



HILLINGDON
LONDON

Equality and Human Rights 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

Provide details here:

The Temporary Accommodation and Private Rented Sector offer Placement Policy sets out the approach Hillingdon will take to satisfy its duty under Part 7 of the Housing Act (1996) to secure accommodation for unintentionally homeless people in priority need. The policy also covers interim placements whilst homeless enquiries are undertaken, longer term temporary accommodation and a private rented sector offer.

In respect of the latter, the policy will enable LB Hillingdon to consider the suitability of offers of private rented sector homes in terms of housing condition, distance from work or support networks and also affordability of the rent. In some cases this may see some households moving into more affordable areas outside of the borough. The council aims to provide accommodation that is suitable, including being both affordable for individual households, but also more affordable to the Council.

This EIA provides an assessment of the policy as a whole although specific attention will be paid to the impact of the proposed out-of-borough placement element. This is because there is a recognition that this change in policy is likely to impact some groups more so than others. Therefore, alongside assessing the impact of the proposed changes on protected groups, this Equalities Impact Assessment will also look at possible mitigating actions.

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

Mr D. Kennedy
Head of Business Performance, Policy and Standards
Date assessment completed and approved by accountable person

29/04/2016

Names and job titles of people carrying out the assessment

Naveed Mohammed - Service Manager Business Performance

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

The Policy has the following aims

- To ensure that Hillingdon Council can continue to meet its duty to provide accommodation to homeless applicants or to resolve a homeless situation. Currently, the main impediment to this is the supply of affordable accommodation. This is important given that since 1988, the courts have held that a person is homeless if they cannot pay the rent without depriving themselves of bare necessities. Case law has since been strengthened with the Homelessness (suitability of accommodation) order requiring councils to be satisfied that proposed accommodation is affordable before it is offered to a household. The introduction of welfare reforms, coupled with the impact of inflation on local rent levels has rendered it increasingly difficult for LB Hillingdon (and indeed other London boroughs) to find local accommodation that meets the twin tests of suitability and affordability.
- To ensure that families are able to access secure, appropriate and affordable accommodation so as to enable increased likelihood of tenancies being maintained and decrease the chance of rent arrears. The cost of housing to buy or to rent in Hillingdon continues to increase. This is compounded by changes in welfare which has resulted in a reduced income for some families following a benefit cap or introduction of universal credit. The cumulative impact means that the gap between prevailing market rents, and what families can reasonably afford has continued to grow and as such has increasingly priced families (especially those reliant on social welfare as the only source of income) outside of the local housing market.
- To enable the council to adopt a more affordable approach to managing housing demand.

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

Of the client group likely to be most affected by the proposed policy - it is those households that present to the Council as homeless, that are in priority need and which meet the necessary criteria to attract council support.

By way of illustration of the profile and characteristics of the households likely to be most affected, the following tables present a demographic overview of homeless applicants for 2015/16.

Given the impact of welfare reforms, the inclusion of affordability as a key consideration when making a decision on placement, is likely to impact those groups that have benefits as their only source of income.

Ethnicity

The following table (table 1) provides a breakdown of ethnicity by income source. It shows that of the total of 1225 clients, 48% had benefits as their only source of income (or 591). Of these, 47% were from a White British background. The next highest ethnic group was Black African at approximately 16%, closely followed by Asian at 13%.

Table 1

Ethnic Group/Income source	Benefits & Salary	Benefits only	Not recorded	Salary only	Grand Total
Other	14	20	19	6	59
Asian	84	74	32	12	202
Black / African / Caribbean / Black British	57	98	31	17	203
Mixed	4	12	5	2	23
Not Answered	61	85	19	17	182
Other European	26	26	22	6	80
White	98	276	60	42	476
Grand Total	344	591	188	102	1225

Age/Gender

Looking at the age and gender profile (table 2) shows that of the 1225 clients, 14% are in the 16-24 age bracket. The majority of clients at 56% fall in the 25-44 age band with the next highest group being the 45-59 age group. Only 5% of clients are aged over 60.

Table 2

Age and Gender	F	M	Not disclosed	Grand Total
0-15	2	1		3
16-24	140	33		173
25-44	444	248		692
45-59	122	135		257
60-64	8	23		31
65-74	9	15		24
75+	4	4		8
Not shown			37	37
Grand Total	729	459	37	1225

Looking at gender shows that there were more females on the client list than males (59%:37%¹). However, whilst in absolute terms more females were likely to be affected; this was not consistent across all age groups. Thus whilst there were more females affected in the 16-24 and 25-44 age groups - between the ages 45-74, there were a greater proportion of males. In summary this shows there is a younger age profile for women, but an older age profile for men within this cohort.

¹ Totals do not equate to 100% due to incomplete data and approximately 4% of unknowns as information is not always disclosed.

Gender/Marital Status

The following table looks at gender by marital status. What's clearly discernible is the fact that of the 1225 clients a significant majority (71%) were single person households. Whilst this was high for men (indeed there were more single men than there were men as part of a couple), single female households were in the majority.

Table 3

Household type/Gender	F	M	Not Disclosed	Grand Total
Couple	123	147	5	275
Older Person	18	36	1	55
Single	578	270	31	879
Not Available	10	6		16
Grand Total	729	459	37	1225

Household composition

Finally, in the same way as impact of welfare reforms means that affordability will be more of an issue for those households reliant on benefits only; larger households (i.e. those with 2+ dependent children) are also likely to be affected more.

Table 4

Number of Single, Couple and Older Person households by Gender and Number of Children	0	1	2	3	4	5	6	7	Not known	Grand Total
Couple										
Female	15	33	42	23	7	3	2			123
Male	19	37	45	29	8	6	6	2		147
Gender not known	2		2	1						5
Older Person										
Female	17	1								18
Male	36									36
Gender not known	1									1
Single										
Female	195	181	123	55	15	7	2			578
Male	240	16	9	5						270
Gender not known	14	9	7	1						31
Household composition unknown										
Female	1								7	8
Male									1	1
Grand Total	540	277	228	114	30	16	10	2	8	1225

The table above shows that whilst there were 173 couples (whether headed by a male or female) with 2+ dependent children, the equivalent figure for single-person households was 216. Of the latter, the vast majority (202 households) were female.

Ethnicity by family composition

When looking at ethnic profile by number of children, the following table shows that of the 1225 clients

- 202 were from an Asian-heritage background
- 203 were from a Black African/Black Caribbean background
- 476 were from a White British background.

Taking the figures above and cross-tabulating these with number of children shows that

- Of the 202 Asian households, 83 (41%) had 2+ children.
- Of the 203 Black African/Black Caribbean households, 74 (36%) had 2+ children
- Of the 476 White British households, 129 (27%) had 2+ children.

Table 5

Ethnic Group/# of Children	Not known	0	1	2	3	4	5	6	7	8+	Grand Total
Other		26	11	10	8	1	2			1	59
Asian	1	71	47	44	27	5	4	3			202
Black / African / Caribbean / Black British		86	43	40	18	8	3	3	1	1	203
Mixed		14	3	3	2	1					23
Not Answered	1	79	44	29	18	7	1	2	1		182
Other European		23	21	25	9	1	1				80
White	5	234	108	77	32	7	5	2		6	476
Grand Total	7	533	277	228	114	30	16	10	2	8	1225

Long-Term Health/Disability

A further protected characteristic to look when assessing the equalities impact of the new policy is disabilities and/or long term health conditions. Taking the same sample base as before (the 1225 clients that approached LBH during 2015/16 for homelessness support) shows that 122 clients - or approximately 10% showed a disability/long-term health need.

Looking at data from 2011 Census indicates that this is slightly lower than the percentage of residents that reported a long-term health condition or disability which (at the time of the census) stood at 14% - defined here as day to day activities being limited 'a little' or 'a lot'.

Table 6

	Day-to-day activities limited a lot	Day-to-day activities limited a little	Day-to-day activities not limited	All categories: Long-term health problem or disability
Very good or good health	0.9%	2.9%	80.3%	84.1%
Fair health	2.3%	4.1%	5.0%	11.496%
Bad or very bad health	3.4%	0.7%	0.3%	4.4%
All categories: General health	6.6%	7.7%	85.7%	100%

The 10% reported was however significantly higher than the 3.6% of local residents that were in receipt of disability living allowance (10,090/273,976)².

Table 7

Period	London Borough Hillingdon	Region London	Country England
Aug-12	10,090	334,610	2,698,340
Aug-11	9,770	328,350	2,652,740
Aug-10	9,420	321,350	2,609,180
Aug-09	9,140	310,510	2,537,590
Aug-08	8,820	299,480	2,453,310
Aug-07	8,510	288,660	2,375,900
Aug-06	8,370	278,920	2,292,900
Aug-05	8,180	272,920	2,237,510
Aug-04	7,970	264,640	2,173,470
Aug-03	7,650	253,460	2,091,820
Aug-02	7,310	239,580	1,995,090

Building on the figures above, the following table provides a breakdown of ethnicity by disability. Of those that disclosed - the main health condition faced was mental health. Within this, it was members of the White British and Black African/Caribbean group that had a higher incidence of mental health conditions. It's important to note here that the relatively small sample base means that caution should be exercised when drawing generalised conclusions.

² Accessed via

<http://www.neighbourhood.statistics.gov.uk/dissemination/LeadTrendView.do?a=7&b=6275131&c=Hillingdon&d=13&e=6&f=34321&g=6329305&i=1001x1003x1004x1005&l=1355&o=393&m=0&r=1&s=1462354332984&enc=1&adminCompId=34321&variableFamilyIds=4945&xW=938> on 29/04/2016.

Table 8

Vulnerability / Ethnicity	Other	Asian	Black / African / Caribbean / Black British	Mixed	Other European	White	Not Known	Total
Learning Difficulty						3		3
Learning Difficulty & Mental Health			1			4		5
Learning Difficulty & Physical		2				1		3
Mental Health	2	5	9	2	2	33	12	65
Mental Health & Physical		2				2	1	5
Physical	3	6	1	1	4	18	8	41
Not Disclosed	54	187	192	20	74	415	161	1103
Grand Total	59	202	203	23	80	476	182	1225

Taking the same categories - but cross tabulating with gender shows that its mental health again that features most predominantly with 65 clients reporting this (across both male and female). Looking at the genders individually shows that it was males that were more likely to report a mental health condition. The second highest reported condition was physical ailments.

Table 9

Vulnerability/Gender	Female	Male	Not Disclosed	Grand Total
Learning Difficulty	1	2		3
Learning Difficulty & Mental Health	3	2		5
Learning Difficulty & Physical	1	2		3
Mental Health	25	38	2	65
Mental Health & Physical	5			5
Physical	10	28	3	41
Not Disclosed	684	387	32	1103
Grand Total	729	459	37	1225

The following table provides an age breakdown by health and/or disability. As above it is the mental health and physical health categories that have the highest reported rates of concern. Cross tabulating this with age shows that the 25-44 age band reported the highest levels of mental health conditions (followed by the 45-59 age band). For physical health this was reversed with the 45-59 age band reporting higher levels of physical health concerns.

Table 10

Vulnerability / Age Group	0-15	16-24	25-44	45-59	60-64	65-74	75+	Not Disclosed	Grand Total
Learning Difficulty		1	1	1					3
Learning Difficulty & Mental Health			4	1					5
Learning Difficulty & Physical			1	1	1				3
Mental Health		8	36	17	1	1		2	65
Mental Health & Physical			3	2					5
Physical		1	12	21	2	2		3	41
Not disclosed	3	163	635	214	27	21	8	32	1103
Grand Total	3	173	692	257	31	24	8	37	1225

Looking at vulnerability by applicant group shows that it is physical and mental health which again feature most predominantly. Cross-referencing this with applicant group shows that single applicants were most likely to report both mental health and physical conditions. This needs to be couched however given the significant share of single people in the sample base.

Table 11

Vulnerability/Applicant Group	Not Disclosed	Couple	Single	Grand Total
Learning Difficulty		1	2	3
Learning Difficulty & Mental Health			5	5
Learning Difficulty & Physical		1	2	3
Mental Health		3	60	65
Mental Health & Physical		1	4	5
Physical	1	4	33	41
Not Disclosed	15	265	773	1103
Grand Total	16	275	879	1225

Perhaps most importantly given the impact the affordability criteria will have on these households - there is a need to look at clients by income source. The table below provides this information. The most vulnerable client group are those whose only source of income is benefits. Looking at this shows that benefits-only clients make up 48% of the grand total. Of these 88 clients, or 15% reported a health condition. Of these - and consistent with the overall trends in this analysis - it was mental health and physical health that emerged as the greatest issues.

Table 12

Vulnerability/Income Source	Benefits & Salary	Benefits only	Not disclosed	Salary only	Grand Total
Learning Difficulty		3			3
Learning Difficulty & Mental Health		3	2		5
Learning Difficulty & Physical	1	2			3
Mental Health	6	48	9	2	65
Mental Health & Physical	1	4			5
Physical	2	28	9	2	41

Not Disclosed	334	503	168	98	1103
Grand Total	344	591	188	102	1225

Whilst the figures above looked at overall disability and health conditions - it is worth looking at those clients approaching the council that have a condition associated with mobility. Whilst this only covers one element of disability - it nonetheless helps provide a richer picture as to the profile of clients approaching the council and who are likely to be affected by any changes introduced by the proposed Placement policy.

For consistency purposes it is worth initially looking at the cohort of 1225 who approached the council for housing support for the period 2015/16 shows that only a small fraction of clients approaching qualified for a DSL award - 11 in total. Taking this figure shows that the majority of clients awarded DSL were from an Asian background (5 of the 11), were more likely to be single (7 of the 11) and aged between 45-59.

Ensuring data quality

Given the relatively low sample base, an exercise was carried out to test the robustness of the approach being taken to ensure the figures can be relied upon in any final analysis.

As such a manual review was carried out on 99 records relating to approaches to the council in June 2015 that were accepted as a homeless threat, in priority need and eligible for assistance. The review found;

- A mention on mental health issues in six cases
- Two cases with physical health issues

Taken together, the cases suggest that of the 99 cases reviewed - 8% reported a disability and/or health condition. This is broadly consistent with the findings overall.

Finally in order to get a picture of broader vulnerability, a review of the 588 households currently in temporary accommodation (and who, had they made an approach now to the council for housing assistance, would have been subject to the proposed policy) has been carried out. This showed the following

- 75.1% of clients were in households with children
- 5.1% of clients reported mental health issues
- 3.9 % of households included expectant mothers
- 2.7 % of households comprised an ex offender
- 2.3 % of households had an age vulnerability (old age)

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

Stakeholders	Interest
Residents	Access affordable, secure, suitable and appropriate housing that meets their needs.
Head of Housing	Ensure a robust and transparent placement policy. Deliver value for money in service delivery. Ensure access to affordable, suitable accommodation for homeless households.
Private Sector Landlords	Provide suitable accommodation that satisfies legal requirements (including habitability).
Members	Ensure policies adopted by the Council meet resident needs. Ensure access to affordable, suitable and secure accommodation for homeless households

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

Age	✓	Sex	✓
Disability	✓	Sexual Orientation	
Gender reassignment			
Marriage or civil partnership		Carers	
Pregnancy or maternity		Community Cohesion	
Race/Ethnicity	✓	Community Safety	
Religion or belief		Human Rights	

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?

Key findings from the analysis include

- The inclusion of affordability as a key consideration criteria for making decisions around placement is likely to affect those households with benefits as the only source of income. Groups that are likely to be most affected include
 - White British households which make up 47% of all households that rely solely on benefits.
 - The other groups affected were Black African/Caribbean at 16% and then Asian at 13%
- There is likely to be a greater preponderance of females affected given their profile within the client base (which shows 59% of all clients as female). However this is not uniform across all age groups with the 16-44 age group having a higher proportion of female, but the 45-74 age band showing a higher proportion of males
- Single person households, whether led by a female or a male featured in much greater numbers (71% of all clients). This was significantly higher than the profile of such households in the local population. When looking at gender, it showed that of the 879 single person households - 65% were female.
- Given the nature of the benefit reforms, larger households (i.e. those with a greater number of persons) were likely to be more affected.
 - Of the larger households, and looking at marital status shows that there was a greater proportion of larger households (2+ children) being led by a single parent as opposed to a couple (216v173). Of the 216, 94% were led by females.
 - Whilst in absolute terms the number of clients from an Asian-heritage background was smaller - a greater proportion of these households had larger compositions. Thus whilst there were 476 White British households, 27% had two or more children. Conversely of the 202 Asian households 41% had 2 or more children.
- Finally focusing on health/disabilities - it was clear that the most significant issues affecting clients related to mental health wellbeing. This was particularly the case for single parents and those for whom benefits represented the only source of income.
- Looking at clients, who approached the council who were awarded DSL indicated a higher preponderance of single people, those from an Asian heritage background and those that were aged between 45-59. It is important to note here however that given the very small numbers - strong inference cannot be drawn. Further it is clear that in reference to the collection of data on disabilities, further work is needed to ensure the council has a detailed understanding of clients who have disabled needs.
- Looking at the number of clients currently in temporary accommodation, whilst the number of pregnant women was relatively low (at 3.6%) - there was a

significant percentage of households with children (75%). As such there is a need to consider fully the educational requirements of household members when considering a placement move.

- Finally it is important to recognise here that individuals are not affected by single issues. Thus - and as has been identified in the analysis - vulnerable clients can be impacted by cumulative issues - so there is a strong likelihood that single parents can be susceptible to mental health issues. Data from table 12 shows that 4 clients were not only vulnerable due to benefits being their only source of income, this was compounded by a physical and mental health issues. Whilst overall numbers maybe small - it is important to recognise that the individual circumstances of households can vary dramatically.

Consultation

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

Please tick ✓ NO ✓ YES

The proposals for the new placement policy will be presented to Cabinet for consideration and approval. Any amendments suggested will be made to the policy before its formal adoption. Internal consultation has included colleagues in Social Care and in Legal Services.

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

Legal context

The Council has a duty under Part 7 of the Housing Act 1996 (HA96) to secure accommodation for a minimum of 2 years for unintentionally homeless people in priority need. In addition to satisfying the above, the Policy subject to this EHRIA also covers interim placements made under Section 188 HA96 while, homelessness enquiries are undertaken, longer term temporary accommodation placements for households accepted as homeless under Section 193 Housing Act 1996 and a private rented sector offer defined by section 193 (7AC) with a view to bringing the section 193(2) duty to an end. The Localism Act 2011 has enabled authorities, with effect from 9th November 2012, to discharge their duties towards households accepted an unintentionally homeless and in priority need, by offering a private rented tenancy (with a minimum term of twelve months) irrespective of objections that the household may have to being housed in the private rented sector. (Homelessness [suitability of accommodation] [England] Order 2012).

Finally it is important to make reference to the Nzolameso V Westminster Supreme Court ruling. Here, the supreme court overturned the decision by the Court of Appeal regarding the placement of a family by Westminster Council into temporary accommodation in Bletchley. Whilst recognising it was lawful for the local authority to provide temporary accommodation outside of its own boundaries, the Supreme Court

did find that Westminster (and by extension all local authorities adopting a policy of out of borough placements);

- should publish and regularly update its policies for procuring sufficient units of temporary accommodation to meet anticipated demand in the coming year;
- have a policy in place explaining how allocations of temporary accommodation were made, including what factors would be taken into account in allocating properties 'closer to home' or further away when there is a shortfall of 'in-borough' units.

Financial context

When considering the financial context, it is important to assess this from the perspective of clients that are likely to be impacted by the proposed changes as well as the local authority.

In respect of the former securing affordable private rented housing has become more difficult due to a combination of housing market pressures increasing rents and changes to the amount of local housing allowance (LHA) that can be paid. This has resulted in an increasing gap between what the rent that the private rental market can command and the amount that can be covered by benefits.

Families that are 'benefit capped' are restricted to the upper limit of entitlement across a range of welfare benefits and consequently are unable to claim what would otherwise be their full entitlement to Local Housing Allowance. The benefit cap applies only to working age families and is not applied to working households. This applies to some families in temporary accommodation and is a particular issue for some larger households.

This is compounded by the fact that LHA is restricted for all households at the levels set by Broad Rental Market Area (BRMA) and by bedsize. This applies uniformly to all claimants and the gap between this level and market rents has become larger in Hillingdon.

A buoyant housing market, Local Housing Allowance restrictions and the benefit cap combine to put private rented tenancies outside the reach of households solely reliant on benefits as their source of income. This is making procurement of private rented accommodation unaffordable in Hillingdon putting a strain on both household finances as well as those of the council.

As a result in order to procure accommodation at a rent covered by, or close to being covered by LHA, LB Hillingdon like other London boroughs, needs to look beyond its boundaries.

National policy context

The policy pays due regard to national changes especially in the context of welfare reform and the impact this has had on the ability of households to afford and maintain tenancies locally.

Please see reference to changes introduced through Localism Act (Legal Context, page 11).

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):

Equality Group	Impact on this group and actions you need to take
Men	<p>Based on the profile of clients, there were less males than females.</p> <p>However despite the lower numbers, potential negative impacts arising from an out-of-borough placement include a deleterious effect on support networks including family and/or friends (subject to the circumstances of the individual household).</p> <p>Where males head-up households with dependent children, an out of borough placement has the potential to impact school life of children. Where males are reliant on support for caring for children - a placement out of the borough is again likely to impact on such arrangements.</p> <p>In order to mitigate against this the council has provided scope in the policy to show discretion on such matters and factor consideration of such impacts in any final decision. Further for those clients/families that are placed outside the borough, due consideration will be given to individual need, with any accommodation offered being of a sufficient nature/quality to meet this need. Finally and recognising the disruption that can be caused, especially during any transition between placements, the council will utilise the services of relocation firms to assist households being placed out of the borough where necessary.</p> <p>Recognising the importance of assessing individual needs before any decision on placement can be made - the policy commits Hillingdon to review applications on a case by case basis. This will enable the council to understand individual circumstances - and determine the most suitable choice of placement.</p>
Women	<p>Impact on women is likely to be greater given their higher profile in the client group.</p>

	<p>However the nature of the impacts is largely the same and so includes impact of social and familial networks, impact on schooling etc. Where females are reliant on support for caring for children - a placement out of the borough is again likely to impact on such arrangements. Although the proposed changes are more likely to affect those clients that rely solely on benefits as their source of income - the placement outside of the borough is also likely to impact any clients with employment.</p> <p>However it is important to note here that the higher preponderance of single parent households from a female background means that they are likely to be affected more so by such impacts.</p> <p>In order to mitigate against this the council has provided scope in the policy to show discretion on such matters and factor consideration of such impacts in any final decision. Further for those clients/families that are placed outside the borough, due consideration will be given to individual need, with any accommodation offered being of a sufficient nature/quality to meet this need. Finally and recognising the disruption that can be caused, especially during any transition between placements, the council will utilise the services of relocation firms to assist households being placed out of the borough, where necessary.</p> <p>Recognising the importance of assessing individual needs before any decision on placement can be made - the policy commits Hillingdon to review applications on a case by case basis. This will enable the council to understand individual circumstances - and determine the most suitable choice of placement.</p>
<p>Race</p>	<p>In addition to the impacts above, a further consideration regarding potential impacts for households from a diverse background is the loss of cultural support networks (including religious) - where a placement outside of the borough could result in a loss of such support.</p> <p>Consideration of cultural needs will be factored into considerations regarding decisions on placement in the Policy.</p> <p>Recognising the importance of assessing individual needs before any decision on placement can be made - the policy commits Hillingdon to review applications on a case by case basis. This will enable the council to understand individual circumstances - and determine the most suitable choice of placement.</p>

<p>Disability</p>	<p>An impact on people with health conditions/disabilities is the potential loss of support networks. This is particularly the case for those clients reliant on carer support either through the local authority/health provider or through friends and family.</p> <p>Further, and in specific relation to clients with a physical disability - any clients that are subject to an out of borough placement - will need to ensure that their needs are adequately met through the new accommodation.</p> <p>Recognising the importance of assessing individual needs before any decision on placement can be made - the policy commits Hillingdon to review applications on a case by case basis. This will enable the council to understand individual circumstances - and determine the most suitable choice of placement.</p>
<p>Age</p>	<p>Impact on older clients largely follows the trend above - in that the most likely impact will be on the support networks, and impact on employment (although this will be mitigated against in the criteria for prioritising local placements).</p> <p>It's important to recognise here though, that for those families with dependent children - any move outside the borough will likely have an impact on schooling for children. There is sufficient latitude in the policy to enable the council to take a flexible approach. The inclusion of education as a criteria for local placement - along with the commitment to review cases on an individual basis to ensure suitability - means that the council has the ability to use discretion where needed.</p> <p>Where a placement outside the borough is the recommended option - the utilisation of a relocation agency to support the household (including securing local school places) will make any transition easier for families affected.</p> <p>Recognising the importance of assessing individual needs before any decision on placement can be made - the policy commits Hillingdon to review applications on a case by case basis. This will enable the council to understand individual circumstances - and determine the most suitable choice of placement.</p>

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

Equality Group	Impact on this group and actions you need to take
All	<p data-bbox="561 264 735 297"><u>Affordability</u></p> <p data-bbox="561 338 1418 629">The main positive impact of the policy for the groups listed is affordability. Given the financial pressures detailed on page 8, the ability to secure affordable housing locally remains very difficult. By offering placements out of the borough, affected clients will have the benefit of being able to stay in safe, secure accommodation that meets their financial needs. Given this, there will inevitably be corollary benefits including</p> <ul data-bbox="660 667 1418 1361" style="list-style-type: none"> <li data-bbox="660 667 1418 1066">- Mental health - According to the Royal College of Psychiatrists - one of the main impacts of debt is on mental wellbeing. Indeed statistics show that one in two adults in debt has a mental health issue. Securing accommodation that is affordable and thus less likely to cause indebtedness is therefore a positive. Looking at the figures shows that mental health is one of the health conditions frequently cited - with single parents and those on benefits being most affected. <li data-bbox="660 1070 1418 1361">- Quality of life - Placements in costly accommodation which takes up a higher proportion of a households monthly income means that money for other items (including necessities) will be less available. By securing more affordable accommodation, households should see an increase in monthly disposable incomes.
	<p data-bbox="561 1395 1066 1429"><u>Stable and Secure accommodation</u></p> <ul data-bbox="660 1467 1418 1718" style="list-style-type: none"> <li data-bbox="660 1467 1418 1718">- If implemented the policy will enable households to secure accommodation for a period of two years. This will enable households to settle into the new accommodation without the risk of tenancies being terminated - therefore offering greater security and the opportunity to lay foundations and establish support networks.

D) Conclusions

From the analysis above it is clear that the new placement policy, whilst having a number of advantages, may potentially negatively impact some groups. Some of these impacts feature across all groups, irrespective of circumstance. For instance the potential for an out-of-borough move may impact on social and familial networks. However it is important to recognise here that this impact is likely to be felt more by

those groups that are particularly vulnerable - whether this is due to a disability or being a single parent. For the latter - the potential impact on carer support or other local dependencies will be more acute.

It is clear from the policy, however, that such factors have been taken into account and consideration of the policy will be on a case by case basis. Thus there is a commitment that as far as is reasonably practicable, accommodation to meet local housing demand will be secured in Hillingdon thereby enabling applicants to retain established links to schools, doctors, social workers, key services, support and social networks.

As such when making a decision on placements the policy commits the Council to;

- Ensuring each private rented sector offer to ensure suitability to the matched individual household with applicants having the ability to request a review of the decision to ensure such suitability.
- In considering suitability the council will take into account the following factors
 - Property standards and management
 - Size and layout of the property
 - Health factors
 - Affordability
 - Education
 - Employment
 - Proximity to schools and services

Further in addition to the above and addressing the point about the impact on certain groups potentially being greater, priority for in-borough placements, will be made for the following;

- Applicants with a severe and enduring health condition requiring intensive and specialist medical treatment that is only available in Hillingdon;
- Applicants undergoing a course of treatment where a disruption of that treatment would be unreasonable;
- Applicants who are in receipt of a significant package and range of health care options that cannot be easily transferred;
- Applicants with a severe and enduring mental health problem who are receiving psychiatric treatment and aftercare provided by community mental health services and have an established support network where a transfer of care would severely impact on their well-being;
- Households with children registered on the Child Protection register in Hillingdon, or families who have high social needs who are linked into local health services and where it is confirmed that a transfer to another area would impact on their welfare;
- Applicants with a long and significant connection to the Borough of Hillingdon;
- Households containing a child with special educational needs who is receiving education or educational support in Hillingdon, where change would be detrimental to their well-being;

- Applicants who have a longstanding arrangement to provide care and support to another family member in Hillingdon who is not part of the residents household and would be likely to require statutory health and social support if the care ceased;
- Applicants who have as part of their household, a child or children who are enrolled in public examination courses in Hillingdon, with GCSE/A level exams to be taken within the academic year;
- Any other special circumstance will also be taken into account.

However when there is a lack of suitable (including affordable) accommodation or there are higher priority households awaiting accommodation in the Borough, out of borough placements will need to be considered to meet the Council's housing duty. To further mitigate this impact the policy commits the Council to take into account the location of the accommodation including:

- Where the accommodation is situated and the distance from Hillingdon;
- The significance of any potential disruption which would be caused by the location of the accommodation to the employment, caring responsibilities or education of the person or members of the person's household and the duration and significance of connections to the Borough of Hillingdon;
- The cultural needs, including proximity to centres for learning, religious establishments etc.
- The proximity and accessibility of the accommodation to medical facilities, carers and other support which;
 - Are currently used by or provided to the person or members of the person's household; and
 - Are essential to the well-being of the person or members of the person's household; and
 - The proximity and accessibility of the accommodation to local service amenities and transport.

Finally recognising that some households will require assistance to move to new accommodation, the council will procure the services of a relocation service providing one to one support for families re-locating including support in registering with schools, medical services, support finding employment etc.

Signed and dated:... *Mr D. Kennedy*29/04/2016...

Name and position: Head of Business Performance, Policy and Standards ...