



## Appendix 6 - Impact Assessment

### STEP A) Description of what is to be assessed and its relevance to equality

What is being assessed? Please tick ✓

Review of a service  Staff restructure  Decommissioning a service

Changing a policy  Tendering for a new service  A strategy or plan

The Housing Allocation Scheme describes how the council assesses applications for housing, prioritizes each application and decides which applicant will be offered (allocated) council and housing association housing.

The changes are framed within the 1996 Housing Act and the Localism Act 2011 which has given new freedoms for local authorities.

Who is accountable? E.g. Head of Service or Corporate Director

Head of Service: Neil Stubbings

Date assessment completed and approved by accountable person

25 March 2013

Names and job titles of people carrying out the assessment

Beatrice Cingtho: Housing Solutions Service Manager  
Paul Alexander: Quality Control Team Manager

A.1) What are the main aims and intended benefits of what you are assessing?

The key objectives of this Allocations Scheme are to ensure that:

- Provide a fair and transparent system by which people are prioritized for social housing.
- Help those most in housing need.
- Reward residents with a long attachment to the borough
- Encourage residents to access employment and training

- Make best use of Hillingdon's social housing stock.
- Promote the development of sustainable mixed communities

A.2) Who are the service users or staff affected by what you are assessing? What is their equality profile?

Service users affected are residents who are currently on the housing register and those who will apply to the council for housing assistance.

Their equality profile is set out below:

As of January 2013, there were 11,520 households on the housing register.

**Table 1 – Breakdown by ethnicity and gender**

Ethnicity/Gender	FEMALE	MALE	Total:
White	3761	1689	5450
BME	2236	1893	4129
Other	506	386	892
Unknown	627	422	1049
<b>Total</b>	<b>7130</b>	<b>4390</b>	<b>11520</b>

(Housing Register profile 15.01.13)

**(a) Ethnicity**

The housing register comprises of the following:

White – 5450 (47%)

BME – 4129 (36%)

Other – 892 (8%)

Unknown – 1049 (9%)

The ethnicity breakdown of the households broadly reflects the socio economic demography of the borough.

**(b) Gender**

The majority of the applicants are headed by a female - 7,130 (62%). In 4,390 (38%) of the cases, the main applicant is male.

**Table 2 – Breakdown by ethnicity and bed-size need**

Ethnicity/Bed size need	0/1	2	3	4+	Total:
White	2508	1742	860	340	5450
BME	1583	1159	831	556	4129
Other	304	285	210	92	891
Unknown	538	280	150	81	1049
Other EEA - Malta	1				1
<b>Total</b>	<b>4934</b>	<b>3466</b>	<b>2051</b>	<b>1069</b>	<b>11520</b>

(Housing Register profile 15.01.13)

0/1 bedroom - 43%

2 bedrooms; - 30%

3 bedrooms - 18%

4 bedrooms or larger – 9%

51% of households who require smaller accommodation (0/1 bedrooms) are white.

52% of households who require larger accommodation (4+) are from BME groups.

**Table 3 – Breakdown by age and gender**

Age Group	FEMALE	MALE	Sum:
16-24	1262	485	1747
25-44	4369	2316	6685
45-59	970	1073	2043
60-64	140	171	311
65-74	191	222	413
75+	198	123	321
<b>Total</b>	<b>7130</b>	<b>4390</b>	<b>11520</b>

(Housing Register profile 15.01.13)

All age groups are represented, with the biggest percentage of 58% in the 25-44 age range.

**Table 4 – source of housing and priority band**

Housing list & Priority Band	A	B	C	D	Total:
Homeless households in temporary accommodation	2	20	460	108	590
Transferring council tenants	61	177	573	337	1148
Transferring Housing Association tenants	11	52	424	274	761
Other households requiring re-housing (excludes social tenants)	12	100	2056	6853	9021
<b>Total</b>	<b>86</b>	<b>349</b>	<b>3513</b>	<b>7572</b>	<b>11520</b>

(Housing Register profile 15.01.13)

There are four sources of applicants

- Homeless households in temporary accommodation or pending enquiries (5%)
- Transferring council tenants (10%)
- Transferring housing association tenants (7%)
- Other households in the private rented sector requiring re-housing (78%).

There are four priority groups, A – D with A being the highest priority and D no priority. 65.7% of those on the housing register (Band D) has no demonstrable housing need

Band A - 84% are transferring tenants

Band B - 66% are transferring tenants.

Band C - broadly representative of all groups

**Table 5: Households with mobility difficulties by 'priority band'**

Band	Wheelchair users both indoors and outdoors (DSL1)	Cannot manage steps/stairs and may use a wheelchair some of the time (DSL2)	Can only manage one or two steps/stairs (DSL3)	No mobility issues identified	Grand Total
A	6	1	0	79	86
B	18	15	9	307	349
C	16	33	115	3349	3513
D	11	13	31	7517	7572
<b>Total</b>	<b>51</b>	<b>62</b>	<b>155</b>	<b>11252</b>	<b>11520</b>

112 applicants on the housing register have mobility issues that may require adaptations

to their property. Of these 51 applicants use a wheelchair all the time and 62 use a wheelchair some of the time.

A.3) Who are the stakeholders in this assessment and what is their interest in it?

Stakeholders	Interest
Residents	They may gain or lose their housing priority as a result of the changes

A.4) Which protected characteristics or community issues are relevant to the assessment? ✓ in the box.

Age	✓	Religion or belief	✓
Disability	✓	Sex	✓
Gender reassignment	✓	Sexual Orientation	✓
Marriage or civil partnership	✓	Community Cohesion	✓
Pregnancy or maternity	✓	Community Safety	
Race/Ethnicity	✓	Other – please state	

## STEP B) Consideration of information; data, research, consultation, engagement

B.1) Consideration of information and data - what have you got and what is it telling you?

### 1. HOUSEHOLDS WITH NO DEMONSTRABLE HOUSING NEED (BAND Ds)

Under the current policy, applicants can join the housing register regardless of whether they are considered to be in housing need or not.

Under the revised policy the council will no longer maintain a waiting list for those considered not to be in housing need (Band D).

Exception:

People over 60 who would benefit from sheltered housing. However, they will be made an offer of sheltered accommodation after other households who meet the residency criteria.

Under the revised policy, a total of 6432 households will be removed from the housing register.

**Table 1a: Households with no demonstrable housing need (Band D)**

	Band A	Band B	Band C	Band D	Total
Current policy	0	0	0	7572	7572
Revised policy	0	0	0	1140	1140

## 2. HOUSEHOLDS WITH SUFFICIENT FINANCIAL RESOURCES

Under the current policy, households who have a joint income, savings, assets over £30,000 or own a property can join the housing register but are not awarded a housing priority (Band D).

Under the revised policy, households with sufficient financial resources will not qualify to join the housing register:

- Those with savings or assets over £30k
- Those who own or have an interest in a property.
- Those with a gross income above the level required for low cost home ownership which will be reviewed on an annual basis to reflect market conditions. Current income level for 1 and 2 bedroom properties is £64k and £77k for 3+ bedrooms.

### Exception:

Members of the Armed Forces who receive lump sum payments as compensation for an injury or disability sustained on active service.

Under the revised policy, a total of 205 owner occupiers will be removed from the housing register.

**Table 2a: Owner Occupiers by priority 'band'**

	Band A	Band B	Band C	Band D	Total
Current policy	0	0	0	205	205
Revised policy	0	0	0	0	0

**Table 2b: Owner Occupiers by ethnicity**

	White	BME	Other	Unknown	Total
Current policy	142	40	5	18	205

## 3. HOUSEHOLDS WHO DO NOT CURRENTLY LIVE IN THE BOROUGH AND DO NOT HAVE A NEED TO MOVE TO THE BOROUGH WHERE FAILURE TO DO SO WOULD CAUSE HARDSHIP

Under the current policy, applicants who live out of the borough can join the housing register. However, they are not awarded a housing priority (Band D)

Under the revised policy, a household living out of the borough will not qualify to join the housing register.

### Exception

- Where they can demonstrate that failure to do so would cause hardship. E.g. to take up a confirmed offer of employment.
- People over 60 who would benefit from sheltered housing. . However, they will be made an offer of sheltered accommodation after other households who meet the residency criteria.

**Table 3a: Out of borough households under current policy by priority ‘band’.**

	Band A	Band B	Band C	Band D	Total
<b>Current policy</b>	0	0	0	892	<b>892</b>
<b>Revised policy</b>	0	0	0	0	<b>0</b>

**Table 3b: Out of borough households by ethnicity**

	White	BME	Other	Unknown	Total
<b>Current policy</b>	395	374	62	61	892

Under the revised policy, a total of 892 households will be removed from the housing register.

#### **4. TOTAL OF HOUSEHOLDS WITH NO HOUSING PRIORITY (BAND D)**

Under the revised policy, a total of 7529 households who are currently on ‘Band D’ will be removed from the housing register.

**Table 4a: Total of ‘Band D’ applicants to be removed**

	No housing need	Sufficient financial resources	Out of borough	Eligible for sheltered accommodation	Total
<b>Current policy</b>	6432	205	892	43	7572
<b>Revised policy</b>	-6432	-205	-892	0	7529
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>43</b>	<b>43</b>

#### **Impact of removing ‘Band D’ applicants from the housing register**

Starting with a total of 11,520 households on the housing register, 7529 (65%) will be removed from the housing register. This will leave 3991 households including 43 ‘Band D’ applicants who have applied for sheltered accommodation only.

#### **5. BEDROOM STANDARD – IMPACT ON OVERCROWDED HOUSEHOLDS**

Under the current policy, Hillingdon accommodation standard is used for assessing the size of a property that a household requires which is generous. Overcrowding assessment is based on this standard.

Under the revised policy, the ‘bedroom standard’ criteria recommended by the secretary of state will be applied. The differences are set out below:

Under current LBH bedroom standard, a bedroom is allocated as follows:	Under revised national bedroom standard, a bedroom is allocated as follows:
------------------------------------------------------------------------	-----------------------------------------------------------------------------

- |                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                             |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Cohabiting couples: 1 bedroom</li> <li>• Children of opposite sex aged over 7 years should not have to share a bedroom.</li> <li>• Each independent adult (18yrs+): 1 bedroom</li> <li>• Two Children of the same sex may share a bedroom unless one child is aged over 10 years and there is an age gap of 5 years or more.</li> </ul> | <ul style="list-style-type: none"> <li>• Married or cohabiting couple</li> <li>• Adult aged 21 years or more</li> <li>• Pair of adolescents aged 10-20 years of the same sex –</li> <li>• Pair of children aged under 10 years regardless of sex</li> </ul> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

As a result, households who were mainly considered overcrowded because of lacking one bedroom will lose their housing priority. Under the revised 'bedroom standard', they are considered adequately housed. This will affect 1018 households.

**Table 5a: Impact of bedroom standard on households currently assessed as 'overcrowded'.**

Bedroom Standard Changes	BME	White	Other	Unknown	Total
No Change – retain Band A-C	428	542	116	98	1184
Changed – become Band D (no priority)	394	430	88	106	1018
<b>Grand Total</b>	<b>822</b>	<b>972</b>	<b>204</b>	<b>204</b>	<b>2202</b>

**Table 5b: Breakdown of households who lose housing priority because no longer considered as overcrowded by rehousing list and ethnicity.**

Re-housing list / Ethnicity	White	BME	Other	Unknown	Total
Homeless households in temporary accommodation	0	0	0	0	<b>0</b>
Existing council tenant transferring to another property	130	51	17	3	<b>201</b>
Existing Housing Association tenants transferring to another property	120	86	8	18	<b>232</b>
Other households living in private rented sector or with family/friends	196	264	64	54	<b>578</b>
<b>Grand Total</b>	<b>449</b>	<b>404</b>	<b>89</b>	<b>76</b>	<b>1018</b>

**Impact of removing housing priority from those households no longer considered as overcrowded.**

Following from 4 above, a total of 3991 households are left on the housing register. Therefore, a further 1018 households will be removed as they are no longer considered overcrowded. This will leave 2973 households on the housing register.

**6. HOUSEHOLDS WHO HAVE NOT CONTINUOUSLY LIVED IN THE BOROUGH FOR 10 YEARS**

Under the current policy, no residency criteria is applied.

Under the revised policy, households who have not been continuously living in the borough for at least 10 years will no longer join the register.

**Exception:**

- People who have served in HM Forces in the last 5 years.
- People over 60 who would benefit from sheltered housing. They will be considered for sheltered housing after other households who meet the residency criteria.
- People who are under-occupying their current social housing.
- Emergency cases where homes are damaged by fire, flood or other disaster if it is not possible to repair the existing home, or if any work to repair is to take such a long period of time that there will be serious disruption to family life.
- Cases nominated under the Police Witness Protection Scheme or other similar schemes that the Council has agreed to be part of.
- Households who need to move to the Borough to avoid hardship. Hardship grounds include:
  - The need to move to take up a confirmed offer of permanent employment
  - The need to move to specialist facilities where they receive care but live outside the Borough
  - The need to move to receive or give care/support (meaning higher care costs or even the use of residential care for those who cannot move)
- People fleeing violence or harassment
- Children spending time away from home due to periods of study such as at university
- People who have moved away for up to 3 years due to the requirements of their job

**Table 6a:**

Priority Reason	Nos. on register	% on register	With 10 year residency applied		Exempt
			Nos. on register	% on register	
Homeless households – in temporary accommodation	482	16%	95	9%	N
Unsatisfactory housing conditions	501	17%	125	11%	N
Overcrowded	1184	40%	380	32%	N
Medical reasons	273	9%	83	7%	N
Welfare reasons:-					
a) Young people leaving care and move-on from supported housing	65	2%	26	2%	N
b) Fostering and adoption	0	-	0	-	N
c) Hardship	0	-	0	-	Y
Members of the British Armed Forces	14	0.5%	14	1%	Y
*Council schemes e.g. National witness mobility	0	-	0	-	Y
*Under-occupation	214	7%	214	18%	Y
*Decants – uninhabitable due to fire, flood, works	0	-	0	-	Y
*Management transfer - imminent personal risk due to violence or harassment	26	1%	26	2%	Y
*Elderly – sheltered housing	213	7%	213	18%	Y

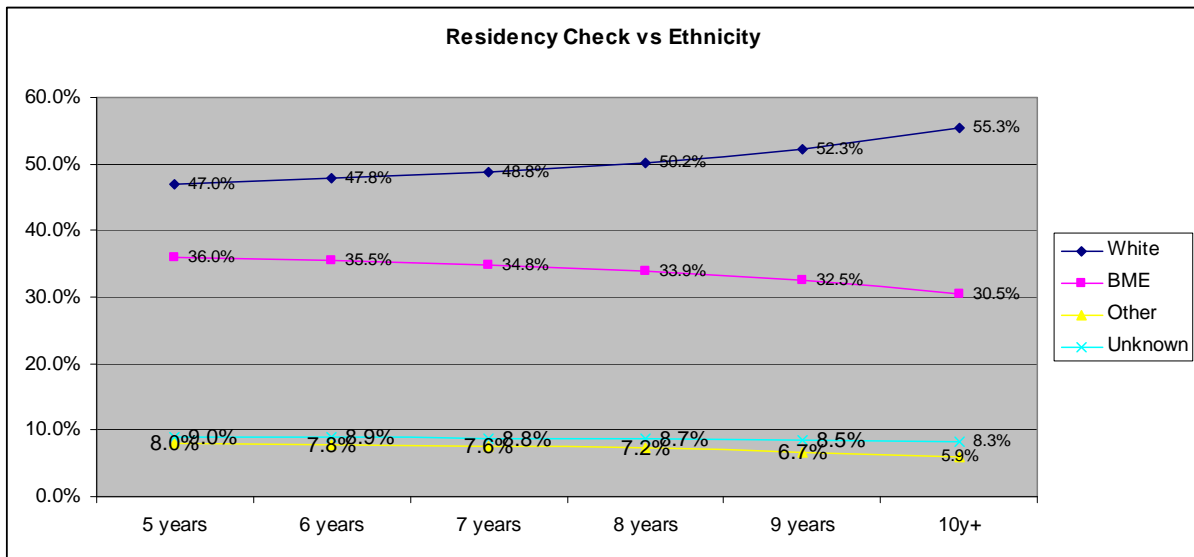


*Release adapted property	1		0	-	N
*Ex-tenant discharge from an institution	0	-	0	-	N
*Tenants relinquishing two properties for one	0	-	0	-	N
*Service tenants	0	-	0	-	N
<b>Total</b>	<b>2973</b>		<b>1177</b>		

\* identifies local priority groups

If the 10 year residency period is applied, a further **1796** households will no longer qualify to remain on the housing register reducing it further to **1177** households.

**Table 6b: Estimated impact of residency requirement (5-10 years)**



**Table 6c: Estimated impact of residency criteria based on 5-10 years**

	5 years	6 years	7 years	8 years	9 years	10y+
Statutory reasonable preference groups.	2278	1964	1650	1336	1022	709
Local priority groups	454	454	454	454	454	454
Statutory - Members of the British Armed Forces	14	14	14	14	14	14
<b>Total</b>	<b>2746</b>	<b>2432</b>	<b>2118</b>	<b>1804</b>	<b>1490</b>	<b>1177</b>
Existing households likely to be affected	227	541	855	1169	1483	1796

(Data extrapolated from manual sample analysis of 500 applications)

**Table 6d: Estimated impact of residency criteria based on 5-10 years by ethnic groups**

	5 years	6 years	7 years	8 years	9 years	10y+
White	1290	1162	1033	905	777	651
BME	989	863	736	610	484	359
Other	220	190	160	130	100	69
Unknown	247	216	186	156	126	98
<b>Total</b>	<b>2746</b>	<b>2431</b>	<b>2115</b>	<b>1801</b>	<b>1487</b>	<b>1177</b>

(Data extrapolated from manual sample analysis of 500 applications)

## 7. BEDROOM STANDARD – IMPACT ON SIZE OF ACCOMMODATION.

Under the revised policy, the 'bedroom standard' criteria recommended by the secretary of state will also have an impact on the remaining 1177 households. This is because some of them will be entitled to fewer bedrooms compared to current policy but their housing need 'priority' will not be affected.

This change will affect 255 households who will become entitled to a smaller property than they are currently assessed for, but their priority 'band' will not change.

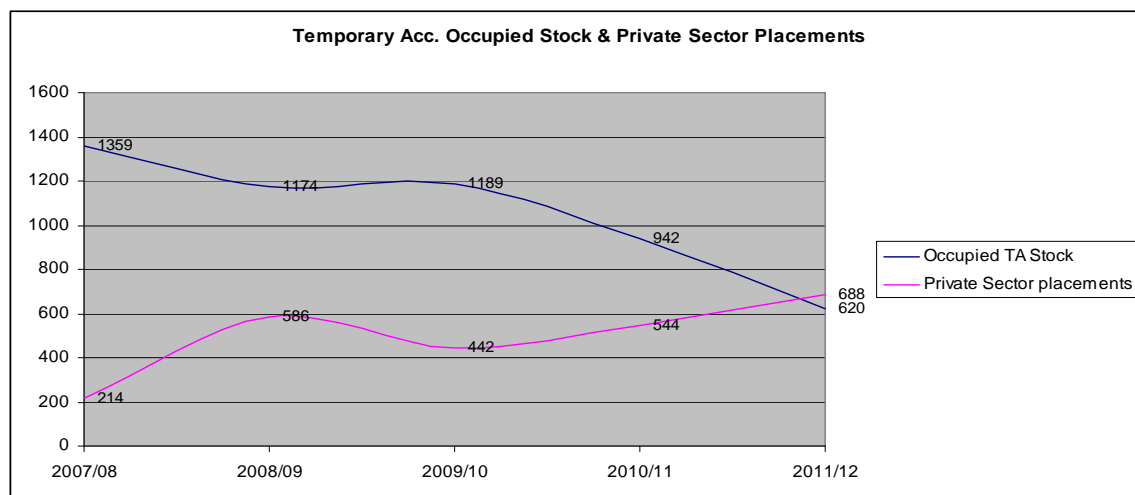
**Table 7a – Breakdown by priority reason and ethnicity**

PRIORITY REASON	WHITE	BME	Other	Unknown	Total
Homeless	52	90	15	5	162
Management transfer - imminent personal risk due to violence or harassment	5	4	0	0	9
Medical grounds	21	18	4	4	47
Move-on from supported housing	2	2	1	0	5
Under-occupation	23	2	0	7	32
Total	103	116	20	16	255

## 8. HOMELESSNESS

The first priority is to prevent people from becoming homeless and the use of the private rented sector accommodation has been vital. See chart below:

**Table 8a: Current use of private rented sector and effect on reduced temporary accommodation.**



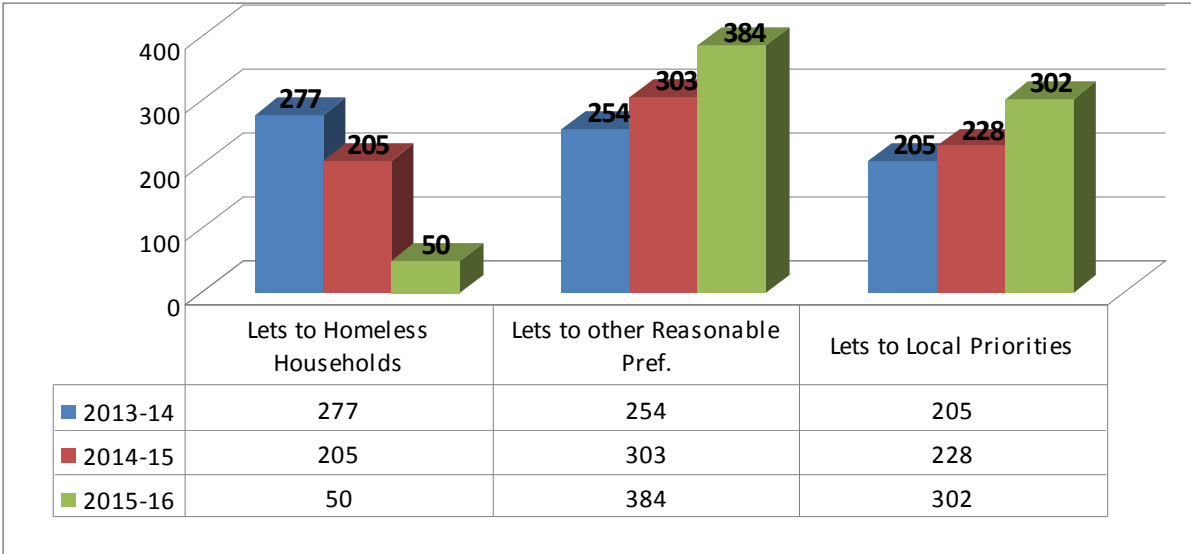
Under the current policy, households are made offers of private rented accommodation on a voluntary basis and they can choose not to accept it without any consequences.

Under the revised policy, the council will use the power given under the Localism Act 2011 to discharge duty to homeless households into the private rented sector and outside of local boundaries where possible. The council will discharge duty if the offer of private sector accommodation is refused unreasonably. As a protection, households who lose their accommodation within 2 years through no fault of their

own will be assisted as a homeless person. Some households who approach the council will find that the housing they need and can afford may only be available outside the borough and the council intends to continue to place households in the borough wherever it is affordable and available.

The revised policy will not affect the 482 households already accepted and in temporary accommodation but it will be applied to those who made homeless applications after 9<sup>th</sup> November 2012 and all other new homeless applicants.

**Table 8b: Implication on future lettings following discharge of duty into the private rented sector**



**Table 8c: Implication of future lettings - % of total lets per year**

Lettings Group	2013/14	2014/15	2015/16
Homeless households	40%	30%	10%
Other reasonable preference groups	35%	40%	50%
Local priority groups	25%	30%	40%

(Note: ratios rounded)

**LOCAL PRIORITIES**

In addition to statutory reasonable preference, the council will provide housing assistance to certain groups who meet local needs and priorities

**9. MEMBERS OF THE BRITISH ARMED FORCES**

The current policy awards priority ‘band B’ to those who have served in the British armed forces and have not been dishonourably discharged.

Under the revised policy, this provision will be extended to:

- Members of the Armed Forces and former service personnel where the application for housing is made within 5 years of discharge.
- Bereaved spouses and civil partners of members of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner and the death was wholly or partially attributable to their service.
- Serving or former members of the Reserved Forces who need to move because of serious injury, medical conditions or disability which is wholly or partially

attributable to their service.

They will be awarded a higher 'Band A'

Based on current demand data, it is difficult to accurately estimate increase in demand for housing from this group. It is therefore estimated that the extension of current policy to other members of the family may result in a small increase of 17 households a year, a total of 31 applications over the course of a year.

**Table 9a: Members of the British armed forces under current and revised policy.**

Members of the British Armed Forces	A	B	C	D	Grand Total
Current policy	0	14	0	0	14
Proposed policy	31	0	0	0	31

**Table 9b: Members of the British Armed Forces by ethnicity**

	White	BME	Other	Unknown	Total
Current policy	8	6	0	0	14

Alternative recommended option

- Retain current 'Band B' for this group AND  
In order to apply the 10 years residence prior to joining the service criteria, award additional priority by increasing the priority of those eligible to 'Band A'.

Data on residency prior to joining the military is not currently collected, however for those housed during 2012/13, 20% demonstrated 10 year residency. If 20% is applied, the numbers will be as follows:

Ex British armed forces personnel	A	B	C	D	Grand Total
Current policy	0	14	0	0	14
Revised policy	6	25	0	0	31

**10. COUPLES AGED OVER 21 WITHOUT CHILDREN**

Under the current policy, this group is awarded 'Band C'

Under the revised policy, they will be awarded a higher priority 'Band B'.

**Table 10a: Couples without children under current and revised policy**

Couples without children	A	B	C	D	Total
Current policy	0	0	34	0	34
Revised policy	0	34	0	0	34

**Table 10b: Couples without children under current policy by ethnicity**

Ethnicity	Total
White	20
BME	4
Other	2
Unknown	8
	<b>34</b>

## **ADDITIONAL PRIORITY**

Other factors can be taken into account in determining relative priorities between applicants. Therefore, under the revised policy, additional priority will be given to residents who have a long term attachment to the borough and those who are working.

### **11. HOUSEHOLDS WHO HAVE CONTINUOUSLY LIVED IN THE BOROUGH FOR 10 YEARS**

Under the current policy, households who are in housing need and have been registered for housing for 10 years are awarded 'Band C'.

Under the revised policy, households will be awarded enhanced priority as follows:  
Band A – If awarded 'Band B' based on housing need and have 10 year residence. 198 households will benefit.

Band B – If awarded 'Band C' based on housing need and have 10 year residence. 827 households will benefit

Under the revised policy, a total of 1025 households with 10 year residence will benefit from this proposal.

**Table 11a: Number of households who will benefit from additional priority due to residency.**

Current Priority Band	New Priority Band		Total
	A	B	
B	198		198
C	-	827	827
<b>Total</b>	<b>198</b>	<b>827</b>	<b>1025</b>

**Table 11b: Type of household who will benefit from additional priority due to residency**

Housing list type	A	B	Total
Homeless households in temporary accommodation	7	109	116
Existing council tenant transferring to another property	147	214	361
Existing Housing Association tenants transferring to another property	28	141	169
Other households living in private rented sector or with family/friends	16	363	379
<b>Total</b>	<b>198</b>	<b>827</b>	<b>1025</b>

The proposals to increase banding for 10 year + residency will not apply to those already in 'Band A' as this is the highest priority that can be awarded.

87% of those left on the housing register will benefit from this proposal (1025/1177). 11% of homeless, 35% of council tenants, 17% of Housing Association tenants and 37% of those living in private rented sector will benefit.

### **12. WORKING HOUSEHOLDS**

Under the current policy, working households who are in housing need are awarded 'Band C'.

Under the revised policy, households will be awarded enhanced priority as follows:

Band A – If awarded ‘Band B’ based on housing need and in employment. 3 households will benefit  
 Band B – If awarded ‘Band C’ based on housing need and in employment. 71 households will benefit.

A total of 74 households in employment will benefit from this proposal.

**Table 12a: Households who will benefit from additional priority due to employment by priority ‘band’**

Current Priority Band	New Priority Band		Total
	A	B	
B	3	-	3
C	-	71	71
<b>Total</b>	<b>3</b>	<b>71</b>	<b>74</b>

**Table 12b: Household who will benefit from additional priority due to employment by housing list**

Housing list type	A	B	Total
Homeless households in temporary accommodation		3	3
Existing council tenant transferring to another property	1	17	18
Existing Housing Association tenants transferring to another property	1	3	4
Other households living in private rented sector or with family/friends	1	48	49
<b>Total</b>			<b>74</b>

**Table 12c: Households who will benefit from additional priority due to employment by ethnicity**

Ethnicity	A	B	Total
White	1	37	38
BME	1	30	31
Other	0	1	1
Unknown	1	3	4
<b>Total</b>			<b>74</b>

**13. ARMED FORCES WHO HAVE CONTINUOUSLY LIVED IN THE BOROUGH FOR 10 YEARS PRIOR TO JOINING SERVICE**

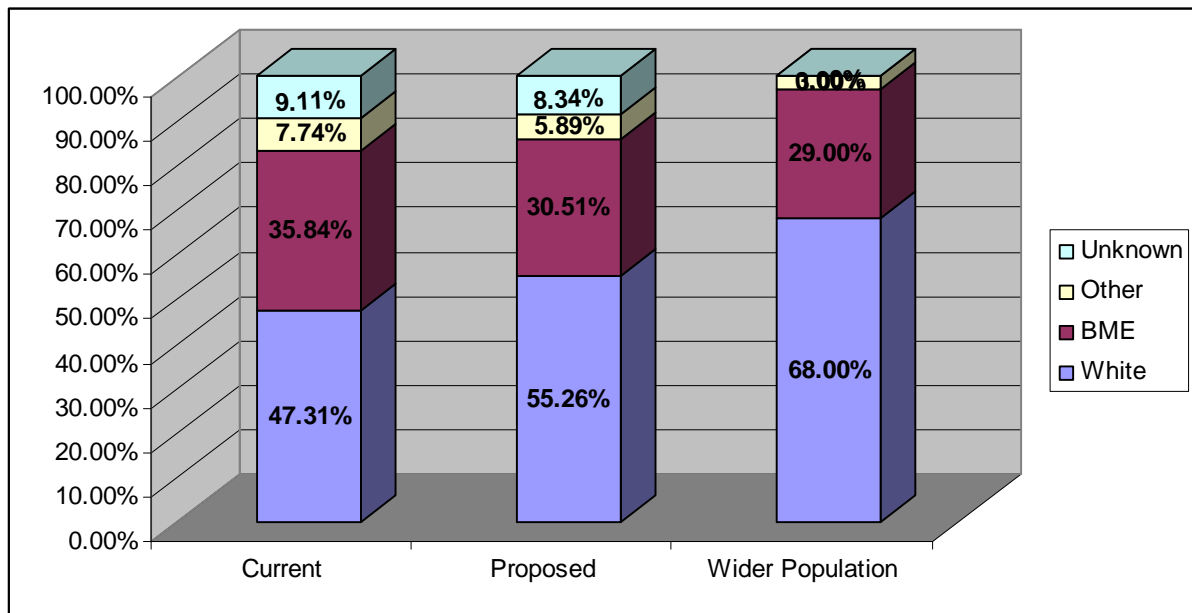
Members of the armed forces who have continuously resided in the borough for 10 years prior to signing up for the service and have not been dishonourably discharged.

❖ Band A.

**See 9 above**

**14. COMBINED IMPACT OF THE CHANGES ON THE PROFILE OF THE HOUSING REGISTER**

**Table 14a: Combined effect of changes on the housing register ethnicity ratio – Current & Proposed vs LBH Population**



Note: Wider population data source JSNA 2012

**Table 14a: Impact of changes by priority reason and 'band'**

Revised policy outcomes/Priority Band	A	B	C	D	Total
Exclusion due to no demonstrable housing need	0	0	0	-6432	
Exception - Elderly households requiring sheltered accommodation in 'Band D'	0	0	0	43	
Exclusion due to sufficient financial resources	0	0	0	-205	
Exclusion due to out of borough residency	0	0	0	-892	
Bedroom standard – households no longer overcrowded	0	0	-1018	0	
Exclusion due to 10 year residency in the borough	-174	-599	-1023	0	-1796
Homeless households	0	0	0	0	
Former members of British Armed Forces	31	-14	0	0	
Couples aged 21+ without children	0	34	-34	0	
Additional priority due to 10 year residence	198	827	-827	0	
Additional priority due to employment	3	71	-74	0	
<b>Net impact – households by band</b>	<b>232</b>	<b>918</b>	<b>-1953</b>	<b>-7529</b>	<b>-8332</b>
<b>Households with no change</b>	<b>52</b>	<b>67</b>	<b>1668</b>	<b>43</b>	<b>1830</b>
<b>Total remaining on the housing register</b>	<b>284</b>	<b>978</b>	<b>1668</b>	<b>43</b>	<b>2973</b>
<b>% of register</b>	<b>9.55%</b>	<b>32.90%</b>	<b>56.10%</b>	<b>1.45%</b>	<b>100%</b>
<b>With 10 year residency applied</b>	<b>110</b>	<b>379</b>	<b>645</b>	<b>43</b>	<b>1177</b>

**Table 14b: Impact of changes by ethnicity and priority 'band'**

Ethnicity	A	B	C	D Sheltered	Total
White	83	243	291	34	651
BME	15	84	254	6	359
Other	1	12	55	1	69
Unknown	11	40	45	2	98
<b>Total</b>	<b>110</b>	<b>379</b>	<b>645</b>	<b>43</b>	<b>1177</b>

**15. ENCOURAGING PERSONAL RESPONSIBILITY**

Some applicants do not actively participate by bidding for available properties or continuously refuse properties that they have successfully placed bids on. The following changes will encourage personal responsibility from the applicants when exercising their right to choose properties through the Choice based lettings scheme.

**(a) Homeless households living in temporary accommodation**

Homeless households take longer to be housed than other households in similar priority bands. In order to ensure that they actively participate in choice based lettings, one direct offer of suitable accommodation will be made to those households living in temporary accommodation longer than other households with the same bed size need. If the offer is unreasonably refused, the council will discharge its duty under Part VII of the Homelessness Act and withdraw any temporary accommodation provided.

Bed size need – General need properties	Average waiting time
Studio	2 years
1 bedroom	1.5 years
2 bedroom	2.5 years
3 bedroom	3.5 years
4 bedroom	3 years

**(b) All applicants - unreasonable refusal of offers**

All applicants who successfully bid for properties but refuse more than 3 reasonable offers within a 6 month period will be suspended from bidding for a period of 6 months.

**Note regarding data collection on residency:** there was more reliable data on those applicants directly known to the council -homeless residents; council tenants and housing association tenants. Applicants living in the private sector have not been required to provide 10 year address histories and may be under represented in the projections. All projections are made using data held by LB Hillingdon and CBL system provider Locata. Where actual data has not been available, manual sampling has been conducted of applications received and tenancies commenced to substantiate the assumptions.

**Consultation**

B.2) Did you carry out any consultation or engagement as part of this assessment?

Please tick  NO  YES



**If no, explain why:**

N/A

**If yes, what did you do or are planning to do? What were the outcomes?**

The proposals was made available to the public for information and comment via the council's website, the housing needs "targeted Housing Options" website (97.6% of choice based lettings scheme bids are placed through the website) and sent to other stakeholders.

Submissions were received from the British Legion and the Labour Group. Presentations and discussions also took place at POC meeting on 30 Jan 2013, Hillingdon Housing Service Senate, Wellbeing Board Management Group and at the Voluntary Services Forum.

The main comment has been about the 10 year residency qualification rule that was made by all the various forums. This ranged from querying the legality, views that it could be thought as discriminatory if adopted and unfair for people coming into Hillingdon from other countries. Some comments on the 10 year period with suggestions of a shorter residence period requirement.

In relation to the residency qualification, a concern was raised about care leavers who are placed outside the borough which has been addressed.

There were general concerns about the use of the private rented sector to discharge duty to homeless applicants and that housing people outside the borough should be kept to a minimum.

Comments from the British Legion focused on the changes proposed to the British Armed Forces, some of which have been addressed.

The proposals for the new allocations scheme will be presented to council members for consideration and approval.

**B.3) Provide any other information to consider as part of the assessment**

Legal context

The council has a public duty to pay due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations (Equality Act 2010)

Financial context

N/A

BID context

Stopping the processing of applications from those with no prospect of being housed will enable staff resources to be focused on vulnerable residents with the greatest need.

National policy context

Flexibilities given to local authorities under the Localism Act 2011 have been used in the review of this policy. In addition, implications of the welfare reforms has been considered

**C) Assessment**

What did you find in B1? Who is affected? Is there, or likely to be, an impact on certain groups?

C.1) Describe any **NEGATIVE** impacts (actual or potential):

<b>Equality Group</b>	<b>Impact on this group and actions you need to take</b>
<b>Race/Ethnicity</b>	<p>Black &amp; minority ethnic (BME) communities including individuals of mixed ethnicity, make up approximately <b>29%</b> of Hillingdon's total population, whereas <b>37%</b> of the Housing Register bands A to C are from BME households. The introduction of a ten year residential qualification criteria will have a negative impact on this group. In addition, it will mean new residents arriving to the borough and/or country will not be able to access the Housing Register for a period of 10 years.</p> <p>The proposal to adopt the governments recommended bedroom standard will have a negative impact on BME households than other groups. This is because larger families are likely to come from BME groups.</p>
<b>All Groups</b>	<p>The 10 year residency criteria is also likely to affect those households in the statutory reasonable preference group to a greater extent. This is because the others generally fall within the groups that are exempted from this criteria.</p>

C.2) Describe any **POSITIVE** impacts

<b>Equality Group</b>	<b>Impact on this group and actions you need to take</b>
<b>Age</b>	<p>The Allocation scheme gives preference to older people. Older residents who are seeking sheltered accommodation are exempt from a number of proposals that excludes other applicants from joining the Housing Register, for example 10 year residency criteria and can join the register if living outside the borough.</p>
<b>Disability</b>	<p>The main criteria for awarding priority is based on the housing need of an individual. This automatically ensures that those with a disability or medical condition or long term limiting illness will be given an appropriate level of housing if they are not suitably housed. No changes are proposed in this scheme to the assessment of medical circumstances.</p>

<b>Gender reassignment</b>	Data on gender re-assignment is not available. Gender re-assignment alone would not have any bearing on an individual's ability to access social housing. In addition, the use of online applications instead of presenting in person to the council which militates against any potential bias.
<b>Marriage &amp; civil partnership</b>	Data on marriage and civil partnership is not available. The scheme reinforces the same rights for civil partners as for married and unmarried couples to apply for housing.  Couples without children are awarded additional priority under the scheme and this applies to same sex partnership as well.  In other areas, marriage and civil partnerships alone would not have any bearing on the ability to access social housing.
<b>Pregnancy and Maternity</b>	The proposals do not change priority for those who are pregnant or have a baby. Since pregnancy is a priority need category for homelessness, anyone making an application through this route is unaffected by the changes.
<b>Religion or belief</b>	The proposals apply equally to members of all religious affiliations who wish to apply for housing.
<b>Sex</b>	Majority of applicants on the housing register are headed by females. Gender alone would not have any bearing on the ability to access social housing.
<b>Sexual orientation</b>	The proposals apply equally to all regardless of sexual orientation.
<b>Community Cohesion</b>	The scheme proposes the criteria that will enable people to register on the Housing Register and be prioritised for social housing. Those registering for housing are likely to be the most economically disadvantaged and therefore contain an over-representation of households in the protected groups including the elderly, families with children, single parent families, those with disabilities and households from ethnic minorities. Access to social housing from the various groups will be monitored and reviewed to ensure that any potential discrimination is addressed.

## D) Conclusions

**Write a summary of the assessment including any negative impacts you have identified and what you will do to mitigate against them.**

1. The assessment shows that for most equality strands, the proposed changes to the Housing Allocations policy will not have a negative impact on the applicants.
  - The anticipated reduction in the numbers of people on the housing register due to the removal of 'Band D' applicants who normally have no prospect of being allocated accommodation will result in those with the greatest need having an

improved priority and should therefore experience a shorter waiting time for an offer of housing.

- The impact on overcrowded households losing their priority as a result of the new 'bedroom standard' is evenly spread across ethnic groups.
- The impact on families who will become eligible for smaller bedroom properties as a result of the new 'bedroom standard' is evenly spread across ethnic groups. They will also retain their housing priority 'band'.

In addition, the additional housing priority that will be awarded to those with long attachment to the borough and those working will result in improved priority and shorter waiting time for an offer of housing.

Although the proposed policy increases access for white people, the overall composition of the housing register with the proposed changes is more reflective of the boroughs' residents.

**Action**

Although we think the policy changes will not discriminate against some of the 'protected' groups, it will only be possible to monitor this effectively once it is implemented. The information is not conclusive in determining whether there might be unintended consequences of the changes.

Therefore, continuous impact monitoring will be carried out which will be reported to members after a year of implementation.

2. The assessment also shows that the qualification rule relation to 10 year residency could result in a number of households who are in housing need becoming excluded from allocation of social housing. For residents who have not resided in the borough for more than 10 years, mainly BME residents, there will be a negative impact. In addition, for new BME and non BME arrivals to the borough, there will be a negative impact as they will not be able to access the waiting list for 10 years.

**Action**

Data has been provided on the estimated impact based on 5, 6, 7, 8, 9 and 10 years. This can be used to review and consider an option that would minimise the impact.

3. In terms of supply and demand, the various exclusions will result in a reduced housing register demand of approximately 1500 applicants. There is an annual supply of approximately 700 social housing vacancies. Allowing for approximately 200 new applicants a year who may qualify, it is likely that this could result in surplus of supply.

**Action**

This offers an option to review and relax some of the exclusions applied.

**Signed and dated:**.....

**Name and position:**.....