

## Public Document Pack

# Housing Select Committee Agenda

Wednesday, 5 March 2014  
**7.30 pm**, Committee Room 3  
Civic Suite  
Lewisham Town Hall  
London SE6 4RU

For more information contact: Timothy Andrew (Tel 02083147916)

### Part 1

<b>Item</b>		<b>Pages</b>
5.	HRA Borrowing Cap	1 - 6
6.	Annual Lettings Plan	7 - 24

# Housing Select Committee Members

Members of the committee, listed below, are summoned to attend the meeting to be held on Wednesday, 5 March 2014.

Barry Quirk, Chief Executive  
Tuesday, 25 February 2014

Councillor Carl Handley (Chair)	
Councillor Vincent Davis (Vice-Chair)	
Councillor Anne Affiku	
Councillor Paul Bell	
Councillor Liam Curran	
Councillor Amanda De Ryk	
Councillor Patsy Foreman	
Councillor Vicky Foxcroft	
Councillor Darren Johnson	
Councillor Alan Hall (ex-Officio)	
Councillor Kevin Bonavia (ex-Officio)	

<b>Housing Select Committee</b>		
Title	The Housing Revenue Account Debt Cap	
Key decision	No	Item 5
Contributor	Executive Director for Customer Services	
Class	Part 1	05 March 2014

## **Reason for lateness**

This report is late owing to delays in collating all of the information required in order to provide Committee with a complete and rounded assessment of the matters at hand.

## **1. Purpose**

- 1.1. To set out the position in respect of the Council's HRA "Debt Cap", to report on the lobbying in relation to borrowing caps by, among others, the London Government Association, London Councils and the Mayor of London, and to report on changes to the borrowing cap arrangements which were announced in the Government's Autumn Statement made in late 2013.

## **2. Recommendations**

Members are recommended to:

- 2.1. Note the contents of the report.

## **3. Background**

- 3.1. The Localism Act 2011 introduced a system of self-financing for local authority housing. This came into effect from 1<sup>st</sup> April 2012. The implementation of the new system included a one-off settlement and redistribution of existing housing debt, requiring each local housing authority to either take on new debt as at 1 April 2012 or to have some of its existing housing debt repaid.
- 3.2. Following the settlement local housing authorities were free to either repay debt or take on new borrowing (up to a centrally determined cap), taking account of local priorities and housing investment needs.
- 3.3. The cap was imposed as a tool to keep overall public borrowing down and took no account of the ability of the sector to service debt.
- 3.4. The principle of self-financing was to put each local authority in a position where it can meet its liabilities through its rent and other charges, without the need for financial support from government.

- 3.5. On 31 March 2012, Lewisham had debt to the value of £136.3m paid off. This reduced the level of HRA debt down from £219.9m to £83.5m. The centrally determined Debt Cap was set at £127.3m, giving Lewisham borrowing capacity of £43.8m.

#### **4. The effect of the HRA Debt Cap on Lewisham**

- 4.1. As previously stated, the principle of self-financing was to enable each Local Authority to be in a position where it can meet its liabilities through its rent and other charges. To ensure that Lewisham's HRA was sustainable and to enable medium and long term financial planning, a 30 year financial model was prepared based on the assumptions made in the self-financing settlement and relevant assumptions around future rates of inflation, rent rises and interest rates.
- 4.2. The outcome of the modelling exercise showed that the HRA could sustain a level of borrowing estimated to be in excess of £300m, significantly greater than the debt cap of £127.3m
- 4.3. In July 2012, a report to Mayor and Cabinet entitled "Housing Matters": New investment and delivery approaches for achieving Lewisham's housing objectives, set out the Council's objectives over the following 10 years. The report also indicated that, with the debt cap in place, there would be a funding shortfall of £85m in achieving those objectives in the desired timescales.
- 4.4. In addition to those objectives already reported to Mayor and Cabinet, a number of sites and estate regeneration opportunities have been identified as a pipeline of development. A relaxation of borrowing restrictions would assist to deliver these and enable a more ambitious long term plan.

#### **5. HRA Debt Cap – Policy position**

- 5.1. Councils have been lobbying for some time that the restrictions on borrowing should be lifted, arguing that "the artificial and unnecessary housing revenue account cap should be removed". Councils have already been using their extra capacity to create more homes for Londoners. However London Councils analysis shows that, if allowed to borrow against existing assets the London boroughs could release funding for an extra 14,000 homes in London by 2021.
- 5.2. In 2013 The Smith Institute and Price Waterhouse Coopers (PWC) issued a report on the HRA – One Year On, which reviewed the levels of success of self financing but was critical of the inclusion of a restrictive cap.
- 5.3. The key points of the report reflect a broad sector-wide consensus in relation to the cap, and on that basis they are set out below, alongside a summary of the how those points reflect the Lewisham specific position.
- 5.4. The first, most important point, is that there is general consensus that HRA reform has had an enabling effect for local authorities. In particular it had led to increased freedom and certainty enabling longer term business planning, allowing authorities to operate their HRA more like a social business. However, the Lewisham financial position as set out above clearly shows that further

reform will be required to level the playing field between housing associations and local authorities, with the borrowing cap placing an artificial limit on the ability of authorities to borrow against secure long-term revenue streams, that is not the case for housing associations.

- 5.5. The experience of other authorities taking part in the research is that, while HRA reform will lead to significantly greater levels of investment in housing over the long term, the artificial cap means that little of this capacity can be accessed in the short to medium term. This is also the case in Lewisham.
- 5.6. The research found that in the majority of HRA business plans, a greater priority had been afforded to the construction of new homes than other investment needs. Other priorities included attaining and maintaining the decent homes standard and estate regeneration, or reducing HRA debt. As set out above Lewisham is pursuing a range of priorities with the available funding, but is also prioritising new build. Committee will also be aware following previous reports that a range of means are being pursued to extend the capacity of available funds to deliver new homes, including delivering a mixed-tenure new build programme in which the proceeds of selling a small proportion of new homes are recycled into the programme to increase the number of affordable homes that can be built.
- 5.7. Most respondents to the research were confident in the success of their business plans but noted clear challenges. Welfare reform was seen as the issue most likely to undermine the viability of HRA business plans and, in particular, the introduction of Universal Credit was viewed as likely to result in a rise in rent arrears. The Lewisham HRA plan makes prudent long term assumptions about the effect of welfare reform, and these assumptions are reviewed on a regular basis.
- 5.8. Generally the research was highly critical of the debt cap, either because of its inclusion at all or because it was set at too restrictive a level. A debt cap was deemed inconsistent with the principles of self-financing, preventing parity with housing associations and the private sector.
- 5.9. Since the introduction of self financing, London Councils has been actively working with local authorities to increase the borrowing capacity to aid the delivery of new homes. They were particularly pushing for a new clause as part of the Growth and Infrastructure bill on the basis that an artificial cap on borrowing means that local authorities are not able to borrow against the full value of their housing assets to finance new homes, even though excessive borrowing is already controlled through Treasury regulation. The New Clause 10, proposed by the Local Government Association and supported by London Councils, would remove this cap on local housing authority debt, empowering councils with the freedom to borrow to meet local housing need.

## **6. London Housing Strategy**

- 6.1. The GLA, in its draft London Housing Strategy, highlighted the need for more flexibility in the rules governing borrowing for housing purposes particularly for local authorities that are keen to finance house building, which Lewisham is.

6.2. In its proposals, however, it goes on to describe a level of detail that most local authorities would be unhappy with. Such as:

- Suggestion that the Mayor of London manages the process of approvals for additional borrowing with a focus on new development;
- administer a system where councils bid for an inflation linked debt cap in return for commitments such as new supply or improvements to existing homes;
- match funding borough commitments with GLA equity funding through a bridge financing model;
- boroughs could pool their borrowing capacity to invest in affordable housing;
- GLA could broker arrangements between boroughs and developers through the consolidation of investment into a single London wide programme – in exchange for nomination rights.

6.3. Lewisham commented on this issue specifically in the consultation response to the draft strategy:

- Lewisham supports the relaxation of the borrowing cap to enable us to make the best use of opportunities available. We do not support the proposal to make additional borrowing conditional on the borrowing being used for new supply. Lewisham is best placed to decide how to invest in our area and we should be free to manage our own resources.

## **7. Government's Autumn Statement 2013**

7.1. It was announced in the Autumn Statement 2013 that the borrowing cap would be increased by £300m (split over two years – 2015/6 and 2016/7) and distributed through local enterprise partnerships through a competitive process. The £300m is expected to fund around 10,000 new affordable homes nationally.

7.2. Details of the criteria and the bidding process for allocating the additional headroom are yet to be released. Officers will give consideration to the criteria before making a decision whether or not to bid.

## **8. Financial implications**

8.1. The purpose of this report is to advise members of the current position in respect of the debt cap and, as such, there are no financial implications arising from the recommendation to note the contents.

## **9. Legal implications**

9.1. There are no specific legal implications arising from this report, save for noting the following Equality Act 2010 implications:

9.2. The Equality Act 2010 (the Act) introduced a new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

9.3. In summary, the Council must, in the exercise of its functions, have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- advance equality of opportunity between people who share a protected characteristic and those who do not.
- foster good relations between people who share a protected characteristic and those who do not.

9.4. The duty continues to be a “have regard duty”, and the weight to be attached to it is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.

9.5. The Equality and Human Rights Commission has recently issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled “Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice”. The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at:

<http://www.equalityhumanrights.com/legal-and-policy/equality-act/equality-act-codes-of-practice-and-technical-guidance/>

9.6. The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:

1. The essential guide to the public sector equality duty
2. Meeting the equality duty in policy and decision-making
3. Engagement and the equality duty
4. Equality objectives and the equality duty
5. Equality information and the equality duty

9.7. The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at:

<http://www.equalityhumanrights.com/advice-and-guidance/public-sector-equality-duty/guidance-on-the-equality-duty/>

## **10. Crime and disorder implications**

10.1. There are no specific crime and disorder implications relating to this report.

## **11. Equalities implications**

11.1. There are no specific equalities implications relating to this report.

## **12. Environmental implications**

12.1. There are no specific environmental implications relating to this report.



Housing Select Committee		
Title	Annual Lettings Plan 2014/15	
Key decision	No	Item 6
Contributor	Executive Director for Customer Services	
Class	Part 1 (open)	5 March 2014

## Reason for lateness

This report is late owing to delays in collating all of the information required in order to provide Committee with a complete and rounded assessment of the matters at hand and in order to allow for full checking of the large amount of statistical data contained within this report.

## 1. Summary and purpose of this report

- 1.1 This report sets out the proposed number of lettings for the Council and other providers for 2014/15 and seeks approval for the changes. We project a downturn in the number of available lettings in 2014/15. Accordingly, the changes to the plan are proposed in order to continue to achieve the strategic Council priorities as laid out in the Housing, Homelessness Prevention and Youth Homelessness Strategies.
- 1.2 Our priorities remain the same as last year including, reducing under occupation and severe overcrowding, moving single vulnerable households on from supported accommodation to independence, supporting the regeneration of designated housing estates and reducing the number of homeless households in temporary accommodation. We have increased the number of lettings to homeless households to keep pace with the increase in accepted homeless applications.
- 1.3 This report also presents the final lettings outcomes for 2012/13 and the position for the first 10½ months of 2013/14 (1<sup>st</sup> April 2013 to February 14<sup>th</sup> 2013). It also shows the current demand position on the housing register. This reflects performance in supply and demand management since April 2012 and informs the proposed lettings plan for 2014/15.

## 2. Policy context

- 2.1. Lewisham's Sustainable Community Strategy 2008-2020 contains the shared priorities for the borough that sets out a framework for improving the quality of life and life chances for all who live in the borough. The Annual Lettings Plan (ALP) works towards meeting the 'Clean green and liveable' priority to enable people to live in high quality housing and can care for and enjoy their environment.
- 2.2. The Council's 10 corporate priorities determine what contribution the Council will make towards the delivery of the Community Strategy priorities. This report meets the 'decent homes for all' priority which seeks investment in social and affordable housing to achieve the decent homes standard and tackle homelessness.

### 3. Recommendations

The Committee is recommended to:

- 3.1 Note the lettings outcomes for 2012/13 and 2013/14 and the position on the housing register.

### 4. Background

- 4.1. Housing Allocations schemes are governed by legislation which requires housing authorities to determine and publish a lettings scheme setting out how it will prioritise applications for social housing. It is a requirement that certain groups are given “reasonable preference” within the policy. These groups are:

- People who are homeless;
- Those living in unsatisfactory housing, e.g. overcrowded or lacking amenities;
- Those who need to move on medical grounds;
- Those who need to move to a particular locality within the district where it would cause hardship if they were unable to do so;
- Those owed a duty under other relevant legislation such as a prohibition order on a property.

- 4.2. Allocation policies must give preference to these groups above others. There is no requirement to give an equal weighting to all of the reasonable preference categories. However, from December 2012 to December 2013 we have seen a significant increase in households in temporary accommodation 17.47% and so we have increased the percentage of lettings to this group.

- 4.3. A key element of the allocations scheme is the Annual Lettings Plan which should be agreed by Members each year. This outlines the distribution between applicants with differing needs of the supply of lettings expected over the coming year.

- 4.4. It is anticipated that there will be a reduction in lets and new supply; let's for 13/14 were expected at 1,515 however projections indicate that this figure will be closer to 1,425 a reduction of 6%.

- 4.5. Last year there was a concern that the introduction of Affordable Rents (AR) and Flexible Tenancies (FT) may impact a) the achievement of the ALP, b) mobility for transferring tenants and c) increase in void turnaround times. However, there is no evidence to support these initial concerns.

- In 12/13 there were 287 lets to AF/FT properties, representing 18.4% of the total number of lets of 1,562;
- In 13/14 (1<sup>st</sup> April – 14<sup>th</sup> February) there has been 205 lets, representing 23.3% of 881.

- 4.6. The Mayor of London launched housing moves a pan-London mobility scheme in May 2012. Lewisham continues to actively participate. Lewisham's contribution is 59 lets across 1-3 bed units. To date Lewisham has offered 38 of their quota to the scheme. The contribution offers an opportunity for Lewisham applicants to obtain the same number of lets to properties elsewhere in London. There is no net loss in available lettings to Lewisham applicants. Priorities for moves include employment and under-occupation, which are also key priorities for Lewisham.

## 5. Lettings Outcomes 2012/13 and 2013/14

- 5.1. A summary of the main outturn results in lettings is shown below. Full details are provided in Appendices 2 & 3.

	2010/11	2011/12	2012/13	2013/14 (up to 14 <sup>th</sup> Feb '14)
General needs lets	1466	1486	1408	794
Special lets *	424	336	345	238
Housing moves	0		6	9
<b>Total lets</b>	<b>1890</b>	<b>1822</b>	<b>1,759</b>	<b>1,041</b>

(\*Note - special lets include, sheltered lets, disabled units and temporary to permanent tenancy sign ups).

The projected outturn for 2013/14 is 1,425 18.99% (334) below the previous year.

- 5.2. An analysis of the overall percentage of lettings to each band shows the following:

	Actual percentage of lets 12/13	Percentage of lets Apr – Feb '14 (to date)	Percentage of lets 13/14 target
Band 1	18.7%	18.7%	25.5%
Band 2	25%	28.7%	26.7%
Band 3	35.1%	28.8%	28.5%
Special lets*	19.6%	22.9%	15.9%
Housing Moves	0.3%	0.9%	3.4%

(\*Note - special lets include, sheltered lets, disabled units and temporary to permanent tenancy sign ups

\*\* Note – 170 lets awaiting resulting which may alter the distribution of percentages)

- 5.3. The increase in lets to band 2 is a reflection of the increased acceptances of Supported Housing Move-ons.
- 5.4. In 2013/14 five priorities outlined in paragraph 6.2 were set from all the categories in the 3 bands. These priorities were where we decided to target a number of allocations in order to ensure a minimum level of rehousing from these groups. The remainder of allocations went to the other categories within the banding scheme.
- 5.5. Overall it is projected the letting plan for 2013/14 will perform broadly to target. Decants are the main area performing below target. This is largely due to the reduced pressure on decanting Milford Towers which is a consequence of the delayed programme of the Catford regeneration scheme.

Scheme	Households moved
Heathside & Lethbridge	40
Excalibur	6
Milford Towers	23
<b>Total</b>	<b>79</b>

- 5.6. An analysis of waiting times for lettings broken down by the various categories of need is shown at Appendix 4 and 5. The shortest waiting time in 12/13 was in band 1 at 3.1 weeks and in the current year also in band 1 at 0.4 weeks. So far in 2013/14 the overall average wait for 1 bed needs across all bands is 91.4 weeks

and for 4 or more bedrooms is 211.2 weeks. This is a significant decrease from the previous year at 107 weeks for a 1 bed and 285 weeks for a 4 bed. The reduction in wait times is largely due to the removal of band 4 which previously had a statistical impact on wait times. This analysis also provides a framework for advice to housing applicants; the average wait for each category of applicant for different bedroom requirements representing a guide to future rehousing prospects.

## 6. Proposed Plan for 2014/15

6.1. The Lettings Plan proposed is set out at **Appendix 1**. It projects an increase in the overall supply of accommodation, 742 across all tenures in 14/15 of which 511 are social rented. However, 'practical completion' of 303 of these properties is March 2015 so it is reasonable to expect that these will roll over to the following year 15/16. Therefore expected 'lettable' new build completions are projected at 208. Re-lets projected at 1,176 (this includes temp to perm and direct lets).

6.2. Five priority areas (in no priority order, below) have been identified for the plan:

- Homeless households in temporary accommodation – in order to sustain the numbers in temporary accommodation at a manageable level and ensure that possible pressures from homeless demand as a result of the welfare benefit changes being introduced are contained
- Decants – based on projected need from schemes due to go on site imminently, in order to ensure schemes start on time and the council maximises the benefit from funding secured for current regeneration schemes
- Under-occupation – a national priority, there are a high number of under occupiers registered which has increased largely due to the spare room subsidy. The Trading Places project team has been introduced working in conjunction with Registered Housing Providers to identify other ways to reduce the levels of under-occupation in social housing stock.
- Severe overcrowding (2 bedrooms or more) – a key local and national priority
- Move-on from supported housing schemes – to cater for the need to decant a number of supported schemes, moving vulnerable households into independent homes and to free up supported housing bed spaces for those with support needs waiting for accommodation

6.3. The retention of these 5 priorities reflects a continuing need to focus on these groups and ensure rehousing in these areas is supported. The remaining lets not targeted to these groups have been spread across bands 1-3 to ensure that we maximise rehousing opportunities to those in the highest need. Groups in bands 1-3 who will benefit from the remaining lets include emergency cases (e.g. those we agreed to move as a result of violence) care leavers; homeless prevention; medical needs and households who are overcrowded by one bedroom.

6.4. The current housing register has 8,263 households (as at 20.02.14). In 13/14 (01.04.13 – 14.02.14) we have achieved 1,041 lets, this reflects that demand far outweighs supply.

	Studio	1	2	3	4+	Grand Total
<b>Demand (Housing Register – 20.04.14)</b>	7	1896	3119	2254	987	8263
<b>13/14 Lets (01.04.13 – 14.02.14)</b>	62	365	403	179	32	1041

- 6.5. There are 719 households registered in band 1 as under occupiers this is an increase of 152 from last year despite moving 81 under occupying households. This increase was anticipated with the introduction of the 'spare room' subsidy (bedroom tax) in April 2013. Increasing the number of moves to this group in order to release larger homes remains a key priority for 2014/15, however the majority of moves to this group are expected through the Trading Places team facilitating mutual exchange moves.
- 6.6. In response to the introduction of the 'spare room' subsidy a dedicated team of officers have been established with our RP partners; the Trading Places project team have been in post since 3<sup>rd</sup> February 2014, continuing and building on the progress of the pilot chain lets scheme that has been developed tackling under occupation, benefit capped households and reducing temporary accommodation costs.
- 6.7. There are currently 152 cases registered with a decant need. The number of council decants needing rehousing next year is slightly higher than last year and still requires a percentage of lettings to account for future phases on several of the council's major regeneration schemes on Excalibur, Heathside & Lethbridge, Milford Towers, Somerville, Kenton and Deptford.
- 6.8. There is also a continuing need to decant single vulnerable households from a number of supported housing schemes in 2014/15 as a number of services are decommissioned as a result of the loss of SP funding. The need to ensure schemes do not become silted up also makes this a continuing priority particularly given the challenges of the welfare benefit changes in moving younger single households into the private rented sector if they require self-contained homes. Currently 140 households are registered as supported housing move on. An increase of 17 from last year, however, 126 households have moved to date in 13/14.
- 6.9. There are 459 serious overcrowded cases registered that lack 2 or more bedrooms a decrease from last year at 476. 93 severely overcrowded households have moved to date in 13/14. Targets will continue to be set for this group in 2014/15 as it remains a priority area.
- 6.10. There were 1,372 households in temporary accommodation at the end of December 2013 an increase from last year of 17.47% (1,168 households).

<b>Households in temporary accommodation</b>	<b>Dec 11/12</b>	<b>Dec 12/13</b>	<b>Dec 13/14</b>
Total	1,032	1,168	1,372

It is proposed to increase targets for this group given the rising numbers in TA.

- 6.11. The production of a detailed Lettings Plan, targeting a range of priorities in each band is a more proactive and focused way of addressing lettings priorities. It is however, administratively intensive and requires ongoing monthly monitoring of performance against targets in order to ensure that targets within the plan are reached. A half year review of progress against the lettings plan targets will be undertaken and will be reported back to the Housing Select Committee and Mayor & Cabinet thereafter if changes to the plan are required.

## **7. Financial Implications**

- 7.1. There are no direct financial implications associated with the proposed changes to the Lettings Plan. There are significant costs associated with housing generally, including managing the allocations service, managing the provision of council housing and providing services to those experiencing homelessness. All of these are affected over time by the demand for housing. However, the lettings is merely the means by which that demand is allocated to existing properties, and so changes to it do not have direct financial implications.
- 7.2. Council regeneration schemes are currently performing satisfactorily. It is worth noting, however, that the Council's financial plans in respect of these schemes are dependent on the timely and effective operation of decant programmes and any delays in such programmes would have a negative impact on those plans.

## **8. Legal and Human Rights Implications**

- 8.1 Section 159(1) of the Housing Act 1996 requires a local authority to comply with Part 6 of the Act (sections 159 to 174) in allocating housing accommodation. Section 159(7) provides that "subject to the provisions of this Part, a local housing authority may allocate housing accommodation in such manner as they consider appropriate." Section 169 provides that, when exercising their functions under Part 6 of the 1996 Act, as amended by the 2002 Homelessness Act, local housing authorities "shall have regard to such guidance as may ...be given by the Secretary of State" when carrying out their role in allocating social housing.
- 8.2 In compliance with section 167(1) (of the 1996 Act,) Lewisham Housing Authority has an Allocations Policy, "... for determining priorities,..." which sets out the procedure to be followed when allocating housing accommodation.
- 8.3 As noted above, s. 169 of the 1996 Act requires Local Housing Authorities to have regard to Guidance issued by the Secretary of State when exercising their functions under Part 6 of the same Act. Currently, the statutory Guidance, published as recent as December 2013; namely "Providing social housing for local people" is in addition to (not replacing,) the Guidance for Local Housing Authorities in England on the Allocation of Accommodation issued in June 2012.. Together, their aim is to assist Local Housing Authorities to take advantage of the provisions within the Localism Act 2011.
- 8.4 The Localism Act 2011 introduces a number of significant amendments to Part 6 of the 1996 Act. Of particular relevance here are the following provisions: Section 160ZA replaces s.160A in relation to allocations by housing authorities. Social housing may only be allocated to 'qualifying persons' and housing authorities are given the power to determine what classes of persons are or are not qualified to be allocated Housing (s.160ZA(6) and (7)).
- 8.5 Section 166A requires housing authorities in England to allocate accommodation in accordance with a scheme which must be framed to ensure that certain categories of applicants are given reasonable preference for an allocation of social housing. Section 166A(9) includes a new requirement for an allocation scheme to give a right to review a decision on qualification in s.160AZ(9), and to inform such affected persons of the decision on the review and the grounds for it. This is in addition to the existing right to review a decision on eligibility.

- 8.6 Section 166A(12) provides that housing authorities must have regard to both their homelessness and tenancy strategies when framing their allocation scheme. The requirement for an allocation scheme to contain a statement of the authority's policy on offering a choice of accommodation or the opportunity to express preferences about their accommodation is retained. (s.166A(2)). However, the requirement to provide a copy of this statement to people to whom they owe a homelessness duty (under s.193(3A) or s.195(3A) of the 1996 Act) is repealed by s.148(2) and s.149(3) of the Localism Act 2011. This is because, following the changes to the main homelessness duty made by the Localism Act 2011, there can no longer be a presumption that the homelessness duty will be brought to an end in most cases with an allocation under Part 6.
- 8.7 The European Convention on Human Rights states in Article 8 that "Everyone has the right to respect for his private and family life, his home and correspondence". The Human Rights Act 1998 incorporates the Convention. Whilst it does not, however, necessarily mean that everyone has an immediate *right* to a home, (because Article 8 is a "qualified" right and therefore is capable in certain circumstances, of being lawfully and legitimately interfered with,) the provision by an Authority of a relevant proactive Allocations Policy and Lettings Plan does assist to reinforce the Article 8 principles.
- 8.8 The Equality Act 2010 (the Act) introduced a new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 8.9 In summary, the Council must, in the exercise of its functions, have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
  - advance equality of opportunity between people who share a protected characteristic and those who do not.
  - foster good relations between people who share a protected characteristic and those who do not.
- 8.10 The duty continues to be a "have regard duty", and the weight to be attached to it is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.
- 8.11 The Equality and Human Rights Commission issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled "Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice". The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at: <http://www.equalityhumanrights.com/legal-and-policy/equality-act/equality-act-codes-of-practice-and-technical-guidance/>

8.12 The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:

1. The essential guide to the public sector equality duty
2. Meeting the equality duty in policy and decision-making
3. Engagement and the equality duty
4. Equality objectives and the equality duty
5. Equality information and the equality duty

8.13 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at: <http://www.equalityhumanrights.com/advice-and-guidance/public-sector-equality-duty/guidance-on-the-equality-duty/>

## **9. Crime and Disorder Implications**

9.1 The allocations scheme recognises the importance of housing in responding to the needs of victims of crime who can be awarded emergency priority where their life is in danger and their case is supported by the police. These include applicants under the witness protection programme. Furthermore, the scheme contributes to reducing offending and awards priority for offenders (dependent upon the nature of their offence), imprisoned for over 13 weeks who relinquish their existing social tenancy.

## **10. Equalities Implications**

10.1 An assessment of the equalities issues arising from the Lettings Plan has been carried out in order to comply with the council's duties under the Equalities Act 2010.

10.2 The lettings plan priorities have generally positive impacts, covered in point 5 above and reflect the need to focus targets on key local and national priorities around housing need. The allocation of targets to each band ensures that all groups with priority under the allocations scheme receive a percentage of lettings.

10.3 Applicants who join the housing register are asked to complete monitoring in relation to their gender, age, ethnicity, disability, sexual orientation and religion or belief. Appendix 7 and 8 show the ethnic profile of lettings by bedroom size for 2012/13 and 2013/14 so far.

10.4 The lettings outturn for different ethnic groups showed a similar profile to previous periods and there were no significant increases or reduction across groups. The number of households not disclosing their ethnicity remains. When implementing the new Allocation Policy in October 2012 we also introduced a new housing application with an updated ethnic monitoring form which will help us improve the data we capture.

## **11. Environmental Implications**

11.1 There are no environmental implications.



## **12. Background documents and originator**

12.1 There are two background documents to this report which are held at the Housing Options Centre:

- The housing register analysis; and
- Equalities issues associated with the plan.

If you require more information on this report please contact Genevieve Macklin, Head of Strategic Housing on 0208 314 6057.

## Appendix 1 – Lettings Plan 2014/15

### Lettings Plan 2014/15

Band and Priority Reason								
	Bedsit	1 bed	2 bed	3 bed	4+ bed	Total	% of general lets	% of all lets
<b>Band 1</b>								
Decants	0	78	58	17	7	160	14.0%	11.6%
Under Occupiers	0	48	60	8	0	116	10.2%	8.4%
All other band 1	0	7	18	6	2	33	2.9%	2.4%
<b>Total band 1</b>	<b>0</b>	<b>133</b>	<b>136</b>	<b>31</b>	<b>9</b>	<b>309</b>	<b>27.1%</b>	<b>22.3%</b>
<b>Band 2</b>								
Supported housing move-on	53	102	0	0	0	155	13.6%	11.2%
Serious Overcrowding	0	0	19	38	5	62	5.4%	4.5%
All other band 2	1	6	10	10	1	28	2.5%	2.0%
<b>Total band 2</b>	<b>54</b>	<b>108</b>	<b>29</b>	<b>48</b>	<b>6</b>	<b>245</b>	<b>21.5%</b>	<b>17.7%</b>
<b>Band 3</b>								
Homeless in temporary accommodation	29	113	284	114	34	574	50.3%	41.5%
All other band 3	2	3	5	2	1	13	1.1%	0.9%
<b>Total band 3</b>	<b>31</b>	<b>116</b>	<b>289</b>	<b>116</b>	<b>35</b>	<b>587</b>	<b>51.4%</b>	<b>42.4%</b>
							0.0%	
<b>Total general lets</b>	<b>85</b>	<b>357</b>	<b>454</b>	<b>195</b>	<b>50</b>	<b>1141</b>	<b>100.0%</b>	<b>82.4%</b>
							% of special lets	% of all lets
<b>Temp to perm sign-up</b>	0	1	95	14	0	110	59.8%	7.9%
<b>Sheltered</b>								
Under occupiers	0	5	0	0	0	5	2.7%	0.4%
Medical High	0	5	0	0	0	5	2.7%	0.4%
General sheltered need	4	40	0	0	0	44	23.9%	3.2%
<b>Disabled adapted</b>								
Decants	0	2	2	0	0	4	2.2%	0.3%
Medical High	0	4	4	4	0	12	6.5%	0.9%
General disabled need	0	2	0	2	0	4	2.2%	0.3%
<b>Total special lets</b>	<b>4</b>	<b>59</b>	<b>80</b>	<b>20</b>	<b>0</b>	<b>184</b>	<b>100.0%</b>	<b>13.3%</b>
Contribution to pan-London Moblity	0	35	16	8	0	59		4.3%
<b>Overall total lets</b>	<b>89</b>	<b>451</b>	<b>550</b>	<b>223</b>	<b>50</b>	<b>1384</b>	<b>752.2%</b>	<b>100.0%</b>

## Appendix 2 - Total Lettings – 2012/13

Band & Rehousing Reason	Bed Size					Grand Total	Actual % of general lets	Actual % of all lets	Target % of general lets	Target % of all lets
	Studio	1	2	3	4+					
<b>Band 1</b>										
Decant	2	111	43	15	2	173	12.30%	9.80%	15.8%	19.1%
Emergency		4	8	4	1	17	1.20%	1.00%		
Exceptional Homeless		1	6	5	2	14	1.00%	0.80%		
Exceptional Medical			2			2	0.10%	0.10%		
Leaving Care		36	3			39	2.80%	2.20%		
Starred decant priority		1	5	4	1	11	0.80%	0.60%		
Un Occ High Demand		37	30	5		72	5.10%	4.10%	5.7%	6.9%
Unauthorised Occupant		1				1	0.10%	0.10%		
<b>Total Band 1</b>	<b>2</b>	<b>191</b>	<b>97</b>	<b>33</b>	<b>6</b>	<b>329</b>	<b>23.40%</b>	<b>18.70%</b>	<b>31.5%</b>	<b>38.0%</b>
<b>Band 2</b>										
Homeless Prevention		8	103	4		115	8.20%	6.50%		
Medical High		13	15	27	5	60	4.30%	3.40%		
Overcrowded by 2 bed or more			35	67	35	137	9.70%	7.80%	8.8%	10.5%
Supported Housing Move On	25	100	2			127	9.00%	7.20%	9.3%	11.2%
<b>Total Band 2</b>	<b>25</b>	<b>121</b>	<b>155</b>	<b>98</b>	<b>40</b>	<b>439</b>	<b>31.20%</b>	<b>25.00%</b>	<b>27.3%</b>	<b>32.9%</b>
<b>Band 3</b>										
Medical Low	5	49	14	5		73	5.20%	4.20%		
Overcrowded By 1 Bed	9	46	46	72		173	12.30%	9.80%		
Priority Homeless	6	37	248	46	15	352	25.00%	20.00%	21.1%	25.4%
Welfare	5	14				19	1.30%	1.10%		
<b>Total Band 3</b>	<b>25</b>	<b>146</b>	<b>308</b>	<b>123</b>	<b>15</b>	<b>617</b>	<b>43.80%</b>	<b>35.10%</b>	<b>24.1%</b>	<b>29.1%</b>
<b>Band 4</b>										
No Rehousing Reason	11	10	2			23	1.60%	1.30%		
<b>Total Band 4</b>	<b>11</b>	<b>10</b>	<b>2</b>			<b>23</b>	<b>1.60%</b>	<b>1.30%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>Total General Lets</b>	<b>63</b>	<b>468</b>	<b>562</b>	<b>254</b>	<b>61</b>	<b>1408</b>	<b>100%</b>	<b>80.00%</b>	<b>82.8%</b>	<b>100.0%</b>
							<b>% of Special lets</b>	<b>% of all lets</b>	<b>Target % of special lets</b>	<b>Target % of all lets</b>
<b>Special Lets</b>										
Temp to Perm		11	140	31	9	191	55.40%	10.90%	53.6%	7.6%
Sheltered	10	67	2			79	22.90%	4.50%		
Disabled		22	33	11	9	75	21.70%	4.30%		
<b>Total Special Lets</b>	<b>10</b>	<b>100</b>	<b>175</b>	<b>42</b>	<b>18</b>	<b>345</b>	<b>100%</b>	<b>19.60%</b>	<b>100.0%</b>	<b>14.1%</b>
Housing Moves		1	3	2		6		<b>0.30%</b>		
<b>Overall total lets</b>	<b>73</b>	<b>569</b>	<b>740</b>	<b>298</b>	<b>79</b>	<b>1759</b>		<b>100%</b>	<b>100.0%</b>	<b>100.0%</b>

Band & Rehousing Reason	Bed Size					Total	Actual % of general lets	Actual % of all lets	Target % of general lets	Target % of all lets
	Studio	1	2	3	4+					
<b>Band 1</b>										
Decant		18	12	2		32	4.00%	3.10%	10.50%	8.40%
Emergency		3	4	1	1	9	1.10%	0.90%		
Exceptional Homeless		1	7	2	1	11	1.40%	1.10%		
Leaving Care	3	25	4			32	4.00%	3.10%		
No Long Req Spe Unit		1				1	0.10%	0.10%		
Starred decant priority		2	7	14	2	25	3.10%	2.40%		
Success Too Large Pr		3	1			4	0.50%	0.40%		
Un Occ High Demand		53	26	2		81	10.20%	7.80%	11.40%	9.20%
<b>Total Band 1</b>	<b>3</b>	<b>106</b>	<b>61</b>	<b>21</b>	<b>4</b>	<b>195</b>	<b>24.60%</b>	<b>18.70%</b>	<b>31.60%</b>	<b>25.50%</b>
<b>Band 2</b>										
Homeless Prevention		5	49	2		56	7.10%	5.40%		
Medical High		9	9	6		24	3.00%	2.30%		
Overcrowded by 2 bed or more			22	55	16	93	11.70%	8.90%	11.20%	9.00%
Supported Housing Move On	37	87	1	1		126	15.90%	12.10%	12.70%	10.20%
<b>Total Band 2</b>	<b>37</b>	<b>101</b>	<b>81</b>	<b>64</b>	<b>16</b>	<b>299</b>	<b>37.70%</b>	<b>28.70%</b>	<b>33.10%</b>	<b>26.70%</b>
<b>Band 3</b>										
Medical Low	1	9	2			12	1.50%	1.20%		
Overcrowded By 1 Bed	5	24	2	11		42	5.30%	4.00%		
Priority Homeless	2	35	132	46	10	225	28.30%	21.60%	32.30%	26.10%
Welfare	8	12	1			21	2.60%	2.00%		
<b>Total Band 3</b>	<b>16</b>	<b>80</b>	<b>137</b>	<b>57</b>	<b>10</b>	<b>300</b>	<b>37.80%</b>	<b>28.80%</b>	<b>35.30%</b>	<b>28.50%</b>
<b>Grand Total</b>	<b>56</b>	<b>287</b>	<b>279</b>	<b>142</b>	<b>30</b>	<b>794</b>	<b>100%</b>	<b>76.30%</b>	<b>100.00%</b>	<b>80.70%</b>
							<b>% of Special lets</b>	<b>% of all lets</b>		
<b>Special Lets</b>										
Temp to Perm	3	18	99	29	2	151	63.40%	14.50%	52.30%	8.30%
Sheltered	3	46	1	1		51	21.40%	4.90%		
Disabled		10	21	5		36	15.10%	3.50%		
<b>Total Special Lets</b>	<b>6</b>	<b>74</b>	<b>121</b>	<b>35</b>	<b>2</b>	<b>238</b>	<b>100%</b>	<b>22.90%</b>	<b>100.00%</b>	<b>15.90%</b>
<b>Housing Moves</b>										
		4	3	2		9		0.90%		3.40%
<b>Overall total lets</b>	<b>62</b>	<b>365</b>	<b>403</b>	<b>179</b>	<b>32</b>	<b>1041</b>		<b>100%</b>	<b>100.00%</b>	<b>100.00%</b>

**Appendix 4 - Average waiting times based on lettings outcomes (weeks) 2012/13**

Band & Rehousing Reason	Bed Size					Average
	Studio	1	2	3	4+	
<b>Band 1</b>						
Decant	82.9	71.6	74.8	72.2	39.5	72.2
Emergency		11.7	24.9	69.1	337.9	50.6
Exceptional Homeless		14.7	41.0	89.7	151.3	72.2
Exceptional Medical			3.9			3.9
Leaving Care		106.2	92.5			105.1
Starred decant priority		167.3	65.4	60.1	3.1	67.1
Un Occ High Demand		361.7	305.3	63.3		317.5
Unauthorised Occupant		15.4				15.4
<b>Total Band 1</b>	<b>82.9</b>	<b>133.0</b>	<b>138.5</b>	<b>71.6</b>	<b>120.4</b>	<b>127.9</b>
<b>Band 2</b>						
Homeless Prevention		11.6	17.0	31.6		17.1
Medical High		47.4	62.9	97.7	339.3	98.2
Overcrowded by 2 bed or more			71.3	86.4	288.4	134.2
Supported Housing Move On	8.5	16.6	19.1			15.0
<b>Total Band 2</b>	<b>8.5</b>	<b>19.6</b>	<b>33.7</b>	<b>87.3</b>	<b>294.8</b>	<b>64.1</b>
<b>Band 3</b>						
Medical Low	40.2	115.5	280.7	293.2		154.2
Overcrowded By 1 Bed	87.9	111.8	240.1	332.3		236.5
Priority Homeless	57.3	47.6	101.5	99.0	286.1	102.6
Welfare	36.9	46.2				43.8
<b>Total Band 3</b>	<b>60.8</b>	<b>90.5</b>	<b>130.3</b>	<b>243.5</b>	<b>286.1</b>	<b>144.4</b>
<b>Band 4</b>						
No Rehousing Reason	286.5	209.5	173.9			243.2
<b>Total Band 4</b>	<b>286.5</b>	<b>209.5</b>	<b>173.9</b>			<b>243.2</b>
<b>Total General Lets</b>	<b>80.1</b>	<b>92.0</b>	<b>105.3</b>	<b>160.9</b>	<b>275.5</b>	<b>117.1</b>
<b>Special Lets</b>						
Sheltered	270.3	194.8	1003.9			224.8
Disabled		83.4	180.7	148.1	147.0	143.3
<b>Total Special Lets</b>	<b>270.3</b>	<b>167.3</b>	<b>227.7</b>	<b>148.1</b>	<b>147.0</b>	<b>185.1</b>
<b>Overall total lets</b>	<b>106.2</b>	<b>104.0</b>	<b>112.4</b>	<b>160.4</b>	<b>259.0</b>	<b>123.8</b>

1<sup>st</sup> – 14<sup>th</sup> February 2014

Band & Rehousing Reason	Bed Size					Average
	Studio	1	2	3	4+	
<b>Band 1</b>						
Decant		94.5	86.4	108.2		92.4
Emergency		17.9	15.3	10.7	5.9	14.6
Exceptional Homeless		0.4	57.1	29.3	3.9	42.0
Leaving Care	121.5	98.0	170.1			109.3
No Long Req Spe Unit		85.0				85.0
Starred decant priority		99.4	100.0	96.6	92.5	97.4
Success Too Large Pr		143.4	191.0			155.3
Un Occ High Demand		247.6	237.6	467.6		249.9
<b>Total Band 1</b>	<b>121.5</b>	<b>170.2</b>	<b>151.6</b>	<b>122.5</b>	<b>48.7</b>	<b>156.0</b>
<b>Band 2</b>						
Homeless Prevention		11.5	35.9	52.1		34.3
Medical High		28.5	102.3	142.7		84.7
Overcrowded by 2 bed or more			69.9	72.5	241.1	100.9
Supported Housing Move On	10.1	17.1	45.9	45.4		15.5
<b>Total Band 2</b>	<b>10.1</b>	<b>17.8</b>	<b>52.6</b>	<b>78.0</b>	<b>241.1</b>	<b>51.1</b>
<b>Band 3</b>						
Medical Low	52.3	160.1	18.6			127.5
Overcrowded By 1 Bed	92.3	134.6	351.2	199.6		156.9
Priority Homeless	9.6	34.7	121.4	120.2	228.3	111.4
Welfare	41.8	42.7	4.7			40.6
<b>Total Band 3</b>	<b>54.2</b>	<b>80.0</b>	<b>122.4</b>	<b>135.5</b>	<b>228.3</b>	<b>113.5</b>
<b>Grand Total</b>	<b>28.7</b>	<b>91.4</b>	<b>108.5</b>	<b>107.7</b>	<b>211.2</b>	<b>100.5</b>
<b>Special Lets</b>						
Sheltered	31.8	132.4	1478.0	28.0		150.8
Disabled		65.2	87.1	64.4		77.9
<b>Total Special Lets</b>	<b>31.8</b>	<b>120.4</b>	<b>150.3</b>	<b>58.3</b>		<b>120.6</b>
<b>Overall total lets</b>	<b>28.8</b>	<b>96.2</b>	<b>111.6</b>	<b>105.7</b>	<b>211.2</b>	<b>102.4</b>

## Appendix 6 - Let's to AF/FT properties 2012/13

Band & Rehousing Reason	Bed Size					Total AF Lets
	Studio	1	2	3	4+	
<b>Band 1</b>						
Decant		1	14	2		17
Emergency			3	2		5
Exceptional Homeless			1	1		2
Leaving Care			13			13
Starred decant priority				1		1
Un Occ High Demand			10	2		12
Unauthorised Occupant			1			1
<b>Total Band 1</b>		<b>1</b>	<b>42</b>	<b>8</b>		<b>51</b>
<b>Band 2</b>						
Homeless Prevention			4	31		35
Medical High			4	1	3	8
Overcrowded by 2 bed or more				10	3	13
Supported Housing Move On		7	30			37
<b>Total Band 2</b>		<b>7</b>	<b>38</b>	<b>42</b>	<b>6</b>	<b>93</b>
<b>Band 3</b>						
Medical Low		2	13	5	1	21
Overcrowded By 1 Bed		2	23	14	4	43
Priority Homeless		2	12	48	3	65
Welfare		1	1			2
<b>Total Band 3</b>		<b>7</b>	<b>49</b>	<b>67</b>	<b>8</b>	<b>131</b>
<b>Band 4</b>						
No Rehousing Reason		5	1			6
<b>Total Band 4</b>		<b>5</b>	<b>1</b>			<b>6</b>
<b>Grand Total AF Lets</b>						
		<b>20</b>	<b>130</b>	<b>117</b>	<b>14</b>	<b>281</b>
<b>Special Lets</b>						
Sheltered						
Disabled		1	4	1		6
<b>Total Special AF Lets</b>		<b>1</b>	<b>4</b>	<b>1</b>		<b>6</b>
<b>Overall AF lets</b>						
		<b>21</b>	<b>134</b>	<b>118</b>	<b>14</b>	<b>287</b>

Band & Rehousing Reason	Bed Size					Total AF Lets
	Studio	1	2	3	4+	
<b>Band 1</b>						
Decant		6	2			8
Emergency		3	1			4
Exceptional Homeless			3			3
Leaving Care	2	9	2			13
Starred decant priority		1				1
Success Too Large Pr		1				1
Un Occ High Demand		5	5			10
<b>Total Band 1</b>	<b>2</b>	<b>25</b>	<b>13</b>			<b>40</b>
<b>Band 2</b>						
Homeless Prevention		3	18			21
Medical High		1	1			2
Overcrowded by 2 bed or more			6	4		10
Supported Housing Move On	10	22		1		33
<b>Total Band 2</b>	<b>10</b>	<b>26</b>	<b>25</b>	<b>5</b>		<b>66</b>
<b>Band 3</b>						
Medical Low		3				3
Overcrowded By 1 Bed	3	9		1		13
Priority Homeless	1	13	46	8		68
Welfare	1	2				3
<b>Total Band 3</b>	<b>5</b>	<b>27</b>	<b>46</b>	<b>9</b>		<b>87</b>
<b>Grand Total AF Lets</b>	<b>17</b>	<b>78</b>	<b>84</b>	<b>14</b>		<b>193</b>
<b>Special Lets</b>						
Sheltered						
Disabled		3	9			12
<b>Total Special AF Lets</b>		<b>3</b>	<b>9</b>			<b>12</b>
<b>Overall AF lets</b>	<b>17</b>	<b>81</b>	<b>93</b>	<b>14</b>		<b>205</b>



## Appendix 7 – Ethnicity Monitoring of Lettings 2013/14

Ethnic Monitoring of Lettings	Studio	%age	1	%age	2	%age	3	%age	4+	%age	Total	%age
ARAB		0.00%	1	0.06%		0.00%		0.00%		0.00%	1	0.06%
BANGLADESHI		0.00%	2	0.13%	3	0.19%		0.00%		0.00%	5	0.32%
BLACK AFRICAN	9	0.58%	64	4.10%	81	5.19%	49	3.14%	19	1.22%	222	14.21%
BLACK CARIBBEAN	9	0.58%	87	5.57%	105	6.72%	40	2.56%	5	0.32%	246	15.75%
BLACK OTHER	1	0.06%	9	0.58%	26	1.66%	9	0.58%	5	0.32%	50	3.20%
CHINESE	1	0.06%	6	0.38%	5	0.32%	2	0.13%		0.00%	14	0.90%
CHINESE OTHER		0.00%		0.00%		0.00%	1	0.06%		0.00%	1	0.06%
ENGLISH		0.00%	1	0.06%		0.00%		0.00%		0.00%	1	0.06%
INDIAN		0.00%	1	0.06%	1	0.06%	1	0.06%		0.00%	3	0.19%
IRISH		0.00%		0.00%		0.00%	1	0.06%		0.00%	1	0.06%
LITHUANIA		0.00%		0.00%	1	0.06%		0.00%		0.00%	1	0.06%
NOT DISCLOSED	33	2.11%	248	15.88%	192	12.29%	92	5.89%	25	1.60%	590	37.77%
OTHER	2	0.13%	6	0.38%	16	1.02%	9	0.58%	2	0.13%	35	2.24%
OTHER ASIAN BACKGRND	1	0.06%	7	0.45%	6	0.38%	8	0.51%	1	0.06%	23	1.47%
OTHER MIXED		0.00%	2	0.13%	4	0.26%	2	0.13%		0.00%	8	0.51%
PAKISTANI		0.00%	1	0.06%	1	0.06%		0.00%		0.00%	2	0.13%
POLAND		0.00%	1	0.06%		0.00%		0.00%	1	0.06%	2	0.13%
SCOTTISH		0.00%	1	0.06%		0.00%		0.00%		0.00%	1	0.06%
TURKISH		0.00%		0.00%	1	0.06%	1	0.06%	1	0.06%	3	0.19%
TURKISH CYPRIOT		0.00%		0.00%	1	0.06%	1	0.06%		0.00%	2	0.13%
VIETNAMESE		0.00%	2	0.13%	7	0.45%	1	0.06%	1	0.06%	11	0.70%
WHITE		0.00%	2	0.13%	6	0.38%	6	0.38%	1	0.06%	15	0.96%
WHITE & ASIAN		0.00%	1	0.06%	1	0.06%		0.00%		0.00%	2	0.13%
WHITE BRITISH	16	1.02%	84	5.38%	100	6.40%	29	1.86%	8	0.51%	237	15.17%
WHITE IRISH		0.00%	5	0.32%	2	0.13%		0.00%		0.00%	7	0.45%
WHITE OTHER BACKGRND		0.00%	13	0.83%	19	1.22%	8	0.51%	1	0.06%	41	2.62%
WHITE&BLACK AFRICAN		0.00%	1	0.06%	3	0.19%	3	0.19%		0.00%	7	0.45%
WHITE&BLACK CARIBBEAN	1	0.06%	11	0.70%	14	0.90%	1	0.06%		0.00%	27	1.73%
WHITE&OTHER BACKGRND		0.00%	1	0.06%	2	0.13%	1	0.06%		0.00%	4	0.26%
<b>Grand Total</b>	<b>73</b>	<b>4.67%</b>	<b>557</b>	<b>35.66%</b>	<b>597</b>	<b>38.22%</b>	<b>265</b>	<b>16.97%</b>	<b>70</b>	<b>4.48%</b>	<b>1562</b>	<b>100.00%</b>

**Appendix 8 - Ethnicity Monitoring of Lettings 2013/14 – (1<sup>st</sup> April '13 – 14<sup>th</sup> February '14)**

<b>Ethnic Monitoring of Lettings 2013/14</b>	<b>Studio</b>	<b>%age</b>	<b>1</b>	<b>%age</b>	<b>2</b>	<b>%age</b>	<b>3</b>	<b>%age</b>	<b>4+</b>	<b>%age</b>	<b>Total</b>	<b>%age</b>
ARAB		0.00%		0.00%	1	0.11%		0.00%		0.00%	1	0.11%
BANGLADESHI		0.00%	1	0.11%	1	0.11%		0.00%		0.00%	2	0.23%
BLACK AFRICAN	4	0.45%	30	3.41%	29	3.29%	40	4.54%	4	0.45%	107	12.15%
BLACK CARIBBEAN	8	0.91%	44	4.99%	58	6.58%	17	1.93%	5	0.57%	132	14.98%
BLACK OTHER	2	0.23%	12	1.36%	8	0.91%	2	0.23%	1	0.11%	25	2.84%
CHINESE		0.00%	1	0.11%	2	0.23%	1	0.11%	2	0.23%	6	0.68%
INDIAN		0.00%		0.00%	2	0.23%		0.00%		0.00%	2	0.23%
NOT DISCLOSED	35	3.97%	165	18.73%	105	11.92%	59	6.70%	14	1.59%	378	42.91%
OTHER		0.00%	5	0.57%	11	1.25%	4	0.45%	2	0.23%	22	2.50%
OTHER ASIAN BACKGRND	1	0.11%	4	0.45%	8	0.91%	4	0.45%	1	0.11%	18	2.04%
OTHER MIXED		0.00%	3	0.34%	4	0.45%	1	0.11%		0.00%	8	0.91%
TURKISH		0.00%	1	0.11%		0.00%		0.00%		0.00%	1	0.11%
VIETNAMESE		0.00%	1	0.11%	1	0.11%		0.00%		0.00%	2	0.23%
WHITE		0.00%	2	0.23%		0.00%		0.00%		0.00%	2	0.23%
WHITE BRITISH	6	0.68%	59	6.70%	48	5.45%	12	1.36%	1	0.11%	126	14.30%
WHITE IRISH	1	0.11%	3	0.34%	2	0.23%		0.00%		0.00%	6	0.68%
WHITE OTHER BACKGRND		0.00%	5	0.57%	9	1.02%	5	0.57%		0.00%	19	2.16%
WHITE&BLACK AFRICAN	1	0.11%		0.00%	2	0.23%		0.00%		0.00%	3	0.34%
WHITE&BLACK CARIBBEAN	1	0.11%	6	0.68%	9	1.02%	2	0.23%		0.00%	18	2.04%
WHITE&OTHER BACKGRND		0.00%	1	0.11%	1	0.11%	1	0.11%		0.00%	3	0.34%
<b>Grand Total</b>	<b>59</b>	<b>6.70%</b>	<b>343</b>	<b>38.93%</b>	<b>301</b>	<b>34.17%</b>	<b>148</b>	<b>16.80%</b>	<b>30</b>	<b>3.41%</b>	<b>881</b>	<b>100.00%</b>