



# 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

The Housing Allocation Policy describes how the council assesses applications for housing, prioritises each application and decides which applicant will be offered (allocated) Council and Housing Association housing.

The Housing Allocations Scheme covers housing in Hillingdon owned by the Council or by Housing Associations that have entered into a nominations agreement with the council.

Hillingdon Council receives many enquiries every year from people looking to rent a home in the borough. Because Hillingdon only has a limited amount of social housing available to rent, the main purpose of this scheme is to explain who will be allocated housing and why.

The proposed changes to the policy are set out below:

- A proposal to add the statutory reasonable preference groups as a further exception to the 10 year continuous residence in the borough rule in paragraph 2.2.4 of the Policy. The statutory reasonable preference categories are as follows
  - people who are homeless within the meaning of Part 7 of the 1996 Act (including those who are intentionally homeless and those not in priority need)
  - people who are owed a duty by any housing authority under section 190(2), 193(2) or 195(2) of the 1996 Act (or under section 65(2) or 68(2) of the

Housing Act 1985) or who are occupying accommodation secured by any housing authority under s.192(3)

- people occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions
  - people who need to move on medical or welfare grounds, including grounds relating to a disability<sup>11</sup>, and
  - people who need to move to a particular locality in the district of the housing authority, where failure to meet that need would cause hardship (to themselves or others)
- 
- A proposal to restructure the Policy so that all statutorily homeless persons with less than 10 years continuous residence in the borough are placed in a new Band D on the housing register thus entitling applicants to a reasonable preference over those who are not admitted on to the housing register, but a lower preference than those in Bands A-C
  - Proposal to change existing exceptions to the ten-year rule by introducing a requirement that they will only apply to those people who are currently resident in the borough. The reason for this proposed change is so that the Council can effectively manage the number of people who are capable of falling within either of the exceptions.
  - The extension of the meaning of the term 'local connection' so that it includes people placed in the borough of Hillingdon in temporary accommodation in one of the following set of circumstances:
    - they are intentionally homeless but have a priority need;
    - they are unintentionally homeless and have a priority need;
    - they are threatened with homelessness unintentionally and have a priority need;
    - they are unintentionally homeless but do not have a priority need.

The application of one or more of these proposals will remove some of the confusion associated with the existing Allocation Policy and allow for a firmer basis upon which to make decisions about the allocation of social housing.

Thus although this EIA provides an assessment of the policy overall, specific attention will be paid to the impact of the proposals that have the potential to have a disproportionate impact on those protected groups under the Equalities Act. Where such impacts are identified the EIA 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

03/11/2016

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 Allocation Scheme is designed to meet all legal requirements and to support and contribute towards the Council's wider objective of putting residents first. The Council is also committed to preventing homelessness and the Allocation Scheme focuses on supporting residents to actively pursue suitable alternatives to avoid becoming homeless.

The key objectives of this Allocations Scheme are to:

- Provide a fair and transparent system by which people are prioritised 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 currently on the housing register and those that will apply to the council for housing assistance. As of 11/10/2016 the number of residents, across all existing categories likely to be affected by the changes stood at 2160 . Their equality profile is set out below.

### **Ethnicity**

The following table (table 1) provides a breakdown of ethnicity of applicants. It shows that of the total of 2160, 42% of all applicants were from a White British background. The proportion of BME applicants stood at 34.3%.

Comparing the figures above the overall population profile for the borough shows that, at 42% - the White British cohort was slightly lower than their profile locally (52%). Similarly at 34% of all applicants - the proportion of applicants from a BME background was also below its profile locally (40%). It is important to note here that at 10.2% - the proportion of applicants where ethnic background was not known was quite high.

Table 1

<b>Band</b>	<b>Count of Applicants</b>	<b>% of Applicants</b>
Other	149	6.90%
BME	735	34.03%
Unknown	221	10.23%
White Other	131	6.06%
White English, Welsh, Scottish, N Irish	924	42.78%
<b>Grand Total</b>	<b>2160</b>	<b>100.00%</b>

Breaking the BME figure down reveals that of the 735 applicants from a BME

background 26% were from a Black African background ( which is significantly higher than the 4.6% of Black-Africans in the borough overall). Somali and Indian groups also feature predominantly at 16.6% and 14.15% respectively. Whilst for Indian heritage groups the latter figure is consistent with their overall population profile - for Somali groups it is more difficult to assess given the category 'Somali' doesn't feature as a separate grouping in the 'main' ethnic classifications used.

Table 1.1

<b>Ethnicity</b>	<b>Count of Applicants</b>	<b>% of Applicants</b>
Arab	1	0.14%
BLACK BRIT-AFRICAN	193	26.26%
BLACK BRIT-CARIBBEAN	51	6.94%
BLACK BRIT-OTHER	12	1.63%
BLACK BRIT-SOMALIAN	122	16.60%
BRIT ASIAN OTHER	109	14.83%
BRIT ASIAN-BANGLADESHI	50	6.80%
BRIT ASIAN-INDIAN	104	14.15%
BRIT ASIAN-PAKISTANI	63	8.57%
MIXED AFRICAN/CARIBBEAN	1	0.14%
MIXED WHITE/ASIAN	6	0.82%
MIXED WHITE/BLK AFRICAN	10	1.36%
MIXED WHITE/BLK CARIBBEAN	10	1.36%
Somali	2	0.27%
Tamil	1	0.14%
<b>Grand Total</b>	<b>735</b>	<b>100.00%</b>

### Age

Looking at the age profile (table 2) shows that of the 2160 clients, the majority fell within the 26-39 age bracket (39%). The next highest was the 40-59 age band (34%).

Comparing this with the profile locally shows that a higher proportion of applicants were from the age band 26-39 - than is their profile locally (which as of 2015-16 stood at approximately 70,170 or 23.8% of the local population). Similarly the proportion of applicants aged 40-59 was also higher than their profile locally (34% of all applicants compared to 25% in the local population).

Table 2

<b>Band</b>	<b>Count of Applicants</b>	<b>% of Applicants</b>
18-25	142	6.57%
26-39	835	38.66%
40-59	729	33.75%
60-79	353	16.34%
80+	101	4.68%
<b>Grand Total</b>	<b>2160</b>	<b>100.00%</b>

### Gender

There is a clear preponderance of female applicants on the housing register. Of the 2160 applicants - just over 70% are female with the remaining 30% male. This is different from the borough-wide gender breakdown which is recorded at 51% male: 49% female as per the 2016 sub-national population projections.

Table 3

Gender	Count of Applicants	% of Applicants
F	1513	70.05%
M	647	29.95%
<b>Grand Total</b>	<b>2160</b>	<b>100.00%</b>

### **Mobility/Disability**

The Census 2011 records data in terms of health rather than disability - so drawing like for like comparisons is problematic. Looking at data from 2011 Census indicates that the percentage of residents that reported a long-term health condition or disability stood at 14% (defined here as day to day activities being limited 'a little' or 'a lot'). Housing services do not collect against a similar measure - however using the proxy of numbers of applicants classified against one of the DSL levels (those requiring adapted properties) shows that 4% of Hillingdon tenants met one of the three DSL levels.

Table 4

Mobility (DSL)	Count of Applicants	% of Applicants
N	2072	95.93%
Y	88	4.07%
<b>Grand Total</b>	<b>2160</b>	<b>100.00%</b>

The latter is however more consistent with the 3.6% of local residents that were in receipt of disability living allowance (10,090/273,976)<sup>1</sup>.

Table 5

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

<sup>1</sup> 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 11/10/2016.

<b>Aug-03</b>	7,650	253,460	2,091,820
<b>Aug-02</b>	7,310	239,580	1,995,090

### **Religion**

The 2011 Census reported that 49% of Hillingdon residents described themselves as Christian. The second highest reported category was no religion at 17% with Muslims forming the third highest category at 10%. Hindus and Sikhs also formed small but sizeable populations at 8% and 6% respectively.

### **Sexual Orientation**

Recent governments have proposed that lesbian, gay, bisexual and transgender (LGBT) people constitute 5 to 7 per cent of the population, which the LGBT rights organisation Stonewall accepts as a reasonable estimate. This equates to about 3.5 to 4m LGBT people in the UK. Yet there are no hard data since the Census does not include appropriate questions to determine the UK population's sexual orientation or gender identity.

According to the HumanCity report - Rainbow Rising - which looked into housing needs of LGBT communities - The majority of LGBT people have experienced at least one housing 'need', including the related problems of homelessness, domestic violence, relationship breakdown, harassment in or around the home, pressure from relatives to move out of the family home and financial difficulties in maintaining their homes.

Research reveals that some of the housing problems faced by LGBT people are tenure-specific while others are experienced across all tenures. Shared housing, including sharing communal areas, being accepted by other tenants and landlords, and having a lack of privacy, impacted on LGBT people's general well-being quality of life.

Housing problems specific to the social rented sector centred on the response of a landlord to harassment or the threat of homelessness. Some LGBT people feel that service providers do not understand or take on board their specific problems and needs and that they feel alienated by policies and practices upheld in the social rented sector, which leads to feelings of victimisation. Indeed, according to research by Stonewall - almost half of LGBT people feel that their local authority, housing association or other voluntary agency they had approached for housing assistance did not understand their needs.

### **Household composition**

Table 6 below shows the household composition of applicants on the housing register. Data shows that single applicants formed the bulk of those on the register (43%). At 36% of the total cohort, couples formed the next largest group.

Table 6

Household Composition	Count of Applicants	% of Applicants
Couple	778	36.02%
Couple - OAPs	68	3.15%
Single	946	43.80%
Single - OAP	361	16.71%
Single - Under 18	7	0.32%
<b>Grand Total</b>	<b>2160</b>	<b>100.00%</b>

**Pregnancy and Maternity**

Data on number of pregnant females in the borough overall are not available. However trends for the number of births in Hillingdon suggests that numbers have been steadily increasing. Thus between 2006 and 2014 - there was an increase of over 700 births per year equivalent to an increase of 20%.

Table 7

	2006	2007	2008	2009	2010	2011	2012	2013	2014
<b>Live births</b>	3,691	3,845	4,126	4,207	4,192	4,357	4,536	4,330	4,423

The figures above present an overview of the current equality profile of both the Borough as a whole - but also (and where available) a comparative analysis of how the composition of the housing register reflects the population as a whole.

It is important to note here that the data on the housing register detailed above also presents a 'baseline' - in that it reflects the application of the current Allocations Policy (before any implementation of the changes being proposed). The following section begins to detail how each of the proposals, if implemented, will impact on the composition of the housing register thus allowing for a better understanding of any disproportionate and/or negative impact.

**Proposal 1 - the Council is proposing to add the statutory reasonable**

**preference groups as a further exception to the 10 year continuous residence in the borough rule in paragraph 2.2.4 of the Policy.**

The most notable impact of proposal 1 is the increase in the numbers included in the housing register from 2199 to 2896 - marking an increase of 31.6%. The majority of this increase coming in at Band D (table 8).

Table8

Bedroom size

<b>Banding</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>Grand Total</b>
<b>A</b>	112	95	80	65	352
<b>B</b>	115	301	457	108	981
<b>C</b>	227	330	191	325	1073
<b>D</b>	60	215	151	64	490
<b>Grand Total</b>	514	941	879	562	2896

Looking at the impact on individual groups indicates that mobility, gender and age groups are likely to broadly stay the same. For instance Table 9 below shows the gender composition for the housing register. As can be seen there is no material difference from instituting Proposal 1 with the female/male split staying consistent at 70:30.

Table 9

<b>Gender</b>	<b>Count of Applicants</b>	<b>% of Applicants</b>
F	2027	70%
M	869	30%
<b>Grand Total</b>	<b>2896</b>	<b>100%</b>

Table 10 details the age distribution. Small movements can be observed across the 5 age bands listed. Whilst numbers in the 18-25, 26-39, 60-79 and 80+ all showing small decreases - the 40-59 age band shows an increase of 3%. In terms of ranking however the 26-39 age band remains the single biggest grouping.

Table 10

<b>Age Band</b>	<b>Count of Applicants</b>	<b>% of Applicants</b>
18-25	223	7.70%
26-39	1135	39.21%
40-59	881	30.41%
60-79	513	17.72%
80+	144	4.97%
<b>Grand Total</b>	<b>2896</b>	<b>100.00%</b>

A similar trend holds true for mobility. The introduction of proposal 1 does not make a material difference to the number of Hillingdon residents that meet the criteria for DSL. There is a marginal decrease in the numbers that qualify - although at 0.68% - the change is not significant.



Table 11

Mobility (DSL)	Count of Applicants	% of Applicants
N	2798	96.61%
Y	98	3.39%
<b>Grand Total</b>	<b>2896</b>	<b>100.00%</b>

The final area to review is impact on the ethnic composition of the housing register. In the baseline data - the single biggest ethnic group was White British at 42.78% with BME at 34.03%. Were the changes in proposal 1 implemented - data indicates that there will be a slight increase in the number of White British applicants on the housing register (to 43.21%) and a slight reduction in the percentage of BME applicants (to 32.54%).

Table 12

Ethnic Grouping	Count of Applicants	% of Applicants
Other	192	6.63%
BME	942	32.54%
Unknown	326	11.27%
White	184	6.34%
White English, Welsh, Scottish, N Irish	1251	43.21%
<b>Grand Total</b>	<b>2896</b>	<b>100.00%</b>

**Proposal 2 - The Council is proposing to restructure its Policy so that all statutorily homeless persons with less than 10 years continuous residence in the borough are placed in a new Band D on the housing register. This would entitle applicants to a reasonable preference over those who are not admitted on to the housing register, but a lower preference than those in Bands A-C.**

Like before - the intention behind the following analysis is to understand how application of proposal 2 is likely to affect the composition of the housing register compared to the baseline.

Taking gender first indicates that like proposal 1 - there is unlikely to be a material difference. There is a marginal decrease in the percentage of female applicants (with an associated increase for male applicants). However at 68.2% females still form the vast majority of applicants on the housing register.

Table 13

Gender	Count of Applicants	% of Applicants
F	1807	68.27%
M	840	31.73%
<b>Grand Total</b>	<b>2647</b>	<b>100.00%</b>

A similar pattern holds true for age and ethnicity. Taking the former - table 14 below shows that, when compared to the baseline - there are small increases to the 18-25, 26-39 and 40-59 age bands. There was however a decrease of 3.49% in the proportion of applicants in the 60-79 age band.

Table 14

Age Bands	Count of Applicants	% of Applicants
18-25	176	6.65%
26-39	1054	39.82%
40-59	949	35.85%
60-79	366	13.83%
80+	102	3.85%
<b>Grand Total</b>	<b>2647</b>	<b>100.00%</b>

For ethnicity the main changes from the implementation of Proposal 2 centre on the increase in the proportion of BME applicants which increases from 34.03% in the original baseline to 37.78%. The biggest drop occurs in the White British cohort which drops from 42.70% to 37.51%.

Table 15

Ethnicity	Count of Applicants	% of Applicants
Other	201	7.59%
BME	1000	37.78%
Unknown	295	11.14%
White	158	5.97%
White English, Welsh, Scottish, N Irish	993	37.51%
<b>Grand Total</b>	<b>2647</b>	<b>100.00%</b>

Looking at mobility indicates that there would be no material difference to the percentage of clients meeting the DSL criteria with figures staying consistent at 95.93% and 4.07% respectively.

Table 16

Mobility (DSL)	Count of Applicants	% of Applicants
N	2072	95.93%
Y	88	4.07%
<b>Grand Total</b>	<b>2160</b>	<b>100.00%</b>

Finally looking at household composition shows that compared to the baseline the percentage of single applicants drops from 43.7% to 35.7%. Similarly there is a marginal drop in the percentage of couples on the housing register from 36.02% to 29.39%. It is important to note here that based on the projections below - there is a higher percentage of blanks. This is due to the fact that clients placed in emergency accommodation would be affected - but for whom there is a lack of detailed information relating to household composition.

Table 17

Household Composition	Count of Applicants	% of Applicants
Couple	778	29.39%
Couple - OAPs	68	2.57%
Single	946	35.74%
Single - OAP	361	13.64%
Single - Under 18	7	0.26%
(blank)	487	18.40%
<b>Grand Total</b>	<b>2647</b>	<b>100.00%</b>

**Proposal 3 - Proposal to change existing exceptions to the ten-year rule by introducing a requirement that they will only apply to those people who are currently resident in the borough. The reason for this proposed change is so that the Council can effectively manage the number of people who are capable of falling within either of the exceptions.**

The most immediate impact of proposal three on the number and make-up of the housing register is the small decline in housing register numbers from 2160 to 2098. How this manifests in terms of impact on protected characteristics is detailed below.

Taking the gender breakdown first - like previous trends there is no marked impact on the compilation of the housing register. There is a very small reduction in the number of female applicants - but at 0.17% - the impact is negligible. Female applicants continue to feature as the preponderant grouping.

Table 18

Gender	Count of Applicants	% of Applicants
F	1473	70.21%
M	625	29.79%
<b>Grand Total</b>	<b>2098</b>	<b>100.00%</b>

Moving on to age presents a similar picture. As can be seen below and following the implementation of change 3, the single biggest age-group continue to be 26-39 at 39.8%. This is in fact an increase (albeit small) on the baseline position. A similar trend applies to the 4-59 age band which again features as the second highest age group. If the age-bands - there is a drop in the number of applicants from the 60-79 age-band from 16.3% (baseline) to 14.87%.

Table 19

Age Bands	Count of Applicants	% of Applicants
18-25	142	6.77%
26-39	835	39.80%
40-59	729	34.75%
60-79	312	14.87%
80+	80	3.81%
<b>Grand Total</b>	<b>2098</b>	<b>100.00%</b>

Looking at ethnicity indicates that any changes are negligible. White British continue

to form the majority grouping - although there is a small reduction in percentage of applicants from this heritage group (42.28% compared to the previous 42.78%). Applicants from a BME background form 34.37% of the revised housing register (following the changes). This compares to 34.03% in the baseline. There is a small reduction of 0.04% in the number of White Other applicants.

Table 20

<b>Ethnicity</b>	<b>Count of Applicants</b>	<b>% of Applicants</b>
Other	148	7.05%
BME	721	34.37%
Unknown	214	10.20%
White	128	6.10%
White English, Welsh, Scottish, N		
Irish	887	42.28%
<b>Grand Total</b>	<b>2098</b>	<b>100.00%</b>

Finally moving on to mobility and household composition suggests that the impact of proposal 3 is likely to be small overall.

For mobility - the table below shows the breakdown in the proportion of clients that meet one of the three levels of DSE. As is shown - there is still only a relatively small number of clients on the housing register that would require an adapted property of some sort. This is consistent with the baseline position.

Table 21

<b>Mobility (DSL)</b>	<b>Count of Applicants</b>	<b>% of Applicants</b>
N	2010	95.81%
Y	88	4.19%
<b>Grand Total</b>	<b>2098</b>	<b>100.00%</b>

Finally for household composition there is a slight increase in the proportion of couples that feature on the housing register from 36% to 37%. There is also an increase in the proportion of applicants that are single from 43.8% to 45.9%. Groups that are negatively affected - albeit in very small terms are OAPs whether single or couple where as a proportion they drop from 3.15% (baseline) to 2.76% (following the change) and 16.7% (baseline) to 14.73% (following the change).

Table 22

<b>Household Composition</b>	<b>Count of Applicants</b>	<b>% of Applicants</b>
Couple	778	37.08%
Couple - OAPs	58	2.76%
Single	946	45.09%
Single - OAP	309	14.73%
Single - Under 18	7	0.33%
<b>Grand Total</b>	<b>2098</b>	<b>100.00%</b>

**Proposal 4 - the extension of the meaning of the term 'local connection' so that it includes people placed in the borough of Hillingdon in temporary accommodation in one of the following set of circumstances:**

- they are intentionally homeless but have a priority need;
- they are unintentionally homeless and have a priority need;
- they are threatened with homelessness unintentionally and have a priority need;
- they are unintentionally homeless but do not have a priority need.

Before moving onto to discuss the potential impacts of the changes contained within proposal 4 - it is important to clarify the methodological approach upon which the calculations are based. The definition used for Temporary Accommodation is *accommodation secured for use following Homelessness investigation under the 1996 Housing Act*. As such this precludes prevention placements as by definition a prevention removes the need for homeless assessment and placing in Temporary accommodation. As there is no data relating to placement in borough by other authorities, the estimates below are based entirely on the assumption that approximately 5% of placements by neighbouring London boroughs are in London Borough of Hillingdon. Using figures from June 2016, Brent have 2895 households, Ealing 2378 households, Harrow 828 households and Hounslow 998 households. Using these figures and applying a 5% rule gives us approximately 355 households being placed in Hillingdon by other boroughs.

Having established the methodology - the most immediate change of implementing Proposal 4 is the increase in numbers on the housing register which increases from 2160 to 3251 based on the assumptions from 2011.

Given the nature of the changes being proposed estimating the impact on individual groups is problematic. As such an assumption is made that whilst overall numbers will increase - proportionally the size of each group will remain consistent with the baseline.

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

<b>Stakeholders</b>	<b>Interest</b>
Residents	Access affordable, secure, suitable and appropriate housing that meets their needs.
Head of Housing	Ensure a robust and transparent Allocations policy. Deliver value for money in service delivery. Ensure access to affordable, suitable accommodation for homeless households.
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

- Overall each of the changes presented do not in and of themselves make a significant difference to any individual group. There are small variations in proportionality across the four changes - and within this certain groups are impacted more in relative terms. However the data and analysis thereof does not indicate that there is a *negative and disproportionate* impact on any one group. Indeed where changes are observed, in each of the four proposals - the 'ranking' of groups remains consistent with the baseline.
- Looking systematically across the four proposals being suggested shows the following
  - Proposal 1 - The potential is for the housing register to increase from 2160 to 2896 with the bulk in non priority Band D, Gender, Age groups and Mobility cohorts are likely to remain broadly similar to the current position.
  - Proposal 2 - Overall numbers on the housing register will increase from 2160 to 2647, increase in the ratio of BME applicants from 34% to 37% , decline in ratio of White British from 43% to 37.5%. Decline in ratio aged 60+ from 21% to 17.5%. Paragraph 12.1 of the Social Housing Allocation Policy states that, where the main homelessness duty has been accepted, applicants will be placed in one of Bands A, B or C. Those homeless households that will, under this, proposal be awarded a Band D will have a reduced prospect of being allocated social housing. Groups with protected characteristics would be included amongst these homeless households and consequently there would be a negative impact on these groups. However, homeless households are afforded the protection of the housing duty under Part 7 of the Housing Act 1996, unlike those in other reasonable preference categories. The lower banding is considered justifiable in view of this and taking into account the net shortage of accommodation available and the operation of the Social Housing Allocation Policy as a whole.
  - Proposal 3 - Small decline in housing register numbers from 2160 to 2098. Impact directly on older non resident applicants reducing the ratio amongst those aged 60+ from 21% to 18.7%
  - Proposal 4 - Significant increase in overall numbers from 2160 to 3251, based on assumptions from 2011.
- It is important to note here that when comparing the breakdown of the current housing register and whether this adequately reflects the make-up of the wider borough access to the housing register is broadly reflective. For instance using mobility as a proxy indicates that 4% of applicants on the housing register required access to some form of adapted property. Looking at borough-wide figures for the percentage of applicants in receipt of disability living allowance indicates this to be at 3.6%.

- Looking at ethnicity approximately 52% of residents in Hillingdon were from a White British background. The profile of residents on the Housing register from a white British background was 43% - indicating a slightly lower profile. For BME groups the split between proportion on housing register Vs proportion overall was 40:35 - again indicating a broadly consistent picture.
- The only group where its proportion on the housing register vastly outweighed its proportion in the overall population was gender where the 70:30 split in favour of females was significantly different to the 51:49 percentage split (in favour of males) overall.

## Consultation

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

Please tick  NO  YES

Section 166A [13] of the Housing Act provides that before making an alteration to their scheme reflecting a major change of policy, a local housing authority must send a copy of the proposed alteration to every private registered provider of social housing and registered social landlord with which they have nomination agreements and afford those persons a reasonable opportunity to comment on the proposals.

Given the proposals meet the criteria of being 'a major change of policy' a consultation was held between 3<sup>rd</sup> August and 14<sup>th</sup> October 2016.

To encourage a representative response rate a hard copy consultation pack, which included a questionnaire and pre-paid return envelope, was sent to every applicant currently on the Housing Register and all homeless households where a re-housing duty had been accepted or homelessness investigations were still underway. This includes all homeless households in temporary accommodation.

New applicants to the Housing Register during the consultation period were also invited to take part. Information about the consultation, proposed changes and questionnaire was available online at the council's 'Have Your Say' Page and on the Locata website.

To meet accessibility needs assistance was offered for those speaking another language or who required the information in an alternative format. Contact details were published for telephone queries and for any requests for a face-to-face discussion through the provision of drop-in sessions at venues across the borough.

Information about the consultation was sent to partner organisations, including all Registered Providers working in the borough, relevant voluntary sector organisations and neighbouring local authorities.

Finally attention was also drawn to the consultation through the Hillingdon Council website, council publications, including social media, and by posters placed in the



Housing Reception area at the Civic Centre, Libraries and the Citizens Advice Bureau, and by providing information regarding the survey to existing groups such as resident's associations.

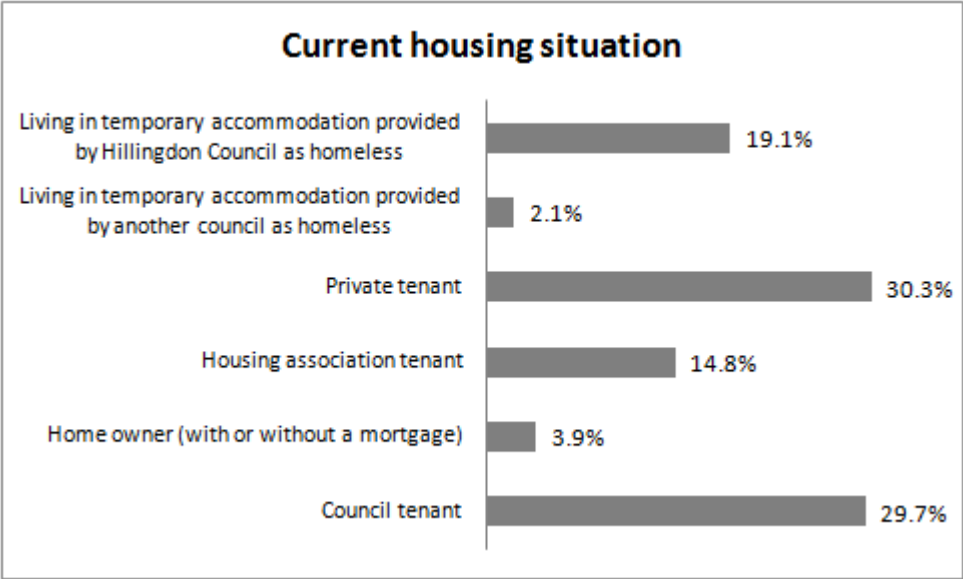
Analysis of the results of the consultation

A total of 372 consultation responses were received.

In terms of headline figures:

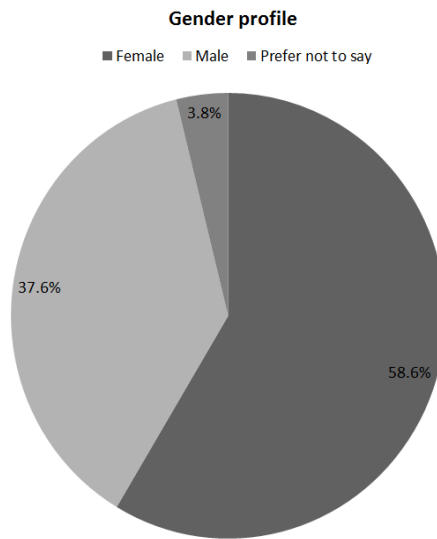
- 98% of respondents were Borough residents.
- 93% of responses came from an individual or household with the remainder coming from private landlords, housing associations or voluntary groups.
- Approximately 78% of the responses came from individuals who were entered on the Housing Register.
- The current housing status of respondents is detailed in chart 1 below. As can be seen below the bulk of the responses came from private tenants (30.3%) followed very closely by council tenants (29.1%). 19.1% of responses came from residents currently in temporary accommodation (provided by Hillingdon) due to homelessness.

Chart 1



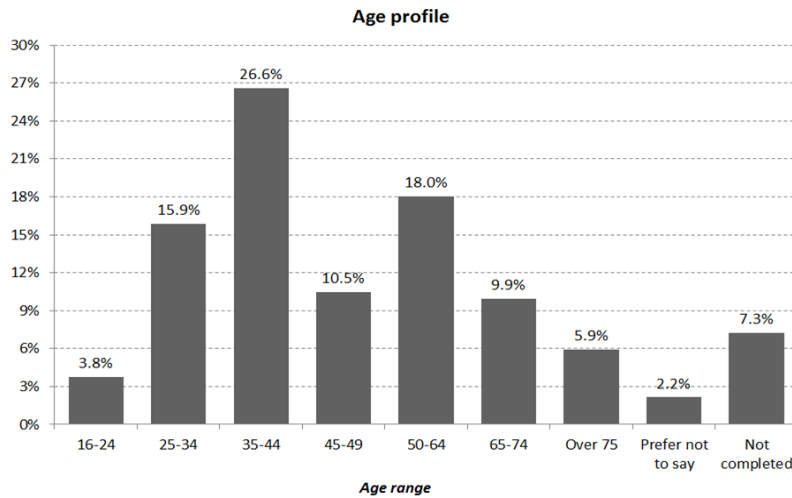
- The gender profile shows that female respondents to the survey make up the majority with 58.6% compared to males 37.6% (chart 2).

Chart 2



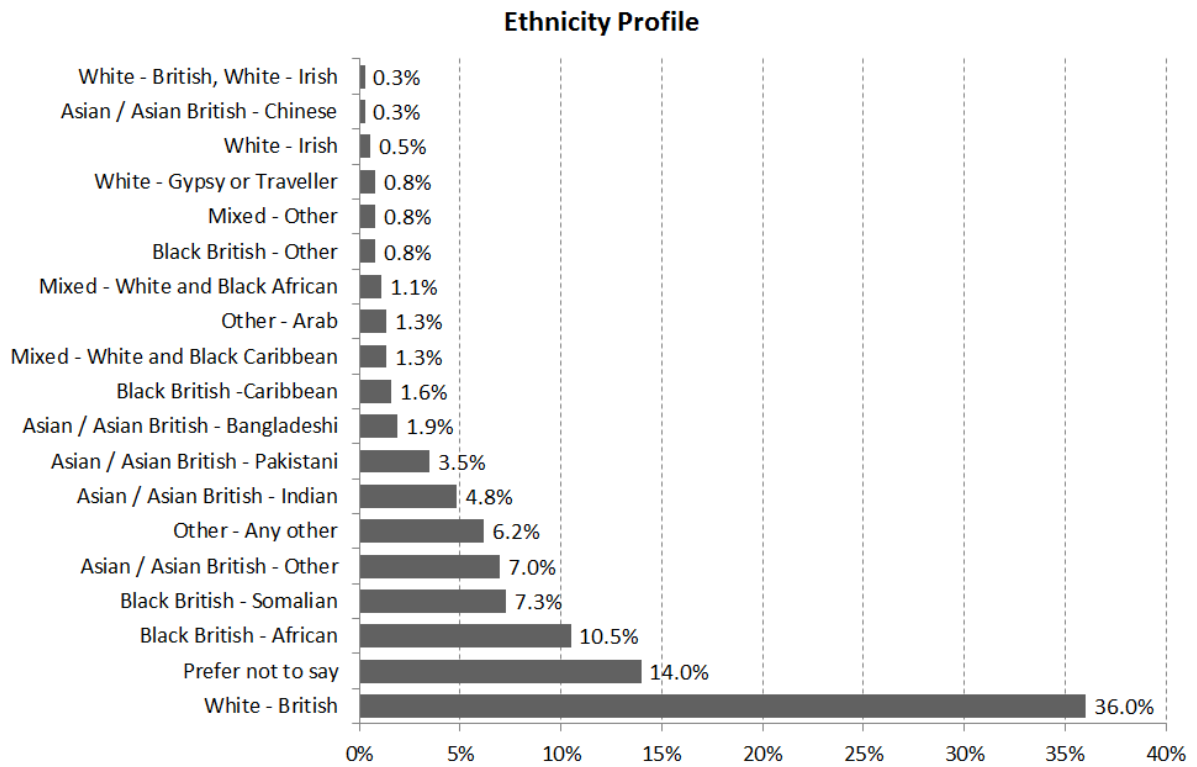
- The following chart provides an age-breakdown of respondents. There was a fair distribution across the age-bands although most responses came from the 35-44 grouping (26.6%). The lowest return (of those that disclosed age) came amongst the 16-24 at 3.8%.

Chart 3



- The ethnic background of respondents shows White British making up the largest ethnic group from the survey (36%) followed by combined Black British ethnic group (24%). Comparing this to the profile of the housing register indicates that the consultation drew a broadly representative response from the White British group. Response rates from the Indian and Black African groups were however slightly lower than their housing register profile.

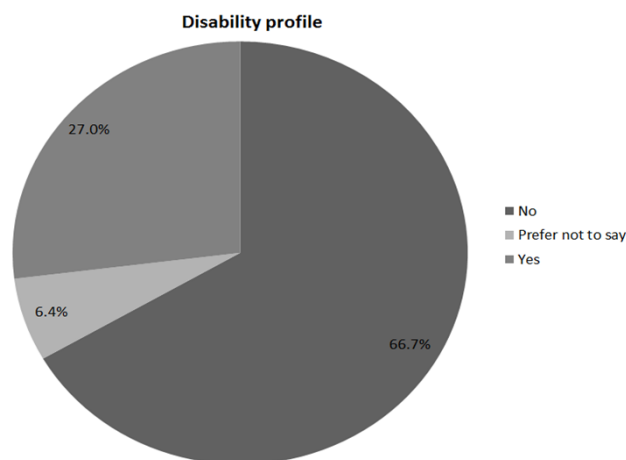
Chart 4



- Chart 5 provides the disability profile of respondents. It is interesting to note here that although the proxy measures used indicate a lower profile of disabled applicants overall in the housing register - the response rate below shows a higher proportion of respondents stating a disability. It is difficult to determine what element of the respondents below are also on the housing register - however the figures do re-affirm the need to improve data collection against key characteristics.

Looking at headline figures indicates that 66.7% of respondents did not state a disability with 27% confirming a disability.

Chart 5



- Moving on to sexual orientation the survey shows high proportion of heterosexual/straight respondents at 83.1% followed by 12.8% who prefer not to say.
- The largest religious group from the survey was Christian (38.9%) followed by Muslim (27.2%) and the smallest group being Humanist (0.6%).
- Finally looking at marital profile shows a high proportion of married couples (40.1%), followed by singles (26.9%) and the lowest proportion being civil partnership (0.8%).

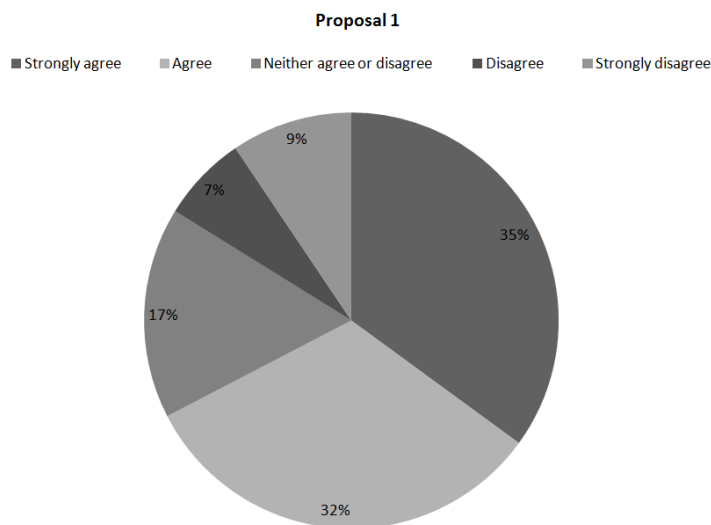
Having profiled the respondents - the following section details the actual responses in favour or against the proposals being put forward.

### Proposal 1

Regarding proposal 1 a combined 67.3% strongly agree or agree in favour of the 10 year continuous qualifying period being retained but also amended to include the reasonable preference categories. This compares to 16.1% that either strongly disagree or disagree.

Chart 6 below provides a fuller breakdown.

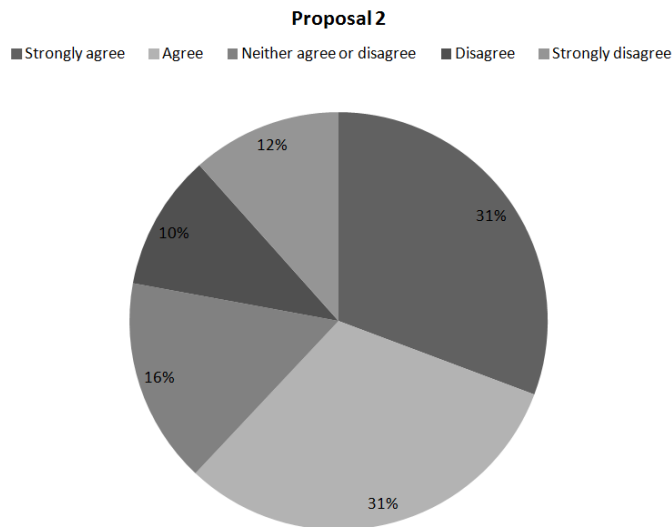
Chart 6



## Proposal 2

- Looking at proposal 2 and the creation of a new Band D for those statutorily homeless applicants that do not have 10 years continuous residency in the borough, analysis of the responses reveals
  - A combined 62.0% either strongly agree or agree in favour of the proposal.
  - A combined 22.1% either strongly disagree or disagree with the proposal and a combined
  - 15.9% of respondents neither agree nor disagree.

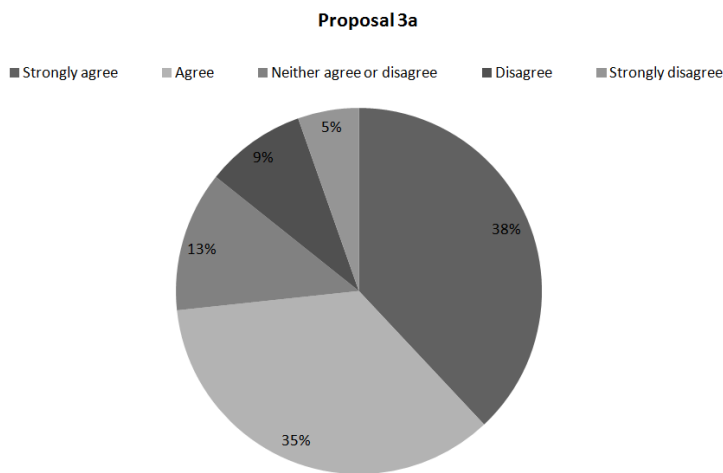
Chart 7



## Proposal 3a

- Moving on to proposal 3a where the council is proposing that people over 60, who would benefit from sheltered housing, will continue to be excluded from the 10 year continuous residency rule, but they will now be required to be currently resident in the borough. The chart (chart 8 below suggests a combined 73.3% strongly agree and agree in favour of the proposal, followed by 14.3% combined strongly disagree and disagree and 12.4% neither agree nor disagree.

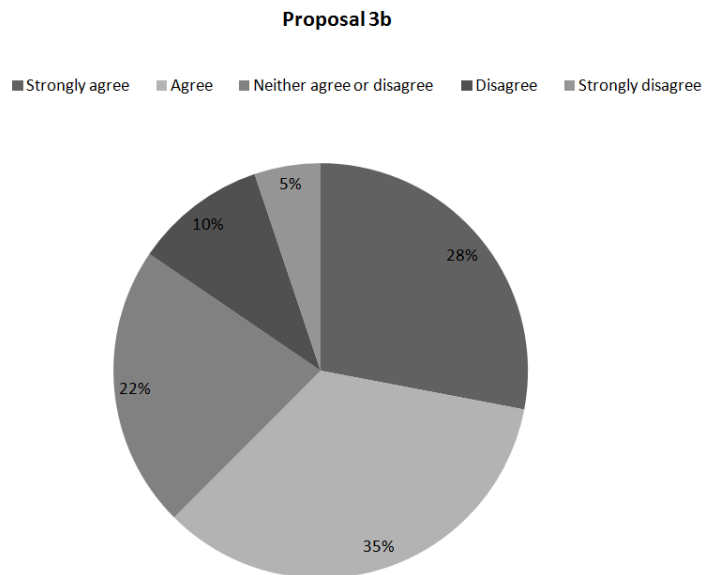
Chart 8



### Proposal 3b

- For Proposal 3b which proffers a change that would see people who are under-occupying their current social housing continue to be excluded from the 10 year continuous residency rule, but who would now be required to be currently resident in the borough, the responses suggest:
  - A combined 62.5% that either strongly agree or agree in favour of the proposal,
  - This compares to 15.5% that strongly disagree or disagree with the changes being proposed
  - Whilst a combined 22.0% neither agree nor disagree.

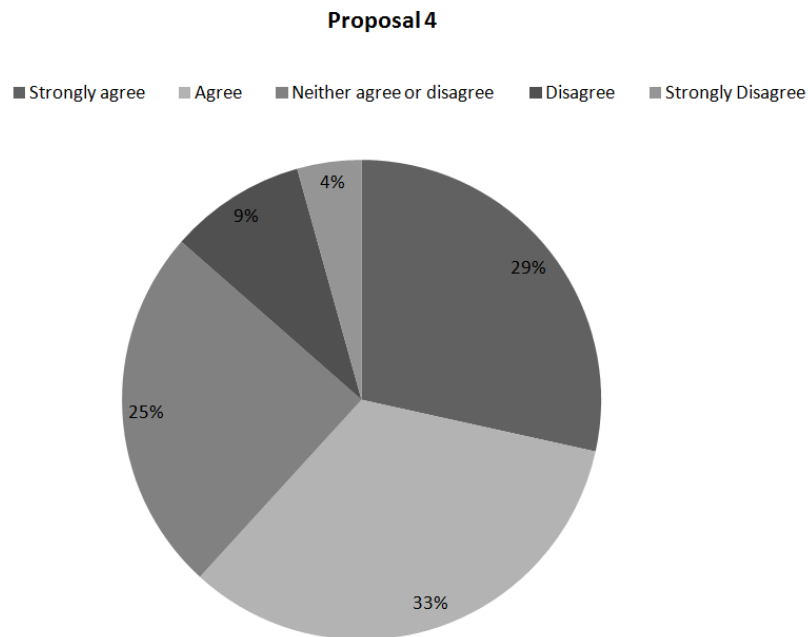
Chart 9



## Proposal 4

- Finally in relation to proposal 4 and the proposed extension of the definition of local connection the data below indicates
  - A combined 61.8% either strongly agree or agree in favour of the proposal,
  - This is followed by 24.7% that neither agree nor disagree and a combined
  - 13.5% of respondents either strongly disagree or disagree.

Chart 10



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

#### Financial context

The Social Housing Allocation Policy does not have a direct impact on the cost of social housing as it is primarily concerned with the maintenance and management of the Housing Waiting list. A key risk with any Allocations policy is that of legal challenge, which can have financial implications.

In general terms, the policy can impact on the value obtained from the Social Housing stock through its influence on access and therefore the value obtained by the Housing Revenue Account, and this in turn may impact on the general fund costs relating to temporary accommodation.

In terms of the specific proposals, Proposal 1 is likely to increase the size of the housing register, with priority rankings the key criteria in considering any wider financial impact on housing costs. The impact of Proposal 2 will be dependent on the size and movement within the Housing list given the Band D priority. Proposal 3 may

increase the number of units available to Hillingdon residents and potentially have a favourable impact on demand pressures across housing. However Proposal 4 has the potential to increase future demand through extending the definition of the local connection.

National policy context

The Social Housing Allocation Policy sets out the criteria and procedure through which housing owned by Hillingdon Council is allocated and nominations are made for housing stock let by Registered Providers in Hillingdon.

It identifies local criteria in defining qualifying persons and pays due regard to the legal framework for allocating social housing, and the wider strategic housing context.

**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
<b>Men</b>	<p>Overall the proportion of applicants from a male background hovers at approximately 30%. Whilst appearing much lower - this is not peculiar in the context of wider housing where the majority of applicants are often made in the name of the female householder.</p> <p>Looking at the impacts - analysis shows that there wasn't a significant and/or disproportionate impact on the representation of males on the housing register by any of the four proposals. Indeed, whilst there were small variations - the overall picture of a 70:30 split remained consistent.</p>
<b>Women</b>	<p>Overall the proportion of applicants from a female background hovers at approximately 70%. Whilst appearing much higher - this is not peculiar in the context of wider housing where the majority of applicants are often made in the name of the female householder.</p> <p>Looking at the impacts - analysis shows that there wasn't a significant and/or disproportionate impact on the representation of females on the housing register by any of the four proposals. Indeed, whilst there were small variations - the overall picture of a 70:30 split remained consistent.</p>
<b>Race</b>	<p>Of the four proposals detailed - analysis of proposals 1, 3 and 4 does not suggest that there is likely to be a disproportionate and/or negative impact from the changes. Indeed in broad terms - whilst there are some distributional changes - in practical terms these are largely negligible (for instance in proposal 3 the percentage of White</p>



	<p>British applicants drops from 42.78% to 42.28%. The change for BME figures from the same proposal sees the proportion move from 34.37% to a new 34.03%.</p> <p>There is however a potentially bigger change initiated by proposal 2. Whilst this is still not enough to indicate a negative and disproportionate impact - changes initiated through this proposal indicate an increase in the proportion of BME applicants by 3.75% and a reduction in the proportion of White British applicants from 42.70% to 37.51% - a 5.19% drop.</p>
<b>Disability</b>	<p>Based on the analysis - there does not seem to be a disproportionate and/or negative impact on people with disabilities. Using the proxy measure of mobility suggests that against each of the proposals - the proportion of people requiring access to some form of adapted property remains consistent at circa 4%. Using the DLA claimant count as a proxy measure suggests that the proportion of people with disability in the wider populace is broadly consistent with the profile of disabled persons on the housing register.</p>
<b>Age</b>	<p>Impact on older clients broadly follows the trends above. The majority of proposals, if implemented, will not significantly impact any particular age groups in a negative and/or disproportionate way. Only proposal 3 has any meaningful impact where accompanying the small decline in housing register numbers overall (from 2160 to 2098) there is also a reduction in the proportion of older non resident applicants reducing the ratio amongst those aged 60+ from 21% to 18.7%. However it is important to note here that applying the test of proportionality - the numbers affected are small overall.</p>

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

<b>Equality Group</b>	<b>Impact on this group and actions you need to take</b>
<b>All</b>	<p>One of the key benefits of the proposals is the relaxation of the 10 year rule as it applies to those individuals that fall under the reasonable preference categories - this includes statutorily homeless applicants, applicants occupying insanitary or overcrowded housing (or who otherwise live in unsatisfactory housing conditions), applicants who need to move on medical or welfare grounds or those applicants who need to move to a particular locality in the borough - where a failure to move would cause hardship to themselves or others. The nature of the reasonable preference categories means they cut across the 'protected groups'. However - long-standing data has indicated that certain groups are more vulnerable for instance:</p> <ul style="list-style-type: none"> <li>• Research by the Chartered Institute of Housing revealed that BME households tend to live in more overcrowded conditions, and overcrowding is most severe among</li> </ul>

	<p>Pakistani, Bangladeshi and black African households. These three groups also have the highest numbers of children. Overcrowding may also be related to multi-generational living arrangements, the shortage of large properties in the social sector, clustering in areas where overcrowding is particularly severe (such as London), and low incomes. Bangladeshi households are more affected than any other ethnic group, with nearly one quarter living in overcrowded conditions CIH, 2008.</p> <ul style="list-style-type: none"> <li>• Whilst the medical or welfare grounds criterion would apply equally - it has the potential to benefit those applicants with disabilities - who otherwise would not have met the 10-year rule.</li> <li>• Finally whilst poor quality housing can affect multiple groups - particularly vulnerable households include those on low incomes. Again a number of protected groups are disproportionately likely to be included in low-income categories including BME groups and single-parent households - many of whom are headed up by females.</li> <li>• If implemented the proposals - especially proposal 4 opens up the possibility of more families being eligible for the housing register and therefore increase their chances to secure affordable and suitable accommodation.</li> </ul>
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## D) Conclusions

The key intentions behind the Allocation Policy are to

- Provide a fair and transparent system by which people are prioritised 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.

To this end, the potential for the Policy to improve the outcomes for local residents is significant. Hitherto, challenges around interpretation and application of the Allocations Policy has meant that not all residents, who would otherwise be eligible, have benefitted from the Policy. However, through clarifying the ten year rule - the proposals now being put forward not only create a firmer basis upon which decisions on housing allocations can be made - they directly benefit residents who can often be amongst the most vulnerable.

It is not surprising therefore - that the analysis shows there is no clear and discernible impact which, through the application of any of the four proposals, would see a negative and disproportionate impact on any individual group.

This is not to say that the impact of the policy is completely benign - indeed each

proposal does in some way alter the composition of the housing register so that the distribution of some groups varies. However applying the test of proportionality - percentage swings of 1-5% are unlikely to disproportionately and negatively affect the groups concerned. It is telling that despite the changes - the relative ranking of the groups remains as it was before the implementation of any proposals.

In addition to the above and following a review of the responses to the consultation - there is broad support for the proposals being put forward. From an equalities and access perspective - the consultation also drew a relatively balanced response with the only caveats applying to the percentage of Indian and Black African respondents which was slightly lower than their respective profile in the housing register.

Based on the above - and given the conclusion that rather than net negative effect - the policy actually seeks to advance equality of access and improved outcomes for local residents - the need for mitigating actions is none.

**Signed and dated:...**

A handwritten signature in black ink, appearing to read 'D. Kennedy', written in a cursive style.

03.11.2016

**Name and position:** Mr D. Kennedy, Head of Business Performance, Policy and Standards