



HILLINGDON
LONDON

Equality and Human Rights Impact Assessment

Social Housing Allocation Policy

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 ✓

Hillingdon Council is required to have a housing allocation scheme in place to assess housing need, advertise available social housing and allocate properties to households in need.

This assessment considers proposed updates and changes to the Social Housing Allocation Policy ('the Policy') from an equality and human rights impact perspective. These changes aim to bring greater transparency and clarity to those households who are a priority for re-housing, including continued priority for residents with 10 or more years' continuous residency; to extend options to a wider range of households to relieve overcrowding; and to ensure that the most vulnerable groups are supported by the policy for rehousing.

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

Dan Kennedy, Corporate Director Central Services

Date assessment completed and approved by accountable person

22/10/24

Names and job titles of people carrying out the assessment

Debby Weller, Head of Housing Strategy and Policy

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

The review of the Policy aims to:

- Ensure greater transparency around those that are a priority for rehousing including by reducing the congestion in Bands A and B.
- Provide clearer prioritisation of vulnerable groups, specifically care experienced young people moving on from social care; vulnerable single people moving on from homeless supported accommodation recommended for social housing by the Single Homeless Move On Panel; and people moving on from other types of social care supported housing accommodation including for mental health and learning disabilities.
- Provide greater priority for those that have a long-term attachment to the borough.
- Make best use of housing stock through continued prioritisation of those giving up larger properties or decanting, and through allowing households that are severely overcrowded to move into homes that relieve some of the pressure.

The key objectives of the policy overall 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;
- Make best use of Hillingdon's social housing stock;
- Promote the development of sustainable mixed communities.

The Policy is consistent with and supports the councils Homelessness Strategy 2019 to 2024, Housing Strategy 2021/22 to 2025/26 and the Council Strategy 2022 to 2026.

The proposed changes can be summarised as:

- Movement from 4 to 14 bands;
- Greater transparency and clarity on priority order;
- Change in additional priority categories;
- Band change for vulnerable priority groups;
- Extension allowing overcrowded households of any bedsize to bid for a smaller property.

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

Those currently registered on the Social Housing Register are impacted by any changes in the prioritisation afforded to different groups of people on the register. Those who may register in the future are also impacted as are other residents of the borough who may not be eligible or meet the qualification requirements to join the housing register.

Census 2021 information Hillingdon

Age

Aged 14 years and under	19.7%
Aged 15 to 24 years	12.5%
Aged 25 to 34 years	14.5%
Aged 35 to 44 years	15.8%
Aged 45 to 54 years	13.1%
Aged 55 to 64 years	10.8%
Aged 65 to 74 years	7.2%
Aged 75 years and over	6.2%

Household Composition

One-person household: Aged 66 years and over	10.2%
One-person household: Other	14.2%
Single family household: All aged 66 years and over	6.0%
Single family household: Married or civil partnership couple: No children	8.4%
Single family household: Married or civil partnership couple: Dependent children	20.3%
Single family household: Married or civil partnership couple: all children non-dependent	7.5%
Single family household: Cohabiting couple family: No children	4.1%
Single family household: Cohabiting couple family: With dependent children	3.1%
Single family household: Cohabiting couple family: All children non-dependent	0.7%
Single family household: Lone parent family: With dependent children	7.3%
Single family household: Lone parent family: All children non-dependent	5.4%
Other household types: Other related household: Other family composition	1.2%
Other household types: With dependent children	6.1%
Other household types: Other, including all full-time students and all aged 66 years and over	5.5%

Household size

1 person in household	24.4%
2 people in household	27.1%

3 people in household	18.8%
4 people in household	17.3%
5 people in household	7.6%
6 people in household	3.0%
7 people in household	1.1%
8 or more people in household	0.9%

Sex

Female	50.6%
Male	49.4%

Ethnic Group

Asian, Asian British or Asian Welsh	33.3%
Black, Black British, Black Welsh, Caribbean or African	7.8%
Mixed or Multiple ethnic groups	4.4%
White	48.2%
Other ethnic group	6.3%

Religion

No religion	19.4%
Christian	39.0%
Buddhist	0.9%
Hindu	10.8%
Jewish	0.5%
Muslim	14.4%
Sikh	8.6%
Other religion	0.9%
Not answered	5.6%

Sexual orientation

Straight or Heterosexual	88.91%
Gay or Lesbian	0.90%
Bisexual	0.96%
All other sexual orientations	0.36%
Not answered	8.87%

Disability

Disabled under the Equality Act: Day-to-day activities limited a lot	6.5%
Disabled under the Equality Act: Day-to-day activities limited a lot	8.2%
Not disabled under the Equality Act	85.3%

Housing Register Information: August 2024

Age

Aged 16 to 24 years	7.3%
Aged 25 to 44 years	54.27%
Aged 45 to 59 years	23.95%
Aged 60 to 64 years	4.67%
Aged 65 to 74 years	5.66%
Aged 75 years and over	4.23%

Gender

Female	68%
Male	32%
Other/not answered	0.1%

Gender Reassignment

Gender identity the same as the gender you were born with

Yes	97%
No	2%
Prefer not to say	1%

Sexuality

Heterosexual / Straight	83.01%
Prefer not to say	12.60%
Bisexual	2.5%
Other	1.13%
Gay woman / lesbian	0.44%
Gary man	0.32%

Disability

Yes	25%
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Ethnicity

Asian, Asian British or Asian Welsh	17.4%
Black, Black British, Black Welsh, Caribbean or African	22.4%
Mixed or Multiple ethnic groups	5.8%
White	44.5%
Other ethnic group	3.7%
Prefer not to say	6.1%

The proportion of Asian households on the housing register is lower than the proportion in the population of Hillingdon as whole as a whole (33.3%) and the

proportion of Black households is higher than the Hillingdon population as a whole (7.8%).

Religion

Christian	30.8%
Muslim	27.4%
None	24.2%
Prefer not to say	9.8%
Sikh	2.8%
Hindu	2.5%
Any other	1.7%
Buddhist	0.8%
Jewish	0.1%

When compared to census data for Hillingdon those on the Housing Register include a lower proportion of Christian households than Hillingdon as a whole and a higher proportion of Muslim, Hindu, and Sikh households and those with no religion.

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

Stakeholders	Interest
Hillingdon residents	That they have the prospect of being able to access affordable, secure, suitable and appropriate housing that meets their needs.
Corporate Director of Adult Social Care and Health. Corporate Director of Children’s Services.	That households, in particular those with vulnerable adults and/or children, have housing options that meet their needs in relation to protection or vulnerability.
Corporate Director of Central Services. Corporate Management Team. Leader of the Council and Cabinet Members.	<ul style="list-style-type: none"> • To ensure a robust, transparent and fair Policy. • To deliver value for money in service delivery. • To ensure Hillingdon Residents have access to affordable, secure, suitable and appropriate housing that meets their needs. • To ensure the Council is meeting its duties under the: <ul style="list-style-type: none"> ○ Housing Act 1985 ○ Housing Act 1986 ○ Homelessness Act 2002 ○ Homeless Reduction Act 2017 ○ Housing and Regeneration Act 2008 ○ Localism Act 2011 ○ Armed Forces Act 2006 ○ Asylum and Immigration Act 1996 ○ Immigration and Asylum Act 1999 ○ Children Act 2004 ○ Equality Act 2010 ○ Data Protection Act 2018

	<ul style="list-style-type: none"> ○ European Union (Withdrawal Agreement) Act 2003 ○ Homeless Code of Guidance for Local Authorities 2018 last updated June 2024 ○ The London Housing Strategy ○ Tenancy Strategy ○ Housing Strategy ○ Allocation of Housing and Homelessness (Eligibility) (England) Regulations 2006 ○ Allocation of Accommodation: Code of Guidance for Housing Authorities June 2012, last updated June 2024 ○ Providing social housing for local people, December 2013 ○ Right to Move and social housing allocations, March 2015 ○ Improving access to social housing for victims of domestic abuse, November 2018 ○ Improving access to social housing for members of the armed forces, June 2020 ○ The regulatory standard for registered providers of social housing in England
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A.4) Which protected characteristics or community issues are relevant to the assessment? ✓ in the box.

Age	✓	Sex	✓
Disability	✓	Sexual Orientation	✓
Gender reassignment	✓	Socio-economic status	✓
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?

Social Housing Lettings Data

The following data is based on social housing lettings that took place between 1st April 2024 and 31st August 2024, during which time there were 241 social housing lettings.

Gender	
Male	36.5%
Female	63.5%

Almost two thirds of lettings are to Female applicants. This is roughly in line with the proportion on the housing register (68%) but considerably more than the proportion in the population as a whole (50.6%).

Age	
Aged 16-24 years	12%
Aged 25-44 years	36%
Aged 45-59 years	20%
Aged 60-64 years	9%
Aged 65-74 year	14%
Aged 75 years and over	9%

For both the housing register and lettings the highest proportion of households are in the 25 to 44 age band followed by the 45 to 59 age band. However, the proportion that those in the 16 to 24 age band make up of lettings (12%) is higher than the proportion they make up of the housing register (7%). This is also true for all of the age bandings 60 years and over.

As those at the younger and older end of the age band are more likely to be considered vulnerable, this is a positive, but also proportionate impact of the policy.

Family Composition		
Single	52	21%
Single 60+	37	15%
Single Parents	45	18%
Single Parent + non dependents	4	2%
Couples no children	6	2%
Couple over 60	6	2%
Couples with children	18	7%
Couples with children and non-dependents	2	1%
Couples with non-dependents no children	3	1%

Not answered	74	30%
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Single parents with dependent children form 7.3% of families in the borough but make up 18% of social housing lettings. Couples with dependent children make up 23.4% of families in the borough but only 7% of social housing lettings.

Ethnicity	
Asian, Asian British or Asian Welsh	14.6%
Black, Black British, Black Welsh, Caribbean or African	10.5%
Mixed or Multiple ethnic groups	2.1%
White	35.6%
Other ethnic group	5.4%
Not answered	31.8%

With the exception of 'Other ethnic group' the proportion made up by the ethnic group is lower for lettings than it is for households on the housing register. This is accounted for by a much higher proportion of households where the ethnicity question is not answered for lettings (31.8%) compared to the housing register (6.1%).

Consultation

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

Please tick NO YES

A separate full consultation report has been completed with positive results for all proposals. The following analysis of the data looks specifically at the degree to which different categories of people consulted agreed or disagreed with the policy proposals.

Movement from 4 to 14 bands

	Agree/Strongly Agree	Neutral	Disagree / Strongly disagree
Overall	75%	12%	13%
Male	75%	14%	10%
Female	75%	11%	14%
Aged 18 to 24	80%	20%	0%
Aged 25 to 34	64%	21%	14%
Aged 35 to 44	78%	6%	15%
Aged 45 to 54	71%	11%	18%
Aged 55 to 64	84%	11%	4%

Aged 65 +	73%	14%	11%
Straight / heterosexual	73%	13%	13%
Bisexual / Gay / Lesbian / Other	86%	7%	7%
Prefer not to say	76%	3%	21%
Yes - have a disability	72%	14%	15%
Asian or Asian British	92%	4%	4%
Black, Black British Caribbean or African	75%	8%	17%
Mixed or multiple ethnic group	57%	21%	21%
White group or background	73%	12%	14%
Other ethnic group or background	67%	17%	17%
Christian	70%	11%	17%
Muslim	95%	0%	5%
Hindu	88%	13%	0%
Sikh / Buddhist / Other	63%	13%	25%
Single person	73%	12%	14%
Couple without children	69%	8%	23%
Single Parent	66%	20%	14%
Couple with children	79%	8%	12%

Groups that agree most with the increased number of bands are:

- Male and Female
- Those aged 18 to 24, 35 to 44 and 55 to 64;
- Those whose sexual orientation is Bisexual / Gay / Lesbian / Other or prefer not to say
- Asian or Asian British ethnicity
- Black, Black British Caribbean or African
- Muslim or Hindu religion
- Couple with children

Disagreement is highest amongst:

- Those of Sikh / Buddhist / Other religion.

Agreement with Priority Order

	Agree/Strongly Agree	Neutral	Disagree / Strongly disagree
Overall	62%	19%	18%
Male	73%	16%	10%
Female	61%	20%	18%

Aged 18 to 24	70%	10%	20%
Aged 25 to 34	64%	21%	14%
Aged 35 to 44	55%	20%	21%
Aged 45 to 54	55%	23%	23%
Aged 55 to 64	71%	13%	16%
Aged 65 +	81%	8%	8%
Straight / heterosexual	62%	19%	18%
Bisexual / Gay / Lesbian / Other	71%	14%	14%
Prefer not to say	58%	21%	21%
Yes - have a disability	61%	22%	16%
Asian or Asian British	65%	15%	19%
Black, Black British Caribbean or African	83%	0%	17%
Mixed or multiple ethnic group	57%	21%	14%
White group or background	64%	19%	16%
Other ethnic group or background	67%	0%	17%
Christian	63%	16%	19%
Muslim	74%	16%	5%
Hindu	75%	13%	13%
Sikh / Buddhist / Other	50%	13%	38%
Single person	85%	6%	9%
Couple without children	54%	26%	18%
Single Parent	57%	24%	20%
Couple with children	61%	16%	20%

Groups that agree most with the priority order are:

- Aged 65+
- Black, Black British Caribbean or African
- Hindu
- Single person

Change in Additional Priority Categories

	Agree/Strongly Agree	Neutral	Disagree / Strongly disagree
Overall	75%	13%	12%
Male	78%	14%	6%
Female	75%	13%	12%
Aged 18 to 24	70%	20%	10%
Aged 25 to 34	63%	21%	16%

Aged 35 to 44	72%	14%	13%
Aged 45 to 54	77%	8%	15%
Aged 55 to 64	89%	4%	7%
Aged 65 +	76%	19%	3%
Straight / heterosexual	76%	13%	10%
Bisexual / Gay / Lesbian / Other	64%	21%	14%
Prefer not to say	61%	15%	24%
Yes - have a disability	75%	15%	10%
Asian or Asian British	85%	12%	4%
Black, Black British Caribbean or African	83%	17%	0%
Mixed or multiple ethnic group	71%	7%	21%
White group or background	77%	13%	10%
Other ethnic group or background	40%	20%	40%
Christian	81%	9%	11%
Muslim	89%	6%	6%
Hindu	75%	13%	13%
Sikh / Buddhist / Other	75%	25%	0%
Single person	81%	17%	2%
Couple without children	72%	10%	18%
Single Parent	64%	17%	18%
Couple with children	81%	10%	9%

Groups that agree most with the change to additional priority categories

- Male
- Female
- Aged 45 to 54
- Aged 55 to 64
- Aged 65+
- Straight / heterosexual
- Disability
- Asian or Asian British
- Black, Black British Caribbean or African
- White group or background
- Christian
- Muslim
- Hindu
- Sikh / Buddhist / Other
- Single person
- Couple with children

Band Change for Vulnerable Priority Groups

	Agree/Strongly Agree	Neutral	Disagree / Strongly disagree
Overall	64%	26%	10%
Male	70%	24%	5%
Female	63%	26%	10%
Aged 18 to 24	50%	30%	20%
Aged 25 to 34	50%	43%	7%
Aged 35 to 44	66%	26%	8%
Aged 45 to 54	71%	18%	11%
Aged 55 to 64	76%	13%	11%
Aged 65 +	69%	22%	8%
Straight / heterosexual	63%	27%	10%
Bisexual / Gay / Lesbian / Other	79%	21%	0%
Prefer not to say	76%	18%	6%
Yes - have a disability	68%	25%	7%
Asian or Asian British	81%	8%	12%
Black, Black British Caribbean or African	58%	25%	17%
Mixed or multiple ethnic group	79%	14%	7%
White group or background	63%	29%	7%
Other ethnic group or background	50%	33%	17%
Christian	72%	19%	10%
Muslim	84%	11%	5%
Hindu	63%	13%	25%
Sikh / Buddhist / Other	75%	25%	0%
Single person	75%	21%	4%
Couple without children	62%	31%	8%
Single Parent	53%	38%	9%
Couple with children	70%	20%	10%

Groups that agree most with the banding change for vulnerable groups are:

- Aged 55 to 64
- Bisexual / Gay / Lesbian / Other and those that prefer not to say
- Mixed or multiple ethnic group
- Asian or Asian British
- Muslim
- Sikh / Buddhist / Other
- Single person

Groups that disagree most are:

- Hindu

Allow overcrowded households to bid for properties with less bedrooms that their need so long as not statutorily or severely overcrowded. Extend from current 4 bed need to other bedsizes

	Agree/Strongly Agree	Neutral	Disagree / Strongly disagree
Overall	69%	13%	18%
Male	60%	21%	19%
Female	72%	10%	18%
Aged 18 to 24	80%	0%	20%
Aged 25 to 34	66%	13%	21%
Aged 35 to 44	70%	14%	14%
Aged 45 to 54	70%	9%	21%
Aged 55 to 64	76%	7%	18%
Aged 65 +	57%	27%	14%
Straight / heterosexual	69%	12%	18%
Bisexual / Gay / Lesbian / Other	64%	7%	29%
Prefer not to say	67%	21%	12%
Yes - have a disability	69%	13%	18%
Asian or Asian British	68%	16%	16%
Black, Black British Caribbean or African	75%	8%	17%
Mixed or multiple ethnic group	71%	0%	29%
White group or background	71%	11%	18%
Other ethnic group or background	67%	17%	17%
Christian	69%	10%	21%
Muslim	74%	11%	16%
Hindu	50%	25%	25%
Sikh / Buddhist / Other	43%	57%	0%
Single person	65%	13%	23%
Couple without children	62%	15%	23%
Single Parent	74%	9%	17%
Couple with children	75%	10%	15%

The groups that agree most with the change related to overcrowding is:

- Those aged 18 to 24
- Aged 55 to 64

- Black, Black British Caribbean or African
- Couple with children

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 - standard text

Since 2010, the Business Improvement Delivery (BID) Programme has driven transformation across the Council, reducing costs and improving efficiency to ensure that in an environment of increased expenditure from population growth and inflationary uplifts we continue to deliver high quality services that put residents first.

Hillingdon's approach to maintaining sound financial management ensures that our finances are in a robust position, and therefore the Council is well placed to respond to Government funding not increasing at the same pace as the combined impact of a growing demand for services and increased market forces. Our latest projections indicate that further savings of £35m will be required by 2026/27 to bridge the resulting budget gap.

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
Couples without children	The removal of the additional priority group couples without children will negatively impact this group.

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

Equality Group	Impact on this group and actions you need to take
Families with children and / or pregnant women	Families with children will be positively impacted by the change in relation to overcrowding. The vast majority of overcrowded households will contain children and this change will increase the numbers of properties available to them.

	The removal of the additional priority group couples without children will also favour those who do have children.
Multi-generational households	Multi- generational households will also benefit from the changes regarding overcrowding and additional priority groups.
Young people	The increased priority for vulnerable groups does not apply exclusively to care leavers, but care leavers are one of the main groups affected and are within younger age bands.

D) Conclusions

The only negative impact identified relates to couples without children. Although accessing affordable housing is problematic for all, given that social housing is a scarce resource, those groups who are most vulnerable or have the most pressing need should be prioritised.

This impact is considered proportionate when considering the relative housing needs of families with children, taking the need to safeguard children into account and to meet the needs of other vulnerable households.

The provision of affordable housing in Hillingdon includes intermediate housing as well as social rented housing. This will be suitable for some groups as will accessing the private rented sector. Housing advice is available to all groups.

The consultation shows that there is broad support for the proposals across the range of equality groups. This negates the need to consider intersectionality.

Signed and dated:.....22nd October 2024.....

Name and position:.....Debby Weller Head of Housing Strategy and Policy