

## LONDON BOROUGH OF HAVERING EQUALITY ANALYSIS

### PROPOSED ACTIVITY:

#### Cabinet Report (26 September 2012) – Draft Housing Allocations Scheme

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#### SCOPE OF PROPOSAL

**1. What is the scope and intended outcomes of the activity being assessed; in terms of both the Council’s organisation and staffing, and services to the community?**

This Equality Analysis concerns the review and development of Havering Council’s Housing Allocations Scheme. The Scheme will be different from previous schemes following changes introduced under the Government’s Housing Strategy 2011 and the Localism Act 2011. New provisions remove the requirement for councils to keep ‘open’ housing waiting lists. We have also taken account of CLG Draft Guidance on Housing Allocations, and two Draft Statutory Instruments that remove the residency criteria for people leaving or who have left the armed forces within 5 years of application and give additional priority to ex-armed forces personnel who have an emergency need for housing.

It is proposed that the new Housing Allocations Scheme will come into effect from 1<sup>st</sup> April 2013 and will affect existing applicants on the Housing Register as well as new applicants.

#### Current allocations scheme

The current scheme consists of 5 bands – A to E, with Band A reserved for people needing to move in urgent circumstances. As at 31 March 2012, there were 11,212 households on the Housing Register. In the last financial year, the Council advertised 901 properties, so the number of households far outweighs the number of properties that become available to let. In addition, some households have been on the Housing Register for many years, with no reasonable expectation of being re-housed.

#### Proposed Scheme

The Council has reviewed its current allocations scheme and in consultation with wide ranging stakeholders has developed a scheme with the aim of being simpler, supporting local people in most need of housing and rewarding those who contribute to their local community.

The main changes we are proposing intend to deliver the following outcomes:

Intended outcome	Policy criteria
To provide housing to those in housing need who live in the borough (with the exception of ex-armed forces personnel)	Those with 2 years’ prior residency and a housing need will be eligible to join the Housing Register (and initially be placed in the Homeseeker Band). In exceptional circumstances we will consider a shorter residency period if someone has an emergency need to move and their home is unsuitable.
To reward people who contribute to their community with a higher priority for housing	Community contribution reward for those in Homeseeker Band who work, volunteer , need to move to foster or adopt, or downsize to a smaller property

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To support people with an emergency need to move	Provision of assisted offers as well as choice based lettings bids (dependent on individual circumstances) for people with an urgent need to move, for example, people fleeing domestic violence, and disabled people who need to move urgently when their home is unsuitable.
To support existing council tenants to transfer more easily than currently when they want to	Existing council tenants and private sector lease tenants will be eligible to apply to join the Housing Register after 5 years of holding a Havering Council or PSL tenancy
Unsuitable tenants	People will not be eligible if they are unsuitable tenants, for example, they have housing-related debts, have been responsible for anti-social behaviour, or breaches in tenancy agreement
Financial income	An assessment of income will form part of the application to see if applicants have the means to afford to rent privately

### **1 (a) Organisation and Staffing**

No additional staff will be required to manage the Housing Allocations Scheme once it becomes effective. However, it should be noted that a six months transitions phase between Cabinet approval and the effective date is required to enable staff to review existing applications in line with the new Scheme. This does mean that any emerging priorities during this phase will need to be carefully managed so that they do not negatively impact on the project and staff time. Should this identified risk become a reality, a review of staffing levels would need to be undertaken.

### **1 (b) Services to the Community**

The housing allocations scheme has been reviewed in light of the Localism Act 2011. The National Housing Strategy and Act remove the need for councils to provide 'open' housing waiting lists. It empowers the Council to use local priorities to decide who is eligible to join the housing register and help existing Council tenants to move so long as those with a 'reasonable preference' for housing under the Housing Act 1996 and ancillary guidance continue to receive this preference. Havering Council's review of the housing allocations scheme aims to create a system for allocating properties that is easy to understand and affords priority between those with a reasonable preference for housing based upon locally defined priorities. The new Scheme will give those wishing to join the Council's Housing Register a realistic view of whether and when they could be allocated social or affordable housing. This in turn will enable those approaching the Council to make informed decisions about their housing and, in turn, is likely to reduce the waiting time for those in the most housing need.

## PEOPLE AFFECTED

### 2. Which individuals and groups are likely to be affected by the activity?

#### 2 (a) Staff Individuals and Groups

##### Staff

##### London Borough of Havering:

- Housing Options Service - Housing Needs & Service Development Team, Housing Advice Team
- Adult Social Care Services – Occupational Therapy, Strategic Commissioning, Leaving Care Team
- Tenancy Management Officers (currently employed by Homes in Havering, but likely to have TUPE transferred to the Council by the implementation date of the revised Scheme)
- Resident Involvement Team (currently employed by Homes in Havering, but likely to have TUPE transferred to the Council by the implementation date of the revised Scheme)

It is expected that the Housing Allocations Scheme will continue to be managed and delivered by existing staff in the Housing Needs & Service Development Team

#### 2 (b) Community Individuals and Groups (*including voluntary organisations*)

The Council's Housing Allocations Scheme will affect both new and existing applicants on the Housing Register for social and affordable housing in Havering Borough and will impact on people across all protected characteristics.

There are criteria in the Scheme that are specifically aimed at supporting:

- low income households that have a housing need with priority to those who contribute to their community
- homeless people
- vulnerable people who have an emergency need to move
- older people, particularly those wanting to downsize to a smaller home
- young people, especially those leaving care
- people with physical disabilities or long-term health conditions
- pregnant and nursing mothers
- people with caring responsibilities for a disabled child or close relative.

## DATA AND INFORMATION

### 3. What data/information do you have about the people with 'protected characteristics' (*age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation*) or **other socio-economic disadvantage** (*e.g. disabled and part-time workers, low income households, looked-after children, vulnerable adults*) among these individuals and groups? What information do you have about how they will be affected by the activity? Will you be seeking further information in order to assess the equalities impact of the activity? How is this information being used to influence decisions on the activity?

#### 3 (a) Staff

Delivery of the Housing Allocations Scheme from 1 April 2013 will directly replace the current allocations scheme and will have little or no effect on the Council's or current Homes in Havering's (HiH) staffing level.

### **3 (b) Community**

The Housing Allocations Scheme will affect existing Housing Register applicants and those applying for social or affordable housing in the future. Interrogation of the Housing Register provides us with some information about those who are currently registered with the Council for social or affordable housing in the borough. We have also used Census 2001 and Office of National Statistics data to inform this assessment.

#### **Age**

##### Older people

Havering Council has the highest proportion of older people of any London Borough. Out of 10,955 council tenants for which information is available, 1,347 (12.35) of them are aged 65 - 74 years and 1,077 (9.8%) are aged 75 - 84 years.

Housing Register data (as at 21 August 2012) indicated that out of 11,688 applicants, 644 were aged 55-64 years, 400 were aged 65-74 years, 226 were aged 75-84 and 119 were aged 84+ years. Of these, 835 applicants currently in bands D and E (with low or no housing need) are more likely to be affected by the proposed scheme.

Under the proposed Housing Allocations Scheme, under-occupying Havering Council tenants (and in most cases under-occupying housing association tenants in the borough), who are likely to be older residents, will be given priority (under the Community Contribution Reward) if they want to move to a smaller home. The Council owns some well laid out sheltered housing, but we recognise that some bedsit flats have not been fit for purpose and we are implementing a refurbishment plan to ensure schemes meet older people's future housing needs.

The older population (men aged 65+ and women aged 60+) is estimated to grow by 3.9% by 2016 and by 15.4% by 2026. This means there will be 1,800 more older residents by 2016 (increasing from 45,300 in 2011 to 47,100 in 2016).

Older people with a housing need will be positively affected by the proposed Scheme. Older people who have a housing need and meet the criteria will be placed in Homeseeker Band. If they have worked or volunteered for the past 12 months, they may be eligible for Community Contribution Rewards (refer to Table 1 in the Scheme) which will give them priority for housing over those in Homeseeker Band. We acknowledge that those applicants aged 70 years and above may not be able to volunteer for 10 hours per month, so in order to apply for Community Contribution Reward this group would need to volunteer for at least 5 hours a month.

We also know that 15% (7,445) of older people in the borough are claiming Attendance Allowance, 51% (3,830) of whom receive the higher rate award. Under the proposed scheme, should an older sole applicant or both joint applicant be unable to volunteer due to a disability or are very frail, they will be eligible for Community Contribution Rewards under the disability criterion. Similarly, older people who are full time carers for a partner or relative will be eligible under the disability criterion of the Community Contribution Reward. Please refer to section 2.1.1 and Table 1 in the draft Scheme.

##### People of working age (16 - 65 years)

###### *People in employment*

74% (112,400) people in Havering borough are economically active people of working age and 70% (105,300) are employed.

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People of working age will be affected by the proposed Scheme and the impact will depend on their circumstances. For example,

- a low income household with housing need living with parents or in the private rented sector will be eligible under the Scheme just as at present so long as their earnings/savings do not render them able to remedy their housing need in the private sector)
- a low income household that is adequately housed (that is, they have no housing need) will no longer be eligible under the Scheme. If they are on the Register at 1 April 2013, they will be removed (unless there are protected by the Council's proposed transitional arrangements). All such households whether on the Register or not on 1 April 2013 will however, continue to have access to housing advice and other support under the Housing Act 1996, as amended by subsequent legislation, should they experience or be threatened with homelessness
- a low income household who have a housing need and work, volunteer, want to foster/adopt or are disabled, will be eligible to apply for the Community Contribution Reward (CCR) and have priority above those in the Homeseeker Band for housing
- people who are working and can afford to rent privately will no longer be eligible to join the Register. If they are on the Register at 1 April 2013, they will be removed (unless there are protected by the Council's proposed transitional arrangements). All such households whether on the Register or not on 1 April 2013 will however, continue to have access to housing advice and other support under the Housing Act 1996, as amended by subsequent legislation, should they experience or be threatened with homelessness .

### Children

The number of children and young people aged between birth and 15 years is expected to grow by 8.2% (3,500) by 2016 and 21.1% by 2026. Just as at present, households with a housing need containing children will continue to be able to join the Housing Register. It is important to note, however, that having children does not in itself denote a housing need, therefore, it is anticipated that some (JG comment: do we have an estimate?) households containing children but without any housing needs will either be removed from the Register on 1 April 2013 or not be eligible should they apply after this date. All such households whether on the Register or not on 1 April 2013 will however, continue to have access to housing advice and other support under the Housing Act 1996, as amended by subsequent legislation, should they experience or be threatened with homelessness .

It is likely that an increase in young children will correlate with an increase in those accommodated by the Council's Children and Young Adults Services. Care leavers will positively benefit from the revised Allocations Scheme as their needs are considered to merit an assisted offer under the Emergency band.

Children in households renting from Havering Council with a secure tenancy or a PSL tenancy will positively benefit from the revised Allocations Scheme in that once a household has held a tenancy with Havering Council for five years, they are eligible to join the Housing Register even if they have no housing need. It is believed this will increase the ability of council tenants to move between property types, say from a flat to a house, or from area to area within the borough as currently such households are in the lowest band, Band E, with minimal chances of receiving an offer or alternative accommodation.

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### Young people

#### People aged 18-25 years

As at 21 August 2012 there were 2,703 applicants<sup>1</sup> aged 18-24 years on the Housing Register. Of these, 139 applicants were in Band E and this group is more likely to be affected by the proposed scheme as they are unlikely to be eligible to join the Housing Register.

#### *Young adults living with parents or in private rented housing*

Under the proposed scheme young adults living with their parents or in private rented housing who are adequately housed may perceive themselves as negatively affected by the implementation of the proposed scheme. However, if they meet the prior residency criterion and have a housing need (reasonable preference under the Homeseeker Band) they will be eligible to apply to join the Housing Register.

#### *Care leavers*

Residents leaving the care of Havering Council's Children and Young Adults Services aged 18-21 will benefit from the proposed changes to the housing allocations scheme. They will be placed in the Emergency Band and will be given assisted offers Council accommodation in addition to the ability to bid for properties through the choice based lettings system. This should mean that they are quickly provided with accommodation and valuable social services resources released to support other young people.

## **Disability**

### Borough-wide information - Joint Strategic Needs Assessment (JSNA) refresh - 2010 report

The key headlines include:

- It is estimated that more than 14,000 adults of working age in Havering have a disability and more than 6,000 are unable to work because of a disability
- Overall, adults in Havering are less likely to have a disability or a long term limiting illness than the national average and are likely to live for a greater number of years without a disability than is the case nationally
- It is less common for people in Havering to claim incapacity benefit (given to people who cannot work due to illness or disability) than is the average in England and London
- 43% of those claiming incapacity benefit in Havering have a mental health issue

#### Physical disabilities

It is estimated that more than 14,000 adults (of working age) in Havering have a moderate or severe disability. The number of those with moderate or severe disabilities is expected to rise by around 7% in the next 10 years, with more than 15,000 adults in Havering having a physical disability at this time.

#### Learning disability

Over 700 Havering adults are recorded on GP registers as having a learning disability. This represents around 0.4% of the population, which is in line with the national average of 0.4% and slightly above the London average of 0.3%. Overall, the number of adults in Havering with a learning disability is expected to increase by around 7% over the next 10 years and it is expected that need for local services will rise commensurately.

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<sup>1</sup> This study was based on the age of the sole or main applicant.

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### Single Housing list data – people with physical, sensory and learning disabilities (July 2012)

Following a recent joint study between Adult Social Care services and Housing Services, a single disability and housing list (as at July 2012) indicate that:

- there are 578 people with disabilities who require housing, of which 48 are clients of Children and Young People and 530 are clients of Adult Social Care
- 490 of these have a Learning Disability (LD) (85%); 56 have a Physical Disability (PD) (10%); and 32 have both multiple disabilities (LD and PD) (5%)
- 60% are male and 40% are female
- approximately two thirds of clients are 30 years old or younger
- 243 are known to have full time or occasional wheelchair use (42%) and a further 10 people have other mobility issues.

### Applicants on the Housing Register who have expressed an interest in extra-care or supported housing

As at 18 August 2012, a total of 138 applicants aged 55 years were interested in either extra-care or supported housing in the borough. Of these, 46 applicants were in band E and this group is unlikely to be eligible to apply for the Housing Register under the proposed scheme.

### *Eligibility*

Disabled people will be positively affected by the proposed Scheme. Disabled people who have lived in the borough for at least the previous 2 years will meet the medical and welfare housing preference and be placed in Homeseeker band.

Once they are in the Homeseeker Band, they may be eligible to apply under a number of options for Community Contribution Reward to gain greater priority for housing. Community Contribution Reward will be awarded for working, volunteering, needing to move to foster/adopt, and downsizing. It is recognised that a single disabled applicant or joint applicants where both are disabled or one is a registered carer of the other may not be able to benefit from this reward, thus, if a single applicant is in receipt of the high rate of Disability Living Allowance or equivalent, or both joint applicants are in receipt of this benefit or equivalent, or if one of the joint applicants is in receipt of this and the other is their full time carer and in receipt of Carers Allowance or Attendance Allowance (or equivalent) they will be eligible to apply for Community Contribution Reward under the Disability criterion, without working, volunteering, needing to move to foster/adopt or downsizing.

### *Emergency need to move*

Disabled people with an urgent need to move when their home is unsuitable will be placed in the Emergency band and supported with assisted offers as well as being able to bid for properties through the choice based lettings system.

In addition, disabled people moving from specialist accommodation provided by the London Borough of Havering's Social Services Team, North East London Foundation Trust (NELFT) or another registered supported housing provider will be supported into housing under the Emergency band.

Older disabled or very infirm people – please refer to the section on Older People.

## **Gender**

Of the 236,100 borough population, 52% are female and 48% are male<sup>2</sup>. This may in part be due to women's longer life expectancy. In the last financial year (2011-12), women made up over 70% of tenants taking up an offer of accommodation from the Housing Register. The reason for this may be that women's circumstances are more likely than men's to come under a reasonable preference category, particularly given the pattern of child care. It is predicted that this preference to women will continue as the Reasonable Preference categories will remain in place.

In addition, to this assessment we have considered the impact the proposed scheme will have on each gender during different stages of life. In particular, we have taken account of pregnancy and maternity and periods when both men and women may have breaks in employment (through no fault of their own, notably through redundancy).

### **Gender reassignment/identity**

No data are available locally about people who are and have undergone gender reassignment or have changed their identity. People applying for the Housing Register need to provide two forms of proof of identity/address. As these documents are issued by a statutory agency this should not impact on a person's ability to supply evidence as part of their application.

### **Marriage and Civil Partnership**

Approximately 0.1% (170) of Havering residents who disclosed their marital status live in same-sex couples. Housing legislation, the Localism Act 2011 and proposed allocations scheme treat same-sex couples the same as co-habiting and married couples. We have considered couples as part of developing the proposed scheme to ensure that it gives couples equal eligibility with single applicants.

### **Pregnancy and Maternity**

Between 2005 and 2010, the number of live births in Havering had increased by 14%. Women who have taken statutory maternity leave will be positively affected by the proposed scheme, as this group will be allowed a 6-month break in employment in a 12-month period and still be eligible to apply for Community Contribution Reward. This policy will give pregnant and nursing mothers equal opportunities alongside their male employees.

### **Carers**

There are few data available locally on carers. Women comprise 79% of Carers Allowance Claimants. This may be in respect of their main care responsibilities for a dependent child or close relative.

We have considered how carers can be treated fairly under the proposed Housing Allocations Scheme. If a single applicant is a full time carer for an ill or disabled child or relative and they receive Carers Allowance, they would be eligible to apply for Community Contribution Reward (CCR).

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<sup>2</sup> Office of National Statistics 2010 mid-year population estimates, Office of National Statistics, 2011



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Likewise, if the joint applicant does not have disabilities and they are the full-time carer for their partner (joint applicant) they will also be eligible to apply under CCR.

### Race/ethnicity

Borough-wide data

<b>BME groups</b>	<b>Percentage</b>
People with a BME heritage living in Havering Borough	8.5%
People with BME heritage on the Housing Register (Dec 2011)	17.64%
No. of properties let to people with a BME heritage (April 2008- Jan 2011)	12.34%

The table above shows that people with a BME heritage make up 17.64% of those households on the current housing register, whilst representing 8.5% of Havering's population. The higher number of BME households correlates with our homeless strategy research that identified that these households are more likely to live in overcrowded living conditions or homeless than other households in the borough. Overcrowded households are likely to be registered for large family homes, which mean that they tend to wait longer to be re-housing due to the relatively small number of family-sized social or affordable homes in the borough.

This over representation of BME households is also reflected in the number of lets from the housing register. Between April 2008 and January 2011 12.34% of lets were to BME groups. Given the relatively small number of family-sized social and affordable homes, existing tenants from may have a limited number of suitable homes to transfer to under the Tenancy Transfer proposals. This will need to be closely monitored.

### Religion or belief

Data held on the Housing Register does not record people with different religions or beliefs.

At the time of the Census 2001, 76% of Havering's population stated that they were Christian, followed by 13% with no religion and just below 8% who preferred not to state their religion.

Other religions in the borough include Hindu (0.77%), Sikh (0.52%), Buddhist (0.18%), Muslim (0.8%) and Jewish (0.5%).

The research above makes it difficult to establish those with a specific religious that could be affected to a greater extent under the new Housing Allocations Scheme.

### Sexual orientation

No data are held on the Housing Register.

The Census 2001 identified that only 0.1% (170) of people in Havering reported that they lived in same-sex couples. Same-sex couples who are co-habiting or who want to make one application for the Housing Register will be treated the same as a married or civil partnership.

### Socio-economic groups

Analysis of the Council's Housing Benefit and housing management systems show a high level of benefit claimants. Records show that 71.71% of Homes in Havering tenants are in receipt of either

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full or partial housing benefit. The number of private tenants (including housing association tenants) claiming housing benefit has also seen a dramatic increase in claimants since 2007 and totalled over 6000 claimants in 2011.

### *Impact on specific socio-economic groups*

Households that have lived in the borough for at least the last 2 years, have a low income and are in housing need will be eligible for the Homeseeker band. In addition, applicants in this group should be eligible for the Community Contribution Reward (CCR) if they give something back to the community. If they are not working (16 hours a week) and are in receipt of welfare benefits, they will still be eligible to apply for CCR if they volunteer at least 10 hours a month, are ex-armed forces personnel who have recently left or are close to leaving the service, want to foster or adopt, are willing to downsize to a smaller property, or are disabled (refer to section 2.1.1 and Table 1 in the Scheme).

### **Other groups – people directly affected by the new allocations Scheme**

#### **Impact analysis on applicants currently on the Housing Register**

##### Applicants currently in Bands A and B

Modelling has been done to assess the impact of the proposals on the current housing register to assess the impact of the proposed changes in the housing allocations review. This showed that anyone currently in high priority bands, Bands A and B, will remain on the housing register.

##### Applicants who live outside the borough

Approximately 2500 households that are currently on the housing register but live outside the borough would no longer be eligible under the proposed Scheme. The vast majority of this group are aged under 55 years with only 333 applicants aged 55 and over. The housing register does not record the reason that households are seeking housing in Havering borough so anticipating the needs of this group has proved challenging.

## **CONSULTATION**

### **4. If no data and information is available about the groups likely to be affected by the activity, how would you inform your EA? Will you be considering carrying out some consultation to inform your EA?**

#### **4 (a) Staff**

Staff who will be responsible for managing the Scheme, namely from the Strategic Housing Team, Housing Needs & Service Development, Housing Options Service and Homes in Havering (HiH) have been members of the Housing Allocation Scheme Project Team.

One-to-one meetings have been held with key internal partners such as the Social Services' Learning Disabilities Team and Corporate Equalities Team to ensure that the needs of customers have been incorporated in the Housing Allocations Scheme review.

21<sup>st</sup> March – Briefing to Corporate Management Team

In addition, as part of the consultation internal services were invited to complete an online survey and attend both a formal and follow-up consultation session held on 30 April and 14 May respectively. This consultation was particularly relevant given the matrix approach needed in order to successfully deliver the allocations scheme, for example working with Children's Services to support care leavers. Consultation notes are a background paper to the report and are available on request.

#### **4 (b) Community**

The Council has consulted extensively with wide ranging stakeholders, including applicants on the Housing Register and local communities. Consultation notes are a background paper to the report and are available on request.

Consultation includes the following:

##### *Round 1*

6<sup>th</sup> January-10<sup>th</sup> February 2012 - Letters were sent to everyone on the Housing Register, setting out the key proposals and inviting them to complete an online or paper survey questionnaire (6 weeks consultation).

6<sup>th</sup> February – Briefing and consultation with Elected Members

##### *Round 2*

April – May 2012

30<sup>th</sup> April – Formal consultation event. Invitations were sent to Registered Providers (also known as Housing Associations or Registered Social Landlords) and stakeholder groups (including residents associations and third sector organisations).

3<sup>rd</sup> May – Public consultation at Hornchurch Library

14<sup>th</sup> May – Follow up consultation workshop for Registered providers and stakeholder groups

14<sup>th</sup> May – Briefing and consultation with Elected Members

15<sup>th</sup> May – public question and answers drop-in session at Briar Road Information Shop, Harold Hill

22<sup>nd</sup> August – final consultation with Registered Providers with which Havering Council has nominations arrangements.

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5. The impact of the proposed Housing Allocations Scheme on staff and communities has been considered, and the impact on each group is detailed in the table below.				
a. Staff	Positive impact	Negative impact	Neutral ✓	The impact of the proposed Housing Allocations Scheme on staff has been considered. The transition phase (between Council adoption and effective date) will require a full complement of staff in the Housing Needs and Service Development Team in order to review existing applications, support new applicants and manage communications.
b. Communities				
Protected category	Positive Impact	Negative Impact	Neutral	Impact on protected characteristic group, mitigating measures and reasons
Age	✓  ✓			<p><i>Older people- wanting to downsize</i> The <i>current</i> housing allocations scheme gives preference to existing council housing applicants who are willing to downsize to a smaller property. There are currently 51 applicants who are registered to downsize, of which 39 are aged 55 and over. Our <i>proposed</i> scheme continues this policy and will better support people who have been council tenants for at least 5 years to transfer to another home and will give priority (under the Community Contribution Reward) to those wanting to downsize to a smaller home. The proposed change should reduce the waiting time and rent of those wishing to move to a smaller property.</p> <p><i>Older people- volunteering</i> Older volunteers who contribute to their community will be eligible to apply for Community Contribution Reward (CCR) and have priority over those in Homeseeker Band for housing. To ensure that older disabled older households who cannot volunteer are treated equally, they will be able to apply for CCR under the disabled criterion (see below).</p>

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	✓		✓	<p><i>Older people – very infirm or disabled</i>          Community contribution reward - If the applicant(s) is frail or disabled and this means that the full eligibility criteria can not be met, Community Contribution Reward will still be granted based on advice from Adult Social Care services, relevant practitioners and if Attendance Allowance (or equivalent) is received. In cases where an applicant(s) has an urgent need to move and their current cannot be adapted to meet their needs, they will be supported through assisted offers under the Emergency Band.</p>
	✓		✓	<p><i>Older people – who are not disabled, and do not work or volunteer</i>          Older people who meet the prior residency criterion and have a housing need, will be eligible to apply to join the Housing Register and could be placed in Homeseeker Band.</p>
	✓		✓	<p><i>Young adults – care leavers</i>          Residents leaving the care of Havering Council’s Children and Young Adults Services aged 18-21 should also benefit from the proposed changes to the housing allocations scheme. They will be placed in the Emergency Band and will be given assisted offers of Council accommodation in addition to the ability to bid for properties through the choice based lettings system. This should mean that they are quickly provided with accommodation and valuable social services resources released to support other young people.</p>
			✓	<p><i>Young adults living with parents or in private rented housing – adequately housed or have no housing need</i>          People living with parents or in private rented housing who are adequately housed or have no housing need will be negatively affected under the proposals. To mitigate and manage this negative effect, the Council will consider homeless enquiries under Housing Act 1996. In the first instance, people should contact the Council’s Housing Advice and Options Team. However, if they have meet the residency criteria and have a housing need under the Homeseeker Band they will be eligible to apply to join the Housing Register.</p>

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	✓		✓	<p><i>Young adults living with parents or in private rented housing – with housing need(s)</i>          Young adults who meet the eligibility criteria and have a housing need(s) will be positively affected by the proposals and will be eligible to join Homeseeker Band, and if eligible apply for Community Contribution. Young people who have an urgent housing need will be supported through assisted offers under the Emergency Band.</p>
	✓			<p><i>Children</i>          Local children in care on fostering or adoption lists will be positively affected by the proposals as applicants that want to adopt or foster will be eligible to apply for Community Contribution Reward, giving them priority for housing over those in Homeseeker Band.</p>
	✓			<p>Children in households that are seeking to transfer to another home will be positively affected as homes with gardens will be prioritised for households with children under 16 years of age. This could enable families with young children to move from a flat to a house with garden.</p>
		✓		<p><i>People of working age - currently on the Housing Register (see also Other Groups)</i>  <i>Applicants who live outside the Borough</i>          Under the proposals, anyone who lives outside of Havering will not be eligible to join the housing register. This is likely to have a negative impact on younger households who may have had to move outside of the borough due to work or in order to find cheaper rents. The reason why the applicant is looking to move into Havering is not formally recorded, but given the age of this group it seems likely that they would be looking to receive support from family members in the borough.</p>
			✓	<p>Other options are available if households living outside the borough are social housing tenants, as they can apply for a transfer through the Pan-London <i>housingmoves</i> scheme, national scheme or apply for a mutual exchange.</p>

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	✓		✓	<p><i>Families</i> If families meet the residency criterion and have a housing need, for example they live in overcrowded accommodation, they will be eligible to apply for the Housing Register and will be placed in Homeseeker Band. They can then also apply for Community Contribution Reward if they meet one of the criteria.</p>
Disability	✓			<p><i>Homeseeker Band</i> Anyone with a disability (learning, physical, and/or sensory) may apply for priority on the housing register on the basis of their specific needs under the medical/welfare banding reason. Furthermore, to ensure that disabled people in general needs housing are treated equally, if a single applicant or both partners in a couple are unable to work or volunteer, they will be able to apply for Community Contribution Reward (evidence of high rate Disability Living Allowance (or equivalent) needed).</p> <p><i>Emergency Band</i> People moving from specialist accommodation provided by the London Borough of Havering’s Social Services Team, North East London Foundation Trust (NELFT) or another registered supported housing provider will be supported into housing under the Emergency band.</p> <p>Any applicant with a severe disability who urgently needs to move (and their current home is unsuitable) will be eligible for the Emergency band. To expedite a direct offer of accommodation. A similar scheme is already in operation through the Special Needs procedure under the current allocation scheme. Disabled applicants will be supported through assisted offers of accommodation as well as having the ability to bid through the choice based letting system in order to support vulnerable people into suitable housing as quickly as possible.</p>
Gender			✓	<p>Under the current housing allocation scheme women make up over 70% of lets through the housing register last year. This may be because women are more likely to fall into a reasonable preference category. It is predicted that this preference to women will continue as the Reasonable Preference categories will remain in place.</p>

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Gender reassignment/identity			✓	This group has been considered. It is expected that the proposed allocations scheme will neither significantly advantage or prejudice this group.
Marriage and Civil Partnership			✓  ✓	If couples meet the residency criterion and have a housing need, they will be able to apply for the Housing Register. If one or both of them works, volunteers, needs to foster or adopt then they will be eligible to apply for the Community Contribution Reward (CCR). This gives a couple equal eligibility with single applicants.  We recognise that if one partner in a couple is disabled, they and/or their partner may still be able to work or volunteer. If their partner is their main carer and this means that neither are able to work/volunteer they will be able to apply for CCR if the disabled partner claims the high rate of Disability Living Allowance (or equivalent).
Pregnancy & Maternity			✓	<i>Equal opportunity to apply for Community Contribution Reward</i> To ensure that women who work or volunteer and are pregnant or nursing are treated fairly, we will take into account these breaks in employment and allow a 6-month break in employment during the 12 months period to enable these women to apply for Community Contribution Reward. We will need written evidence of statutory maternity pay and part of the application.
Carers	✓			<i>A full time carer for an ill or disabled child or relative</i> We have considered how carers can be treated fairly under the proposed Housing Allocations Scheme. If a single applicant is a full time carer for an ill or disabled child or relative and they receive Carers Allowance, they would be eligible to apply for Community Contribution Reward. Likewise, if the joint applicant does not have disabilities and they are the full time carer for their partner (joint applicant) they will also be eligible to apply under CCR.
Race/ethnicity	✓			Under the proposed Scheme, people wanting to downsize will be given priority under Community Contribution Reward to move. This should free up large, family homes. This should



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			<p>✓ be an advantage to BME households who show a high rate of overcrowding.</p> <p>✓ In the last 3 years BME households were over represented in the number of lets made from the housing register, with 12.34% of lets having been made to BME groups. As such, it is predicted that the proposal to include a tenant transfer scheme will not unfairly disadvantage BME households. However, this will have to be closely monitored.</p> <p>✓ <i>People with indefinite or limited leave to remain in the country</i> People who have sought asylum and have been granted indefinite or limited leave to remain in the country and have a right to social and affordable housing will be eligible to apply for the Housing Register if they meet the prior residency criterion and have a housing need (under Homeseeker Band). They can then apply for Community Contribution Reward if they meet the criteria. If people in this group are not eligible for to join the Housing Register, they will still be eligible for housing advice under the Housing Act.</p>
Religion or belief			<p>✓ These groups have been considered. It is not expected that the proposed Allocations Scheme will have a significant advantageous or detrimental impact on this group.</p>
Sexual Orientation			<p>✓ Following consideration, it is expected that the proposed Housing Allocations Scheme will have no significant advantageous or detrimental impact on this group.</p> <p>✓ Young gay, lesbian and bi-sexual homeless people Housing advice and support will be given as part of the Council's homelessness duties under part 7 of the Housing Act 1996.</p>
Socio-economic	✓		<p>✓ <i>People of working age, living with parents or private rented housing</i> People who are living at home with family or in the private rented sector and have a housing</p>

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<p>Groups</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>need as defined by the proposed banding scheme will be eligible to join the housing register as long as they meet the other eligibility requirements.</p> <p>People on a low income who are adequately housed and living at home with parents or in the private sector may perceive themselves are being negatively affected by the proposals. However, the negative impact is mitigated for those who meet the residency criterion and have a housing need as they will be eligible to join the Housing Register. It is proposed that anyone with a housing need, for example living in overcrowded housing with insufficient income to rent privately (see Appendix 1 of the Scheme) will be eligible to apply to join the housing register.</p> <p><i>Low income households, particularly lone parent families, disabled people and part-time workers</i></p> <p>Households that meet the residency criterion, have a low income and are in housing need will be eligible for the Homeseeker band. In addition, applicants in this group should be eligible for the Community Contribution Reward (CCR) if they give something back to the community. If they are not working (16 hours a week) and are in receipt of welfare benefits, they will still be eligible to apply for CCR if they volunteer at least 10 hours a month, are ex-armed forces personnel, want to foster or adopt, are willing to downsize to a smaller property, or are disabled (see section 2.1.1 and table 1 in the Scheme).</p> <p>The Community Contribution Reward (CCR) scheme recognises people who contribute to their community. It has been developed to ensure that part-time workers and that not in employment have opportunities to apply. The options include: volunteering, working, fostering or adopting, ex-armed forces personnel or wanting to downsize to a smaller home. If the main and joint applicant are disabled and unable to work/volunteer or they are main carers for a disabled child or relative they can also apply for CCR. The range of options offered to applicants to increase their priority on the housing register gives all protected characteristic groups, including lone parent families, low income households and disabled people an opportunity to achieve the Community Contribution Reward (CCR).</p>
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	<p>✓</p> <p>✓</p>		<p>✓</p>	<p>To ensure that working applicants who lose their job through no fault of their own are given an equal opportunity to apply for CCR, they are allowed to have a 3-month break over the previous 12-month period (they will need to be working or volunteering at both the beginning and end of the 12 months period).</p> <p><i>Low income households in the private rented sector or living with parents and have a housing need will be eligible to apply for the Housing Register</i></p> <p>If low income households in private rented housing are adequately housed (i.e. they have no housing needs) they may perceive themselves to be disadvantaged by the proposals. Under the <i>current</i> allocations scheme low income households who do not have a housing need are eligible to join the housing register but face many years on the waiting list due to their low priority. If the proposed scheme is adopted, then they would no longer be eligible to join the housing register. <i>Although these households are not eligible under the proposed Scheme, it should be noted that these they will still be able to seek housing assistance as homeless legislation takes affordability issues into account.</i></p>
<p><i>Other groups applicants - currently on the Housing Register</i></p>		<p>✓</p> <p>✓</p>	<p>✓</p> <p>✓</p>	<p><i>Younger people who live outside the Borough</i></p> <p>Under the proposals, anyone who lives outside of Havering will not be eligible to join the housing register. This is likely to have a negative impact on (i) younger households who may have had to move outside of the borough due to work or in order to find cheaper rents. People living outside the borough who are social housing tenants could transfer or enter a mutual exchange through the national or pan-London <i>housingmoves</i> scheme.</p> <p><i>Older people who live outside the Borough</i></p> <p>Data shows that 333 out of borough residents who are looking to move into the area are aged over 55. The proposals are likely to have a negative impact on these people. The reason why the applicant is looking to move into Havering is not formally recorded, but given the age of this group it seems likely that they would be looking to receive support from family members in the borough. People living outside the borough who are social housing tenants could transfer or enter a mutual exchange through the national or pan-London <i>housingmoves</i> scheme.</p>

**6. What is the likely impact on arrangements for safeguarding children and/or safeguarding vulnerable adults?**

**6 (a) Vulnerable children & Vulnerable adults**

The proposed changes will continue the work of the Housing Needs Assessment Team in safeguarding of vulnerable children and adults and have an overall positive impact. Under the proposals an emergency band has been created for households that need to move urgently, for example those fleeing domestic abuse. Anyone placed in the emergency banding will be given an assisted offer of accommodation in addition to being able to bid through the choice based letting system. It should be noted that in exceptional emergency situations, an assisted offer will be the quickest route to re-housing. This should mean that vulnerable children and/or adults will be re-housed quickly and removed from any dangerous situation.

Furthermore, the proposed Scheme will support applicant(s) who need to move to adopt or foster children, thereby continuing the care of vulnerable children, in partnership with the Council's Children and Young Adult Service. Applicants who want to foster or adopt (and meet the eligibility criteria for Homeseeker band) can apply for Community Contribution Reward and have priority over those in Homeseeker band.

**PREVENTING DISCRIMINATION**

**7. If any negative impact is identified, is there a way of eliminating or minimising it to reasonable level? If not, how can the negative impact be justified?**

**7 (a) Staff**

The transition phase will need to be managed to ensure the project is successfully delivered but it is not expected that the proposed scheme will have a negative impact on staff.

**7 (b) Community**

It is predicted that the proposed changes will have a negative impact on out of borough applicants who will no longer be eligible to join the housing register. This will particularly affect young households who have left the borough in search of employment or cheaper accommodation and elderly applicants wishing to move into the borough to live nearer to family. This decision can be justified as the Localism Act 2011 gives the Council greater power to decide who is eligible to join the housing register and there is political support for only allowing local residents to access council housing. Some of this impact will be mitigated by existing schemes designed to aid cross-borough movement. Social tenants will be able to complete a mutual exchange and Havering is currently considering joining the Pan London Mobility Scheme. In addition to this, private tenants from outside the borough will still be able to access homelessness services if required.

## **PROMOTING EQUALITY**

### **8. How will the activity help the Council fulfil its legal duty to advance equality of opportunity in the way services are provided?**

#### **8 (a) Staff**

The proposed changes will have no impact on the Council's staff.

#### **8 (b) Community**

The proposed changes to the housing allocations scheme should make the housing register easier to understand by reducing the number of bands from five to two. Reducing the number of bands on the housing register will also ensure that those who are most vulnerable and who have the most housing needs are prioritised. This includes those with disabilities and BME households.

We have considered the impact of our proposals on each of the protected characteristics groups and details can be found in Section 5.

## **SPECIFIC NEEDS**

### **9. What actions will you be taking in order to maximise positive impact and minimise negative impact from the activity?**

#### **9 (a) Staff**

During the transition phase (6 months) a communications strategy and applications review will be implemented and will increase partnership working in order to communicate the policy to vulnerable clients and the wider community. Once the proposed scheme becomes effective from April 2012 it is not expected to have an impact on the Council's housing staff or existing internal partnership working relationships.

#### **9 (b) Community**

Consultation has been undertaken with wide ranging stakeholders, including Housing Register applicants, members of the public and key partner organisations such as Age Concern has been undertaken. This has allowed changes to be made to the proposals in light of residents' and partner organisations' opinions.

If the proposed scheme is adopted by the Council then a transition phase will be undertaken in order to (i) to fully explain the scheme to those directly affected who will no longer be eligible, (ii) protect the top priority bidding applicants under the current allocations scheme for a certain period and (iii) review existing applications.

- Writing to everyone on the housing register providing them with a copy of the changes that will be made to the housing register as part of the housing allocation review and how this may affect them.
- Utilise a multi-platform approach to communicate with applicants to highlight the advantages of the housing allocations review including information on the Council's internet pages. This will

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promote the fact that review will simplify the housing register and allow greater focus on those in housing need.

- Team briefings with social services will also be held to ensure that their service users, including elderly and disabled people are aware of the changes and the impact they may have on them.

### **MONITORING AND REVIEW**

#### **10. Once implemented, how often do you intend to monitor the actual impact of the activity?**

##### **10 (a) Staff**

The scheme will be review and managed through regular Project Team and frontline team meetings. The teams will share learning in order to support frontline staff and assess any impact on staff resources.

In addition, the Housing Allocations Scheme will be formally reviewed by the Project Team in April 2014 and annually thereafter.

##### **10 (b) Community**

The actual impact of the Housing Allocations Scheme on the community will be monitored using a number of different methods, including:

- Regular housing register reports to ensure that:
  - A proportionate number of BME households are being taken into account, including the monitoring the length of time larger families wait for housing under the new scheme
  - A proportionate number of households who fall into the protected groups categories are applying for the Community Contribution Reward
  - Havering Council Tenant Transfer Scheme applicants are not unfairly advantaged and being housed before those in the reasonable preference categories.
- A full review of the housing allocations scheme after it has been in operation for one year and annually thereafter, in consultation with key stakeholders
- Focus groups will be undertaken with key stakeholders on a quarterly basis, such as Adult Social Services to ensure that vulnerable households have their needs taken into consideration.

### **SIGN OFF AND PUBLICATION**

#### **11. When completed, the Equality Analysis needs to be signed off by the Head of Service. Once signed off, it should be forwarded to the Directorate Equality Analysis Web administrator to publish it on the Council's website.**

**HEAD OF SERVICE**

**Name:**

**Date:**

**Signature**