons who fall within the statutory 'reasonable preference' groups:
  - people who are homeless (within the meaning of Part 7);
  - people who are owed a duty by any local housing authority under section 190(2), 193(2) or 195(2) (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any such authority under section 192(3);
  - people occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions; people who need to move on medical or welfare grounds (including any
  - grounds relating to a disability); and people who need to move to a particular locality in the district of the Council, where failure to meet that need would cause hardship (to themselves or to others).
- Emergency cases where homes are damaged by fire, flood or other disaster
- Cases nominated under the Police Witness Protection Scheme or other similar schemes of which the Council has agreed to be party to.
- Households who need to move to the borough and where failure to meet that need would cause exceptional hardship to themselves or to others. Hardship grounds include applicants with the need to move:
- Under the Right to Move scheme where there is a genuine intention of taking up an offer of work;
- To specialist facilities where they receive care;
- To receive or give care/support which could otherwise result in higher care costs, or even the use of residential care for those who cannot move.
- People who qualify for assistance through specialist external mobility schemes
- Cases with exceptional need that are not covered under this scheme. For example, where child or public protection issues require rehousing, or for domestic abuse cases where it is not possible for the applicant to remain in their home.
- Applicants who the Director of Housing and, at the very least, one other statutory agency (e.g. the Police, NHS), has agreed are unable to access suitable accommodation other than that given by the Council or a housing association.
- To ensure compliance with the judgment of the Court of Appeal in R (Ward & Ors) v Hillingdon LBC; R(Gullu) v Hillingdon LBC

**3.8** The ordering of households according to date of application does not reflect the priority of their housing need. Many households do not apply on the housing register because they are not aware of process and therefore, they are given a lower priority even though they may be living in extremely poor-quality accommodation. Waiting for housing based on the date of application does not reflect the needs for housing of individual households. The new points system is based on housing need however points are awarded based



on the time that households have been waiting. These are known as “Time in Need” points.

- 3.9** The 2021 scheme introduced an Opportunities Register which recorded the housing needs and preferences for those households who would not be able to be housed through the housing register itself so they could be offered other housing choices. This has proved highly successful particularly at marketing shared ownership properties at New Green and St Georges developments. It is the intention to make the application process simpler by integrating the Opportunities Register into the main housing register. This will more adequately reflect the levels of housing needs in the borough.
- 3.10** The Housing Act 1996 Part VI requires significant changes to the Housing Allocation Scheme to be consulted on with stakeholders and housing applicants.
- 3.11** Consultation with affected parties is essential to good practice. In terms of administrative law, ‘consultation’ has a specific meaning and should be proportionate, fair, and inclusive.
- 3.12** Following the authorisation of this draft Scheme by Cabinet, a formal consultation was conducted in the autumn of 2023 it opened on the 7 September 2023 and closed on the 30 November 2023. The consultation was based on a proposed 3 out of 6 year residency criteria, implementing a points-based system, and removal of community contribution award both of which have subsequently changed. The consultation consisted of:
- The draft Scheme and public consultation questionnaire published on the Council’s consultation portal;
  - The questionnaire being sent to all key stakeholders, including housing associations, neighbouring boroughs and voluntary sector organisations.
- 3.13** Ninety-nine people responded to the Public Consultation. Their feedback is detailed in appendix 2, with recommendations for the adoption of the Housing Allocation Scheme (2024).
- 3.14** The key issues raised in the consultation were:
- Concerns that reducing the residency criteria to 3 out of 6 years would limit opportunities for local residents to successfully bid on social housing and encourage inward migration. However, no evidence was provided to support this, and the current restriction excludes many local people who have lived for short periods in the other neighbouring boroughs. The current scheme has a series of exemptions that apply to a significant proportion of application, thereby making it meaningless and difficult to understand. The proposal is a more transparent way to set out the residency criteria. However to reflect the concerns raised in the consultation, the final proposed scheme recommends a residency criteria of four out of the last 6 years.

- Concerns were also raised about proposed removal of the community contribution banding with a majority of respondents opposed, viewing the community contribution as a positive part of the current scheme. This did not however demonstrate that there was opposition to the housing needs based assessment, which an employment criterion clearly contradicts.
- The management of the points-based system to ensure transparency and fairness. The proposed changes had a mixed reception with an equal number of respondents in favour than against. The main concern for the consultees was the protection of existing applicants' priority in the transition of the new scheme. This has been reflected in the transitional arrangements put in place for existing applicant through the transition points which will protect their current priority under the new scheme. Once implemented the proposed scheme will be reviewed to ensure that the benefits of the points scheme, in terms of transparency and meeting housing needs, have been achieved.

### **3.15 Implementation of the new scheme**

The implementation of the new scheme requires formal notification to be sent to all the applicants currently on the housing register, the housing computer system changed to reflect the new scheme, change and transition to a points-based system and on-line application form to be amended to reflect the changes.

A project team has been established to implement these changes and it is anticipated that six months will be required from the date of decision before the new scheme “goes live”.

### **3.10 Other options considered:**

#### **Amending the current scheme to remove the community contribution and clarifying the residency criteria.**

This is not recommended as the principle of prioritising applicants based on housing need would not have been achieved.

## **IMPLICATIONS AND RISKS**

### **Financial implications and risks:**

The implementation of this Scheme has minimal financial implications. However, there could be legal fees incurred in defending challenges against this Scheme. These costs would be met from Housing Revenue Account budgets.

### **Legal implications and risks:**

- i. Consultation of Reform to Social Housing Allocations.

The Government issued a consultation in January 2024 on proposed changes to the Code of Guidance on Housing Allocations, issued under Part V1 of the Housing Act 1996.

In response to the consultation proposals legal advice was sought on the proposed changes and the implications for the Havering Housing Allocation Scheme.

- UK connection test – where a person must demonstrate their connection to the UK before they can be allocated social housing. This can be achieved by (a) being a British citizen, Irish citizen, Commonwealth citizen with a right of abode, or EEA or Swiss citizen with equal treatment rights [footnote 2]; or (b) by being a lawful resident in the UK for 10 years (Section 5). *If this is implemented it is likely to require an amendment to the Allocation Scheme (AS) as the current or proposed Scheme do not provide for a “UK connection test”. Additionally, it is proposed that those who arrive as part of a safe and legal resettlement or relocation scheme will be exempt from the UK connection test - the Scheme would need to be amended accordingly. The proposed new “UK connection” test will apply to new applicants as well as those currently on the waiting lists.*
- Local connection test – where a person must demonstrate a connection to a local area for at least 2 years before they can be allocated social housing. This will ensure greater consistency across the country and ensure more local people can access social housing in the area they call home, supporting people to put down roots and maintain links to family and community (Section 6). *- The Scheme complies with the minimum proposed local connection requirement. i.e. a minimum 2 years. (The new scheme proposes a 4 out of 6 year residency). However, the government proposal intends to use a broader definition for local connection than just “residence”, in order to capture employment and family associations as well. Also, it’s proposed that there might be other “statutory” exemptions to the local connection test.*
- Income test – setting thresholds for applicants and those on a waiting list to qualify for social housing. This will have no impact on existing tenants, but rather will ensure new tenancies are reserved for those who, at the point of signing for a new social home, would most struggle to afford private accommodation (Section 7). *The proposed scheme will include an income assessment for when the applicant will be able to meet their own housing needs. Applicants will also be excluded from the register when it has been determined that an applicant or partner has deliberately deprived themselves of capital to access social housing. To this effect the current income threshold is £36,000 for single people or couples without children and £50,000 is applicable.*

*The Government is consulting on whether the income threshold should be set and whether this should vary at a regional level. They are also looking at whether local housing authorities could continue to set their own lower thresholds based on local circumstances. This means that the current set income threshold may need to be revised. The government proposes to issue guidance on this so the scheme would need to be reviewed in light of any set guidance. It is also proposed that there would be exceptions to the income test. Therefore, it is likely that our income threshold may meet the requirements of the new guidance.*

- Anti-social behaviour test – people who have unspent convictions for certain criminal anti-social behaviour, as well as certain civil sanctions, will be disqualified from social housing for a defined period (Section 8). *The current provision in the proposed scheme on anti-social behaviour is unlikely to be sufficient. The Scheme would need to be revised to ensure that it complies with the new requirements. Additionally, it is likely that we would need other internal procedure which outline how the test would be applied as well as how any Equalities/PSED would be addressed.*
  - Terrorism test – it is proposed that terrorist offenders with unspent convictions will not qualify for social housing unless excluding them would increase the risk to public safety (Section 9). *- The Scheme may need to be revised to include this provision.*
  - Grounds for eviction (anti-social behaviour and terrorist offences) – implementing a ‘three strikes and you’re out’ policy for repeat offenders of anti-social behaviour and creating a new ground for eviction for terrorist offences (Section 10). *This is unlikely to have a huge bearing on the Scheme, however checks would be required to ensure that the provisions of the Scheme are in line with any internal anti-social behaviour policies created.*
  - Fraudulent declaration test - mandating a period of disqualification for those who knowingly or recklessly make false statements when applying for social housing (Section 11). *The Scheme confirms disqualification of fraudulent applicant for a period of two years.*
  - Applicants on a waiting list – applying the new eligibility and qualification tests not only to new applicants but also to those currently on a social housing waiting list (Section 12). *Applying these new tests may be administratively burdensome for Local Authorities and the response to the consultation will reflect this and the need to this to be recognised in the new burdens assessment.*
- ii. The current and proposed allocation scheme allows for minor changes to be made by the Director of Living Well, in consultation with the relevant Portfolio Holder to make minor changes to the scheme. Based on legal

advice at the time, if these changes are introduced, they may be considered minor and changes introduced under this procedure.

- iii. Pursuant to Section 166A of the Housing Act 1996, every local authority must have an allocation scheme and must not allocate housing accommodation except on accordance with the allocation scheme. The allocation scheme must include the procedure for allocation of accommodation as well as the persons or description of persons by whom decisions are made.
- iv. **Public Sector Equalities Duty**  
The proposed changes relating to residency requirements, income threshold and points system are changes that are open to the Council to make. In deciding whether to implement the proposed changes, the Council must have regard to an Equality Impact Assessment and consider the impact each of the proposed changes would have on persons with protected characteristics with a view to eliminating any potential unlawful discrimination. Where potentially negative consequences of the Scheme change have been identified, effective mitigation should be put in place to reduce the impact. Further the scheme now including those who have a reasonable preference as being exempt from residency requirements and being able to access the scheme has been stated in the EQHIA.

The relevant legal framework for this exercise is set out in Section 149 of the Equality Act 2010 and known as the Public Sector Equality Duty (PSED).

- v. **Reasonable preference groups**

It is a legal requirement under Section 166 A (3) of the Housing Act 1996 to ensure that 'reasonable preference' is given to persons falling within that section.

This section includes those who are homeless within the meaning of Part 7 of the Housing Act 1996, and not just those who are owed the full housing duty. Established case law supports the position that an allocation scheme should not seek to exclude groups of people within the reasonable preference categories.

The revised Scheme excepts those within reasonable preference groups from the 4 out of 6 year residency period, allowing these individuals to access the housing register. Recent case law in the Administrative Court has also confirmed that "the legislation does not prohibit a disqualification criterion that affects some persons falling within a reasonable preference category, provided that as a whole the scheme does give reasonable preference to that category of persons". As such the Scheme as proposed meets the statutory requirements around reasonable preference criteria, and the latest line of case law. It is noted that this is a fruitful area of legal challenge and so decisions in the Courts will need to be monitored to ensure

that the Council's Scheme remains in line. This can be done through the periodic review of the Scheme.

- vi. Consultation, legitimate expectation and due regard to existing policies.

When considering the proposed changes, the Council is required to have regard to its internal policies, including the Homelessness Strategy and Tenancy Strategy. The Council is also required to have regard to the London Housing Strategy. The legal framework for this requirement is outlined below.

Section 166 A (12) for the Housing Act 1996 provides that: -

A local housing authority in England must, in preparing or modifying their allocation scheme, have regard to—

- (a) their current homelessness strategy under section 1 of the Homelessness Act 2002,
- (b) their current tenancy strategy under section 150 of the Localism Act 2011, and
- (c) in the case of an authority that is a London borough council, the London housing strategy.

Prior to making the proposed changes, the council should consult with stakeholder and those who could be affected by the proposed changes. Additionally, the Council has a statutory duty to consult with every private registered provider of social housing and registered social landlord as well as its secure tenants. The form of consultation should be inclusive and robust to ensure that the duty to consult is satisfied.

The relevant statutory framework is outlined below:

Section 166 A (13) of the Housing Act 1996.

Before adopting an allocation scheme, or making an alteration to their scheme reflecting a major change of Scheme, a local housing authority in England must—

- (a) send a copy of the draft scheme, or proposed alteration, to every private registered provider of social housing and registered social landlord with which they have nomination arrangements (see section 159(4)), and
- (b) afford those persons a reasonable opportunity to comment on the proposals.

(14) A local housing authority in England shall not allocate housing accommodation except in accordance with their allocation scheme.

Section 105 of the Housing Act 1985

Consultation on matters of housing management.

- (1) A landlord authority shall maintain such arrangements as it considers appropriate to enable those of its secure tenants who are likely to be

substantially affected by a matter of housing management to which this section applies—

- (a) to be informed of the authority's proposals in respect of the matter, and
- (b) to make their views known to the authority within a specified period; and the authority shall, before making any decision on the matter, consider any representations made to it in accordance with those arrangements

In addition to the above, the Council required to consult with those who would reasonably expect to be consulted. The Council should check and ensure that all those who were consulted when the 2016 allocation scheme was implemented (or when any previous amendments to the council's allocation scheme were made) are consulted also.

Prior to presenting this Scheme, extensive consultation in accordance with the statutory requirements has been carried out and the results of this exercise are set out in Appendix 2. The Council is required to take into consideration all of the information received from the consultation exercise when deciding whether to implement the proposed changes and in this case the result of the consultation have led to the proposed 10 year residency requirement having been kept at 6 years per the existing policy, with the relevant statutory and required exemptions to that residency requirement.

vii. Part 6 Final Offer to Part 7 homeless applicants

Where an offer of accommodation under the Council's allocation scheme is made on the basis that a refusal would end the duties under homelessness legislation, the council must comply with the requirements of section 193 of the Housing Act 1996 which outlines the format for such an offer. The process regarding making an offer of accommodation is appropriately dealt with in Part 4 of the proposed Scheme, with the appeals process also detailed at Part 5.

**Human Resources implications and risks:**

The recommendations made in this report do not give rise to any identifiable HR risks or implications that would affect either the Council or its workforce.

**Equalities Health and Wellbeing implications and Risks**

It is anticipated that the implementation of this Scheme will generate positive health and wellbeing benefits to directly affected residents. Significant decisions entailed in implementing aspects of the Scheme will be informed by the accompanying Equality and Health Impact Assessment (EqHIA - please see appendix 3) which will serve to identify opportunities to maximise health benefits and mitigate potential harms arising from the specific actions proposed.

**BACKGROUND PAPERS**

**APPENDIX 1:** Housing Allocation Scheme (2024)

**APPENDIX 2:** Public Consultation report – Feedback and raw data

**APPENDIX 3:** Equalities and Health Impact Assessment

[Consultation on reforms to social housing allocations - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/consultation-on-reforms-to-social-housing-allocations)



# Housing Allocation Scheme (2024)

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# **1. Introduction**

## **1.1 Purpose of this scheme**

This policy becomes effective on the XX of XXXXX 2024. It replaces the allocation scheme agreed in October 2021.

## **1.2 Aims and objectives of this scheme**

The overarching aim of this scheme is to ensure the Council meets its legal requirements for the allocation of affordable housing under Part VI of the Housing Act 1996.

### **1.3 This includes the allocation of:**

- Housing owned and managed by the Council
- Housing owned by housing associations with whom the Council has nomination agreements allowing the Council to nominate an applicant for housing using this scheme.
- Other housing options available.

### **1.4 The objectives of the scheme are:**

- To let properties in a fair and transparent way
- To ensure appropriate levels of priority are afforded to applicants
- To ensure that the scheme is as simple to engage with for applicants
- To offer as much choice to applicants as is reasonably possible
- To provide applicants access to a range of housing options
- To provide feedback to applicants about homes let through the scheme
- To encourage and support sustainable communities and social inclusion
- To ensure applicants are treated fairly, individually and in accordance with the Council's commitment to Equality, Diversity and Inclusivity
- To make best use of affordable housing, including the use of targets and/or quotas to meet the needs of the local community.

## **1.5 Scope of this scheme**

This policy applies to new applicants, (including homeless households), and to existing Council tenants transferring from one property to another.

The Housing Act 1996, (as amended by the Homelessness Reduction Act 2017, Homelessness Act 2002 and the Localism Act 2011), requires local authorities to make all allocations and nominations in accordance with an Allocation Policy. A summary of the Allocation Policy must be published and made available free of charge to any person who asks for a copy.

This document is available on the Council's website: [www.havering.gov.uk](http://www.havering.gov.uk) and a summary will be available as a paper copy on request.

The Housing Act 1996 (as amended) requires local authorities to give reasonable preference in their allocations policies to people with high levels of assessed housing need. The 'reasonable preference' categories are:

- People who are homeless as defined by the Housing Act 1996, Part 7;

- People who are owed a duty by any local housing authority under section 190(2), 193(2) or 195(2) (or under section 65(2) or 68(2) of the Housing Act 1985), or who are occupying accommodation secured by any such authority under section 192(3);
- People occupying insanitary or overcrowded housing, or who are otherwise living in unsatisfactory conditions;
- People who need to move on medical or welfare grounds (including any grounds relevant to a disability); and
- People who need to move to a particular locality in the district of the Council, where failure to meet that need would cause hardship (to themselves or to others).

The Council can also give additional preference to households in one of the reasonable preference groups listed above. By law the Council must give additional priority to applicants who are current or previous members of the armed forces and who are in housing need.

The Act also requires local authorities to state within the policy what its position is on offering applicants a choice of housing accommodation or offering them the opportunity to express preference about the housing accommodation to be allocated to them. The Scheme does not apply to the allocation of temporary accommodation or other accommodation provided as part of the council's duties to the homeless.

## **1.6 Timescales for this policy**

This scheme will commence on xxxx. It will apply to all applicants whenever they joined the housing register.

## **1.7 Legal context**

The scheme complies with the requirements of the Housing Act 1996 and takes into account the following Acts and codes of guidance;

- Allocation of Accommodation: Code of Guidance for Housing Authorities 2002
- Homelessness Code of Guidance for Local Authorities 2022
- Allocation of Accommodation: Choice Based Lettings Code of Guidance for Housing Authorities 2008
- Fair & Flexible: Statutory Guidance of Social Housing Allocations for Local Authorities in England 2009
- Right to Move
- Armed Forces Regulations 2012
- Homelessness Reduction Act 2017
- General Data Protection Regulations (GDPR) 2018
- Domestic Abuse Act 2022
- Care Act 2010
- Housing Act 2004
- Equality Act 2010
- Rehabilitation of Offenders Act 1976
- Housing & Regeneration Act 2008
- The Children Act 1989
- Rent (Agriculture) Act 1976 Housing Act 1985

## 2. The Housing Register

### 2.1 Background

In accordance with the Housing Act 1996 Part VI (as amended by the Homelessness Act 2002), section 166A of the Housing Act 1996 and the Localism Act 2011 all Local Authorities and/or agents administering the Local Authorities duties must provide a Housing Allocation scheme.

Demand for social housing in the area far outweighs supply and this policy details how Havering Council ("the Council") will determine the allocation of its social housing stock and the stock of its housing association partners both where the Council holds nomination rights over the vacant unit of accommodation and where the vacancy has been made available to the Council on a voluntary basis.

This scheme has been adopted having regard to the relevant codes of guidance and supplementary guidance: ("Allocation of accommodation: guidance for local housing authorities in England" (2012); "Providing social housing for local people".

Statutory guidance on social housing allocations for local authorities in England" (2013) and "Right to Move. Statutory guidance on social housing allocations for housing authorities in England" (2015)) and the Council's Homelessness and Tenancy strategies.

The Choice Based Lettings (CBL) Scheme aims to provide most applicants with as much choice as possible as to where they live, by openly advertising vacancies and inviting applicants to express interest in vacancies they would like to be offered and for which they are eligible.

The purpose of this scheme is to set out how the Council assesses applicant eligibility and priority for housing and the types of property for which applicants can apply.

This scheme sets out:

- Eligibility to join;
- How to apply for housing;
- Assessment of applications;
- Who is given preference – the points scheme;
- How homes will be let.

Due to high demand for affordable housing and the comparatively limited supply, not everyone who applies on the Housing Register will be able to be housed in social housing.

The Housing Register will therefore provide access to a range of housing options within Havering and beyond. The following are the schemes that are currently available to Housing Register applicants however these will be amended as new schemes and housing opportunities become available:

- Local authority rented housing
- Housing association rented housing
- Shared ownership and equity share housing
- Low cost private rented and market rented housing
- Housing mobility schemes
- Key worker housing
- Supported housing

## 2.2 Types of tenancy or tenancy changes that are not included in this scheme

The following are types of tenancy or changes to tenancy that are not an allocation under this scheme:

- Mutual Exchanges
- Assignments of tenancy
- Succession of tenancy
- An Introductory Tenancy becoming a Fixed Term Tenancy (or, in respect of Housing Association tenants, a Starter Tenancy, becoming an Assured Tenancy)
- Provision of non-secure interim accommodation in discharge of any homelessness duty
- Service Tenancies.

Further information about each of the above types of lettings is available from the Council.

## 2.3 Eligibility to join the Housing Register

Anyone can approach the council for advice and assistance, however there are some restrictions on who can apply to join the housing register. Applicants who *cannot* join the Housing Register:

### i. People from abroad

A person is ineligible and may not be allocated accommodation under Part VI of the Housing Act 1996 who is either; a person subject to immigration control and is not within a class of persons set out in regulations made by the government; or is within a class of other persons from abroad set out in regulations made by the government unless they are:

- a) already a secure or introductory tenant, or
- b) an assured tenant of a private registered provider of social housing or registered social landlord.

People in the following categories are not 'qualifying persons' and are not able join the housing register.

### ii. Unacceptable behaviour.

Generally, applicants or members of their household who have committed or been involved in unacceptable behaviour serious enough to make them unsuitable to be social housing tenants will not be accepted onto the Housing Register.

Unacceptable behaviour may include:

- failing to pay rent
- breaching a condition of the tenancy agreement
- causing a nuisance to neighbours
- being convicted of using their home for immoral or illegal purposes
- making a false statement to obtain a tenancy
- causing the condition of the property to deteriorate by a deliberate act
- being convicted of an indictable offence, in or in the vicinity of their home
- being the perpetrator of violent, coercive or controlling behaviour towards a resident of the borough.

### iii. Non-Residence

People who are not resident in the borough on the date of application and have not lived in Havering for 4 out of the last 6 years from the date they apply for housing cannot join the housing register. Applicants must also continue to live in the borough if they wish to remain on the housing register. Exceptions may be made if they are:

- Resident in a hospital
- Resident in supported housing
- Serving a custodial sentence and were resident in Havering for four years prior to entering hospital/custody.
- Housed through an agreement with other local authorities, for example through a mobility scheme.
- Accepted homeless applicants under section 193 of the Housing Act 1996 and have been placed in another borough as a discharge of the Council's homelessness duties.
- An existing social tenant needs to move to take up employment or an apprenticeship in Havering.

An exception will also be made where an applicant:

- (a) is serving in the regular forces or who has served in the regular forces within five years of the date of their application for an allocation of housing under Part 6 of the 1996 Act;
  - (b) has recently ceased, or will cease to be entitled, to reside in accommodation provided by the Ministry of Defence following the death of that person's spouse or civil partner where:
    - (i) the spouse or civil partner has served in the regular forces; and
    - (ii) their death was attributable (wholly or partly) to that service; or
  - (c) is serving or has served in the reserve forces and who is suffering from a serious injury, illness or disability which is attributable (wholly or partly) to that service.
- Or in any other exceptional circumstance.

iv. Owners of a residential property

People who own or jointly own or part-own a property which is reasonable for them to occupy.

v. Out of borough social housing tenants

People who are social housing tenants, or joint tenants, of any other local authority or housing association in the UK regardless of the type of tenure.

vi. Households with sufficient income, savings, or equity, to meet their own housing need:

Where we believe that an applicant or partner have deliberately deprived themselves of equity or savings to qualify for housing, we will still include the equity and savings in our assessment of housing need after taking into account the reasons why the money was spent. The financial guideline threshold is £36,000 for single people or couples without children and £50,000 for applicants with dependent children, but this threshold will be reviewed annually as agreed by the Director of Living Well in consultation with the Lead Member for Housing.

vii. Households placed in Havering by another local authority which has an interim or long term duty to them as a homeless applicant.

A fresh application will be considered where the applicant:

- a) has been subject to immigration control, the applicant has been given the right to remain in the UK and has recourse to public funds, or
- b) can show he/she is habitually resident and has recourse to public funds.



Where the Council decides an applicant is ineligible by reason of their immigration status, the Council must notify the applicant of the decision and grounds for it in writing. The applicant has the right to request a review of that decision (see section 11).

## **2.4 Applying to join the Housing Register**

Full details of how to apply for housing can be obtained from the Council's website:  
[www.haverling.gov.uk](http://www.haverling.gov.uk)

Where two eligible applicants wish to have a shared application they will be known as joint applicants. An applicant, joint applicant or household member can only have one active application or be included in only one application to the Council, at any time. The information given on the application must be correct and the applicant will be asked to provide evidence supporting the details supplied.

The Council reserves the right to disqualify any applicant from joining the register for a period of two years and/or withdraw any offer of tenancy or recover possession of a tenancy if the applicant has knowingly given false information. All applicants will be asked to complete a declaration stating that the information provided is true.

Applicants who knowingly or recklessly give false information or withhold information relevant to their application may be guilty of an offence under section 171 of the Housing Act 1996. Under that Act, the Local Authority has the power to take action against an applicant which could result in a fine of up to £5,000. Where an applicant has obtained a tenancy by deception, the Council will take possession action to recover the tenancy under the Housing Act 1985, Ground 5.

The Council will make any enquiries necessary, including home visits, in order to determine an applicant's eligibility to join the Housing Register and their level of priority for housing. When completing the online declaration, applicants are authorising the Council to make such enquiries as are required to complete the assessment.

When completing the application, applicants are also authorising the Council to disclose this information to other parts of the Council and other organisations, including, but not limited to the Police, Probation Services and Social Services, in order to verify the application and complete nomination processes.

Applicants and joint applicants will be asked to provide information about themselves, their household and their housing circumstances so that an accurate assessment of need can be made. Applicants will be required to provide evidence to support their application. Applications made without the requested evidence will not be accepted or assessed.

Where an applicant is assessed as not eligible to join the scheme, the Council will inform the applicant in writing of the reason/s and how to request a review of the decision (see section 15). The Council will also advise them of other housing options available within Havering or beyond.

## **2.5 Change of Circumstances**

Applicants must notify the Council of any changes in their circumstances which may affect their priority or their eligibility for a particular type or size of home. Notifications of changes of circumstances must be made through the online registration system and, where that change of circumstances requires verifying by the Council, the applicant will be unable to bid until the new information is assessed and verified.

Examples could be:

- A change of address (including a move into interim accommodation following a homeless application)
- A change to household income
- Adding an additional household member
- Removing a household member.

This list is for example only and is not exhaustive.

### **3. Assessment of Applications**

#### **3.1 Household Make-up**

An application may include anyone that may reasonably be expected to reside with the applicant as part of their household e.g. close family relative, partner etc. The desire to be part of the household is not sufficient reason for inclusion in the application.

#### **Extended families (minors)**

In cases where a child is to be included in, or added to, an application but no parental responsibility exists within the household (e.g. grandchildren, nieces, nephews), proof must be provided of legal guardianship or confirmation from Social Services that this placement is necessary and permanent.

#### **Carers**

Applicants who require a full-time residential carer may include the carer on their application. Proof of the requirement should be provided by Social Services or a primary health care professional. The carer will be assessed as part of the household even if not resident (i.e. lack of bedroom priority may be due).

#### **Fostering**

Fostering is defined as fostering for a period more than two years (not necessarily involving the same child or children).

Families undertaking fostering may be able to include foster children as part of their application to ensure that they are eligible for the appropriate sized property. It is essential that written confirmation of the fostering arrangement be obtained from Social Services.

#### **Children in care**

- a) *Compulsory*: children are treated as though at home, subject to written confirmation from Social Services that the children are to live with the parents on a permanent basis should they be allocated a suitable property. Failing such confirmation, children will not be included on the application;
- b) *Voluntary*: children are treated as though at home.  
No offer of tenancy will be made in either case without confirmation from Social Services that the children are to live on a permanent basis with their parent(s).

### Adult children at university

Can be included if they previously lived in the household and their intention is to return as their main and only home on completion of their course. Confirmation will be required from the student that they intend to return on a permanent basis.

### Children from previous relationships

In determining whether a child can be considered as part of the household, the following will be considered:

- Does the child have accommodation available to them which it is reasonable for them to continue to occupy?
- Does the child have a main residence?
- Who is the primary carer for the child?
- Existence of any order of the court pertaining to the child's residency.

Although the above are relevant factors they do not guarantee that a child will be accepted as part of a household.

### Adding new household members

Adults will not be added to an application where this results in the need for accommodation larger than that for which the applicant's household was originally eligible, unless an over-riding need such as ill-health or disability can be shown (for example, where an applicant needs to look after an elderly parent).

The desire to be part of the household is not sufficient reason for inclusion on the application. Adults requiring an extra bedroom will only be added to an application if they have a demonstrable, permanent need to live with the applicant.

On verification of applications, all adults will need to supply details of their accommodation history for the previous 6 years.

## **3.2 Specific Needs**

Applicants requiring a specific type of accommodation or adaptations because of disability/health issues will be given preference for vacancies more suited to their needs.

Together with any other relevant agencies, the Council will work with the applicant to carry out a full assessment of the household's property needs, e.g. need for wheelchair access, ramps, level access shower etc. (for further information see section 7 - "Adapted and accessible properties and the Accessible Housing Register").

However, where an applicant successfully bids on a property that does not contain the necessary adaptations, the Council, or landlord of the accommodation, may assess whether it is reasonable to carry out the adaptations and whether the adaptations can be undertaken within a reasonable time period.

The Council has an Aids & Adaptations scheme that provides adaptations to properties however there may be a wait. Applicants will not be offered a property where a vulnerable person may be placed at risk.

## **3.3 Divided Households**

Where a household is living apart, only one application can be registered. In order to determine which property provides the basis of the housing assessment the circumstances at both addresses will be considered.

A Housing Needs assessment will be carried out on both properties as if the household were residing together. The lowest needs assessment will then be applied to the application.

### **3.4 Effective date of application**

The effective date for new applications will be the date a completed application is received by the Council.

Applicants already registered for housing, and re-registering their interest at the point that this scheme is implemented, will retain their original application date. Existing applicants who fail to re-register their application within the time limits specified in the invitation to re-register for housing will not retain their original application date and the effective date of application will be the date that the new application is completed.

Where applications are partially completed on-line the effective date of application will be the date that the full application is fully completed.

Where an applicant is accepted as homeless and owed a full housing duty, the effective date of the application will be the date that the homeless application was made.

Where the Council asks tenants to move as part of a refurbishment or redevelopment of their property, the effective date will be the date of the original commencement of tenancy at that property.

### **3.5 Annual review**

Applicants will be required to confirm their application on an annual basis. They will be contacted by email and/or text message on the anniversary of their application on two occasions and if they do not confirm their application and circumstances within the time specified their application will be suspended.

## **4. Cancelling an application**

If eligible to bid, when an applicant has not expressed an interest in any available properties for one year, the Council will contact them to advise that their application will be cancelled unless they confirm that they wish to remain on the register. This will be known as a review of non-bidders. The applicant will be given 14 days to respond before the cancellation takes effect.

An application will be cancelled from the Housing Register in the following circumstances:

- At the applicant's request
- Where an applicant does not respond to an application review, within the specified time limit
- If the applicant becomes ineligible for housing (see 4 above)
- When the applicant has been housed in suitable accommodation
- Where the applicant has either withheld information or provided false information in order to obtain a tenancy
- Where the applicant has died.
- Where the applicant has moved out of borough and no longer meets residency criteria.

Any applicant whose application has been cancelled has the right to ask for a review of the decision. Where an applicant wishes to re-join the Housing Register at a later date, the application will then be assessed as if it were a first application. Applicants will be able to cancel their own application at any time without notice.

## 5. Suitable Properties

Applicants will be restricted from being allocated properties in certain circumstances.

Examples may include:

- Where a medical assessment recommends ground floor or accommodation with a lift only;
- Where a risk assessment indicates an allocation would place a vulnerable person at risk;
- Where there is an order of court such as an exclusion order preventing a person from residing in a locality.

The above list is not exhaustive. Where a restriction applies an applicant will be informed and any bids placed on unsuitable properties will not be accepted.

### Bedroom Eligibility

A separate bedroom will be allocated to a household for the following:

- Single or joint applicants
- A couple
- An adult where that adult has no same sex sibling with whom they can share
- Two children of the same sex (regardless of age)
- Two children of opposite sex where both are under 10 years
- Child aged 10 years or over where the child has no same-sex sibling with whom s/he could share.

Overriding medical and welfare factors will be considered when determining any additional bedroom requirement. Guidance will be sought from a medical practitioner or involved professionals.

Bedroom size eligibility will also be dependent on whether the property can accommodate a household's size, for instance properties with very small bedrooms may not accommodate larger households. Any restrictions relating to the household size that an advertised property can accommodate will be clearly noted in the CBL property advert.

Due to high demand for, and a shortage of, large family accommodation within Havering, the above criteria may be relaxed and, where room sizes and configuration allow (for example where a second reception room could be utilised as an additional bedroom), vacant properties may be made available to applicants who require a larger number of bedrooms than the property provides. In such cases, applicants will be asked to confirm they are willing to move to a property smaller than their need by opting in via their application form.

If an applicant successfully bids for a property that is smaller than they need, the property will normally be offered unless one of the following applies:

- the applicant would become statutorily overcrowded in the new property

- the only reason we have accepted an applicant on the Housing Register is because their current home is too small and an applicant bids for a property that is the same size as the one they are currently living in.

Where the bedroom requirement criteria are relaxed in relation to a particular vacancy, this will be clearly noted in the CBL property advert.

The Council may also exercise discretion in order to facilitate the transfer of tenants under-occupying family accommodation for which there is a pressing need and where the tenant is willing to move to a smaller property or where a tenant is required to permanently vacate their home due to planned refurbishment or redevelopment, or where permitted by the provisions of a local lettings plan.

## 6. Housing for older people

The Council has two types of retirement housing:

- Sheltered Housing, for tenants who are more independent and require less home care support.
- Extra Care Sheltered Housing, for tenants who are more dependent and frailer, sometimes called “very sheltered”, “extra care” or “Part Two and a half” schemes. This accommodation is for people who require intensive home care support to remain living independently in their own homes.

Sheltered Accommodation is offered to people who require a medium or low level of support due to frailty, ill-health or restricted mobility. Communal facilities include a lounge and laundry facilities, and a dedicated scheme manager provides residents with advice and support.

In order to be eligible for supported accommodation, applicants must meet all of the following criteria:

- 55 years old or over
- Single or joint applicants with no dependants
- In need of the housing support provided by the scheme

In addition, applications may be considered from owner-occupiers aged over 60 and who have been assessed as being unable to meet their housing needs from their own resources. The Council can assist these people by offering supported accommodation on the basis that the owner agrees to lease their property to the Council to be used as temporary accommodation.

In this case, applicants will be visited and assessed to ensure that they can live independently (with a care package, if required). If the applicant's accommodation and support needs are considered too high for sheltered accommodation, the application will be referred for consideration for Extra Care housing.

Applications for *Extra Care Sheltered Housing* will be considered by the Sheltered Housing Extra Care Assessment Panel and will be administered outside of the terms of this scheme. The Panel will assess applications, taking advice from medical, health and other professionals working with the applicant to assess medical or other needs.

## 7. Adapted or accessible properties and the AccessibleHousing Register

In order to ensure that properties which benefit from adaptations for a disabled occupant or are suitable for applicants experiencing mobility difficulties are allocated to applicants who would most benefit from the facilities that they provide, the Council operates an Accessible Housing Register. Properties that are suitable for applicants with disabilities or mobility difficulties are clearly labelled to show this when they are advertised through a “MOB” code.

A MOB code depends on the level of adaptations carried out or accessibility of the properties. CBL adverts for these properties will include information to detail how accessible they are. For example, if the vacancy has a small number of steps, no steps, lift access or if it is accessible to an applicant who uses a wheelchair as well as details of any internal adaptations such as a wet room or widened internal doors etc.

Applicants will also be given a corresponding MOB code to enable them to identify adapted or accessible properties that will meet their needs. CBL bids placed by applicants with MOB codes will be given priority on the bidding shortlists for properties that are advertised with a MOB code.

## 8. Applicant categories

Applicants will be placed in one of three categories:

### 8.1 Housing Applicants

These are applicants who are not in social housing (i.e. Council or Housing Association tenants) within Havering and do not qualify for inclusion in the “Homeless Applicants” category.

### 8.2 Transfer Applicants

These are existing tenants of social landlords (Havering Council or Housing Associations) whose tenancy home is held within Havering.

### 8.3 Homeless Applicants

These are applicants to whom the Council has accepted a full duty to accommodate under the terms of Part VII of the Housing Act 1996 (as amended).

## 9. The points scheme

The points scheme relates only to applicants for social rented housing.

Applicants are awarded points to reflect their current housing circumstances. Points are totalled to evaluate the applicants’ relative housing priority. Not all applicants will qualify for all points categories (see table below).

Applicants' eligibility for an award of points is dependent on the applicant category they are placed in (denoted by a ✓ within the table).

The circumstances of all household members will be considered when points are awarded. Points may be varied upwards or downwards depending on changes in an applicant’s circumstances.

	Points award (weighting)	Housing Register	Existing Social Housing Tenants	Accepted Homeless Households
<b>A. LOCAL CONNECTION</b>				
<u>Time waiting points for each year on the Housing Register</u>	10	✓	✓	✓
<b>B. HOMELESSNESS</b>				
<u>Homeless – owed a full housing duty</u>	75			✓
Homeless – Relief Duty	50			✓
Threatened with Homelessness - (Prevention)	25	✓	✓	✓
Parental eviction – sons and daughters	30	✓	✓	✓
<b>C. INSANITARY, OVERCROWDED &amp; UNSATISFACTORY CONDITIONS</b>				
Lacking - each bedroom	20	✓	✓	
Lacking facilities (bathroom, kitchen, or WC)	25	✓	✓	
Sharing facilities (bathroom, kitchen, or WC)	10	✓	✓	
Lacking cold or hot water supplies, power or heating	30	✓	✓	
HHSRS Cat 1 Hazard (disrepair)	40	✓	✓	
<b>D. WELFARE / HARDSHIP</b>				
Welfare points	30	✓	✓	
Move-on from supported housing projects	60	✓		
Move-on from care	60	✓		
Fostering & Adoption	35	✓	✓	
Hardship	20	✓	✓	
Social Tenant “Right to Move”	10	✓		
Key workers	30	✓		
<b>E. MEDICAL</b>				
High Medical Need to Move	75	✓	✓	
Medium Medical Need to Move	50	✓	✓	
Low Medical Need to Move	25	✓	✓	
<b>F. MANAGEMENT TRANSFERS</b>				
Social tenants under-occupying current home by one bedroom	45		✓	
Social tenants under-occupying their current home by two or more bedrooms	90		✓	
Decants	80		✓	
Management Transfers – Immediate threat to welfare / life	150		✓	
Management Transfers - “Best Use of Stock” / Other urgent need to move	80		✓	
<b>G. SHELTERED HOUSING</b>				
Eligible for Sheltered Housing only	10	✓	✓	
<b>H. ARMED FORCES REGULATIONS 2012</b>				
Eligible under Armed Forces Regulations 2012 *	60	✓		



## 9.1 Local connection

In order to be eligible for assessment an applicant must currently, and normally live in the area in settled accommodation, and have done so for four out of the last six years and must remain resident within the borough during the lifetime of the application.

Settled and normal accommodation does not include, for example, Bed and Breakfast, staying temporarily with family, friends, etc. The following applicants will qualify for these points and are not required to meet the residency criteria set out above:

- Existing social housing tenants resident in the borough.
- A person who would be a relevant person under The Allocation of Housing (Qualification Criteria for Armed Forces Regulations 2012 [SI 1869].
- A person who is fleeing domestic violence who would qualify for reasonable preference due to homelessness and cannot reside safely where they have a local connection.
- A person who is required to be rehoused in another local authority area due to arrangements with other statutory bodies for example; Witness Protection Schemes; Multi-Agency Public Protection Arrangements.
- In exceptional circumstances, where the applicant has a need for support or medical treatment which cannot be met in any other reasonable location.
- A person who is an existing social housing tenant seeking to transfer from another local authority district in England who have reasonable preference under s166(3)(e) of Housing Act 1996 because of a need to move to the local authority area to avoid hardship, and need to move because the tenant works in the district, or need to move to take up an offer of work. This is also known as 'Right to Move'.
- Non voluntary residence in another area (e.g. in prison).

## 9.3 Applicants will **not** be considered to meet the residence criteria if:

- They have been placed in Havering in temporary accommodation by another council or authority.
- They have been placed in residential care, foster care or supported housing by another council or statutory body or support agency.
- They are residing in a bail hostel or approved premises, unless a local connection already existed prior to their residence commencing.

## 9.4 Exceptional circumstances

In exceptional circumstances, where the applicant has a need for support or medical treatment which cannot be met in any other reasonable location, an application may be awarded points where the local connection is not met, or where a person has no local connection elsewhere.

## 9.5 Homelessness

### 9.5.1 Homeless – owed a full housing duty

Applicants owed a full housing duty under section 193(2) or 195(2) of the Housing Act 1996 and this duty has not been discharged by the offer of a private sector let or a let of a suitable council or housing association property.

#### **9.5.2 Homeless – not owed a full housing duty**

Where an applicant is assessed as homeless, is eligible for assistance but is not in priority need as defined by the Housing Act 1996 Part VII (as amended by the Homelessness Act 2002) and therefore not owed a rehousing duty by the Council.

#### **9.5.3 Threatened with Homelessness – priority need households**

Households currently occupying Assured Shorthold or Tied Tenancies under a legal notice or in receipt of a court order requiring the household vacate the property, or households currently living with family or friends or residing in private sector lodgings or supported accommodation who have been served with a legal notice to quit, who are in priority need as defined by the Housing Act 1996 Part VII (as amended by the Homelessness Act 2002).

Applicants who have breached the terms of their tenancy or licence will be subject to the terms detailed in section 14 (Suspended Applications).

These points will be applied for a maximum of 2 months prior to the expiry date of the notice/possession order. Where the notice/possession order has expired more than 2 months ago and has not been enforced, the points will be reviewed and may be removed if the tenancy/accommodation continues to be available.

#### **9.5.4 Threatened with Homelessness - non-priority need households**

Households currently occupying Assured Shorthold or Tied Tenancies under legal notice or in receipt of a court order requiring the household vacate the property, or households currently living with family or friends or residing in private sector lodgings or supported accommodation who have been served with a legal notice to quit, who are not in priority need as defined by the Housing Act 1996 Part VII (as amended by the Homelessness Act 2002).

These points will be applied a maximum of 2 months prior to the expiry date of the notice/possession order. Where the notice/possession order has expired more than 2 months ago and has not been enforced, the need will be reviewed and may be removed if the tenancy/accommodation continues to be available.

#### **9.5.5 Parental Eviction – Sons and Daughters**

These points will be awarded to the single adult children of existing Havering council tenants who are threatened with homelessness but they are able to remain in the parental home until a suitable property is available. The applicant must have been living in the parental home for the previous 12 months.

### **9.6 Unsanitary, overcrowded or unsatisfactory conditions**

#### **9.6.1 Lacking Bedrooms**

An applicant will be deemed to be lacking a bedroom if a separate bedroom is not available for each of the following:

- Single applicant
- Joint applicants who are a couple
- A couple (not the main applicants)
- An adult who has no same sex sibling with whom they can share
- Two children of the same sex (regardless of age)
- Two children of opposite sex where both are under ten years

- A child aged 10 or over where the child has no same sex sibling with whom s/he can share

Medical and welfare factors will be taken into account when determining any additional bedroom requirements. Guidance will be sought from a medical practitioner or involved professionals.

Where an applicant has deliberately moved an adult family member into the home, any overcrowding attributable to the addition of this family member will be disregarded when calculating bedroom deficiency within the home unless an overriding need such as ill health or disability requiring the person to be considered as part of the household can be shown (for example, where there is a demonstrable need for on-going care or support).

#### 9.6.2 Lacking or Sharing Facilities

Points will be awarded to applicants who have no access to, or currently share with another household a bathroom, kitchen or WC. Another household is defined as any person or persons who will not be rehoused with the applicant and his/her family.

Points will be awarded where the applicants do not have hot or cold-water supplies, electricity or adequate heating (i.e. not central heating). Points for sharing facilities will not be applied where the applicant is entitled, under the terms of their tenancy or licence, to sole use of the facilities contained within the dwelling

#### 9.6.3 HHSRS Category 1 Hazard (Disrepair)

These points will be awarded to private sector tenants and residents of dwellings where the Council's Private Sector Housing Team has determined that the property poses a Category 1 hazard under the Housing Health and Safety Rating System (HHSRS) and the Council is satisfied that the problem cannot be resolved by the landlord within 6 months. The household is not able to resolve their own housing problem by moving to alternative private sector accommodation; and as a result continuing to occupy the accommodation will pose a considerable risk to the applicant's health.

### 9.7 **Welfare/Hardship**

Points for welfare will be given following consideration as to whether the circumstances of the applicant will meet the following criteria and that their current accommodation is inadequate for their needs. Welfare points will only be given where the need is not reflected in other categories of points.

Where an applicant qualifies for welfare points only one award will be made per application. Where an applicant qualifies for more than one welfare award detailed below only the highest award will be applied.

#### 9.7.1 Welfare points

Where the applicant's current accommodation has a significant detrimental impact upon the well-being of the applicant and/or members of their household with the effect that their accommodation is considered to be unsuitable for their needs.

The award of these needs will be made having regard to information provided by one or more of the following:

- App's GP or consultant
- Social services
- Occupational Therapist

- Other specialist agency representing the applicant.

### **9.8 Move on from supported housing projects**

Applicants will be awarded these points in accordance with protocols agreed between the Council and the voluntary sector body providing the accommodation. Not all applicants who occupy the recognised supported housing projects will qualify for these points.

Eligible applicants must have a vulnerability and urgent housing need that is best met by the provision of long term settled housing. All other cases will be assisted by the project and the Housing Options service to move on to private rented accommodation.

The criteria for points under this category will be:

- A care leaver is ready to move to independent settled housing and is prepared for a move to independent living
- The applicant possesses the life skills to manage a tenancy including managing a rent account
- The applicant needs either long term or medium-term tenancy support
- That support package has been assessed and is in place
- The applicant's needs are such that accommodation in the private rented sector would, through its short-term nature, have a detrimental effect on their transition to independent living.

### **9.9 Move on from care**

Applicants are awarded this category in accordance with the protocols between the Council's Housing and Children's Services departments.

Applicants must be a former "Relevant Child" as defined by the Children Leaving Care Act 2002. Not all care leavers will qualify for this points award.

The criteria are as follows:

- A care leaver is ready to move to independent settled housing
- The applicant possesses the life skills to manage a tenancy including managing a rent account
- That support package has been assessed and is in place

### **9.10 Fostering/adoption**

Where an applicant has been approved to be a foster carer or adopt, on behalf of Havering Council, and needs to move to a larger home to accommodate a looked after child or a child who was previously looked after by the council.

This will include special guardians, holders of a residence order, family and friends, carers who are not foster carers but who have taken on the care of a child because the parents are unable to provide care and, where suitable accommodation is not provided, the child would need to be placed in the care of the council.

Confirmation of an applicant's eligibility for this award will be required from the council's social services teams

### **9.11 Hardship**

These points will be given due to an applicant's need to move on grounds of a requirement to give or receive support or due to employment:

- The applicant needs to access social services or medical facilities and is unable to travel across the borough
- The applicant needs to take up or continue employment, education or training not available elsewhere and who does not live within reasonable commuting distance
- The applicant needs to give or receive substantial and ongoing care

These points would not normally be awarded to applicants who claim that they require ongoing support from relatives or friends unless there are severe mental health, medical or welfare issues relating to this person or a member of the household and exceptional reasons why this support cannot be made available through a reliance on private or public transport.

### **9.12 Social Tenant - Right to Move**

This award will also be applied where a social tenant residing outside of the borough needs to move to the borough for work.

This points award will only be made to households with a housing need, as defined by the terms of this scheme. When determining whether the award will be made, the following factors may be considered:

- the distance and/or time taken to travel between work and home;
- the availability and affordability of transport, considering level of earnings;
- the nature of the work and whether similar opportunities are available closer to home;
- other personal factors, such as medical conditions and childcare, which would be affected if the tenant could not move;
- the length of the work contract;
- whether failure to move would result in the loss of an opportunity to improve their employment circumstances or prospects, for example, by taking up a better job, a promotion, or an apprenticeship

This list is not exhaustive.

The award will only be applied if the employment is not temporary or part-time (less than 16 hours per week) in nature.

Where the hours of employment are less than full time, the level of earnings will be considered. The applicant's place of work must be based in the Council's area, the existence of a company office based in the Council's area will not by itself meet the criterion.

Voluntary work is also excluded.

### **9.13 Medical Circumstances**

If required, a medical assessment will be undertaken by a medical practitioner in order to determine which level of priority, if any, should be given to an application. The points will only be given where the applicant's health is detrimentally affected by their current housing and whose circumstances are not otherwise recognised by the points scheme. Where more than one member

of an applicant household qualifies has a medical condition, only one award of medical points will be made per application.

A medical assessment may also be carried out to determine the most appropriate form of housing for the applicant to move to, however this is separate from the assessment of their current housing needs.

Where a homeowner is in accommodation determined as unsuitable for the household due to medical circumstances but resources are available (privately or through the award of a Disabled Facilities Grant) to provide necessary adaptations, the application will not be afforded points on medical grounds.

#### High Medical Need to Move

Where a medical assessment has determined that an applicant or a member of the household requires an urgent move because of a life threatening or progressive illness or sudden disability and where the applicant's property is directly contributing to the deterioration of the applicant's health or they are unable to access the property.

This may include:

- Where an applicant's condition is expected to be terminal within a period of twelve months and rehousing is required to provide a basis for the suitable provision of care
- The applicant's condition is life threatening and the applicant's existing accommodation is a major contributory factor and where the property cannot be rectified within an appropriate timescale
- An applicant is unable to move adequately within or access their current accommodation and requires re-housing to more suitable housing.

This list is for illustrative purposes only and is not exhaustive.

#### Medium Medical Need to Move

Where an applicant's housing is unsuitable for severe medical reasons which significantly aggravate the medical condition of the applicant, or member of their household but is not life-threatening or where the applicant's current home is highly unsuitable for them, or a member of their household but is not life threatening.

#### Low Medical Need to Move

Where the property currently occupied by the applicant aggravates their own, or a member of their household's, medical condition.

Applications may only be re-assessed for the award of points on medical grounds for the following reasons:

- Upon a change of circumstances where this would affect the type of accommodation required (such as an applicant previously awarded preference for 1 bedroom accommodation now requiring separate bedrooms; or an applicant previously awarded medical priority for a bungalow, now requiring sheltered accommodation);
- Deterioration or improvement in medical condition of applicant;
- On the death of one party who had a medical award;
- The party who had the medical award is no longer a member of the household

- A move to a different address (any medical award would be made on the applicant(s) current accommodation);
- Where additional information that was not previously available is provided.

#### Suitable housing on medical grounds

The Council's Medical Advisor may recommend the type size and location of accommodation that is deemed to be suitable to meet a household's long term housing needs. Where this recommendation is accepted, the applicant will be informed and any bids placed on unsuitable properties will be overlooked.

#### **9.14 Management Transfers**

These provisions will only apply to existing tenants of the council. Where an applicant qualifies for Management Transfer points, only one award will be made per application. Where an applicant qualifies for more than one Management Transfer award detailed below only the highest award will be applied.

Tenants of social landlords where the tenancy is outside Havering will not qualify for these awards.

#### **9.15 Under-occupying tenants**

This points award will be made to tenants of council or housing association general needs (i.e. not sheltered, or retirement) housing to which the borough has nomination rights. This includes where an occupant succeeds to the tenancy of a property which is unsuitable for their needs.

Due to the shortage of family-sized accommodation within the borough, the Council has exercised its discretion to give additional preference to applicants wishing to vacate this type of property in favour of smaller accommodation. This includes where an occupant succeeds to the tenancy of a property which is unsuitable for their needs.

The Council operates an Assisted Transfer scheme to encourage the release of high demand accommodation. Details will be available from the Council but includes:

- Practical support to enable households to move and help in identifying properties;
- Grants to cover the costs of moving;

#### **9.16 Decants**

This award will be made where the social landlord requires the decanting of current occupants to facilitate the refurbishment or redevelopment of the property/site.

#### **9.17 Threat of Violence – Immediate Threat to Welfare/Life**

These points will be awarded to tenants requiring an urgent transfer of accommodation where continued occupation of the applicant's home would place the household at serious and immediate risk of harm due to one or more of the following:

- Racial violence
- Domestic violence
- Hate crime
- Sexual violence
- Other violence

- Being a witness of crime and referred under Witness Protection provisions by the Police.

Evidence to support the applicant's claim to be at risk of violence will be sought by the partners. Evidence required may include:

- Risk Assessment by MARAC (Multi Agency Risk Assessment Conference)
- Evidence from the Police
- Medical evidence of assault

### **9.18 Management Transfers**

Where there are management problems and a move to alternative accommodation is appropriate, or where it is in the interest of the landlord to do so in order to facilitate best use of its housing stock.

Examples of where a Management Transfers award will be considered include:

- Housing Health and Safety Rating System (HHSRS) where a category 1 hazard A, B or C has been identified
- Racial harassment – not at serious and immediate risk of violence
- Where there are compelling reasons to move the tenant in the interests of making best use of the borough's social housing stock;
- Sexual harassment/victimisation – not at serious and immediate risk of violence
- Other discriminatory harassment or abuse – not at serious and immediate risk of violence
- Other violence that does not pose a serious and immediate risk
- Tenants of the Council occupying homes benefitting from major adaptations where these facilities are no longer required
- Tenants of the Council whose homes require major adaptations where the need can be better, or more economically, met in an alternative property

This list is not exhaustive and is for illustrative purposes only.

### **9.19 Sheltered Housing**

Sheltered housing points will only be awarded to applicants who meet the age and household structure criteria for sheltered accommodation but who would not qualify for any other points award other than the "Local Connection" award or would be suspended from bidding (see Section 14) due to:

- Having been assessed as having sufficient financial resources to secure alternative accommodation (see section 2.3)

Applicants qualifying for this points award will be restricted to bidding for sheltered accommodation only.

### **9.20 Armed Forces Regulations 2012**

These points will only be made to households with a housing need, as defined by the terms of sections B to F above and where:

- A member of the household is serving or has served in the regular or reserve forces (as defined in the Armed Forces Act 2006) and has a serious injury, illness or disability incurred through that service; or



- The household is at risk of homelessness from Ministry of Defence accommodation as a result of the death of a spouse or partner as a result of their military service will be given additional preference.

Former service personnel will qualify for this points award where the housing application is made within five years of discharge. Any lump sum payments made to the applicant on discharge will be disregarded for the purposes of assessing an applicant's financial resources.

## **10. Suspension of applications**

Applications will be suspended and will not be permitted to bid for vacant properties in the circumstances detailed below. Due regard will be given to the household's circumstances when applying a suspension to an application.

### **10.1 Housing Related Debts/Debts to the Council**

Applicants with housing related debt or debts to the Council will not be permitted to bid on advertised properties. Due regard will be given to the household's circumstances and the criteria below when determining whether they will be permitted to bid.

Housing related debt refers to:

- Rent or mortgage arrears
- Dilapidation charges / rechargeable repairs
- Court costs
- Arrears of service charges included in rent or mortgage
- Housing Benefit debts or overpayments;
- Council Tax debts;
- Outstanding debt through Rent Deposit scheme

### **10.2 Debt in respect of an applicant's current accommodation**

Where at the point of application, or during the lifetime of an application, an applicant or member of the applicant's household has, or incurs, housing related debts relevant to a property they are currently legally liable for or debts to the Council, the applicant will not be permitted to bid on advertised properties.

Due regard will be given to the household's circumstances when determining if these bidding restrictions should apply. If all the housing related debts are cleared, the applicant will be able to bid on advertised properties. Evidence that the debt has been cleared will be required and it will be the applicant's responsibility to provide this evidence.

### **10.3 Debt in respect of an applicant's previous accommodation**

Where at the point of application an applicant or member of the applicant's household has any housing related debts relevant to a property they were legally liable for in the last 3 years, the applicant will not be permitted to bid on advertised properties for a period of 6 months.

After the six-month period the application can be reviewed. If all the housing related debts have been cleared, the applicant will be permitted to bid on advertised properties. Evidence that the debt has been cleared will be required and it will be the applicant's responsibility to provide this evidence.

Applicants with a debt outstanding at the end of the six months but who have maintained an agreed payment plan for 6 months may be permitted to bid on advertised properties.

Where there remains a debt outstanding they will be expected to enter into a further payment plan and adhere to it exactly. Breaches of this agreement will result in the applicant being unable to bid on advertised properties for a further period of six months from the date of the breach.

Evidence that the payment plan has been adhered to will be required and it will be the applicant's responsibility to provide this evidence. Due regard will be given to the household's circumstances when determining if these bidding restrictions should apply.

If during the life of the application it becomes apparent that the applicant has accrued a housing related debt, the application will be reassessed accordingly. If the applicant has successfully bid on a property, the bid will be automatically overlooked. Due regard will be given to the household's circumstances when determining whether restrictions to bidding should apply.

#### Breach of Tenancy or Licence Terms

Where the applicant, a member of the applicant's household, or a visitor of the household has breached the terms/conditions of a tenancy/licence the applicant will not be permitted to bid on advertised properties. This does not apply to breaches of tenancy in regard to housing related debt, for debt see section 14. The application will be reviewed after two years.

Where the applicant can demonstrate significant improvement in the management of their tenancy and have adhered to the terms/conditions for a period of not less than twelve months, their application will be reassessed.

Due regard will be given to the household's circumstances when applying a penalty to an application.

#### 10.4 Unacceptable Behaviour

Where an applicant, or a member of the applicant's household, has been subject to an action by a landlord or other body due to anti-social or unacceptable behaviour.

Relevant actions can include Notices, Community Behaviour Orders (or historical Anti-Social Behaviour Orders), Community Protection Notices, Noise Abatement Notices or other order, convictions, injunctions, etc. (n.b. this list is not exhaustive). Anti-social behaviour can occur where a tenant permits or fails to control another person that displays anti-social behaviour

#### 10.5 Perpetrators of Domestic Violence/Honour/Hate Crime

Where there is any evidence of domestic violence, honour-based activity or hate related crimes, not necessarily a conviction, by the applicant, or a member of their household, or at the instruction/direction of the applicant or a member of their household, then the applicant will not be permitted to bid for vacant properties. Supporting evidence will be sought from the Police and/or other involved agencies.

Applicants will not be permitted to bid on advertised properties for an initial period of two years from the action for unacceptable behaviour. After this period the applicant may apply to have this

suspension lifted after this period and will be required to provide evidence of improvement in the behaviour, e.g. successful maintenance of a tenancy.

#### 10.6 Violent or aggressive behaviour towards employees of the council or its agents.

Where an applicant, or a member of the applicant's household, is verbally, physically or sexually intimidating or abusive, they will not be permitted to bid on advertised properties for a period of not less than two years from the date of the most recent incident.

This suspension will be reviewed after this period when it will be assessed whether the offender has improved their behaviour and no longer presents a threat. For an applicant to be permitted to bid for properties there will have been no further incidences of abusive behaviour.

#### 10.7 Sufficient financial resources to meet the applicant's housing need

A threshold of income and/or assets will be applied, including equity from the sale of a property or equity held within an existing property. Affordability of other housing options will be calculated based on housing needed by the household.

Where a household has sufficient assets or equity/investments to meet their housing need then they will be offered advice and assistance to meet their own housing needs in the private sector. Due regard will be given to household's ability to release equity.

However, where the applicant, or a member of the applicant's household, has medical and/or support needs, and does not have the financial resources to secure appropriate accommodation they will be able to apply for on the register. Rents and house prices (open market and shared ownership) will be regularly reviewed to ensure calculations of income and asset thresholds remain reasonable. Details of current thresholds will be detailed in Section 2.3.

The Council may re-assess these cases where the applicant can provide evidence of a significant temporary loss of income through no fault of their own. The temporary period will normally only be considered where it exceeds or is likely to exceed 6 months, e.g. loss of income due to ill health.

#### 10.8 Homeowners

An applicant will be considered to be a homeowner where they have a legal interest in a property and/or occupation rights to it and are able to exercise those occupation rights. This includes applicants who own homes purchased under low-cost home ownership schemes such as Homebuy or Shared Ownership.

Homeowners will be permitted to bid for vacant properties where the following circumstances or conditions apply **and** the homeowner, or a member of their household, does not have the financial resources to secure appropriate accommodation (equity within the current property will be taken into consideration) see section 2.3: -

- The applicant or a member of the applicant's household has medical needs, rendering their current accommodation unsuitable. Guidance will be sought from a medical practitioner.
- Where a homeowner is in accommodation determined as unsuitable for the household due to medical needs (for example, poor mobility) but resources are available (either privately or through a Disabled Facilities Grant) to provide necessary adaptations, the applicant will not qualify to bid for properties.

- In such a circumstance, it is expected and understood that any owned property is to be sold to release the equity within a 9-month period, or  
The household is facing imminent eviction (due to a Court Order for possession having been granted) because of mortgage arrears accrued through no fault of their own

#### 10.9 Refusal of an offer of accommodation

Where an applicant registered in the Housing Applicant or Transfer Applicant categories refuses a suitable offer of accommodation their application will be suspended for a period of six months. The application will be reviewed upon completion of the six month suspension.

Please note that Homeless applicants towards whom the Council has accepted a duty will only be made one suitable offer. If this is refused no further offers will be made and the council will consider its duty discharged.

#### 10.10 Applicants who have knowingly worsened their housing circumstances

Where in the last three years prior to application, or during the life of an application, an applicant has knowingly worsened their housing circumstances the application will be suspended for a period of not less than 12 months.

The application will be reviewed after twelve months to determine whether the applicant has secured more suitable/secure accommodation from which the application can be reassessed.

Where the Council applies one of the above bidding restrictions to an application, the applicant will be informed of the restrictions and the reasons for this decision. For details of how suspensions will be applied, see Section 18 – Refusal of Offers.”

## **11. Reviews**

An applicant has the right to request a review of decisions made under part VI of the Housing Act 1996, in particular:

- Decisions about the facts of the applicants case which are likely to be, or have been taken into account in considering whether to allocate housing accommodation to the applicant;
- Ineligibility for an allocation or lack of any reasonable preference based on previous unacceptable behaviour;
- Ineligibility for an allocation due to immigration status.

Decision letters issued in respect of housing applications will advise the applicant of their right to request a review and provide appropriate guidance on how to do this.

A request for a review of a decision can be made in writing or verbally to a member of staff. The request should be made within 21 days of the notification of the decision. Reviews will be considered within 28 days of the request being received and the applicant will receive a written response outlining the result of the review.

An applicant will only be entitled to one internal review. If the applicant disagrees with the decision made, then the applicant may appeal to the Local Government Ombudsman or seek to challenge the decision via a judicial review. Initial reviews will be carried out by an

officer who was not involved in the original decision, and who is senior to the original decision making officer.

## **12. The Letting process**

### **12.1 Local lettings policies and allocation quotas**

The Council will operate local lettings policies in order to achieve a clearly defined objective in relation to accommodation of a specific type and/or in a specific geographic location. Local lettings policies may be used to meet the following objectives:

- To create mixed, balanced and settled communities;
- To encourage the development of sustainable tenancies and communities within particular developments or geographic areas;
- To make the best use of accommodation benefitting from attributes that make it particularly appropriate for applicants of a particular description;
- To address concentrations of deprivation or anti-social behaviour.

The above list is for illustrative purposes and is not exhaustive. In addition, the Council may, in response to prevailing local conditions, or to assist in the management of its housing stock, set quotas whereby a proportion of units of accommodation may be allocated to certain classes of applicants or Applicant Categories (see section 8).

These categories may include:

- Properties advertised through the CBL services where priority will be given to bids placed by either Housing Applicants, Transfer Applicants or Homeless Applicants;
- Properties where priority will be given to applicants who are currently in employment;
- Properties allocated to young people leaving care;
- Properties allocated to applicants requiring accommodation in order to facilitate an adoption or fostering arrangement;
- Properties allocated to social tenants from outside of the borough under the terms of the statutory Right to Move scheme; Properties allocated to Key Workers.

The above list is for illustrative purposes and is not exhaustive. Any properties subject to a Local Lettings Plan or quota will be clearly identified when advertised through the CBL service. Any Local Lettings Policies or Quotas in place will be published on the council website and will be reviewed on a regular basis.

### **12.2 Lettings made outside the scheme**

The following allocations will be made outside of the CBL scheme:

- Direct Offer
- Extra-Care Retirement Property Lettings
- Non-successors.

#### **12.2.1 Direct Offer**

Where there are exceptional circumstances, or overriding management requirements, the Council may occasionally make an offer of accommodation outside of the CBL scheme by way of a direct offer.

Examples of which are:

- As a discharge of homelessness duty

- Where a tenant or a member of their household is in immediate, serious danger if they remain in the property
- Allocations to non-successors as detailed in 12.2.3 below
- Where an applicant requires a property with specific adaptations and such a property is available and no other applicants require the same.

The above list is not exhaustive. Where a property is allocated by direct let the property will not be openly advertised. Direct Offers will be authorised by the Assistant Director of Housing Demand or their nominated representative.

#### **12.2.2 Extra Care/Sheltered Properties**

Retirement, or “Sheltered”, housing schemes will generally be included in the CBL scheme, except for vacancies in extra-care schemes designed for frail elderly people requiring significant personal care. These vacancies will be allocated according to needs assessments by the relevant care agencies, scheme managers and landlords where appropriate.

#### **12.2.3 Non-Successors**

If a tenant of the Council dies and there is another member of the household who does not have the right to succeed but who:

- Had been living with the tenant for the year before the tenant’s death (this does not include lodgers or B&B guests) or
- Had been resident and looking after the tenant for the year before the tenant’s death or
- Has lawfully accepted responsibility for the tenant’s dependants

The Council will consider offering a new tenancy where the landlord is satisfied this is a priority when viewed in the context of other demands on housing needs in the area. If a new tenancy is considered, this could be either in the same accommodation or in suitable alternative accommodation.

However, the non-successor will not be offered a tenancy at the existing property where doing so will render the property under-occupied or where a property has been adapted for the principal tenants use and such adaptations may be required for another household.

## **13. Bidding**

Bidding refers to an applicant expressing an interest in an advertised property.

Properties will be advertised on the CBL website with a specific deadline to bid. Applicants with sufficient priority to be able to bid, or their nominated representative will be able to bid on their behalf. Where a bid is placed by a nominated representative, family member or friend on behalf of the applicant, this will be considered as a bid made by the applicant.

### **13.1 Bidding Requirements**

#### **Housing Applicants and Transfer Applicants**

Housing and Transfer Applicants, subject to the exceptions detailed below, can choose whether to bid in each advertising cycle and can use one or two of their bids.

Transfer Applicants however, awarded points under the Management Transfer categories (see section 9) except for under-occupying tenants will be expected to actively bids where

suitable vacancies are available. Failure to do so may result in the Council placing bids on the applicant's behalf for the next suitable vacancy/vacancies.

### Homeless Applicants

Homeless applicants towards whom the Council has accepted a duty will be expected to actively bid where suitable vacancies are available. Failure to do so may result in the council placing bids on the applicant's behalf for the next suitable vacancy/vacancies and the council discharging its duty to accommodate under Part VII Housing Act 1996 as amended.

Properties of all types and in all locations will be deemed suitable unless exceptions are agreed by the council prior to bidding commencing.

### 13.2 Auto-bidding

The auto-bid function places bids on any available properties that match the applicant's requirements at the beginning of each bid cycle. This is done automatically by the computer system. The requirements that the applicant is able to specify are:

- i) Type of property
- ii) The area in which the property is located
- iii) Floor level.

Auto-bidding is available to applicants who are unable to access any methods of bidding and do not have a representative who can place bids on their behalf. Auto-bidding may also be used by the Council when placing bids for applicants (see Bidding Requirements).

## **14. Advertising**

Properties will be advertised on the CBL website with a closing date for bidding. Applicants may be invited to bid for properties for which they would like to be considered.

The adverts for properties will contain as much information as possible about the property in order for applicants to make informed bids and will contain clear details of any applicants restricted from bidding on the property. Property adverts will contain clear details of which applicants will be given preference for the property (for example applicants requiring adapted homes, homeless households, transferring tenants etc.).

Some properties will be subject to a local lettings policy (LLP). In these cases it will be clearly stated in the advert and this will include details of any restrictions on households who are eligible for the property. Where the property size indicates that restrictions must be placed on the number of persons who can be accommodated, this will be stated on the advert (for example, where a property has very small bedrooms).

There may be occasions when the council may need to withdraw an advertised property. Reasons for withdrawal may include:

- An error in the advertising details
- Extensive works are required to the property
- The existing tenant has withdrawn their notice.

This list is not exhaustive. The viewing date will also be listed and applicants will be asked to ensure that are able to attend the viewing on the specified date if they bid.

## 15. Shortlisting

Applicants may only bid on vacant properties if they are eligible for the type of property advertised. Of those eligible bidders, the order of priority will be determined as follows:

- Priority will be afforded first to applicants with the greatest housing need as assessed in accordance with the points scheme, (i.e. the applicant with the highest points assessment), who meet the preference criteria stated in the property advert (e.g. transfer applicants, households requiring adaptations etc.).
- Where two or more applicants bid on a vacant property and have equal priority, preference will be given to the applicant who has the earliest effective date of application.
- Where two or more applicants with exactly the same level of priority and effective date on the scheme bid for the same property, a senior officer of the Council will decide to whom the offer will be made based on best use of the housing stock and needs of the applicants.
- Where an applicant bids successfully for more than one property, the applicant will be offered one property only, in accordance with their preference which they must decide with one working day.
- Where a property has specific adaptations (e.g. wheelchair access, ramps, level access shower), priority will be given to applicants who require the adaptation in the property. Details of adaptations and criteria of applicants who will be given preference will be contained in the advert to allow applicants to make an informed decision whether the adaptation is suitable for their needs. Details of the Accessible Housing Register which details how adapted or accessible properties, and applicants who require them, are categorised are available from the Council.

Between the period of being successfully offered a tenancy up to the point of tenancy sign up, the applicant will not be permitted to bid on other advertised properties.

The Council will contact applicants who have been shortlisted for a property. It is the applicant's responsibility to ensure that the Council holds their up-to-date contact details and that they respond within 1 working day to any contact made by the Council. If an applicant does not return contact they will be overlooked for the offer.

At the point of shortlisting, an applicant's circumstances will be verified by Council officers. This is to ensure that the application has been correctly assessed and there have been no changes to the applicant's circumstances since assessment of the application that would alter the priority awarded to the application or the household's eligibility for the specific property they have bid on.

If any changes have occurred that would alter the priority awarded or eligibility, the application will not be shortlisted. The applicant will be informed of this using the most appropriate method of communication for that applicant.

Where an applicant declines a property the property will be offered to the applicant who has the next highest priority on the shortlist and who meets the eligibility and preference



criteria of the property. Where a property has not been accepted due to the shortlist being exhausted, the property will be re-advertised.

Certain accommodation (e.g. sheltered accommodation) will only be let to people who meet the age criteria for the specific property or housing scheme, and/or have a disability which means they require this type of housing. Applicants who do not meet the criteria clearly included in the property advert (e.g. age restrictions) will automatically be overlooked without contact from the Council. Where a property has been advertised and received no eligible bids, the Council may re-advertise the property and relax the eligibility criteria.

## **16. Viewing a Property**

Upon completion of the shortlisting process up to five applicants will be asked to attend the viewing on the specified date. They will be accompanied by a Council officer who will be able to answer any questions relating to the property or the neighbourhood.

At the end of the viewing all applicants will be asked to confirm that they want to be considered for an offer within one working day. In exceptional circumstances the applicant may be given additional time to confirm.

Where an applicant fails to attend an arranged accompanied viewing of a property, they will not be permitted to make further bids until they have contacted the Council.

## **17. Offers of Tenancy**

A formal offer of tenancy will be made in writing to the applicant with the highest priority who have confirmed they want the property.

Applicants will be offered one of the following types of tenancy:

- Introductory
- Starter
- Fixed-Term Tenancy
- Assured
- Secure
- Assured Shorthold
- Tenancy held in trust.

### **17.1 Introductory Tenancies**

Introductory and Starter Tenancies provide increased management and support for new tenants usually during the first twelve months of a tenancy but may be extended beyond this. This initial period also provides reduced security of tenure, though progression to a fixed term, full secure or assured tenancy is automatic at the end of the period, provided there have been no breaches of tenancy resulting in the commencement of possession proceedings.

Introductory tenancies will not be offered to existing secure and assured tenants of any of the Council if they are accepting a transfer of tenancy to another Council property. Other housing providers in Havering have different policies regarding the types of tenancy offered to transferring tenants, applicants will need to seek advice from the Landlord of the property being offered.

### 17.2 Assured Tenancies

Assured tenancies are offered by social housing providers other than local authorities. Details of terms and conditions will be contained in the tenancy agreement.

### 17.3 Fixed Term Tenancies

Fixed term tenancies are offered by local authorities. Details of terms and conditions will be contained in the tenancy agreement.

### 17.4 Secure Tenancies

Secure tenancies are offered by local authorities. Details of terms and conditions will be contained in the tenancy agreement.

### 17.5 Assured Shorthold Tenancies

Assured shorthold tenancies are fixed term tenancies which can become a periodic tenancy and provides less security of tenure than an assured or secure tenancy.

### 17.6 Tenancy Held in Trust

16 & 17 year olds will be offered a tenancy held in trust and may require a suitable guarantor.

17.7 If a person is not eligible to join the housing register, then the council cannot allocate a tenancy to him or her with someone else who is entitled to join the Housing Register.

This includes:

- Persons who are ineligible under Part VI of the Housing Act 1996 and associated statutory instruments on the grounds that they are a person subject to immigration control or a person from abroad, other than a person subject to immigration control;
- Persons not habitually resident in the United Kingdom, the Channel Islands, the Isle of Man and the Republic of Ireland, except for those allowed by law;
- EU nationals exercising EU treaty rights with a limited right to reside which means they are ineligible for an allocation of accommodation.

## 18. Refusals of offer

If, after a property has been offered an applicant refuses the property then the circumstances of the refusal will be considered. If the Council considers that there were not reasonable grounds for refusing the property then the application will be suspended for 6 months.

If a homeless applicant, to whom the Council has accepted a duty, refuses a suitable offer then no further offers will be made and the council will consider its duty discharged.

## 19. Withdrawal of offer

There may be occasions when the Council or Housing Association may need to withdraw an offer of tenancy after it has been made.

Reasons for withdrawal may include:

- A change in the applicant's circumstances
- The applicant is found to be not eligible for the property
- An error in the advertising details
- Where the offer might put a vulnerable person at risk
- Extensive works are required on the property

- The applicant has attempted to obtain the property by deception.

This list is not exhaustive and withdrawal will be at the discretion of the landlord.

## 20. Feedback

To enable applicants to make informed bids, the Council will give regular feedback to applicants, to enable applicants to determine the likelihood of future bids being successful. The Council will provide this information on the CBL website.

Information about successful lets will include:

- Property size and area
- Band/Need and effective date of the successful bidder
- Number of bids received on each vacancy.

Applicants receive feedback about each bid they place through their personal login to the website. Information includes:

- Position of bid on the final shortlist
- If the applicant has been shortlisted for or offered a property
- If the applicant has been overlooked for a property and the reason for this.

## 21. Other Housing Options

The Council offers a number of schemes as part its housing options service. These may include the following:

- Low cost home ownership - shared ownership, first homes and equity share schemes
- Rent Deposit scheme to assist households in securing private rented accommodation
- Other affordable tenures such as discounted market rent
- Market rented housing
- Under occupation incentives – financial incentives or assistance in moving may be available to Council tenants who are under occupying family accommodation and wish to move to smaller more suitable accommodation e.g. couple or single person household occupying a 2 or 3 bed house and wishing to move to a 1 bed property.
- Mutual Exchange - The Council will actively support applications for mutual exchanges from tenants who wish to exchange with another tenant or a tenant of another Housing Association or Local Authority.
- Tenants incentive scheme – support for council tenants to purchase properties.

Further details of the above schemes and any others operated by the Council, including eligibility criteria, can be sought directly from the Council and properties available under these schemes are advertised on the website.

## 22. Dissemination & review of this policy/scheme

The allocation scheme will be implemented in 2024.

The review of the scheme will be taken 12 months after implementation and the outcome of the review will be reported to the Director of Housing, the Lead member for Housing

Demand and the Tenants Participation Board. Minor amendments to the scheme may be made by the Director of Living Well, in consultation with the Lead Member for Housing Demand.

## **23. Equal opportunities statement**

The Council operates in a diverse area, providing homes for a wide range of needs. Particular emphasis will be given to developing good practice to ensure that all applicants are enabled to use the scheme, and that it does not discriminate against any applicant seeking housing from the Council.

The Allocations Scheme aims to recognise and support diversity to ensure that no sections of society are excluded and that the service meets the needs of those who may require additional care and support. This policy seeks to meet the needs of all applicants regardless of race, ethnicity, faith or religious belief, gender, sexual orientation, age or disability and to comply with all relevant legislation. Use, operation and outcomes will be monitored to ensure no sections of the community are excluded or disadvantaged.

## **24. Data protection statement**

Applicants have the right to request such general information as will enable them to assess:

- a) How their application is likely to be treated under the Allocations Scheme, including whether they are likely to be given reasonable preference.
- b) Whether housing accommodation appropriate to their needs is likely to be made available to them.
- c) Details of any decision about the facts of their case which is likely to be, or has been, taken into account in considering whether to allocate housing accommodation to them.

When an applicant applies to the Housing Registers, the Council will seek only information that they require to assess the applicant's application and housing needs.

The data protection principles which underpin the Data Protection Act 2018, are that data must be:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Not kept longer than necessary
- Processed in a way which maintains the data subject's rights to privacy
- Not transferred to countries without adequate protection.

Confidential information held about applicants will not be disclosed to third parties apart from:

- Where the individual who is the subject of the confidential information has consented to the disclosure
- Where the Council is required by law to make such disclosures
- Where disclosure is made in accordance with an information sharing protocol.

The Freedom of Information Act is in two parts. The first part, the Publication Scheme, came into force in February 2003. The second part of the Act came into force on 1

January 2005 and from then the Council has been obliged to provide information to anyone who requests it, unless an exemption applies.

The deadline for meeting requests is 20 working days. It is free to make a request, but the Council can charge for copying and postage. The Council cannot provide information about anyone else e.g. another applicant.

DRAFT

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## Housing Allocations Scheme 2023

<https://consultation.havering.gov.uk/housing/copy-of-housing-allocations-scheme-2023>

This report was created on Wednesday 06 December 2023 at 11:32

The activity ran from 07/09/2023 to 30/11/2023

Responses to this survey: **99**

### 1: What is your name?

**Name:**

There were 95 responses to this part of the question.

### 2: What is your email address?

**Email:**

There were 93 responses to this part of the question.

### 3: What is your contact phone number?

**Telephone:**

There were 87 responses to this part of the question.

### 4: Which of the following applies to you?

**Responder type**

There were 99 responses to this part of the question.

Option	Total	Percent
Council tenant	25	25.25%
Private renter	15	15.15%
Homeowner / leaseholder	44	44.44%
Private landlord	2	2.02%
Letting agent	0	0.00%
Housing Association	7	7.07%
Third sector charity / voluntary organisation	2	2.02%
Statutory organisation (e.g. NHS, NELFT)	0	0.00%
Other public sector	0	0.00%
Business	0	0.00%

<b>Other (If other, please specify)</b>	4	4.04%
<b>Not Answered</b>	0	0.00%

If 'Other', please specify:

There were 6 responses to this part of the question.

**5: Please indicate here if you do NOT wish us to retain your contact details for further consultation and feedback purposes.**

**Contact consent**

There were 98 responses to this part of the question.

<b>Option</b>	<b>Total</b>	<b>Percent</b>
<b>Yes, I agree you can contact me</b>	63	63.64%
<b>No, I don't agree you can contact me</b>	35	35.35%
<b>Not Answered</b>	1	1.01%

**6: Do you agree with this aim to make best use of social housing stock by supporting those most in need?**

**Aim 1 - right aim?**

There were 98 responses to this part of the question.

<b>Option</b>	<b>Total</b>	<b>Percent</b>
<b>Yes</b>	75	75.76%
<b>No</b>	23	23.23%
<b>Not Answered</b>	1	1.01%

**Please use this space to add any comments:**

There were 61 responses to this part of the question.

**7: Has this aim been achieved through the proposed Allocations Points Scheme?**

**Aim 2 - aim met?**

There were 92 responses to this part of the question.

<b>Option</b>	<b>Total</b>	<b>Percent</b>
<b>Yes</b>	46	46.46%
<b>No</b>	46	46.46%
<b>Not Answered</b>	7	7.07%

**Please use this space to add any comments:**

There were 50 responses to this part of the question.



**8: Has this aim been achieved through the proposed Allocations Scheme?**

**Aim 3 - aim met?**

There were 93 responses to this part of the question.

Option	Total	Percent
Yes	44	44.44%
No	49	49.49%
Not Answered	6	6.06%

**Please use this space to add your comments:**

There were 49 responses to this part of the question.

**9: Has this aim been achieved through the proposed Allocations scheme?**

**Aim 4 - aim met?**

There were 90 responses to this part of the question.

Option	Total	Percent
Yes	40	40.40%
No	50	50.51%
Not Answered	9	9.09%

**Please use this space to add any comments:**

There were 40 responses to this part of the question.

**10: Has this aim been achieved through the proposed Allocations scheme?**

**Aim 4 - aim met?**

There were 90 responses to this part of the question.

Option	Total	Percent
Yes	47	47.47%
No	43	43.43%
Not Answered	9	9.09%

**Please use this space to add any comments:**

There were 38 responses to this part of the question.

**11: Do you think the council should be developing low cost home ownership options, such as shared ownership, as well as rent homes? Are there other housing options we need to consider?**

**Building low cost homes**

There were 96 responses to this part of the question.

Option	Total	Percent
Yes	72	72.73%
No	24	24.24%
Not Answered	3	3.03%

**Please use this space to add any comments:**

There were 55 responses to this part of the question.

**12: Is there anything else you would like to add relating to the proposed Allocations scheme?**

**Please use this space to add any comments:**

There were 54 responses to this part of the question.

**13: Do you have any further comments or suggestions?**

**Please use this space to add any comments:**

There were 53 responses to this part of the question.

**14: Gender**

**Gender**

There were 96 responses to this part of the question.

Option	Total	Percent
Man	25	25.25%
Woman	64	64.65%
Gender Neutral / Agender	0	0.00%
Trans Woman	0	0.00%
Trans Man	0	0.00%
Non-Binary	1	1.01%
Other	6	6.06%
Not Answered	3	3.03%

## 15: Relationship Status

### Relationship Status

There were 96 responses to this part of the question.

Option	Total	Percent
Single	27	27.27%
Married	38	38.38%
Civil Partnership	0	0.00%
Co-habiting	6	6.06%
Widowed	9	9.09%
Prefer not to say	12	12.12%
Other	4	4.04%
Not Answered	3	3.03%

### Relationship other

There were 2 responses to this part of the question.

## 16: Age

### Age

There were 96 responses to this part of the question.

Option	Total	Percent
Under 18	0	0.00%
18-24	0	0.00%
25-34	8	8.08%
35-44	22	22.22%
45-54	12	12.12%
55-64	19	19.19%
65-74	20	20.20%
75-84	4	4.04%
85+	1	1.01%
Prefer not to say	10	10.10%
Not Answered	3	3.03%

## 17: Sexual Orientation

### Sexual Orientation

There were 94 responses to this part of the question.

Option	Total	Percent
Bisexual	2	2.02%
Gay	1	1.01%
Hetrosexual (straight)	70	70.71%
Lesbian / Gay Woman	2	2.02%
Prefer not to say	18	18.18%
Other	1	1.01%
Not Answered	5	5.05%

#### Other Sexual Orientation

There were 4 responses to this part of the question.

### 18: Faith, Religion or Belief

#### Religion

There were 95 responses to this part of the question.

Option	Total	Percent
Christian	47	47.47%
Muslim	0	0.00%
Jewish	0	0.00%
Hindu	1	1.01%
Buddhist	1	1.01%
Sikh	0	0.00%
No Religion	21	21.21%
Prefer not to say	22	22.22%
Other	3	3.03%
Not Answered	4	4.04%

#### Other Religion

There were 3 responses to this part of the question.

### 19: Are you pregnant or have you given birth in the last 26 weeks?

#### Pregnant

There were 94 responses to this part of the question.

Option	Total	Percent
Yes	3	3.03%
No	81	81.82%
Prefer not to say	10	10.10%
Not Answered	5	5.05%

## 20: Do you have unpaid responsibility for a child as a parent / guardian etc.?

### Childcare responsibilities

There were 96 responses to this part of the question.

Option	Total	Percent
Yes	25	25.25%
No	59	59.60%
Prefer not to say	12	12.12%
Not Answered	3	3.03%

### Full or Part time childcare

There were 24 responses to this part of the question.

Option	Total	Percent
Full-time	17	17.17%
Part-time	7	7.07%
Not Answered	75	75.76%

### Age of child/children

There were 28 responses to this part of the question.

Option	Total	Percent
Aged 0 to 4 (preschool)	7	7.07%
Aged 5 to 10 (primary)	17	17.17%
Aged 11 to 18 (secondary)	15	15.15%
Not Answered	71	71.72%

## 21: Are you a British / United Kingdom citizen or national?

### British Citizen

There were 97 responses to this part of the question.

Option	Total	Percent
Yes	86	86.87%
No	4	4.04%
Prefer not to say	7	7.07%
Not Answered	2	2.02%

## Citizenship and Nationality

There were 6 responses to this part of the question.

Option	Total	Percent
EU National	3	3.03%
EEA National	0	0.00%
Indefinite Leave to remain/enter	2	2.02%
Refugee	0	0.00%
Asylum Seeker	0	0.00%
Other	1	1.01%
Not Answered	93	93.94%

## Other Nationality

There were 2 responses to this part of the question.

**22: Ethnic origin is not about nationality, place of birth or citizenship. It is about the group to which you perceive you belong.**

## White

There were 68 responses to this part of the question.

Option	Total	Percent
White - British	59	59.60%
White - Irish	0	0.00%
White - Gypsy or Irish Traveller	0	0.00%
White - European	6	6.06%
Other - White background	3	3.03%
Not Answered	31	31.31%

## Mixed/multiple groups

There were 6 responses to this part of the question.

Option	Total	Percent
Mixed/multiple groups - White and Black Caribbean	2	2.02%
Mixed/multiple groups - White and Black African	1	1.01%
Mixed/multiple groups - White and Asian	0	0.00%
Mixed/multiple groups - Other mixed background	3	3.03%
Not Answered	93	93.94%

### Asian/Asian British

There were 2 responses to this part of the question.

Option	Total	Percent
Asian/Asian British - Indian	1	1.01%
Asian/Asian British - Pakistani	1	1.01%
Asian/Asian British - Bangladeshi	0	0.00%
Asian/Asian British - Chinese	0	0.00%
Asian/Asian British - Other Asian background	0	0.00%
Not Answered	97	97.98%

### Black/Black British

There were 3 responses to this part of the question.

Option	Total	Percent
Black/Black British - African	3	3.03%
Black/Black British - Caribbean	0	0.00%
Black/Black British - Any other Black/African/Caribbean background	0	0.00%
Not Answered	96	96.97%

### Other ethnic group

There was 1 response to this part of the question.

Option	Total	Percent
Other ethnic group - Arab	0	0.00%
Other ethnic group - Prefer not to say	0	0.00%
Other ethnic group - Other ethnic group	1	1.01%
Not Answered	98	98.99%

### Prefer not to say ethnicity

There were 14 responses to this part of the question.

Option	Total	Percent
Yes	14	14.14%
No	85	85.86%

### Other Ethnicity

There were 3 responses to this part of the question.

## 23: Do you consider yourself to have a disability, impairment or health condition?

### Disability

There were 96 responses to this part of the question.

Option	Total	Percent
Yes	35	35.35%
No	51	51.52%
Prefer not to say	10	10.10%
Not Answered	3	3.03%

### Impairment

There were 33 responses to this part of the question.

Option	Total	Percent
Sensory - e.g. mild deafness; partially sighted; blindness	7	7.07%
Physical - e.g. wheelchair user	7	7.07%
Mental Illness - e.g. bi-polar disorder; schizophrenia; depression	14	14.14%
Development or Educational - e.g. autistic spectrum disorders (ASD); dyslexia and dyspraxia	7	7.07%
Learning Disability / Condition - e.g. Down's syndrome; Cerebral palsy	1	1.01%
Long-term Illness / Health Condition - e.g. cancer, HIV, diabetes, chronic heart disease, stroke	15	15.15%
Other	4	4.04%
Not Answered	66	66.67%

### Other Impairment

There were 6 responses to this part of the question.



Do you agree with this aim to make best use of social housing stock by supporting those most in need? -
Social housing should be for low income families. Removing the £50,000 a year cap wages . Your not helping the low paid .
Local residents should be first priority for social housing including long time British citizens. At the moment 46 thousand illegal immigrants arrived by dinghy boats last year and 20 odd thousand this year all put up in hotels. It was mentioned on GB news that migrants are causing the housing crisis around the UK and are given social housing ahead of those on a long waiting list for years and years and rough sleepers left to rot on the streets. Ealing council came under fire by putting British citizens and legal migrants in shipping containers while they favoured illegal immigrants for new social housing that's why housing developments are popping
- I support these changes. However, I would be interested in seeing the figures on how many people on the waiting list got given social housing in the past 5 years and how long was the average wait.
- How do these changes compare with what other greater London councils have done?
- Is the removal of the gross household income aimed at helping people to save for a house deposit while they use social housing that could have gone to people on lower incomes?
I Had Lived and worked in Havering for 58 years. I became disabled, applied for going on the housing register I was turned down. The only way I could get a property that I could afford, I need to move. Moving to Ipswich to get a Housing Associating Flat with a safety alarm.
As far as I am concerned you are not helping People of need who have lived in the borough. You are helping
Difficult question with no nuance. How do you define "most in need". I am afraid that people in authority do not understand the injustice felt by people seeing the huge increase in population with the needs for water, electricity and infrastructure generally.
Putting long term residents of Havering first.
BUT I do not agree with having lived in Havering for 3 years - this should remain at the statutory 6 years otherwise people from other boroughs will be given precedence above Havering residents.
Havering residents of 6 years or longer residency should always be given priority.
Even if they don't have disabled children, this does not give someone precedence because their children are "healthy" why are they being discriminated.
If residents have lived here 3 years only and moved here because of your new policy which will happen, this
But not at the detriment to people who have lived in this country all their life and have paid taxes
In principle I agree with the proposal but I would amend the qualifying period to be 3 consecutive years. I am concerned that an individual may drift in and out of the borough during the 6 year period which could suggest a lack of commitment to our community.
I'm a wheelchair user and this property isn't able to be further adapted to suit my needs.
Depends on who qualifies as most in need and who doesn't.
There are people that are moved from home to home for many years children uprooted numerous times changing schools that isn't seen as most in need unfortunately.
Yes, but I do have concerns that it will then be huge increase in demand for already very low stock of housing. I agree that there needs to be lots of changes though.
I think residency should stay at 6 years and at least one person in employment.
It should be for peoples needs, overcrowding needing to be nearer family.
I am disabled and in the near future may need help in getting social housin. My sister has cancer and lives with me. This could cause hardship very soon and the steps that the council is taking may provide relief in

<p>The policy of 6 years continuous residency should remain in place.</p> <p>I agree with the income threshold should be removed.</p> <p>I feel that the current banding system should remain.</p>
<p>I believe social housing should be available for those most in need, with disabled, key workers &amp; low income families given priority. If you have £30,000 in savings, you're not poor!</p>
<p>I also believe applicants should have lived in Havering for at least 10 years.</p>
<p>As a married couple stuck in private renting it would be good if council properties lifted the income threshold as even a joint income of £50000 is not enough to privately rent and save for a home</p>
<p>I am most concerned that over the past 10-15 years it is obvious that the White working class has been virtually ignored when it comes to supplying them with social housing regardless of their needs, and this</p>
<p>The points system must recognise how many years somebody has been on the waiting list. Those evicted by private landlords, unless the fault should be with the tenant, should be a Priority. Points should be allocated every year the person has lived in Havering. People with children should get additional points for each year on the list. Havering residents should take priority over others such as illegal immigrants. Council tenants should expected to relocate to a smaller home when their need changes, with the disabled supplied with the same equipment and housed at ground level. Those earning over £40,000 pa should taken off the waiting list. The Moto should be Havering residents first. Most important the Council should compulsory purchase</p>
<p>If the Council is experiencing such a high demand for Council Housing why on earth reduce from 6years to 3years the requirement of being a Havering resident. It makes NO logical sense.</p>
<p>This is a poorly worded question. It should read: 'Do you agree that our plans will make best use of social housing stock?' The answer to that question would be 'No' - decreasing the length one has to be a resident</p>
<p>Do not agree with change: 3 out of 6 years residency:</p> <p>Havering residences and families want to stay in Havering and not be pushed out by others coming into the borough so they can get a house quicker.</p> <p>Established residences have already created a support network and contribute to the borough. new people to the area do not have support networks and depend on other paid services too much. This borough is financially poor already</p> <p>Leave it at 6 years, this is easy to achieve.</p> <p>Income threshold: Keep at gross income threshold for applicants £36,000 with a savings cap of £30,000, This allows residences to get a step on the ladder, and releasing housing stock in the future.</p> <p>By having a income threshold, housing stock will be well maintained by tenants reducing costs to council. Put in low income tenants and they will not have funds to complete minor repairs or maintain property to</p>
<p>I myself am applying for social housing, a single parent with 2 children and a sick person, but I do not meet the conditions due to the fact that I have lived here for 5 and a half years and not 6 years.</p>
<p>Why do the people who grew up in Romford who went to school in Romford who represented Romford in one way or another come second to people from other areas</p>
<p>You should put rent regulations in place and cap rents to reflect wages</p>
<p>This must be inclusive and not restricted to homeless, immigrants, non working etc. there are emergency worker lone parents struggling to pay private rent and afford childcare - these must be eligible too for council</p>

There are many people Like my self already council home tenant that are in desperate need to move .
If I was to be allocated the property I need my council property would be available . There should be consideration for though who already a tenant needing a larger or smaller property
I do but you stated Cllr McGearry that children of council tenants will be given priority - well NO those children should have done as their parents should have done and worked hard to purchase their own private property. I don't agree to give priority to children of Havering - there are those on the housing list with more
I have been on the list I'm living I'm a mouldy Danny caravan with 3 children 1 being disabled and can't get anywhere with the council I have lived in havering for the past 15 years and can't get passed band 3
The council has been prioritising those coming from outside the borough with housing needs than those within the borough. I have been on the housing register since 2009 and am still in temporary accommodation. The councils priority should be those who have been in the borough longest compared to
But it is difficult to see how anyone with income of £50000 can be considered in need of social housing. There should be an income above which residents are forced to leave social housing even if they have been
Stop charging sheltered housing tenants for service charges paid for twice.and get rid of sheltered housing
Many people who manage their lives and family within their means will likely be disadvantaged and have to wait longer to upsize or secure their first home as people who have not managed their lives or their family
Yes but you need to look at all residents needs not just not most in need
However priority should be given to those in employment/given higher score.
It should stay at 6 years, unless its a marriage or relationship break up and only if the person can prove that it was necessary to move to Havering for job or relationship.
What does need mean as well.
You haven't really made it clear in your wording its all words that mean nothing.
Social housing should be for those most in need as the likelihood of them being able to afford anything in the private sector is infinitesimal . Providing a stable home will help to increase life chances for families and
It needs to made clear who is considered to be 'most in need'.
I agree for social housing to help homeless people or a disabled person. I disagree with offering social housing to people who decide to have children and cannot afford it as they have no ambition to earn more. If you stop giving these people who refuse to work hard to pay for their own 3 bedroom house, you will have
Single people should also have a chance to get a property as private rent/purchase is not an option for most due to the costs. Some private rentals want 6 months rent in advance. Local young people deserve to live
I do not agree at all that qualification rules should be changed
I think that people whom work should have priority. Its well documented that once people who don't work and in receipt of benefits get the council flat they are less likely to ever work of course if they are unable to
The proposed changes are very good. I am one of the people who have consistently accused the council for lack of transparency in the bidding process. However, care needs to be taken to ensure that people who are currently on the waiting list are not disproportionately affected by the change to the banding system. I am saying this because, I have been on the housing register since 2016 and have seen two changes. Each time
but please make sure tenants are abiding by tenancy rules some are not
I was on the list for sheltered accommodation due to my age,(71),and I was not advised that I had to accept the first place that came available and if I declined that offer,I would be suspended for a year before I could apply again,this was never advised to me, and I have looked at my emails from the council and no mention of
Uncontrolled illegal immigration is causing the housing crisis around the UK forcing local councils to build thousands of homes destroying wildlife habitat. We will lose every bit of green belt woodland countryside farmland local parks and campsites and wildlife animals will be pushed to extinction. We haven't got the infrastructure to keep letting in thousands and thousands of migrants it is already putting a strain on the NHS and doctors surgeries plus illegal immigrants are given priority for social housing ahead of rough
As long as they are not in need due to choosing not to work or laziness. If your out at work trying to

By changing the ruling of Area connection/contributions your allowing more and more people who don't know the area to be accepted, when your own Havering people are sleeping rough on your streets. And households already struggling with over crowding struggle to get close to a bigger property. Care about your own.
Yes absolutely the worse off and most in need should be prioritised.
Living in the borough should stay at 6 years. Income should stay at £36,000. Social housing is and should stay for people on low incomes. If properties given to higher earners they would buy that property not save to buy a private property.
I agree that those in most need should have a priority. However, Havering need to also have a scheme whereby people born in the borough, with strong family ties should also have a strong preference over those who are new to Havering.
Just because people are working, they should NOT be excluded from getting a council property. They cannot
I do believe that those families in most need should be priority, but unfortunately I don't think this is happening as I know for a fact, some social housing that becomes vacant does not go through the normal
Providing the tenants look after the properties and don't let the property look like 'hovels'.
I totally agree that people under a certain wage should be housed by the council when available
Although I agree it should be those of greatest need, I think time living in the Borough should be taken into
I believe that the policy should be geared towards those that were born in the borough and have lived here,
I have been in emergency housing now for 9 years and the house I live in was only meant to be temporary it's old and is not energy efficient. I have waited so long to to have our forever home the uncertainty of being told to move out has been constant as landlord wanted house back and landlord won't replace the windows or help but increases the rent. I believe it's only fair that I should be able to finally have a secure home now
Yes
I am unable to see a valid reason to reduce the six year residency to three years together doing away with the income level except encourage people to move into Havering who may have no intention of making Havering a better place and put more
I agree that a transparent and clear points system could potentially work but I don't get why you are changing the residency to 3 years instead of 6. Its already hard enough for local residents to get a home.
Has this aim been achieved through the proposed Allocations Points Scheme? - Please use this space to add
This is a waste of time and money.
The current allocation scheme is fairer than the proposed ones especially for community contribution bands
I do not support the proposal to reduce the eligibility criteria from living in Havering for 6 years to 3 out if the last 6 years. I believe this change is to the detriment of long time Havering residents who should be given
I have no idea.
Should remain at 6 years residency
Wage limit too high. People on £50k are not 'those in most need '
Why remove 6 years?
Residents from neighbouring boroughs will learn and rent and get on list and get a council place in priority over a Havering resident that has lived here for 6 years or longer
Savings should be proven to be used for a deposit (government savings accounts)
I disagree with the need for community contribution, however the points based transparency is a good thing. I think a commitment to the community is an important aspect that helps bond a community.
There aren't enough 2 bedroom bungalows or houses adapted for wheelchair use with direct to a garden (essential for mental health as I can't drive&also we have a dog.

Not sure
I believe the points system would work a lot better for families like mine with having many medical needs, being overcrowded and struggling with our living situation. Hopefully it will work better than the bands and date allocation and not then push people further down the list when they have already been bidding for
It's hard to say.
This question makes no sense. How can it be achieved if this is only a proposal ?
Not sure
Too many people with disabilities and / or mental health issues are being left in 1st floor and higher floor flats. These people, including the elderly cannot in many cases negotiate stairs where no lifts are provided.
People can't get mortgages as they are self employed, hopefully this scheme will help.
The policy of 6 years continuous residency should remain in place. I agree with the income threshold should be removed. I feel that the current banding system should remain.
Yes it's important that it's a fair scheme and doesn't make people who are struggling but don't fully meet the criteria suffer. But rather a scheme flexible to accommodate everyone within reason.
Maybe stop selling off council properties for reduced prices it's not fair on those waiting for a home
Can't believe that it has done with regard to my previous answer.
Should a applicant or their partner to be able to physically work and are shown not to be actively trying to obtain work, points would be reduced every year that this situation exists. Those able to work and work is
The proposed Allocations Points Scheme will favour those who have little or no historical connection to
If anything, the length of time someone needs to reside in the borough should increase, not decrease.
Policy isn't clear on the rules of different genders sharing a bedroom. I.e. boy and girl over 10 years old.
Cllr McGeary has failed to listen as Cabinet Member for Housing - he gives priority to those who are disabled or those who come to this borough, as we are known as a soft touch, and gives priority to those, not the
I have been on the housing register since 2009. I have been working for 3 years. I have an autistic son receiving high DLA with housing needs. Yet despite all the points I should have none of my needs have been
3 years is more reasonable than 6. And should be according to the families needs for example send kids.
But hopefully as the last one was going to do this and it only last 2 years
Those working should be given a higher banding
Applicants income needs to be assessed for joint income. As before there should be a threshold I.e. anyone having a joint income of over £50,000 should not be eligible as they can afford to buy or rent privately. Council stock should be used only for those who don't earn much or are unable to work, have health and disability issues etc. It would be irresponsible to set no threshold for income.
No idea, unless you advise how many points for what need.
Each case needs to be looked at individually to ensure all aspects are taken into account
This claims that so few houses are available and yet you are lowering the amount of time needed to be resident in the borough, and the other changes will surely only add to the waiting list not lessen it.
50k is too high. 36k is already too high. This is why so many people apply. By using a threshold for selection purposes, you have allowed for people on a low salary to apply. They should not be able to apply at all. You can live on minimum wage, I know many people who are doing it. They just realised that having 3 kids whilst on minimum wage is not possible and aiming for a house is out of their reach. They settled for less and are happy with a low paid job as not that stressful. This is a lifestyle choice. Consider this 'lifestyle choice'. You should put this in your selection criteria....is it your 'lifestyle choice' to not show more ambition in the workplace and stay on low salary? You have opened the door to more benefits scroungers with a threshold in the first place and it will be worst with a higher threshold. There should not be a threshold at all. Are you homeless? Are you disabled? If yes, they have priority. Are you in immediate danger from an abusive partner? They come next. Anyone else can get a better job if they want a three bedroom house for themselves and their 3 children or they can get a temporary housing for a couple of years only and for the

At a time of Cost of Living Crisis, which includes even the Council's own budget, I don't want to be paying any
Once again I'm afraid points systems only encourage people to increase their points, i.e. by having more
Not sure.
Working people born in havering should always have priority
As someone that needs to adapt a home I am hoping that this won't prevent me from being eligible for a non adapted house. I would rather have a house that does not meet my needs (currently I am in temporary where I sleep on a sofa and pee in a commode in the kitchen) then no house at all. Most disabled people
NO!!! This is all smoke and mirrors aimed at trying to confuse and lead people on to think they are in with a chance when bidding, when in fact there is very little or no chance at all.
I work in Housing for a Local Authority and know for a FACT that Councils prioritise homeless families first as temporary accommodation is expensive.
As I previously stated, some social housing seems to be handpicked, but not for those in need because it doesn't go through the system to give these families a chance of the certain properties
The system must be fair and the most needy take priority.
Residency within a borough should be kept at 6 years otherwise there is a risk spaces will be taken by newcomers.
Income and saving thresholds should be kept to assure housing stock is for the people in need who truly can't rent/buy on open market.
I totally agree that if a council tenant has wages coming in that can afford private dwelling they should be given a set time to buy or rent accomodation say with in the year Council should surely be given to low
The change in residency should not be changed. People who have lived here since birth and require social housing should take precedence over people who have only been here 3 years.
Assessment should be made by the council. Self assessment open to abuse.
Removing the income threshold does not help those more in need
The Allocation Points Scheme should be transparent and different categories and points to be awarded
Points scheme could work. But its hard to say of so without seeing the points for each need.

Has this aim been achieved through the proposed Allocations scheme? - Please use this space to add any
But are you housing those most in need?
It seems anyone who has lived here for 3 years will get priority over a 6 years or longer resident!
Not at the detriment to families who have lived here and paid their taxes
We must all work together, work and community should go hand in hand.
I am aware that for some people work may be difficult but have little time for people who could work but choose to not work because they can get what they need for shelter and sustenance from the state and local
Definitely not enough wheelchair accessible & partially adapted properties within the borough at present.
Not surprising as their aren't enough social housing properties either!
Rents need to be more affordable thought. Some rent costs are the same as privately renting which is
Sustainable communities are about everything linked together. Housing policy shouldn't just be about those most in need. There should be affordable options available for everyone in the community.
Those most in need are the ones who don't receive any benefits but work, those on the breadline are the
Please see previous comments.
The policy of 6 years continuous residency should remain in place.
I agree with the income threshold should be removed.
I feel that the current banding system should remain.
Please focus on building a housing complex that accommodates the elderly who are independent so that they can move to smaller accommodation and free up space for bigger families. It would have all the facilities to make their stay easy and comfortable and not feel isolated and away from any facilities and
Please refer to previous answer.

I agree with everything except the requirement to work change. The only reason for being out of work is disablement or no work needing their skills. Those working for the minimum wage should, as a rule, be
The scheme will break up historical communities and neighbourhoods by acting as a magnet to encourage
There is nothing sustainable or community
building in allowing all and sundry to jump ahead of the queue faster than hard worker but low wage lifelong
reducing 6 years to 3 will not sustainable communities and neighbourhoods as new people from other
locations will move in. Existing residences will not know their neighbours or have time to establish support
We need to bring back the community hub and enable affordable housing for local residents who care about
the area and some of whom are children of people who have lived here for many years. We need to build
the community spirit even with residents from other areas - ownership and inclusion in a community
You are still not prioritising those on the housing list already - instead if a non havering family arrive with a
Those prioritised through housing are those out of the borough who are deemed to have housing needs. But
the priority should be people like us who have been in the borough 15 plus years who have been on the
Sustainable neighbourhoods are those with little movement of residents. If you keep putting people with
short term urgent needs into a neighbourhood it will never become desirable.
Families cannot afford 2000 pounds rent when they only receive 1350. More affordable homes are due
It's a welcome change to the original harsh approach
Hopefully it will and we will not charge in 2 years time
Must be careful not to ghettoise areas
I am not sure what this means exactly. What is a sustainable community, how do you create that. Needs to
The 3 years should be for veterans, disabled people and homeless people. 6 years for anyone else. But they
Why have you knocked down the estate off London Road behind the rising sun p.h. that was the very type of
community your talking off. It's over a year now and it is still empty and you spent a lot of money
refurbishing some of the blocks quite recently, it doesn't make sense you never made full use of that housing
That's ok, support those in need but with less economic and financial burden!
Stop building over open spaces and country side it's having a negative impact on wildlife animals
I don't understand what sustainable means to the council. Not selling off housing stock would make housing
sustainable. Raising the LHA would make housing sustainable. Legislation against section 21 evictions and
regulating private rent increases would make housing sustainable. New build estates are too expensive for
those of us waiting to be housed, constantly building 1 and 2 bed flats is not sustainability. We need large
Building far too many 1 and 2 bedroom properties and nowhere near enough 3/4 bed homes that are
really needed to get tenants off the the list to upsize.
This will NEVER be achieved as our adult children are FORCED to move out of the borough.
The Council DO NOT BUILD and don't want to build any properties because they do not want to maintain
them. They sell off land cheap and let Housing Associations build as there's no maintenance costs and the
how will you build sustainable communities if those who have always lived in the borough, with family,
extended family and friends living in the borough, not qualify if they don't have as many or more points than
No, I don't think it's been fair or transparent
It's hard to keep up when you change it all the time it should be based on the longest waiting time and in
which situation like people in emergency housing still after 9 years when was meant to be 2
Same as previous answer
Aims 8 and 9 contradict each other. By removing the community contribution element, this actively
I don't see how this helps build sustainable communities if it is less likely that havering residents are housed
Has this aim been achieved through the proposed Allocations scheme? - Please use this space to add any
Preference should be given to UK residents living in the borough.
Not refugees
As long as housing is only given to local people not those arriving by dinghy boats
Some detailed stats on this would be useful

Community contribution is a great idea and should remain a high band
The points scheme is fair and transparent to everyone.
Salary band should stay.
6 years should stay
If that were true, how, other than daily publishing names, which is against GDPR = how can you be transparent about where you are on list and how many points you have.
Have you asked all those on the housing allocations list to sign a GDPR and that these are kept in a safe place?
Transparency is very important. To be fair on both sides of the coin is also important so I would expect the council to ensure the system is operated correctly and not let individual's abuse a transparent and fair system.
Possibly but it will have to take into account people who aren't able to understand complex structures & systems put into place by the council. (I've previously worked in a Disability Resource Centre in the past in another borough.) Many people lose independence of choice by the fact that they aren't able to understand the ideas themselves either through disabilities or fear of asking & then they have carers or authorities explaining their
Perhaps. I don't think anything is ever fair and transparent
It will never be fair when there have been residents on the waiting list for a long time and someone else
I welcome the new scheme. As a 67 year old living in a 1st floor flat, the stairs are starting to trouble my knees, so its nice to know I may have the chance to transfer to a ground floor property should the need arise.
The policy of 6 years continuous residency should remain in place. I agree with the income threshold should be removed. I feel that the current banding system should remain.
PLease see previous answer.
The same page keeps appearing I have commented twice already
How is it fair that a new family that has only recently arrived in Havering can take priority over a family that has been on the Council waiting list for years just because they have a few extra points.
Knowing one's position in waiting list is a good thing.
The points matrix isn't clear. It doesnt tell you how many points you need to go up the housing priority list.
Transparency is the key and no anomalies relating to housing allocation. So much hearsay as to some getting
Those already on the housing list are pushed further and further to the back as non havering residents are
Costs continue to increase yearly when services not provided
Only a schedule of the number of points that will be allocated for each specific need characteristic would do
Working households should still have a priority or extra points added even people who work are in over
But what is affordable rent we need to explain this
You keep asking the same question
This is not a yes/no answer until it is proven when in practice
i think we need examples of how this would work. it must be so dispiriting to see your chance for a particular property going further down a list with no explanation.
You should though charge your current tenants more money for their rent. Except disabled, veterans and homeless, if they can even get access to social housing with the way the system is at the moment. The discount should be no more than 10% of current market rates. That should encourage the scroungers to
This is key and strongly encouraged!. If this has been the case, my family and I would have moved to a new home but still remain in temporary accommodation after 8 years.
One thing the council has never been is clear and transparent. I don't believe this move increases that



It is a discriminatory policy to exclude people born in Havering. Forcing them to buy a property, or privately rent so the council don't help to keep families and communities together.
This is all a con.
People moving into the borough should live here for 10 YEARS before being eligible to apply. Our adult
You do not give any details of how the point system will work and therefore I can not express any views
As we previously mentioned, stating explicitly how many points will be awarded to different categories
Possibly but as I said it is hard to know whether I agree without seeing how the points are allocated.

Do you think the council should be developing low cost home ownership options, such as shared ownership, as well as rent homes? Are there other housing options we need to consider? - Please use this space to add
Absolutely not .
More effort should be put in to help the low paid .
To rent affordable homes .
Let the government sort out house buying schemes & building societies.
Yes don't give social housing to those who have been evicted from somewhere else for causing anti social behaviour. I had problems with a neighbour 8 years ago he made my life a misery every time someone
Rent homes, not shared ownership
A waste of time, People need proper low cost housing for low income and Disability.
Please do so as I'm a high end earner but have no savings to buy my own house. This initiative will help people like me to start saving during this tough times and avoid paying high rents and commissions which
Yes, if social housing is to be a springboard as set out in the policy, there should be routes out such as shared
The Council should build an area just for council tenants - people who have been paying Havering rent money and not in the PLS but council tenants.
They should be given priority AND having resided in Havering for more than 6 years!! I even think it should be ten years and that would stop residents from other boroughs moving in to the EASY HAVERING. Havering is getting like the Government a NANNY STATE - holding peoples hands instead of making people realise how lucky they are to obtain a council property.
Allow people who are working to rent a property from the council for a set number of years so they can save for their own property which could include shared ownership
When this has happened in other areas & the very people who need housing the most miss out because there's such limited housing stock available to allocate.Councils use the schemes to generate income & they
Shared ownership outside a proper legal framework can be difficult and the principle open to misuse. It can work for some people though.
Would the council consider increasing housing stock by building and renting more properties to people who
Building council homes should be the priority. so those properties can go back to the community.
Co-housing - apartments with shared facilities and resources, more sustainable and cuts costs. With adequate storage too
Do it yourself shared ownership - work with developers for people to train in the various trades involved in
I think people that are in social housing are there because they cannot afford private rents or to buy, at least while property prices and private rentals remain so high.
Low cost housing for disabled people to buy may also be a very welcomed incentive. If already offered I am sorry but is very difficult to find any information about it
Owning a house now is more difficult than anytime before with all the mortgage prices etc. people with low income can't afford that at all especially those who can't work. Why not make a scheme where people with low income can pay directly to the council as a lease or rent that ends with owning the house after several years without the need for the bank or for high interest. If the person passes away their partner or children
A mixture of housing is needed. Council homes should be given to the most vulnerable who can't afford high private rent/qualify for a mortgage.
Social housing should be rent only.

This question has not been thought out as you can answer it both ways. It should be two distinct questions. It is impossible to take one answer when your answer can only allow a test or a no when we need to answer
The current system of homes for rent is sufficient for the council. There are plenty of private sector schemes covering those that require ownership, (shared or not shared) of their property
As long as it's done properly and doesn't replace Right to Buy, but is instead an additional option.
create a small estate with mixed units. 4 bed, 3 bed, 2 bed houses, 2 and 1 bed flats, senior ground floor units, with green space. Resident can only have 5 year tenancy and must move out of unit - ideally into another unit on same estate. Keeping community and people support together . Families with children learn the council does not help vulnerable people.
Share ownership is still very expensive. Something like rent to buy is more realistic
My 26 year old daughter (not the paramedic daughter with children) and her partner recently gave up their awful Council one room bedsit and with family help now reside in New Green on shared ownership. They would not have managed this without an inheritance in the family. This is not right and though they are happy now, there should have been more social housing available to them particularly as they both work
Yes but the council don't have money due to legal requirements on adult and social care! If we did not take on this responsibility but instead Government took this on, then Havering would have the money to carry
More landlords that rent according to the council rates. The discrepancy is too big.
Shared ownership needs more realistic rent and service charge costs to be affordable Make housing developers ACCOUNTABLE for greed and in building QUALITY not profit for shareholders and dividends creating huge further wealth divides
Yes low rents and service charges for sheltered housing tenants.
We need to do this urgently and must be low cost housing
We need to be encouraging young people to make their homes here to develop communities. The rents in the private sector is stopping people getting their own homes.
there is a definite need to look at options. Shared ownership could be an answer but still seems to be out of most people's pockets. Alternatives such as tiny homes should be considered, more building projects to
Is at no here as this idea of low cost and share ownership is only good for disabled, veterans and homeless
Shared ownership is a worse option than leasehold and that is bad enough. Build one and two bedroom properties. If people want larger properties take responsibility for yourself and your family. I am an owner occupier and not all of my children had their own room. People have to realise there is not a bottomless pit of money to pay for everything, it comes from the tax people pay from working.
Council has bigger issues to get on with
Shared ownership has not lived up to expectations from what I've heard it's a rip off!
Yes, excellent idea.
by using prefabricated homes which could be built faster
The local councils should not build anymore housing. The shortages are caused by illegal immigrants entering the UK. They shouldn't be given anything they are not fleeing from a war torn country these migrants have been coming from France. A safe country and should be sent back there the UK has already lost 2 million
No because you already lack homes, if you sell them off there won't be anymore.
Yes I could afford to part buy if I was given the option. I also looked at adapted and supported living but none of these options allowed for the main applicant to be disabled and to have children (5). I also think it should be my choice to live in or bid on a smaller house than the council deem acceptable. I am waiting for a 4 bed and that's after they have a flat to my eldest child to bring down my need. I was so happy in a 3bed with my 6 children, now 5 children waiting for a unicorn. I would be allowed to buy a 2 or 3 bed property but not
Shared Ownership is another con that's forced on our adult children who just want their own home and to raise a family. The residents need to be able to rent. The Affordable rent is definitely NOT AFFORDABLE at 80% of market value. build more houses

I do believe that people need to have the advantage of being able to buy a property
Definitely, owners/part owners tend to look after their properties over renters.
Push the government for rent control
Have you thought of caravans or mobile homes as an option for short term living accommodation. I find our caravan parks have a great sense of community help with each other.
Shared ownership would be a good option.
Although I don't agree with shared ownership per say, I feel the council could help younger people by maybe having flats that they can rent but part of the rent is held as a kind of deposit for them to purchase a private home later, because at the moment young people can't afford to private rent and save for a deposit.
Yes, shared ownership is a good idea for those that would like to own there home one day but are unable to
Not everyone is able to do the low cost like single parents even when working full time it's near impossible
Give all people securing a council home the option to buy the property from day 1 by offering tenants an option to pay towards a mortgage rather than rent. This way the council could charge a little more for the
Shared ownership
Properties where the rent might be slightly higher compare to the social housing , but percentage of the rent money go towards deposit with the view to buy.
I don't know. Good that you are considering options.

Do you have any further comments or suggestions? - Please use this space to add any comments:
Help the low income families get a place to rent .
Not sell off council stock at a discount
Don't keep asking the same question .....
I think by reading my responses you realise I don't agree with the Allocations Scheme.
The Council is being "too soft".
We need someone like Margaret Thatcher who will stand and be counted and not hide behind a curtain and being soft.
Why, who said / proposed to reduce to 3 years?
What does it take for a single parent with 2 small children to get a council property with 2 bedrooms, that can't even get on the list and lives in the worst house with the worst landlord, things need to change
I would like to see prospective candidates for council homes in our borough to add points to their score by engaging in community actions such a helping improve council housing stock or clearing community areas like parks. This could be done for free or if they have no employment at minimal wage. They more they do the more points they accrue.
Please bear in mind the few severely disabled people&their families many of whom aren't able to earn much due to caring for the person with a disability.They don't have the luxury of time or energy to keep chasing&keep checking out new systems put in place by the housing teams&therefore they don't even realise that changes have been implemented &they miss out on information this way.

I'm not sure I know enough about housing to comment other than to say it seems a good idea but will need evaluation over time.
Does it work?
Does the system need improvement once ip and running?
Is the principle/system adaptable and flexible to people's needs?
Are people being housed well?
What's the cost?
Does it save money?
Buying council properties should not be allowed until more council properties are built.
Derelict properties within the Borough should be restored to ease the council list.
When the council rents from private landlords there should be a minimum fixed term for tenants.
I think assessments need to be done face to face with applicants, seeing is believing I feel. Instead of people fitting a box and getting a certain amount of points for different needs doing house visits would be better.
Any schemes should always take into account long term Havering residents first.
Havering council used my property for 15 years I am a private landlord and they handed back the property in an absolutely disgraceful state, the property was not maintained and therefore could not be used by the council to house anyone, at a cost of £5,000 in repairs I have transformed it and it is now leased through an intermediary of Havering Council to help with social housing. I want compensation for the works I have had
Properties should be inspected yearly to ensure the tenant is taking care of it (including gardens). It is a privilege to have a council property and not a God given right. Tenants that are struggling to care for their
Not really. Just need help in future and hope this system will only improve
The policy of 6 years continuous residency should remain in place.
I agree with the income threshold should be removed.
I feel that the current banding system should remain.
The format of this consultation is not fit for purpose resulting in me having to copy & paste the same
I believe it is wrong to house girls under 21 just because they are pregnant. They are immature & need guidance & support, not be given a free flat & benefits, only to be left to their own devices.
Stop selling off all your council stock for cheap
Why alter a system that is working.
Havering is in a dire financial state trying to balance it's book.
Stop wasting money
I disagree with most of the amendments, as noted, and think they will add further strain to the system with
Existing council tenants who are eligible for another bedroom. What's the process on applying to transfer to another Havering council property? Surely tenants don't have to reapply to join the housing register for this?
It's such a long process and the council is always delayed in replying. Can the process for existing council
It seems all it fixes is getting onto register more easily, but it doesn't solve your housing problem
Please see previous comments. Thank you
Yes I would like confirmation that those on the housing list are given priority.
Just that there are people out there that really need it but some workers don't even listen to you just say no
Except in the case of disabled people who will clearly never be in a position to earn enough to support themselves with housing, council tenants should be made aware that social housing is not for life but to help them over a bad patch. They should be encouraged to work and save so as to be able move out of social housing at the earliest opportunity. I have heard people in social housing boasting about their foreign holidays and new cars and laughing at people who deny themselves such things in order to support
Make sure that there is still a incentive for working households on low incomes
I agree
They seem more realistic to peoples current needs
Medical needs have been abysmally ignored through NOW Medical Advisors who have their own agenda and therefore deliberately ignore a sociological perspective or social model, instead using a narrow medical

Havering council is going broke why what have you done with our money.?
To make the down size more easy and bit more locative deals and better understanding of residents needs
Priority banding to those in employment and living in the Borough long term or from Brith
I feel that a single adult with a 1 child over 4 years old should be eligible for a 2 bedroom property.
Estate officials will be essential to monitor the scheme and how it is being used or misused
Yes, social housing bring anti social behaviour. I am not talking about strong anti social behaviour but the kind where people who get a house for very little simply have no manner with their neighbours. Loud music for example or parties. There should be a easier manner to report them and get the matter sorted. Housing association and Council don't help much and the process is too long. It should be as straight forward as reporting it and get the tenant checked immediately. Then on the second strike, they are out. You will get
Dread to think how much collective time has been spent on this, at a very difficult time for Residents AND Council, which to a great extent will benefit people who havee only just arrived in the Borough
Oh yes I do, I think you should withdraw from the sharing of council allocations with all the other boroughs it was designed to funnel people from the inner boroughs to the outer boroughs and was wholly discriminatory against the people of havering I mean isn't that why we have one of the fastest growing child populations
stop mixing generations in housing
Yes to transparency. Yes to prioritising those with the most need.
No to getting rid of financial limits (why on earth would anyone earning more than 50k need a council house for anything more than profit and greed)
No to getting rid of the 6year borough requirement. Why should anyone outside of this borough be given any of the limited housing stock?
Regulate landlords. Ban section 21's.
The Council should prioritise the residents that have lived here for over 10 years. There are homeless people here that have been placed by other boroughs and then become Havering's problem after 5 years. This needs to stop to allow ALL OUR ADULT CHILDREN the choice to stay here or buy a property elsewhere.
Just that in this period where everyone is struggling we should be made to realise we only use council properties for a short time only to help ourselves and then get out for the next family to help them.
The aims seem good, although you haven't specified exactly how the points system will work. Presumably, x points for each child, x points for time on the waiting list, x points for a health need etc.
I also think that some consideration should be given to people who are trying to help themselves, ie by working. I also think that everybody should be able to apply.
Additional housing should not be developed without the infrastructure to support the additional people. There is already enough pressure on local services, particularly the NHS. If this cannot be done then these
Do not sell off any council housing stock at discounted price. To ensure housing for the future and to ensure council tax payers do not help fund others allowing them to benefit from a cheap buying price and then to
The proposed changes need to be clear and easily understandable by Havering residents. The application process should be straight forward and help made available throughout the application process. We see many clients that struggle with the system and this means a lot of time people in need give up due to complexity of the application system.
Is there anything else you would like to add relating to the proposed Allocations scheme? - Please use this

Stop selling off council houses below cost
Stop selling off council houses full stop
Only allocate housing to those who haven't been evicted from another place
Can these housing proposals be discussed with students in local schools?
This would help them better understand how the housing conditions are in their local area.
Cater for residents that are British not from overseas who have paid nothing in to the UK system.
Maybe the high street banks should be encouraged to offer 100% mortgages which will help and motivate people to buy their own houses which will ultimately reduce the pressure on the council itself.
Do not remove the community contribution band and do not allow people who have not lived in Havering for only 3 years to join the list. This will make the list ridiculously busy and the demands for housing will be too high. Look after the long term residents of Havering, look after the residents who work in Havering I.
Why are the hundreds of flats so awful. I guess they will be ghettos within 10 years.
Existing long term residents of Havering should be given priority over applicants from inner London
Yes will the results of this survey be published.
No names as no GDPR has been requested nor signed.
It would be good to get the opinion of REAL Havering Residents and not those who are moving into the borough as an easy route to get a cheap Council property.
I totally disagree that you should be resident for 3 out of 6 years . It should be 6 out of 6 minimum.
To check on your new tenants, to make sure they are not causing anti social behaviour
I wish you luck.
I sincerely hope that the most vulnerable are protected by safety nets because otherwise people who are
My fear is that many families will be moved further down the list after many years of bidding.
I think it's better than the previous one
This seems to me to be a return to to the old way of property allocation and is far better than the current
Yes, families of children with special needs should be assessed and placed in accommodation that suits their needs. Not like me where my autistic ADHD child is stuck in a first floor maisonette with no access to a garden for outlet and thus they are jumping and banging on the poor old lady downstairs all day everyday!! I fell down the stairs twice and got seriously injured as a result of turning to take her bike downstairs for her
There should be no more Right to Buy. Council homes should be kept for those in need & not sold at discount to residents. It is unfair to those on the waiting list & unfair to those who aren't vulnerable but
This year I viewed a property. Because I declined as too expensive for me. I'm an OAP but my pensions exclude me from benefits. I was told because I had refused I cannot bid for a year. I feel this is discrimination
Fairness should be the object of this consultation. If residents and applicants can see fairness at the heart of the changes, these changes will be accepted by those on the waiting list and other residents of Havering
Yes, Leave it as it is
To be more flexible
I have given comments above. I know Havering are fighting a losing battle due to their finances and the huge demand for council accommodation- I do feel this new strategy may help residents but I am concerned how
You mentioned making it easier for the children of social tenants to get social housing. Why? People should be incentivised to stand on their own two feet and not expect ratepayers to subsidise them in perpetuity.
I have been in emergency housing for nearly 10 years and now I have disabilities I need adaption which can not been done and yet I'm still waiting on a council property which is not far this house could go to a family for an emergency plus the house is not energy efficient and landlord refusing to fix things and council can not
Points should be allocated to working households still, it keeps people in work and is a good incentive

<p>Families in low income should be a priority.</p> <p>Send families should be a priority and any medical issue.</p> <p>People want a house that they dont need to keep being threatned to leave.</p> <p>Rents need to match local housing rates or how can families even eat.</p> <p>3 years is better than 6 years. Where would a family relocate after 3 years.</p> <p>More lanlords that rent according to lhr .</p> <p>People need realistic options so they can have the bare minumum conditions of living in a decent way.</p>
Do the right thing and start being accountable to your tenants.explain the corrupt behaviour that has been
To make officers very experience in all aspects of housing and new build and to the right back ground checks
Really think that the criteria for social housing needs to be tightened and not open to abuse as sure that many people currently living in social housing could well afford to move into their own property allowing those who need the social housing an opportunity to rent a property.
As with all things reviewing the system is essential. Also ensuring that properties are used by the tenants they are allocated to. Good standards of repairs offered in a timely manner
I have my own home but I feel for the younger generation many of whom have little chance of being able to afford even semi decent accommodation even if they are employed and working hard to provide for a family. The situation now seems impossible and only a massive increase in affordable social housing and a rethink of what accommodation should consist of can solve this. Also clarity of who can apply for social
The only way to offer the help that some people need is by being bold and stop being scared by a family that apply for housing using their children as a weapon. They can sort themselves out, be bold or they will never learn and you are not sending others like them the right message. Homeless, disabled and veterans cannot help themselves and they are unfortunately quiet. Be bold for them. Be proud to become a council that help
Domestic abuse victims, children leaving care system, armed forces veterans, people with disabilities should be prioritised as they are the most vulnerable in our society.
To make changes like your proposing you should wait until the next elections and put them in a manifesto rather than inviting people to comment. if you get feedback from 1% of the havering electorate I'd be
<p>1) Create two registers (temporary accommodation register and permanent accommodation register).</p> <p>2) Working families with evidence of 3 years in the borough and also with at least 3 years working should be allowed to join the permanent register.</p> <p>3) Non- working household should allowed to join the temporary register</p> <p>4) People who are in serious need (due to domestic abuse, house disrepair etc.) should be be moved to temporary accommodation and if they are working, should be allowed to join the permanent register and if they are not working, should enrol in temp. register.</p> <p>5) People should be able to move from temp. to permanent if situation if they meet the criteria in future.</p> <p>6) In both registers, there should be high level of openness and transparency</p>
I don't agree with it. Deport illegal immigrants and housing should be available to British citizens and British Born or the whole of the UK will turn into a third world concrete jungle. Inner London areas and barking and
Prioritise people born and raised here
The property next to where I am staying was rented by a family a few weeks ago (through the council) who have the sole purpose/idea of buying the house and selling it for a profit. They are clearly not in need. I don't understand why the housing market is in crisis/collapse and so many of us are homeless and yet the council are still giving a 3 bed house to a working couple who are gutting it ready for sale as soon as they can - I'm homeless and can't even bid on a 3 bed house. The council tenants who moved out of that property were
More help should be given to those trying to downsize other than using bidding site. Rules are too rigid and
<p>The Council should prioritise the residents that have lived here for over 10 years.</p> <p>There are homeless people here that have been placed by other boroughs and then become Havering's problem after 5 years.</p> <p>This needs to stop to allow ALL OUR ADULT CHILDREN the choice to stay here or buy a property elsewhere.</p>

I feel that the allocation scheme should be looked into as there are certain properties that are not included in the stock for allocation before you start to make a new allocation scheme
Established penalties need to be set, so those that don't respect and keep rented property in good order are fined and evicted, ensuring the undeserving are penalised.
Many people do get annoyed when we hear of people that have been in a council accommodation for so long but could have either bought the property or gone into private dwelling. I would love to be in Council place with no worries about repairs or updating rooms. But like a responsible person I've saved and got a
Some properties could be made available by evicting problem tenants more quickly. It was a clause in my original tenancy agreement that I could be evicted if I was convicted of a criminal offence, but I have never
I feel that when it is advertised as for local people that, local should mean local.
No
Hurry up and build new homes for the long waiting residents in emergency housing which is no fault of their own mine was due to domestic violence and even though I'm still having threats from my ex they want me to go through that hell again and go into another emergency housing and then my landlord wanted his property
<p>1. Residency criteria</p> <p>Majority of the CAH members who responded to the proposal agree with the residency changes, as often 6 continuous years is onerous for our clients.</p> <p>Some concerns were raised for people who are re-housed in a temporary accommodation by the council in a different Local Authority - it needs to be made clearer how these residents will be able to access the Housing register as they will not be living in Havering at the point of application. YMCA residents for example.</p> <p>Other members of staff expressed concerns that if the criteria is reduced, residents cannot just move to the area and expect to be given social housing accommodation. The main concern here is that LA won't be able to manage applicant's expectations as so many people will go on the register but in reality, there is not much LA can offer.</p> <p>2. Income threshold</p> <p>Divided opinion here, however, the majority of our staff disagree with complete removal of income threshold. Residents on a high income potentially have more housing options available to them - rental or right to buy.</p> <p>Removing the income criteria would enable people who are not as in need financially to be eligible for social housing, removing the whole purpose of social housing itself. We do not have enough social housing stock already and this could make it much more difficult for those on the lowest incomes to be placed in appropriate properties.</p> <p>Instead you could consider increasing the cap on income's to reflect the increase in price for private rented</p> <p>I don't know how you can possibly house all of the people that need housing. So my fear is that with a points based system based on need so many points or needs are required to be housed hardly anyone with normal</p>



## Housing Allocation Scheme

### Equality and Health Impact Assessment (EqHIA)

#### Document control

<b>Title of activity:</b>	Housing Allocation Scheme (2024)
<b>Lead officer:</b>	Darren Alexander, Assistant Director, Housing Demand
<b>Approved by:</b>	Patrick Odling-Smee, Director, Living Well
<b>Authors:</b>	Kwabena Obiri, Housing Choice & Applications Manager
<b>Date completed:</b>	22/04/24
<b>Scheduled date for review:</b>	May 2025

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

# 1. Equality & Health Impact Assessment checklist

## About your activity

1	Title of activity	Housing Allocation Scheme		
2	Type of activity	Scheme Housing lettings		
3	Scope of activity	<p>This Scheme applies to new applicants, (including homeless households), and to existing tenants transferring from one property to another.</p> <p>The Housing Act 1996, (as amended by the Homelessness Act 2002, the Localism Act 2011 and the Homelessness Reduction Act 2017), requires local authorities to make all housing allocations and nominations in accordance with a Housing Allocation Scheme.</p> <p>A summary of this Housing Allocation Scheme must be published and made available free of charge to any person who asks for a copy.</p>		
4a	Are you changing, introducing a new, or removing a service, Scheme, strategy or function?	Yes	If the answer to <u>any</u> of these questions is 'YES', please continue to <b>question 5</b> .	If the answer to <u>all</u> of the questions (4a, 4b & 4c) is 'NO', please go to <b>question 6</b> .
4b	Does this activity have the potential to impact (either positively or negatively) upon people (9 protected characteristics)?	Yes		
4c	Does the activity have the potential to impact (either positively or negatively) upon any factors which determine people's health and wellbeing?	Yes		

Completed by:	Kwabena Obiri, Choice and Applications Manager
Date:	22/04/24

## How this Scheme will impact on people?

### Background

Social housing is provided by social landlords – generally, local authorities or housing associations. However, it has been clear for some time that housing supply is not keeping up with

demand. Affordable housing however is broader and includes all housing that has received a public subsidy or grant in its development.

Demand for social housing in Havering significantly exceeds the number of properties available. In the financial year 2022-23, only one in every 5 households on the housing register had a realistic prospect of getting social housing. This Scheme sets out how the Council will prioritise access to the available housing.

### **Purpose of this Scheme**

The Housing Act 1996 Part VI requires local authorities to give reasonable preference in the way they allocate their available social housing.

The purpose of this Scheme is to clearly explain how Havering Council, (“the Council”), decides how available social housing is allocated. It sets out the Council’s eligibility, qualifying and housing need criteria to ensure priority is fairly assigned and allocated to households in the greatest need. It also sets out how the Council will enable access to other forms of affordable housing such as shared ownership and intermediate rented housing.

### **Aims of the scheme**

The aims of the scheme are to:

- ensure that we make the best possible use of the social housing stock;
- provide housing that is suitable to the specific needs and requirements of households;
- prioritise households that have been assessed to be in most need and to those who make a positive contribution to our community;
- help build sustainable communities and neighbourhoods, and
- ensure social and affordable housing is allocated in a clear, fair and transparent manner.

### **Scope of the scheme**

This Scheme applies to new applicants, (including homeless households), and to existing tenants transferring from one property to another.

The Housing Act 1996, (as amended by the Homelessness Act 2002, the Localism Act 2011 and the Homelessness Reduction Act 2017), requires local authorities to make all allocations and nominations in accordance with an Allocation Scheme. A summary of the Allocations Scheme must be published and made available free of charge to any person who asks for a copy.

This document is available on the Council’s website: [www.havering.gov.uk](http://www.havering.gov.uk) and paper copies will be provided on request.

The Housing Act 1996 (as amended) requires local authorities to give reasonable preference in their allocations policies to people with high levels of assessed housing need. The main groups are:

- People who are homeless as defined by the Housing Act 1996, Part 7;
- People who are owed a duty by any local housing authority under section 190(2), 193(2) or 195(2) (or under section 65(2) or 68(2) of the Housing Act 1985), or who are occupying accommodation secured by any such authority under section 192(3);
- People occupying insanitary or overcrowded housing, or who are otherwise living in unsatisfactory conditions;
- People who need to move on medical or welfare grounds (including any grounds relevant to a disability); and

- People who will suffer hardship to themselves or to others if they are unable to move to a particular locality or district.

In addition to the above, the Council also exercises its statutory discretion to grant additional preference and/or to determine priority between applicants with reasonable preference. Applicants in reasonable preference categories makeup around 82% of the Council's housing register – comparatively reasonable preference made up around 62% of all Council allocations in 22/23, contributing to 310 of 502 lets. Whilst there is slightly larger demand for accommodation than supply for applicants of reasonable preference, the figures show that they are overall treated fairly, contributing to just under two-thirds of all Council lets.

The Act also requires local authorities to state within the policy what its position is on offering applicants a choice of housing accommodation, or offering them the opportunity to express preference about the housing accommodation to be allocated to them.

The current policy was agreed by the Cabinet in 2021 and since then there has been a change in administration - the review has been conducted to ensure that the policy meets with current legislation and guidance.

### **In summary – the proposed key changes**

The new, Housing Allocation Scheme will introduce the following key changes:

#### **1. Qualification Criteria**

##### **• 4 out of 6 years continuous residency:**

In order fulfil the Council's qualification criteria to join the Housing Register, an applicant will be required to demonstrate a continuous residency four out of six years in the borough of Havering.

#### **2. Points Based Award Scheme**

Change from the banding system under the current Scheme to a points based award system which reflect their current housing circumstances. Points are totalled to evaluate the applicant's' relative housing priority.

<b>Who will be affected by the activity?</b>	
Applicants to the Havering Council Housing Register to seek housing.	
<b>Protected Characteristic - Age</b>	
<i>Please tick (✓) the relevant box:</i>	<b>Overall impact: Neutral</b>
<b>Positive</b>	This Scheme states an Age qualification for applicants to be placed on the Council's Housing Register. This is:
<b>Neutral</b>	<u>Age - Applicants must be 18 years of age or over</u> The Council will not normally grant a tenancy to anyone under the age of 18 years unless another adult is prepared to act as their guarantor and agrees to cover the rent or any arrears.
<b>Negative</b>	Exception: The age qualification criterion will not apply where a young person, aged under 18 years, is owed a duty under current legislation, but is unable to access suitable accommodation other than by being given an offer of council

		<p>or housing association accommodation. In exceptional circumstances, the Council can grant permission to occupy a property to an applicant under 18 years by means of an Equitable Agreement.</p> <p>The Scheme therefore is inclusive of all eligible persons and does not discriminate on the basis of age, except in the case where persons are under 18 years old and in which case exemption is made according to the duty owed to some young people under legislation as stated above.</p> <p>Applicants to sheltered housing will not be affected by the residency criteria. There is also an exemption for those households that need to give or receive care.</p>
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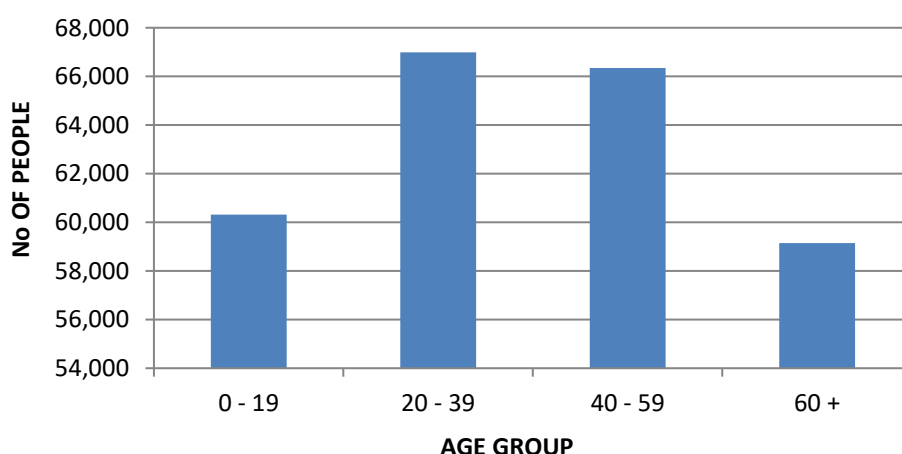
### Evidence:

Declining mortality rates mean higher life expectancies.

A newborn male baby in the UK today can expect to live for 79.2 years and a girl to 82.9 years, with 22.6% of newborn boys and 28.3% of newborn girls projected to live to 100 years old<sup>1</sup>.

- Havering has the oldest population in London with a median age of 40 years, as recorded in the 2011 census.
- The life expectancy at age 65 years in Havering is 19 years for males and 21.7 years for females. The life expectancy at birth for people living in Havering is 80.2 years for males and 83.9 years for females.
- From 2011 to 2016, Havering experienced the largest net inflow of children across all London boroughs. 4,580 children settled in the borough from another part of the United Kingdom during that five-year period.
- It is projected that the largest increases in population up to 2033 will occur in the following age brackets; children (0-17 years), and older people age groups (65 years and above).

### HAVERING - BY AGE GROUP



<sup>1</sup> Article: 'Living longer; how our population is changing and why it matters' (Office for National Statistics, August 2018)

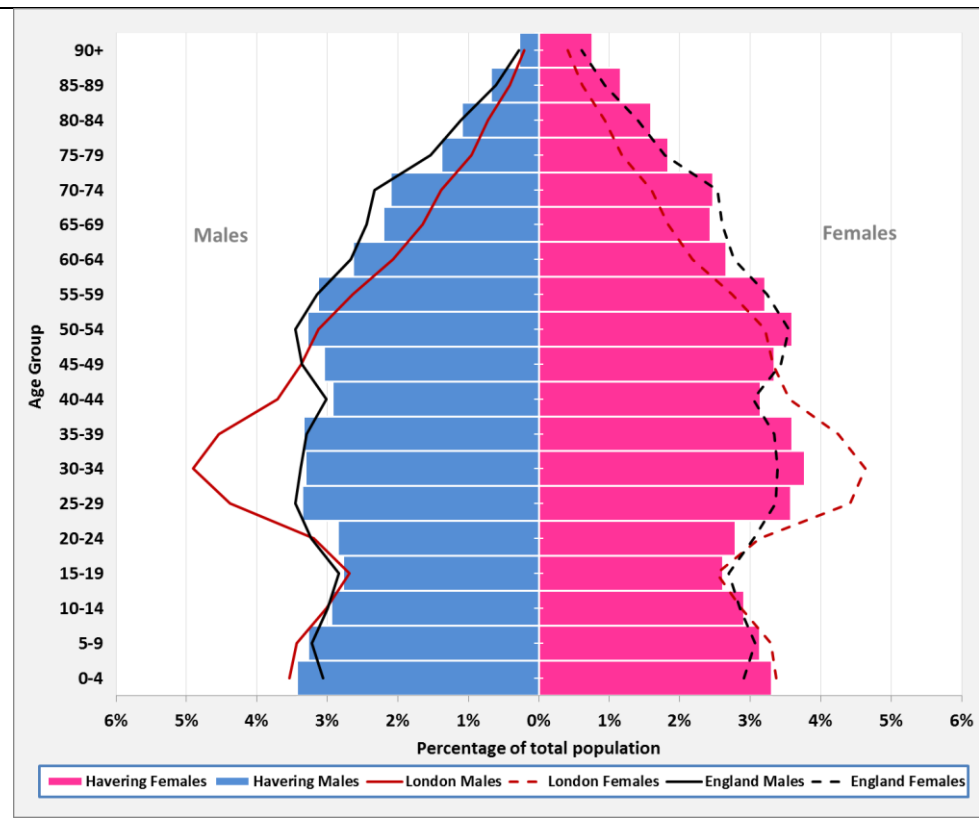
The Havering population is estimated to be 257,810 (ONS, 2018). The table below gives a breakdown by five year age bands and gender.

<b>Age Band (Years)</b>	<b>Male</b>	<b>Female</b>	<b>Persons</b>
00-04	8,850	8,520	17,370
05-09	8,429	8,081	16,510
10-14	7,595	7,503	15,098
15-19	7,166	6,743	13,909
20-24	7,351	7,198	14,549
25-29	8,642	9,220	17,862
30-34	8,526	9,742	18,268
35-39	8,614	9,268	17,882
40-44	7,542	8,125	15,667
45-49	7,868	8,624	16,492
50-54	8,460	9,279	17,739
55-59	8,072	8,290	16,362
60-64	6,806	6,860	13,666
65-69	5,696	6,272	11,968
70-74	5,417	6,379	11,796
75-79	3,561	4,741	8,302
80-84	2,817	4,121	6,938
85-89	1,747	3,000	4,747
90+	719	1,966	2,685
<b>All Ages</b>	<b>123,878</b>	<b>133,932</b>	<b>257,810</b>

Havering has the oldest population in London with a median age of 39 years. There are approximately 60,102 persons aged 65 and over in Havering. This is more than a fifth of the whole population (23.3%).

Figure 1 below shows a much older age structure for the population of Havering compared to London but similar to England.

Figure 1 : Havering, England and London Mid-2018 Population Pyramid



Data source: ONS 2018 Mid-year population estimates.

The increased age of residents within Havering could see mean that there is an increased pressure for smaller or sheltered type properties.

Sources used:

- This is Havering 2019/20 version 4.4, Public Health Intelligence
- ONS 2018 Mid-year Population Estimates

### Protected Characteristic - Disability

Please tick (✓) the relevant box:

**Positive**

✓

**Neutral**

**Negative**

**Overall impact: Positive**

This Scheme decides on applicants cases based on a number of criteria, including an applicant's health and consequent housing need priority. The Scheme states:

#### MEDICAL

The medical element of the assessment is based on whether the applicant's health, or a member of their household's health, would improve by moving to alternative accommodation. Consequently, medical priority is awarded according to the extent to which the health or welfare of one or more members of the applicant's household, is affected by their current housing conditions and the expected benefits of providing suitable alternative housing.

Applicants are asked to complete a Medical Assessment Form. A Housing Assessment Officer will consider the information supplied by

	<p>the applicant, along with any further and necessary information supplied by other parties such as health professionals and housing officers.</p> <p>Applicants claiming to have a severe and enduring mental illness will need to demonstrate that they currently have, or have recently had, access to Havering Mental Health Services.</p> <p>Depending on the circumstances, medical priority points can be awarded on a scale of 25-75. The following table is used as a guide to how medical priority is determined:</p> <table> <tr> <th><i>Medical Condition Classification</i></th><th><i>Points</i></th></tr> <tr> <td><i>High</i></td><td><i>75</i></td></tr> <tr> <td><i>Moderate</i></td><td><i>50</i></td></tr> <tr> <td><i>Low</i></td><td><i>25</i></td></tr> </table> <p>Applicants who clearly have an urgent need to move because they have a critical medical condition, or very serious disability, will be awarded 75 points. These points will be awarded in consideration of any other housing need points the applicant may be eligible for.</p> <p>Therefore, the Scheme makes due consideration of the disability and/or severe health issues of an applicant and provides a bespoke service to consider an individual's health circumstances in deciding their Housing Register application. This should improve the outcomes for disabled applicants.</p>	<i>Medical Condition Classification</i>	<i>Points</i>	<i>High</i>	<i>75</i>	<i>Moderate</i>	<i>50</i>	<i>Low</i>	<i>25</i>
<i>Medical Condition Classification</i>	<i>Points</i>								
<i>High</i>	<i>75</i>								
<i>Moderate</i>	<i>50</i>								
<i>Low</i>	<i>25</i>								

#### **Evidence:**

- In 2017, 3,506 adults (aged 18-64 years) were estimated to be living with serious physical disabilities in Havering.
- The estimated rate of serious physical disabilities in Havering (2,323 per 100,000 population aged 18-64 years) is similar to England but significantly higher than London average. It is one of the highest rates within London local authorities (see Figure 22). One of the key reasons for this is likely to be due to the relatively older population in Havering compared to other London boroughs.

Please note: Rate per 100,000 calculation uses mid 2016 population.

The following shows the prevalence of various disabilities in Havering:



Table 1: Number of people aged 18-64 with disabilities in Havering by age band, 2020

Age band	Number with learning disability	Number with Impaired mobility	Number with serious visual impairment	Number with moderate or severe, or profound hearing impairment
18-24	519	192	12	347
25-34	911	366	24	791
35-44	882	1,790	23	1,652
45-54	792	1,685	22	4,271
55-64	721	4,438	21	8,143
18-64	3,824	8,471	102	15,204

Table 2: Number of people aged 18-64 with mental health problems in Havering, 2020

Mental health problem	Number
Common mental disorder	29,906
Borderline personality disorder	3,796
Antisocial personality disorder	5,184
Psychotic disorder	1,100
Two or more psychiatric disorders	11,327

Table 3: Number of people aged 65 & over unable to manage at least one mobility activity on their own in Havering, 2020

Age band	Number
65-69	1,023
70-74	1,642
75-79	1,506
80-84	1,740
85 and over	3,410
65 and over	9,321

Table 4: Disabled population with medical needs

Band	Medical Type	Total	% of Register
1	<i>Special Needs</i>	12	0
	<i>Severe Medical</i>	11	0
2a	<i>Disability</i>	136	5
3	<i>Moderate Medical</i>	44	2

#### Sources used:

This is Havering (2018)

Projecting Older People Population Information: <https://www.poppi.org.uk/index.php>

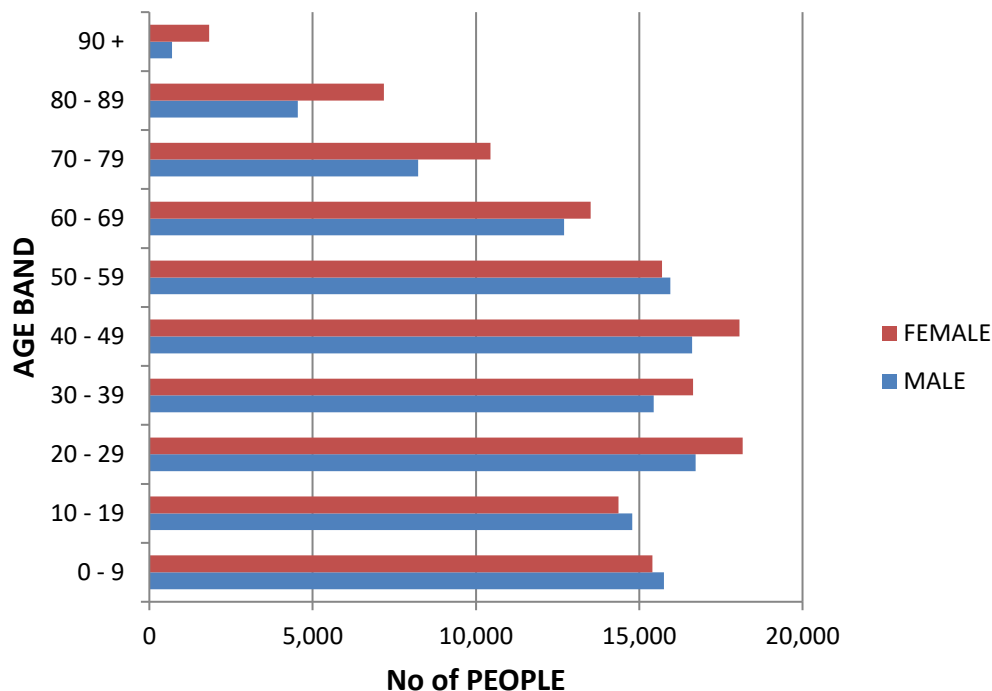
Projecting Adults Needs and Services Information: <https://www.pansi.org.uk/>

Protected Characteristic - Sex/gender		
Please tick (✓) the relevant box:		<b>Overall impact: Positive</b>  This Scheme changes will be positive for households.  The majority (78%) of applicants on the housing register are from women headed households, mainly due to the higher levels of poverty in such households. The current Scheme (2021) gives additional priority to working households. Women are less able to find work due to their role as primary carers for children and therefore the current policy indirectly discriminates against women. The split in the income thresholds between families and single people will mean that lower paid single women and single parents will not be discriminated against.  The increase in priority for households suffering domestic abuse will also have a positive impact on women, who are more likely than men to be the victims of abuse.  There is a negative impact of the residency criteria Scheme that will affect women only headed households who cannot undertake community contributions due to childcare responsibilities.
Positive	✓	
Neutral		
Negative		

**Evidence:**

## HAVERING POPULATION

- BY GENDER AND AGE BAND



Gender	Total	% of Register
Male	589	22
Female	1990	78
Total	2579	100

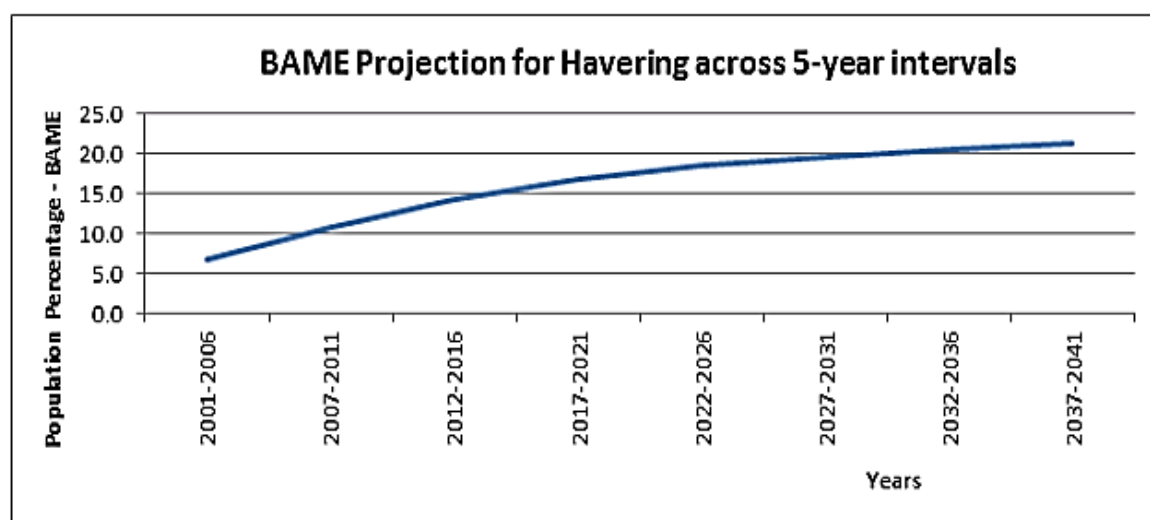
#### Sources used:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates>

Protected Characteristic - Ethnicity/race		
Please tick (✓) the relevant box:		<b>Overall impact: Neutral</b>
<b>Positive</b>		This scheme offers an ethnicity neutral approach to making a decision on the allocation of housing.
<b>Neutral</b>	✓	There are no proposed changes to the residency criteria which may impact in terms of this protected characteristic.
<b>Negative</b>		<ul style="list-style-type: none"> <li>Exception (Travelers &amp; Refugees) - Overall impact would be neutral/positive for applicants of traveller background or refugee status with no sizable advantage gained from the reduction of residency for applicants requiring family accommodation as there would still be extended waiting periods in their elevated banding. Single or coupled applicants of refugee or traveller backgrounds stand to benefit from a reduction in residency with greater opportunities of success for 1 bed permanent accommodation.</li> <li>Persons who fall within the statutory 'reasonable preference' groups: <ul style="list-style-type: none"> <li>- people who are homeless (within the meaning of Part 7);</li> <li>- people who are owed a duty by any local housing authority under section 190(2), 193(2) or 195(2) (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any such authority under section 192(3);</li> <li>- people occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions;</li> <li>- people who need to move on medical or welfare grounds (including any grounds relating to a disability); and</li> <li>- people who need to move to a particular locality in the district of the Council, where failure to meet that need would cause hardship (to themselves or to others).</li> </ul> </li> </ul>

## Evidence:

- Havering is one of the most ethnically homogenous boroughs in London, with 83% of its residents recorded as 'White British' in the 2011 census; higher than both London and England.
- However, the ethnically homogenous characteristic of Havering is gradually changing due to its growing cultural diversity.
- The Borough's white population is projected to decrease from the current 84% to 78% in 2032.
- The BAME population, notably those from Black African heritage (though many of whom are likely to be British born) is projected to increase from 4.1% in 2017 to 5.3% of the Havering population in 2032



According to the GLA ethnic projections (2020) There are approximately 40,500 (18%) people from BAME groups living in Havering, the majority being black Africans (11,700, 4.5%).

Table 1: The GLA ethnic population projections 2020

Ethnic Group	Male	Female	Persons
White British	94,850	101,950	196,810
White Irish	1,320	1,620	2,940
Other White	7,280	7,330	14,610
White & Black Caribbean	1,900	1,840	3,740
White & Black African	710	780	1,490
White & Asian	890	860	1,750
Other Mixed	900	920	1,820
Indian	4,050	4,530	8,590
Pakistani	1,290	1,510	2,810
Bangladeshi	1,190	1,140	2,340
Chinese	610	1,010	1,620
Other Asian	1,980	2,120	4,110
Black African	5,270	6,430	11,700
Black Caribbean	2,090	1,940	4,030
Other Black	790	970	1,760
Arab	290	220	510

Other Ethnic Group	660	570	1,220
<b>Total</b>	<b>126,070</b>	<b>135,740</b>	<b>261,850</b>

Table 2: Housing Register by Ethnicity

Racial Classification		Housing Register	
Race	Ethnicity	Total	% of register
White	British	1493	58
	Irish	17	1
	Other	117	5
BAME	Chinese	3	0
	Asian Bengali	34	1
	Asian Indian	20	1
	Asian Other	40	2
	Asian Pakistani	28	1
	Black African	268	10
	Black Caribbean	63	2
	Black Other	34	1
	Gypsy/Irish Traveler	2	0
	White & Asian	8	0
	White & Black African	30	1
	White & Black Caribbean	50	2
	Other Arab	12	0
	Other Mixed	25	1
	Other	11	0
No response	Blank/Refused	324	12
		2579	

2.3.2 (j) Exception (Travelers/Refugees) - a reduction in residency criteria appears to have no significant advantage to applicants of traveler background. From data sourced from P1E records, shows the number of accepted homeless cases under Part 7 between 2016-18 for travelers were as follows:

Table 3: Accepted homeless cases for applicants of traveler/gypsy background 2016-18

Year	Total
2016	0
2017	0
2018	0

For the year 19/20 data sourced from HCLIC showed there were five known traveler cases investigated under part 7 with one case accepted under s.193 main duty. Accepted applications to the housing register did not fare better for applications from travelers with one application made in 2019 and zero acceptances to the register between 2016 and year-end 2020. This appears to suggest there is very little in the way of housing demand from the travelling community.

Table 4: Accepted applicants from traveler/Gypsy community to the housing register

Year	Status	Homeless	Banding	Bed Need	Rehoused
2022	Traveler	Yes	2c	3	No
2022	Traveler	Yes	2a	2	No

Opportunities for non-UK residents/asylum seekers appear to be relatively neutral to positive dependent on bedroom size required. Data obtained shows that between 2016-20 eight households were granted homeless decisions under s.193 of HA96. Out of these eight households five went on to apply and become accepted on the housing register.

Figures published by the MHCLG show:

- in London, Black Caribbean households were over-represented in new social housing lettings (accounting for 11.2% of new lettings, compared with 4.3% of the population), as were Black African households (15.2% of lettings, compared with 6.6% of the population)
- in London, White British households were under-represented in new social housing lettings (accounting for 37.0% of new lettings, compared with 45.4% of the population), as were Other White households (7.5% of lettings, compared with 13.2% of the population) and Asian Indian households (2.0% of lettings, compared with 6.9% of the population). This reflects the higher levels of poverty and housing needs amongst BAME populations.

The table below shows the lettings to BAME and non-BAME communities in Havering in 2016 compared to the national average (England). This is the latest year that figures are available.

Table 5. Social Housing Letting 2016/17

	White			Other than White		
	%	Social housing lettings	Population estimate (2016)	%	Social housing lettings	Population estimate (2016) %
Havering	83.7	518	88.3	16.3	101	11.7
Average England	87.4	783	89.8	12.6	152	10.2
Average London	49.1	424	62.1	50.9	492	37.9

<https://www.ethnicity-facts-figures.service.gov.uk/housing/social-housing/new-social-housing-lettings/latest>

This shows that under the current Scheme non-white households accounted for 16.3% of the social housing lettings in Havering (compared to 50% in London and 12.6% nationally). Non-white households however made up 11.7% of the Havering population (compared to 37.9% in London and 10.2% nationally). In Havering 21% of applicants on the housing register are from non-white ethnicity (see Table 2) however they only received 16.3% of lettings.

Protected Characteristic - Religion/faith		
Please tick (✓) the relevant box:		<b>Overall impact: Neutral</b>  This Scheme offers a religion/faith neutral approach to making decision on the allocation of housing. The Scheme will be carried out with an emphasis on equality of treatment.
Positive		
Neutral	✓	
Negative		
Evidence:		

Most recent available data (Census 2011) shows the majority of Havering residents are Christians.

Table 7: Religion and Belief 2011 Census, Havering

Faith	Number	%
Christian	155,597	65.6%
Buddhist	760	0.3%
Hindu	2,963	1.2%
Jewish	1,159	0.5%
Muslim	4,829	2.0%
Sikh	1,928	0.8%
Other Religion	648	0.3%
No Religion	53,549	22.6%
No Response	15,799	6.7%
<b>Totals</b>	<b>237,232</b>	<b>100%</b>

**Sources used:**  
Census 2011

### Protected Characteristic - Sexual orientation

Please tick (✓)  
the relevant box:

**Positive**

☐

**Neutral**

☒

**Negative**

☐

**Overall impact: Neutral**

This Scheme offers a sexual orientation neutral approach to making decision on the allocation of housing. The Scheme will be carried out with an emphasis on equality of treatment.

It is not necessary for residents to disclose their sexual orientation therefore a neutral impact is expected.

**Sources used:**

There is insufficient evidence at this time as to whether the impact on this protected characteristic will be positive or negative. It is currently envisaged that there will be neutral impact at the least.

### Protected Characteristic - Gender reassignment

Please tick (✓)  
the relevant box:

**Positive**

☐

**Neutral**

☒

**Negative**

☐

**Overall impact: Neutral**

This Scheme offers a gender reassignment neutral approach to making decision on the allocation of housing. The Scheme will be carried out with an emphasis on equality of treatment.

**Evidence:**

The Equality Act 2010 says employees must not be discriminated against in employment for being married or in a civil partnership.

In the Equality Act marriage and civil partnership means someone who is legally married or in a civil partnership. Marriage can either be between a man and a woman, or between partners of the same sex. Civil partnership is between partners of the same sex.

Marriages and registration of civil partnerships in the UK are currently suspended due to the COVID-19 pandemic.

**Sources used:**

<https://www.equalityhumanrights.com/en/advice-and-guidance/marriage-and-civil-partnership-discrimination>

**Protected Characteristic - Marriage/civil partnership**

*Please tick (✓) the relevant box:*

**Positive**

☐

**Neutral**

☒

**Negative**

☐

**Overall impact: Neutral**

This policy offers a marriage/civil partnership neutral approach to making a decision on the allocation of housing. The Policy will be carried out with an emphasis on equality of treatment. The policy will support households regardless of their marital status

**Evidence:** There is insufficient evidence at this time as to whether the impact on this protected characteristic will be positive or negative. It is currently envisaged that there will be neutral impact at the least.

**Protected Characteristic - Pregnancy, maternity and paternity**

*Please tick (✓) the relevant box:*

**Positive**

☐

**Neutral**

☒

**Negative**

☐

**Overall impact: Neutral**

This Scheme offers a pregnancy, maternity and paternity neutral approach to making decision on the allocation of housing. The Scheme will be carried out with an emphasis on equality of treatment.

**Evidence:** There is insufficient evidence at this time as to whether the impact on this protected characteristic will be positive or negative. It is currently envisaged that there will be neutral impact at the least. The changes proposed in the new Scheme will not impact this group.

**Health & Wellbeing**

*Please tick (✓) all the relevant boxes that apply:*

**Overall impact: Neutral**



<b>Positive</b>		<b>Do you consider that a more in-depth HIA is required as a result of this brief assessment? No ✓</b>
<b>Neutral</b>	✓	
<b>Negative</b>		<p>The process of reviewing this Scheme will assist the Council in ensuring that accommodation occupied by the tenants meets their housing needs. Housing plays a key role in the health and well-being of residents. Overcrowding of accommodation can lead to health issues and family disputes. Evidence detailed below demonstrates that this is a real problem in Havering. The review process will identify and enable the Council to allocate social housing to those in the greatest need.</p> <p>Where resources permit, and eligibility for social housing remains, the Council will look to housing tenants in accommodation that meets the tenants needs, either in council stock or through the use of reciprocal and nomination agreements with registered providers with whom the Council works in partnership.</p> <p>Similarly, reviews of this Scheme will also indicate in terms of disability where the tenant's current home is no longer suitable – either where the tenant or a member of their household no longer has a need for a specifically adapted property or where the review identifies that the tenant has a need for an adaptation to their home.</p> <p>Again, where resources permit, the Council will seek to allocate more suitable accommodation for the tenant or will assist the tenant to obtain a disabled facilities grant to adapt the home.</p>
		<p><b>Evidence:</b></p> <p>The table below shows the identified size mix for affordable housing in Havering using both the 2014 and 2015 round GLA long-term trend migration figures for comparison purposes. (<i>Affordable housing is considered to be housing of any tenure which is judged to be affordable to a particular group or household by analysis of housing costs, income levels and other factors</i>).</p> <p>This takes account of both overcrowded households who require a move to a larger dwelling and also under-occupying households who require downsizing.</p> <p style="text-align: center;"><b>Fully objectively assessed housing need for Havering for affordable homes 2011 -2033</b></p> <p>For both the 2014 and 2015 round data, the evidence points to a high need for three bedroom properties in the affordable housing sector. The main driver of this need in the affordable sector is the need to address overcrowded households in Havering who require larger affordable housing.</p> <p style="text-align: center;">Affordable Housing in Havering</p>

		<p>The review of this Scheme will assist the Council in identifying where downsizing may be appropriate to certain households and these properties can be placed back into the churn of much needed council stock.</p> <table> <tr> <th></th><th>GLA 2014</th><th>GLA 2015</th></tr> <tr> <td>1 bedroom</td><td>900</td><td>640</td></tr> <tr> <td>2 bedrooms</td><td>2,400</td><td>2,850</td></tr> <tr> <td>3 bedrooms</td><td>4,100</td><td>5,400</td></tr> <tr> <td>4 bedrooms</td><td>700</td><td>1,610</td></tr> <tr> <td>5 bedrooms</td><td>100</td><td>20</td></tr> <tr> <td>Total affordable housing</td><td>8,200</td><td>10,520</td></tr> <tr> <td><b>TOTAL</b></td><td>25,200</td><td>30,050</td></tr> </table>		GLA 2014	GLA 2015	1 bedroom	900	640	2 bedrooms	2,400	2,850	3 bedrooms	4,100	5,400	4 bedrooms	700	1,610	5 bedrooms	100	20	Total affordable housing	8,200	10,520	<b>TOTAL</b>	25,200	30,050
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		<p><b>Sources used:</b></p> <p>Outer North East London Strategic Housing Market Assessment for Havering – November 2016, by Opinion Research Services</p>																								

## Review

This EqHIA will be reviewed annually, or as and when new legislation or relevant influential data that may impact on the EqHIA arrives.

**Scheduled date of review:** May 2025

**Lead Officer conducting the review:** Kwabena Obiri, Housing Choice and Applications Manager  
Darren Alexander, Assistant Director Housing Demand.

## 1. Action Plan

The real value of completing an EqHIA comes from the identifying the actions that can be taken to eliminate/minimise negative impacts and enhance/optimize positive impacts. In this section you should list the specific actions that set out how you will address any negative equality and health & wellbeing impacts you have identified in this assessment. Please ensure that your action plan is: more than just a list of proposals and good intentions; sets ambitious yet achievable outcomes and timescales; and is clear about resource implications.

Protected characteristic / health & wellbeing impact	Identified Negative or Positive impact	Recommended actions to mitigate Negative impact* or further promote Positive impact	Outcomes and monitoring**	Timescale	Lead officer
Race/ethnicity	Residency criteria will impact predominantly BAME communities.	Mitigations have been added to the Scheme for refugees, traveler communities and homeless households.	The impact of the Scheme on these groups will be monitored.	Annually	Kwabena Obiri

Add further rows as necessary

\* You should include details of any future consultations and any actions to be undertaken to mitigate negative impacts

\*\* Monitoring: You should state how the impact (positive or negative) will be monitored; what outcome measures will be used; the known (or likely) data source for outcome measurements; how regularly it will be monitored; and who will be monitoring it (if this is different from the lead officer).

## Review

**Scheduled date of review:** May 2025

**Lead Officer conducting the review:** Kwabena Obiri, Housing Choice and Applications Manager

Please submit the completed form via e-mail to [EgHIA@havering.gov.uk](mailto:EgHIA@havering.gov.uk) thank you.