

## Housing Allocation Scheme

### Equality and Health Impact Assessment (EqHIA)

#### Document control

|                                   |                                                      |
|-----------------------------------|------------------------------------------------------|
| <b>Title of activity:</b>         | Housing Allocation Scheme                            |
| <b>Lead officer:</b>              | Darren Alexander, Assistant Director, Housing Demand |
| <b>Approved by:</b>               | Patrick Odling-Smee, Director, Living Well           |
| <b>Authors:</b>                   | Kwabena Obiri, Housing Choice & Applications Manager |
| <b>Date completed:</b>            | 15/01/24                                             |
| <b>Scheduled date for review:</b> | January 2025                                         |

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

# 1. Equality & Health Impact Assessment checklist

## About your activity

|    |                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                 |                                                                                                      |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|
| 1  | Title of activity                                                                                                                                | Housing Allocation Scheme                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                 |                                                                                                      |
| 2  | Type of activity                                                                                                                                 | Policy<br>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 <b>question 5</b> . | If the answer to <u>all</u> of the questions (4a, 4b & 4c) is 'NO', please go to <b>question 6</b> . |
| 4b | Does this activity have the potential to impact (either positively or negatively) upon people (9 protected characteristics)?                     | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                 |                                                                                                      |
| 4c | Does the activity have the potential to impact (either positively or negatively) upon any factors which determine people's health and wellbeing? | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                 |                                                                                                      |

|               |                                                |
|---------------|------------------------------------------------|
| Completed by: | Kwabena Obiri, Choice and Applications Manager |
| Date:         | 22/04/24                                       |
|               |                                                |

## How this 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 2022-23, only one in every 5 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](http://www.havering.gov.uk) and paper copies will be provided on request.

The Housing Act 1996 (as amended) requires local authorities to give reasonable preference in their allocations policies to people with high levels of assessed housing need. The main groups are:

- People who are homeless as defined by the Housing Act 1996, Part 7;
- People who are owed a duty by any local housing authority under section 190(2), 193(2) or 195(2) (or under section 65(2) or 68(2) of the Housing Act 1985), or who are occupying accommodation secured by any such authority under section 192(3);
- People occupying insanitary or overcrowded housing, or who are otherwise living in unsatisfactory conditions;
- People who need to move on medical or welfare grounds (including any grounds relevant to a disability); and

- People who will suffer hardship to themselves or to others if they are unable to move to a particular locality or district.

In addition to the above, the Council also exercises its statutory discretion to grant additional preference and/or to determine priority between applicants with reasonable preference. Applicants in reasonable preference categories makeup around 82% of the Council's housing register – comparatively reasonable preference made up around 62% of all Council allocations in 22/23, contributing to 310 of 502 lets. Whilst there is slightly larger demand for accommodation than supply for applicants of reasonable preference, the figures show that they are overall treated fairly, contributing to just under two-thirds of all Council lets.

The Act also requires local authorities to state within the policy what its position is on offering applicants a choice of housing accommodation, or offering them the opportunity to express preference about the housing accommodation to be allocated to them.

The current policy was agreed by the Cabinet in 2021 and since then there have been a change in administration - the review has been conducted to ensure that the policy meets with current legislation and guidance.

### **In summary – the proposed key changes**

The new, Housing Allocation Policy will introduce the following key changes:

#### **1. Qualification Criteria**

##### **• 4 out of 6 years continuous residency:**

In order fulfil the Council's qualification criteria to join the Housing Register, an applicant will be required to demonstrate a continuous residency four out of six years in the borough of Havering.

#### **2. Points Based Award Scheme**

Change from the banding system under the current policy to a points based award system which reflect their current housing circumstances. Points are totalled to evaluate the applicant's' relative housing priority.

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

|  |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|--|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  |  | <p>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.

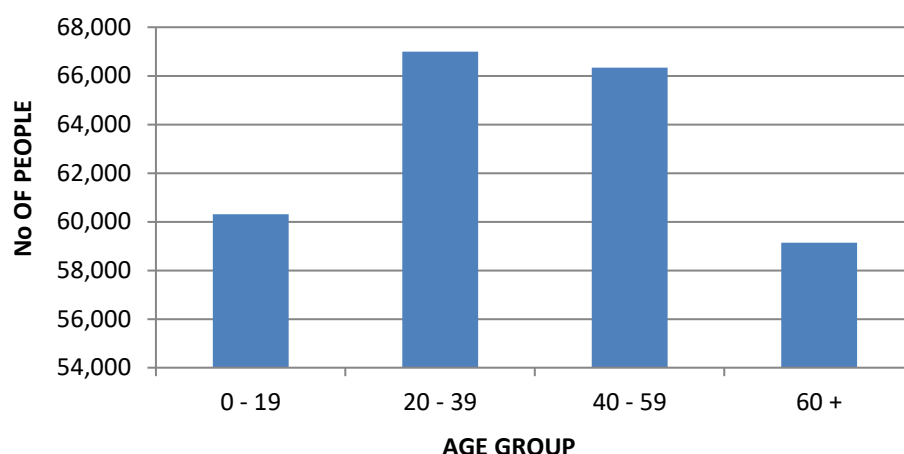
A newborn male baby in the UK today can expect to live for 79.2 years and a girl to 82.9 years, with 22.6% of newborn boys and 28.3% of newborn girls projected to live to 100 years old<sup>1</sup>.

- Havering has the oldest population in London with a median age of 40 years, as recorded in the 2011 census.
- The life expectancy at age 65 years in Havering is 19 years for males and 21.7 years for females. The life expectancy at birth for people living in Havering is 80.2 years for males and 83.9 years for females.
- From 2011 to 2016, Havering experienced the largest net inflow of children across all London boroughs. 4,580 children settled in the borough from another part of the United Kingdom during that five-year period.
- It is projected that the largest increases in population up to 2033 will occur in the following age brackets; children (0-17 years), and older people age groups (65 years and above).

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<sup>1</sup> Article: 'Living longer; how our population is changing and why it matters' (Office for National Statistics, August 2018)

## HAVERING - BY AGE GROUP



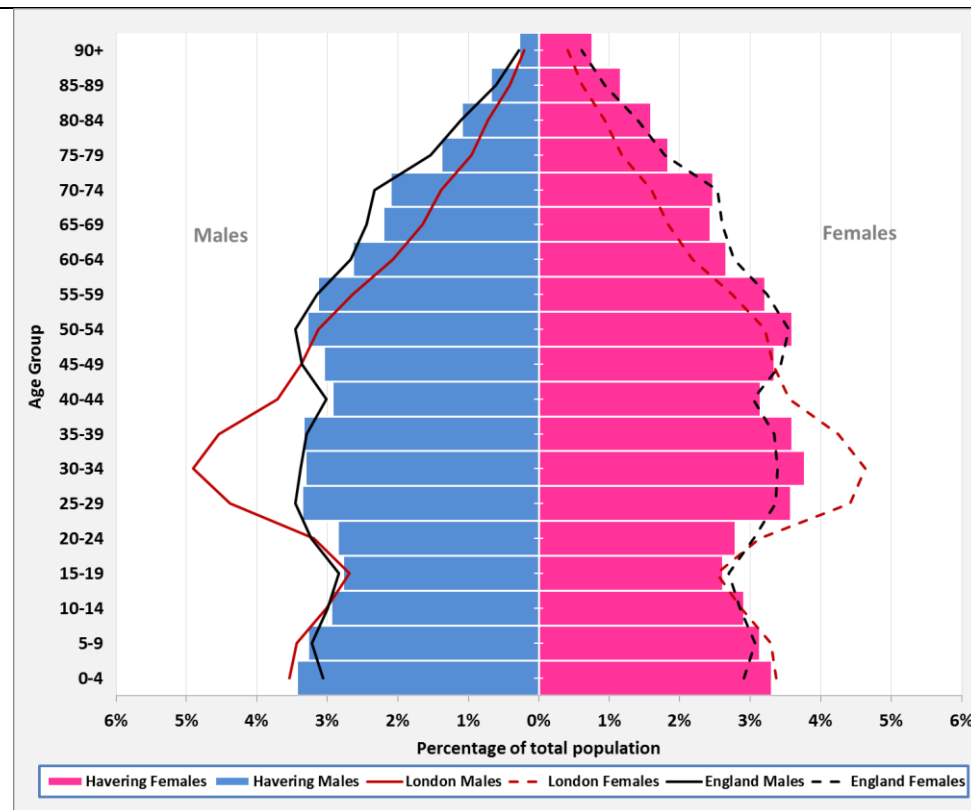
The Havering population is estimated to be 257,810 (ONS, 2018). The table below gives a breakdown by five year age bands and gender.

| 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          |
| <b>All Ages</b>  | <b>123,878</b> | <b>133,932</b> | <b>257,810</b> |

Havering has the oldest population in London with a median age of 39 years. There are approximately 60,102 persons aged 65 and over in Havering. This is more than a fifth of the whole population (23.3%).

Figure 1 below shows a much older age structure for the population of Havering compared to London but similar to England.

Figure 1 : Havering, England and London Mid-2018 Population Pyramid



Data source: ONS 2018 Mid-year population estimates.

The increased age of residents within Havering could see mean that there is an increased pressure for smaller or sheltered type properties.

Sources used:

- This is Havering 2019/20 version 4.4, Public Health Intelligence
- ONS 2018 Mid-year Population Estimates

### Protected Characteristic - Disability

Please tick (✓) the relevant box:

**Positive**



**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:

**Neutral**



**Negative**



#### MEDICAL

The medical element of the assessment is based on whether the applicant's health, or a member of their household's health, would improve by moving to alternative accommodation. Consequently, medical priority is awarded according to the extent to which the health or welfare of one or more members of the applicant's household, is affected by their current housing conditions and the expected benefits of providing suitable alternative housing.

Applicants are asked to complete a Medical Assessment Form. A Housing Assessment Officer will consider the information supplied by

|                                         | <p>the applicant, along with any further and necessary information supplied by other parties such as health professionals and housing officers.</p> <p>Applicants claiming to have a severe and enduring mental illness will need to demonstrate that they currently have, or have recently had, access to Havering Mental Health Services.</p> <p>Depending on the circumstances, medical priority points can be awarded on a scale of 25-75. The following table is used as a guide to how medical priority is determined:</p> <table> <tr> <th><i>Medical Condition Classification</i></th><th><i>Points</i></th></tr> <tr> <td><i>High</i></td><td><i>75</i></td></tr> <tr> <td><i>Moderate</i></td><td><i>50</i></td></tr> <tr> <td><i>Low</i></td><td><i>25</i></td></tr> </table> <p>Applicants who clearly have an urgent need to move because they have a critical medical condition, or very serious disability, will be awarded 75 points. These points will be awarded in consideration of any other housing need points the applicant may be eligible for.</p> <p>Therefore, the 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.</p> | <i>Medical Condition Classification</i> | <i>Points</i> | <i>High</i> | <i>75</i> | <i>Moderate</i> | <i>50</i> | <i>Low</i> | <i>25</i> |
|-----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|---------------|-------------|-----------|-----------------|-----------|------------|-----------|
| <i>Medical Condition Classification</i> | <i>Points</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                         |               |             |           |                 |           |            |           |
| <i>High</i>                             | <i>75</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                         |               |             |           |                 |           |            |           |
| <i>Moderate</i>                         | <i>50</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                         |               |             |           |                 |           |            |           |
| <i>Low</i>                              | <i>25</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                         |               |             |           |                 |           |            |           |

#### **Evidence:**

- In 2017, 3,506 adults (aged 18-64 years) were estimated to be living with serious physical disabilities in Havering.
- The estimated rate of serious physical disabilities in Havering (2,323 per 100,000 population aged 18-64 years) is similar to England but significantly higher than London average. It is one of the highest rates within London local authorities (see Figure 22). One of the key reasons for this is likely to be due to the relatively older population in Havering compared to other London boroughs.

Please note: Rate per 100,000 calculation uses mid 2016 population.

The following shows the prevalence of various disabilities in Havering:

Table 1: Number of people aged 18-64 with disabilities in Havering by age band, 2020

| Age band | Number with learning disability | Number with Impaired mobility | Number with serious visual impairment | Number with moderate or severe, or profound hearing impairment |
|----------|---------------------------------|-------------------------------|---------------------------------------|----------------------------------------------------------------|
| 18-24    | 519                             | 192                           | 12                                    | 347                                                            |
| 25-34    | 911                             | 366                           | 24                                    | 791                                                            |
| 35-44    | 882                             | 1,790                         | 23                                    | 1,652                                                          |
| 45-54    | 792                             | 1,685                         | 22                                    | 4,271                                                          |
| 55-64    | 721                             | 4,438                         | 21                                    | 8,143                                                          |
| 18-64    | 3,824                           | 8,471                         | 102                                   | 15,204                                                         |

Table 2: Number of people aged 18-64 with mental health problems in Havering, 2020

| Mental health problem             | Number |
|-----------------------------------|--------|
| Common mental disorder            | 29,906 |
| Borderline personality disorder   | 3,796  |
| Antisocial personality disorder   | 5,184  |
| Psychotic disorder                | 1,100  |
| Two or more psychiatric disorders | 11,327 |

Table 3: Number of people aged 65 & over unable to manage at least one mobility activity on their own in Havering, 2020

| Age band    | Number |
|-------------|--------|
| 65-69       | 1,023  |
| 70-74       | 1,642  |
| 75-79       | 1,506  |
| 80-84       | 1,740  |
| 85 and over | 3,410  |
| 65 and over | 9,321  |

Table 4: Disabled population with medical needs

| Band | Medical Type            | Total | % of Register |
|------|-------------------------|-------|---------------|
| 1    | <i>Special Needs</i>    | 12    | 0             |
|      | <i>Severe Medical</i>   | 11    | 0             |
| 2a   | <i>Disability</i>       | 136   | 5             |
| 3    | <i>Moderate Medical</i> | 44    | 2             |

#### Sources used:

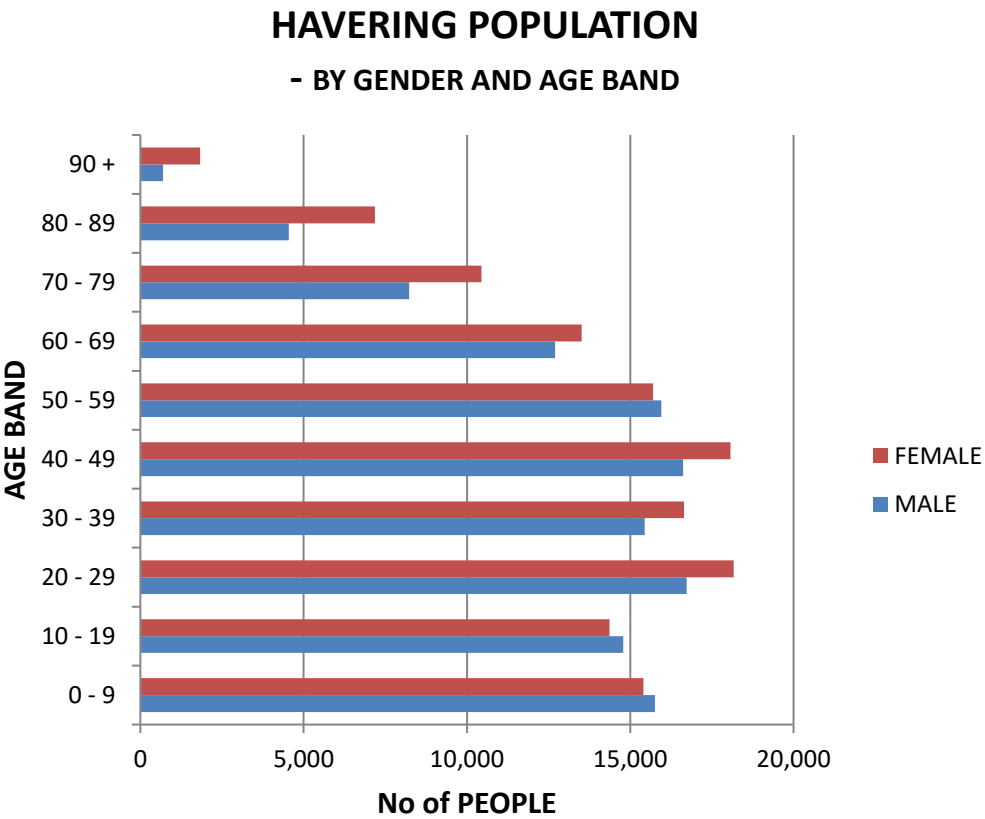
This is Havering (2018)

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

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

| Protected Characteristic - Sex/gender |   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------------------------------|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Please tick (✓) the relevant box:     |   | <b>Overall impact: Positive</b><br><br>This policy changes will be positive for households.<br><br>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.<br><br>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.<br><br>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. |
| Positive                              | ✓ |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Neutral                               |   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Negative                              |   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

Evidence:



| Gender | Total | % of Register |
|--------|-------|---------------|
| Male   | 589   | 22            |
| Female | 1990  | 78            |
| Total  | 2579  | 100           |

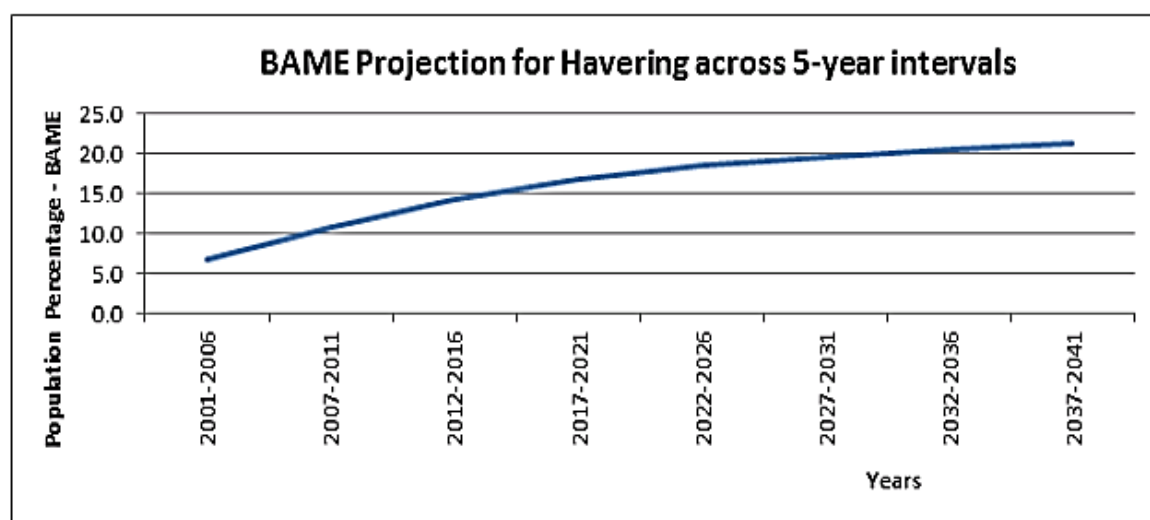
#### Sources used:

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

| Protected Characteristic - Ethnicity/race |                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------------|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Please tick (✓) the relevant box:         |                                     | <b>Overall impact: Negative</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Positive</b>                           | <input type="checkbox"/>            | This policy offers an ethnicity neutral approach to making decision on the allocation of housing.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Neutral</b>                            | <input checked="" type="checkbox"/> | There are no proposed changes to the residency criteria which may impact in terms of this protected characteristic.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Negative</b>                           | <input type="checkbox"/>            | <ul style="list-style-type: none"> <li>Exception (Travelers &amp; Refugees) - Overall impact would be neutral/positive for applicants of traveller background or refugee status with no sizable advantage gained from the reduction of residency for applicants requiring family accommodation as there would still be extended waiting periods in their elevated banding. Single or Coupled applicants of refugee or traveller backgrounds stand to benefit from a reduction in residency with greater opportunities of success for 1 bed permanent accommodation.</li> <li>Persons who fall within the statutory 'reasonable preference' groups: <ul style="list-style-type: none"> <li>people who are homeless (within the meaning of Part 7);</li> <li>people who are owed a duty by any local housing authority under section 190(2), 193(2) or 195(2) (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any such authority under section 192(3);</li> <li>people occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions;</li> <li>people who need to move on medical or welfare grounds (including any grounds relating to a disability); and</li> <li>people who need to move to a particular locality in the district of the Council, where failure to meet that need would cause hardship (to themselves or to others).</li> </ul> </li> </ul> |

## Evidence:

- Havering is one of the most ethnically homogenous boroughs in London, with 83% of its residents recorded as 'White British' in the 2011 census; higher than both London and England.
- However, the ethnically homogenous characteristic of Havering is gradually changing due to its growing cultural diversity.
- The Borough's white population is projected to decrease from the current 84% to 78% in 2032.
- The BAME population, notably those from Black African heritage (though many of whom are likely to be British born) is projected to increase from 4.1% in 2017 to 5.3% of the Havering population in 2032



According to the GLA ethnic projections (2020) There are approximately 40,500 (18%) people from BAME groups living in Havering, the majority being black Africans (11,700, 4.5%).

Table 1: The GLA ethnic population projections 2020

| Ethnic Group            | Male   | Female  | Persons |
|-------------------------|--------|---------|---------|
| White British           | 94,850 | 101,950 | 196,810 |
| White Irish             | 1,320  | 1,620   | 2,940   |
| Other White             | 7,280  | 7,330   | 14,610  |
| White & Black Caribbean | 1,900  | 1,840   | 3,740   |
| White & Black African   | 710    | 780     | 1,490   |
| White & Asian           | 890    | 860     | 1,750   |
| Other Mixed             | 900    | 920     | 1,820   |
| Indian                  | 4,050  | 4,530   | 8,590   |
| Pakistani               | 1,290  | 1,510   | 2,810   |
| Bangladeshi             | 1,190  | 1,140   | 2,340   |
| Chinese                 | 610    | 1,010   | 1,620   |
| Other Asian             | 1,980  | 2,120   | 4,110   |
| Black African           | 5,270  | 6,430   | 11,700  |
| Black Caribbean         | 2,090  | 1,940   | 4,030   |
| Other Black             | 790    | 970     | 1,760   |
| Arab                    | 290    | 220     | 510     |

|                    |                |                |                |
|--------------------|----------------|----------------|----------------|
| Other Ethnic Group | 660            | 570            | 1,220          |
| <b>Total</b>       | <b>126,070</b> | <b>135,740</b> | <b>261,850</b> |

Table 2: Housing Register by Ethnicity

| Racial Classification |                         | Housing Register |               |
|-----------------------|-------------------------|------------------|---------------|
| Race                  | Ethnicity               | Total            | % of register |
| White                 | British                 | 1493             | 58            |
|                       | Irish                   | 17               | 1             |
|                       | Other                   | 117              | 5             |
| BAME                  | Chinese                 | 3                | 0             |
|                       | Asian Bengali           | 34               | 1             |
|                       | Asian Indian            | 20               | 1             |
|                       | Asian Other             | 40               | 2             |
|                       | Asian Pakistani         | 28               | 1             |
|                       | Black African           | 268              | 10            |
|                       | Black Caribbean         | 63               | 2             |
|                       | Black Other             | 34               | 1             |
|                       | Gypsy/Irish Traveler    | 2                | 0             |
|                       | White & Asian           | 8                | 0             |
|                       | White & Black African   | 30               | 1             |
|                       | White & Black Caribbean | 50               | 2             |
|                       | Other Arab              | 12               | 0             |
|                       | Other Mixed             | 25               | 1             |
|                       | Other                   | 11               | 0             |
| No response           | Blank/Refused           | 324              | 12            |
|                       |                         | 2579             |               |

2.3.2 (j) Exception (Travelers/Refugees) - a reduction in residency criteria appears to have no significant advantage to applicants of traveler background. From data sourced from P1E records, shows the number of accepted homeless cases under Part 7 between 2016-18 for travelers were as follows:

Table 3: Accepted homeless cases for applicants of traveler/gypsy background 2016-18

| Year | Total |
|------|-------|
| 2016 | 0     |
| 2017 | 0     |
| 2018 | 0     |

For the year 19/20 data sourced from HCLIC showed there were five known traveler cases investigated under part 7 with one case accepted under s.193 main duty. Accepted applications to the housing register did not fare better for applications from travelers with one application made in 2019 and zero acceptances to the register between 2016 and year-end 2020. This appears to suggest there is very little in the way of housing demand from the travelling community.

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

| Year | Status   | Homeless | Banding | Bed Need | Rehoused |
|------|----------|----------|---------|----------|----------|
| 2022 | Traveler | Yes      | 2c      | 3        | No       |
| 2022 | Traveler | Yes      | 2a      | 2        | No       |

Opportunities for non-UK residents/asylum seekers appear to be relatively neutral to positive dependent on bedroom size required. Data obtained shows that between 2016-20 eight households were granted homeless decisions under s.193 of HA96. Of these eight households five went on to apply and become accepted on the housing register.

Figures published by the MHCLG show:

- in London, Black Caribbean households were over-represented in new social housing lettings (accounting for 11.2% of new lettings, compared with 4.3% of the population), as were Black African households (15.2% of lettings, compared with 6.6% of the population)
- in London, White British households were under-represented in new social housing lettings (accounting for 37.0% of new lettings, compared with 45.4% of the population), as were Other White households (7.5% of lettings, compared with 13.2% of the population) and Asian Indian households (2.0% of lettings, compared with 6.9% of the population). This reflects the higher levels of poverty and housing needs amongst BAME populations.

The table below shows the lettings to BAME and non-BAME communities in Havering in 2016 compared to the national average (England). This is the latest year that figures are available.

Table 5. Social Housing Letting 2016/17

|                 | White |                         |                            | Other than White |                         |                              |
|-----------------|-------|-------------------------|----------------------------|------------------|-------------------------|------------------------------|
|                 | %     | Social housing lettings | Population estimate (2016) | %                | Social housing lettings | Population estimate (2016) % |
| Havering        | 83.7  | 518                     | 88.3                       | 16.3             | 101                     | 11.7                         |
| Average England | 87.4  | 783                     | 89.8                       | 12.6             | 152                     | 10.2                         |
| Average London  | 49.1  | 424                     | 62.1                       | 50.9             | 492                     | 37.9                         |

<https://www.ethnicity-facts-figures.service.gov.uk/housing/social-housing/new-social-housing-lettings/latest>

This shows that under the current 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.

## Protected Characteristic - Religion/faith

Please tick (✓) the relevant box:

**Positive**

**Neutral**

**Negative**

**Overall impact: Neutral**

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.

✓

### Evidence:

Most recent available data (Census 2011) shows the majority of Havering residents are Christians.

Table 7: Religion and Belief 2011 Census, Havering

| Faith          | Number         | %           |
|----------------|----------------|-------------|
| Christian      | 155,597        | 65.6%       |
| Buddhist       | 760            | 0.3%        |
| Hindu          | 2,963          | 1.2%        |
| Jewish         | 1,159          | 0.5%        |
| Muslim         | 4,829          | 2.0%        |
| Sikh           | 1,928          | 0.8%        |
| Other Religion | 648            | 0.3%        |
| No Religion    | 53,549         | 22.6%       |
| No Response    | 15,799         | 6.7%        |
| <b>Totals</b>  | <b>237,232</b> | <b>100%</b> |

### Sources used:

Census 2011

## Protected Characteristic - Sexual orientation

Please tick (✓) the relevant box:

**Positive**

**Neutral**

**Negative**

**Overall impact: Neutral**

This 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**

**Neutral**



**Negative**

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:

Positive

Neutral



Negative

**Overall impact: Neutral**

**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

For both the 2014 and 2015 round data, the evidence points to a high need for three bedroom properties in the affordable housing sector.

|                          | <p>The main driver of this need in the affordable sector is the need to address overcrowded households in Havering who require larger affordable housing.</p> <p style="text-align: center;">Affordable Housing in Havering</p> <p>The review of this 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.</p> <table><tr><th></th><th>GLA<br/>2014</th><th>GLA<br/>2015</th></tr><tr><td>1 bedroom</td><td>900</td><td>640</td></tr><tr><td>2 bedrooms</td><td>2,400</td><td>2,850</td></tr><tr><td>3 bedrooms</td><td>4,100</td><td>5,400</td></tr><tr><td>4 bedrooms</td><td>700</td><td>1,610</td></tr><tr><td>5 bedrooms</td><td>100</td><td>20</td></tr><tr><td>Total affordable housing</td><td>8,200</td><td>10,520</td></tr><tr><td><b>TOTAL</b></td><td>25,200</td><td>30,050</td></tr></table> |             | GLA<br>2014 | GLA<br>2015 | 1 bedroom | 900 | 640 | 2 bedrooms | 2,400 | 2,850 | 3 bedrooms | 4,100 | 5,400 | 4 bedrooms | 700 | 1,610 | 5 bedrooms | 100 | 20 | Total affordable housing | 8,200 | 10,520 | <b>TOTAL</b> | 25,200 | 30,050 |
|--------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-------------|-------------|-----------|-----|-----|------------|-------|-------|------------|-------|-------|------------|-----|-------|------------|-----|----|--------------------------|-------|--------|--------------|--------|--------|
|                          | GLA<br>2014                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | GLA<br>2015 |             |             |           |     |     |            |       |       |            |       |       |            |     |       |            |     |    |                          |       |        |              |        |        |
| 1 bedroom                | 900                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 640         |             |             |           |     |     |            |       |       |            |       |       |            |     |       |            |     |    |                          |       |        |              |        |        |
| 2 bedrooms               | 2,400                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 2,850       |             |             |           |     |     |            |       |       |            |       |       |            |     |       |            |     |    |                          |       |        |              |        |        |
| 3 bedrooms               | 4,100                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 5,400       |             |             |           |     |     |            |       |       |            |       |       |            |     |       |            |     |    |                          |       |        |              |        |        |
| 4 bedrooms               | 700                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1,610       |             |             |           |     |     |            |       |       |            |       |       |            |     |       |            |     |    |                          |       |        |              |        |        |
| 5 bedrooms               | 100                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 20          |             |             |           |     |     |            |       |       |            |       |       |            |     |       |            |     |    |                          |       |        |              |        |        |
| Total affordable housing | 8,200                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 10,520      |             |             |           |     |     |            |       |       |            |       |       |            |     |       |            |     |    |                          |       |        |              |        |        |
| <b>TOTAL</b>             | 25,200                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 30,050      |             |             |           |     |     |            |       |       |            |       |       |            |     |       |            |     |    |                          |       |        |              |        |        |
|                          | <p><b>Sources used:</b></p> <p>Outer North East London Strategic Housing Market Assessment for Havering – November 2016, by Opinion Research Services</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |             |             |             |           |     |     |            |       |       |            |       |       |            |     |       |            |     |    |                          |       |        |              |        |        |

## Review

This EqHIA will be reviewed annually, or as and when new legislation or relevant influential data that may impact on the EqHIA arrives.

**Scheduled date of review:** January 2025

**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:** January 2025

**Lead Officer conducting the review:** Kwabena Obiri

Please submit the completed form via e-mail to [EgHIA@haverling.gov.uk](mailto:EgHIA@haverling.gov.uk) thank you.