

Housing Allocation policy

Equality and Health Impact Assessment (EqHIA)

Document control

Title of activity:	Housing Allocation policy
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Date completed:	24/09/21
Scheduled date for review:	October, 2022

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

1. Equality & Health Impact Assessment checklist

About your activity

1	Title of activity	Housing Allocation policy		
2	Type of activity	Policy Housing lettings		
3	Scope of activity	<p>This policy 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 policy.</p> <p>A summary of this Housing Allocation policy 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, 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		

Completed by:	Kwabena Obiri, Choice and Allocations Manager Joe Agius, Strategy & Policy Officer
Date:	29/09/21

How this policy 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 2019-2020, only two in every 10 households on the housing register had a realistic prospect of getting social housing. This policy sets out how the Council will prioritise access to the available housing.

Purpose of this policy

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 policy 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 this policy

The aims of this policy 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 this policy

This policy 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 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 61% of the Council's housing register – comparatively reasonable preference made up around 47% of all Council allocations in 19/20, contributing to 214 of 455 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 half 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 2016 and since then there have been changes in the legislation and 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 Policy will introduce the following key changes:

1. Qualification Criteria

- **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 of six years in the borough of Havering.

- **Residency exemptions**

A new exemption to the residency criterion will be granted to applicants of refugee status or of traveller background of five years, provided they have resided in the borough for five years continuously, and can demonstrate a community contribution such as paid, unpaid or voluntary work in the borough or being a recognised carer for an elderly or disabled adult or child. Further exemptions will also be introduced for members of the armed forces, under-occupiers of social housing, people who fall within the reasonable preference groups, those who have the "right to move", victims of domestic abuse, and exceptional cases.

- **Income threshold:**

In a change to the previous policy, the gross income threshold for applicants has been raised from £36,000 to £50,000 and a change of the savings limit to £30k.

This is proposed in recognition of the changing financial climate. Applicants who come above this threshold will not qualify to join the register.

2. Banding Changes

- Change to five new bands and new prioritisations within the bands. Increased priority for households with medical conditions that affect their housing and care leavers.
- Applicants previously placed under the Reduced Priority banding will no longer qualify for social housing apart from those who fall within a reasonable preference criteria as defined by the Housing Act 1996, Part 6.

- Establishment of an “Opportunity Register” to enable households not able to join the register to join and have their housing needs recorded and access other housing options.

Who will be affected by the activity?	
Applicants to the Havering Council Housing Register to seek housing.	
Protected Characteristic - Age	
<i>Please tick (✓) the relevant box:</i>	
Positive	<input type="checkbox"/>
Neutral	<input checked="" type="checkbox"/>
Negative	<input type="checkbox"/>
<p>Overall impact: Neutral</p> <p>This policy states an Age qualification for applicants to be placed on the Council’s Housing Register. This is:</p> <p><u>Age - Applicants must be 18 years of age or over</u></p> <p>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.</p> <p>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 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 policy 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>	

Evidence:

Declining mortality rates mean higher life expectancies.

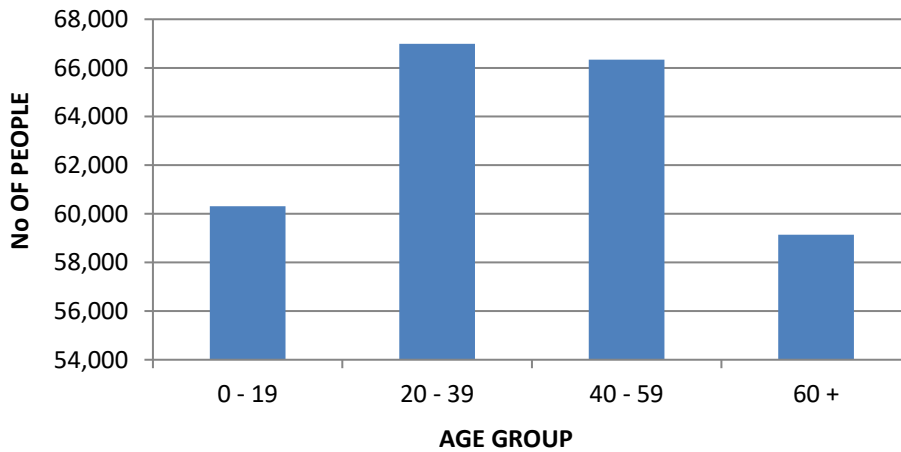
A newborn male baby in the UK today can expect to live for 79.2 years and a girl to 82.9 years, with 22.6% of newborn boys and 28.3% of newborn girls projected to live to 100 years old¹.

- Havering has the oldest population in London with a median age of 40 years, as recorded in the 2011 census.

¹ Article: ‘Living longer; how our population is changing and why it matters’ (Office for National Statistics, August 2018)

- 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



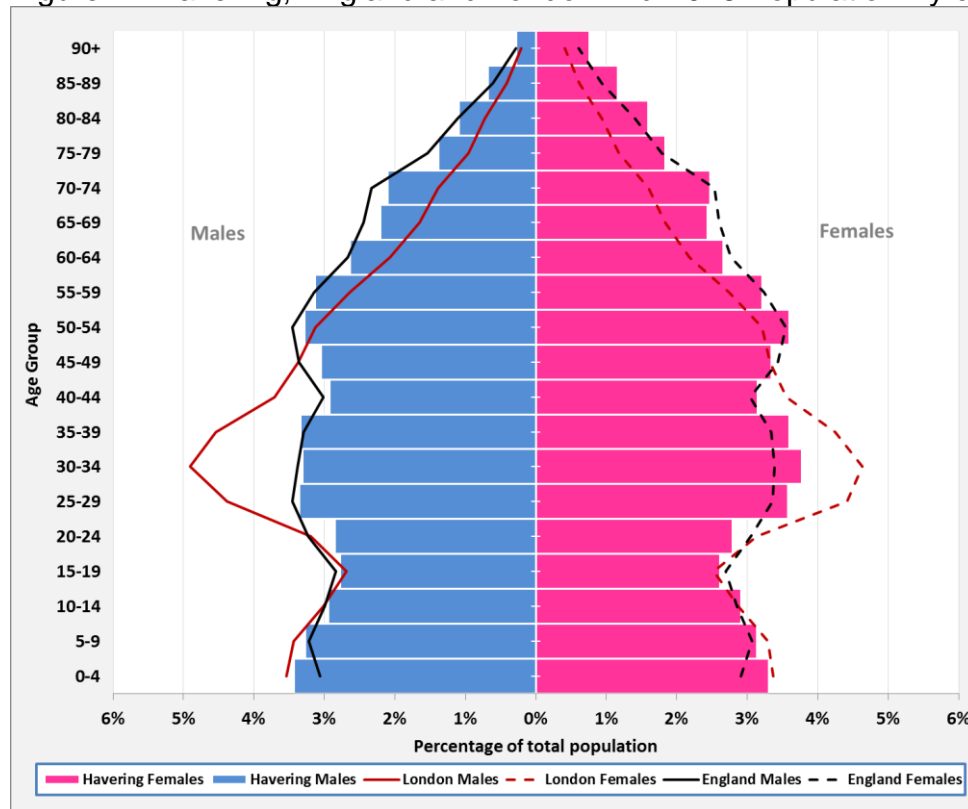
The Havering population is estimated to be 257,810 (ONS, 2018). The table below gives a breakdown by five year age bands and gender.

Age Band (Years)	Male	Female	Persons
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
All Ages	123,878	133,932	257,810

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 policy decides on applicants cases based on a number of criteria, including an applicant’s health and consequent housing need priority. The policy 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 the applicant, along with any further and necessary information supplied by other parties such as health professionals and housing officers.

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.

Depending on the circumstances, medical priority can be awarded under the Band 1, 2a or Band 3. The following table is used as a guide to how medical priority is determined:

<i>Medical Condition</i>	<i>THE EFFECT OF CURRENT HOUSING ON THE APPLICANT'S HEALTH</i>		
	<i>Severe</i>	<i>Moderate</i>	<i>Low</i>
<i>Serious</i>	<i>Band 1</i>	<i>Band 2a</i>	<i>No medical priority</i>
<i>Moderate</i>	<i>Band 2a</i>	<i>Band 3</i>	<i>No medical priority</i>

Applicants who clearly have an urgent need to move because they have a critical medical condition, or very serious disability, will be placed in the Band 1. This is an improvement compared to their priority under the current Allocation Scheme.

Therefore, the policy 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.

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
<i>ER</i>	<i>Special Needs</i>	<i>7</i>	<i>0</i>
	<i>Severe Medical</i>	<i>18</i>	<i>1</i>
<i>CC2</i>	<i>Disability</i>	<i>60</i>	<i>3</i>
<i>H</i>	<i>Moderate Medical</i>	<i>35</i>	<i>2</i>

Sources used:

This is Havering (2018)

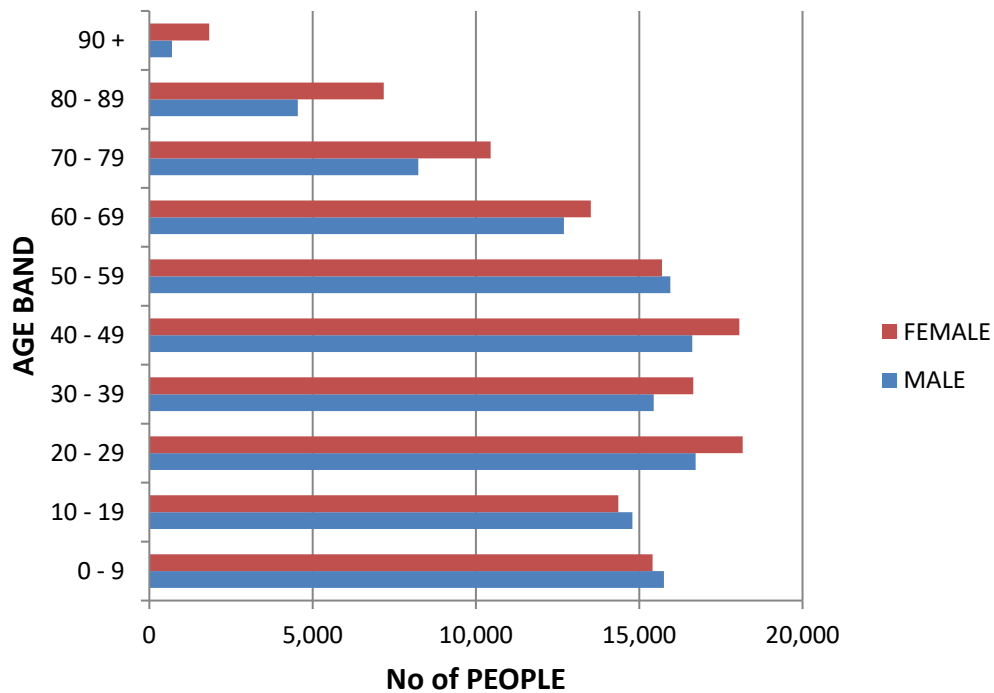
Projecting Older People Population Information: <https://www.poppi.org.uk/index.php>

Projecting Adults Needs and Services Information: <https://www.pansi.org.uk/>

Protected Characteristic - Sex/gender	
Please tick (✓) the relevant box:	
Positive	<input checked="" type="checkbox"/>
Neutral	<input type="checkbox"/>
Negative	<input type="checkbox"/>
<p>Overall impact: Positive</p> <p>This policy changes will be positive for households.</p> <p>The majority of applicants on the housing register are from women headed households, mainly due to the higher levels of poverty in such households. 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.</p> <p>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.</p> <p>There is a negative impact of the residency criteria policy that will affect women only headed households who cannot undertake community contributions due to childcare responsibilities.</p>	

Evidence:

HAVERING POPULATION
- BY GENDER AND AGE BAND



Gender	Total	% of Register
Male	402	21
Female	1511	79
Total	1913	100

Sources used:

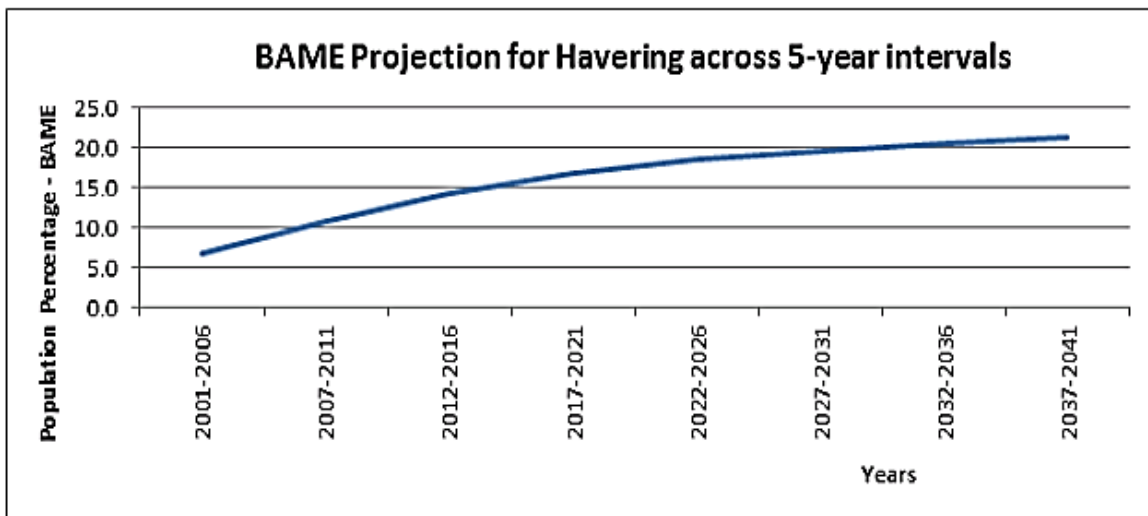
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates>

Protected Characteristic - Ethnicity/race	
<i>Please tick (✓) the relevant box:</i>	
Positive	Overall impact: Neutral
	This policy offers an ethnicity neutral approach to making decision on the allocation of housing.
Neutral	<p>There are no proposed changes to the residency criteria which may impact in terms of this protected characteristic.</p> <p>We know from the Hillingdon Court of Appeal cases that refugees and travelers fall within this protected characteristic group and that residency requirements can indirectly discriminate against these groups, as by virtue of their circumstances they are less likely to be able to satisfy a residency requirement. For an effective mitigation to be in place we need to show that the mitigations will eliminate or significantly reduce the discrimination. We have therefore introduced mitigations for travelers and refugees.</p> <ul style="list-style-type: none"> • Exception (Travelers & Refugees) – Reducing the residency criteria to 5 years which would reduce the impact of the 6 year residency criteria. Therefore the overall impact would be neutral for applicants of traveller background or refugee status. Single or couple applicants of refugee or traveller backgrounds stand to benefit from a reduction in residency with greater opportunities of success for 1 bed permanent accommodation. Travellers and refugee applicants are very likely to fall within a reasonable preference category, as shown in the analysis below, so will also benefit from that exemption to the residency requirement. Evidence suggests there is very little in the way of housing demand from the travelling community (see below). • Persons who fall within the statutory ‘reasonable preference’ groups: <ul style="list-style-type: none"> - 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);
Negative	

	<ul style="list-style-type: none"> - 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). <p>The figures for the refugee applicants below shows that all those who have applied were homeless applicants and placed in the RP band, which reduced their chances of being rehoused. Under the changes being made in the proposed Scheme there is a mitigation that those falling within a reasonable preference group, which includes homeless households, will have access to the Scheme. As such homeless households will be placed in the Band 2c if they have a community contribution, and Band C if they don't. Any medical needs or other relevant factors will also be taken into account in accordance with the Scheme, and banding accordingly allocated as for all applicants with access to the Scheme. This will therefore improve their chances of being housed.</p>
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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
Total	126,070	135,740	261,850

Table 2: Housing Register by Ethnicity

Racial Classification		Housing Register	
Race	Ethnicity	Total	% of register
White	British	1273	67
	Irish	17	1
	Other	88	5
BAME	Arab	2	0
	Asian Bengali	20	1
	Asian Indian	12	1
	Asian Other	27	1
	Asian Pakistani	13	1
	Black African	186	10
	Black Caribbean	47	2
	Black Other	18	1
	White & Asian	7	0
	White & Black African	28	1
	White & Black Caribbean	31	2
	Other Mixed	16	1
	Other	2	0
No response	Blank/Refused	126	6
		1913	100

2.3.2 (j) Exception (Travelers/Refugees) - 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 housing demand from the travelling community.

Table 4: Accepted applicants from traveler/Gypsy community to the housing register

Year	Status	Homeless	Residency Met?	Banding	Year Residency Met	New Band	Bed Need	Rehoused
2019	Traveler	Yes	No	RP	-	-	1	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. Of these eight households five went on to apply and become accepted on the housing register.

The below data shows the pathway of accepted Non-UK national applicants to the register, with the remaining three cases provided with alternative housing solutions such as discharge into private sector accommodation.

Table 5: Accepted Non-UK nationals/Refugees to the housing register

Year	Status	Homeless	Residency Met?	Banding	Year Residency Met	New Band	Bed Need	Rehoused
2016	Refugee	Yes	No	RP	2020	CC2	4	No
2018	Refugee	Yes	No	RP	-	-	1	Yes
2018	Refugee	Yes	No	RP	-	-	2	No
2018	Refugee	Yes	No	RP	-	-	4	No
2019	Refugee	Yes	No	RP	-	-	3	No
2019	Refugee	Yes	No	RP	-	-	2	No
2019	Refugee	Yes	No	RP	-	-	3	No
2019	Refugee	Yes	No	RP	-	-	3	No

For context, the only Non-UK national currently on the list with a higher priority banding resulting from RP banding (residency criterion) is currently in CC2 band with an effective date of 22 September 2020. For the purpose of context, an analysis of the number of properties the applicant would have been successful for based on lowered exception criteria by years is documented below:

Table 6: Prospective accommodation offer for eligible Non-UK national/refugee applicant

CC2 Band (having fulfilled residency criterion from RP Banding)		
Effective Date	Bedroom Eligibility	Potential Successful bids based on effective date
22/09/15 (5 year residency)	Four bedroom	13
22/09/18 (4 year residency)	Four bedroom	8
22/09/17 (3 year residency)	Four bedroom	8
22/09/18 (2 year residency)	Four bedroom	4
22/09/19 (1 year residency)*	Four bedroom	3
Total		32

Based on the data, there appears to be a sizeable impact to the applicant starting from RP band, who based on the five-year wait to achieve banding status would have missed out on 32 four bedroom properties to applicants in higher banding. This differs from a qualifying applicant as homeless who met initial residency placed under Homeseeker (H) band and subsequently qualified for CC2 under similar circumstances.

If expected waiting times are applied based on banding effective date stretching back five years (22/09/15) the results would show as follows:

Table 7: Waiting based on earlier effective date (2015)

Banding	Bedroom Need	Waiting Time (in Band – with residency served - no RP)	Total waiting time (with accrued RP years)
ER	Four bedroom	1 month	5 years
CC1	Four bedroom	1-6 months	5.5 years
CC2	Four bedroom	1-2 years	6-8 years
H	Four bedroom	3-7 years	8-12 years

From the above table there is a visible distinction in the prospective waiting times based on the above applicants placement in CC2 with an earlier effective date. With the current effective date (22/09/20) applied the waiting times would vary considerably:

Table 8: Waiting times based on current effective date (2020)

Banding	Bedroom Need	Waiting Time (in Band – with residency served – no RP)	Total waiting time (with accrued RP years)
ER	Four bedroom	6 months	5.5 years
CC1	Four bedroom	2-3 years	7-8 years
CC2	Four bedroom	3-5 years	8-10 years
H	Four bedroom	4-7 years	9-12 years

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 9. 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 policy 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.

The impact of the mitigations will be measured against the current figures:

- Currently only 62 applicants out of 1896 (3%) on the housing register are accepted under reasonable preference as homeless despite not having 6 years residency.
- 34 applicants out of above 62 (55%) identified are from within non-White British households
- 34 out of 1896 amounts to 2% accepted onto register as exceptions under reasonable preference.

Protected Characteristic - Religion/faith		
<i>Please tick (✓) the relevant box:</i>	Overall impact: Neutral	
Positive	This policy offers a religion/faith neutral approach to making decision on the allocation of housing. The Policy will be carried out with an emphasis on equality of treatment.	
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%
Totals	237,232	100%

Sources used:
Census 2011

Protected Characteristic - Sexual orientation

Please tick (✓)
the relevant box:

Overall impact: Neutral

Positive	<input type="checkbox"/>
Neutral	<input checked="" type="checkbox"/>
Negative	<input type="checkbox"/>

This policy offers a sexual orientation neutral approach to making decision on the allocation of housing. The Policy 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 evidential information 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:

Overall impact: Neutral

Positive	<input type="checkbox"/>
Neutral	<input checked="" type="checkbox"/>
Negative	<input type="checkbox"/>

This policy offers a gender reassignment neutral approach to making decision on the allocation of housing. The Policy 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:

Overall impact: Neutral

Positive

Neutral

Negative

This policy offers a marriage/civil partnership neutral approach to making 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 evidential information 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:

Overall impact: Neutral

Positive

Neutral

Negative

This policy offers a pregnancy, maternity and paternity neutral approach to making decision on the allocation of housing. The Policy will be carried out with an emphasis on equality of treatment.

Evidence: There is insufficient evidential information 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 policy will not impact this group.

Health & Wellbeing

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

Overall impact: Neutral

Positive

Neutral

Negative

Do you consider that a more in-depth HIA is required as a result of this brief assessment? No ✓

The process of reviewing this policy 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.

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.

Similarly, reviews of this policy 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.

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.

Evidence:

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. (*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*).

This takes account of both overcrowded households who require a move to a larger dwelling and also under-occupying households who require downsizing.

Fully objectively assessed housing need for Havering for affordable homes 2011 -2033

	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
TOTAL	25,200	30,050

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.

Affordable Housing in Havering

The review of this policy will assist the Council in identifying where downsizing may be appropriate to certain households and these properties can be placed back in to the churn of much needed council stock.

		Sources used: Outer North East London Strategic Housing Market Assessment for Havering – November 2016, by Opinion Research Services

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: October, 2022

Lead Officer conducting the review: 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 policy for refugees, traveler communities and homeless households.	The impact of the policy on these groups will be monitored.	Annually	Kwabena Obiri

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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: October 2022

Lead Officer conducting the review: Kwabena Obiri

Please submit the completed form via e-mail to EqHIA@haverling.gov.uk thank you.