

<b>Mayor and Cabinet</b>			
<b>Title</b>	Annual Lettings Plan 2018/19		
<b>Key decision</b>	Yes	<b>Item no</b>	
<b>Wards</b>	All		
<b>Contributors</b>	Executive Director for Customer Services, Head of Law		
<b>Class</b>	Part 1		

### **1. Summary and purpose of this report:**

- 1.1. The Annual Lettings Plan sets out how the Council intends to allocate the lettings that become available to it in 2018/19. This covers properties which become available from the Council's own homes and those of other providers such as Housing Associations where the Council has nomination rights.
- 1.2. It is projected that the number of properties which will become available to let in 18/19 will be 1,208. The long-term trend in the reduction in the number of existing properties becoming available for let is projected to continue, with 875 existing properties forecast to become available for letting. Since 2012/13, the number of existing properties becoming available for letting has reduced by 31%. This ongoing reduction is offset by the over 330 new social and affordable rent new builds expected to become available in 2018/19.
- 1.3. The aims of the Annual Lettings Plan remain to distribute the lettings available to those in most need, to reduce households in unsuitable and costly temporary accommodation, to reduce under occupation and severe overcrowding, to move single vulnerable households on from supported accommodation to independence and to support the regeneration of designated housing estates.
- 1.4. Since 2012/13, the number of households in temporary accommodation *has* increased by 67% whereas there has been a 31% reduction in available lets in the same period. Therefore it is proposed to continue to keep the increased number of lettings to homeless households to help to manage the increase in accepted homeless applications and reduced supply.
- 1.5. This report also presents the final lettings outcomes for 2016/17 and the position for the first nine months of 2017/18 (1st April '17 to 31st *December* '17). It also shows the current demand position on the housing register. This reflects performance in supply and demand management since April 2017 and informs the proposed lettings plan for 2018/19.
- 1.6. The Annual Lettings Plan for 2018/19 contains no policy changes nor substantive changes to the approach taken in previous plans. The plan allocates properties

as per the previously established methodology, taking account of an anticipated change in the number of properties that will become available during the course of the year.

- 1.7. The Annual Lettings Plan for 2018/19 does forecast a slightly different allocation to certain priority groups compared to the plan for 2017/18. It is anticipated that fewer properties will be required for those being decanted in 2018/19, enabling over 10% of the forecasted number of lets to be allocated to other Band 1 categories. There has been a slight increase in the amount of properties that are anticipated to be required for supported housing move on cases to support the ongoing de-silting of these schemes, and a slight increase in the proposed number of lets to homeless households as a proportion of the whole. These are offset by a slight decrease in the proportion of lets made available to those on the housing register with other rehousing reasons, although a substantial allocation of properties to these cohorts is still included within the plan.

## **2. Policy Context:**

- 2.1. The contents of this report are consistent with the Council's policy framework. It supports the achievements of the Sustainable Community Strategy policy objectives:

- Ambitious and achieving: where people are inspired and supported to fulfil their potential.
- Empowered and responsible: where people can be actively involved in their local area and contribute to tolerant, caring and supportive local communities.
- Healthy, active and enjoyable: where people can actively participate in maintaining and improving their health and well-being, supported by high quality health and care services, leisure, culture and recreational activities.

- 2.2. The proposed recommendations are also in line with the Council policy priorities:

- Strengthening the local economy – gaining resources to regenerate key localities, strengthen employment skills and promote public transport.
- Clean, green and liveable – improving environmental management, the cleanliness and care for roads and pavements and promoting a sustainable environment

## **3. Recommendations:**

The Mayor is recommended to:

- 3.1. Note the lettings outcomes for 2016/17 and 2017/18 and the position on the housing register.
- 3.2. Approve the proposed Lettings Plan for 2018/19 set out in Appendix 1 of this report.

## **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.
- 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. Five priority areas have been identified for the plan, as listed below in no particular order:
- Homeless households in temporary accommodation – in order to sustain the numbers in temporary accommodation at a manageable level, and manage the pressures from homeless demand as a result of ongoing welfare reform and housing market conditions.
  - 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 working 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 – moving vulnerable households into independent homes and to free up supported housing bed spaces for those with support needs waiting for accommodation
- 4.5. The annual lettings plan for 17/18 projected that 1,142 properties would become available to let. Current forecasts estimate that the final number of lets for 17/18 will be just below the projection at the start of the year with just under 1,100 lets anticipated including new build units. In 16/17 there were 970 lets made in the year.
- 4.6. The Mayor of London launched the ‘Housing Moves’ pan-London mobility scheme in May 2012. Lewisham continues to actively participate. Lewisham’s contribution for 18/19 is 23 lets across 1-3 bedroom units. To date Lewisham has

offered 27 properties and has successfully let 10 properties, Lewisham's contribution for 18/19 is reduced in line with other boroughs. This is because the number of lettings recorded on Lewisham's MHCLG submissions, which Housing Moves use for the calculations, showed significant reductions and this was true across the board.

- 4.7. Participation in this scheme 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 2016/17 and 2017/18:

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

	2013/14	2014/15	2015/16	2016/17	2017/18 YTD	Projected 2018/19
General needs lets	1119	996	1172	865	522	1073
Special lets	286	152	95	94	59	112
Housing moves	11	10	12	11	12	23
Total lets	1,416	1,158	1,279	970	593	1,208

\*Not including properties that are approved to let

- 5.2. The projected outturn for 2017/18 is 1,051 which is 8% above the previous year and represents over 800 fewer units than were available in 2011/12.

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

	Actual % of lets 16/17	Percentage of lets Apr – Dec '17	Percentage of lets 17/18 target
Band 1	16.7%	15.7%	21.5%
Band 2	25.9%	26.1%	21.2%
Band 3	46.6%	46.2%	44.4%
Special lets*	9.7%	9.9%	9.0%
Housing Moves	1.1%	2.2%	4.8%

\*Note that special lets includes sheltered lets and disabled units

- 5.4. The large number of lets to band 3 is attributed to 80% of two beds and 70% of three beds being offered to households in temporary accommodation who are

band 3 priority, in line with the priority to reduce the number of homeless households in temporary accommodation.

5.5. Decants are broadly performing to target:

<b>Scheme</b>	<b>1 Bed</b>	<b>2 Bed</b>	<b>3 Bed</b>	<b>4+ Bed</b>	<b>Total</b>
Excalibur Phase 4	0	21 (17)	0	0	21 (17)
Excalibur Phase 5	1	15 (13)	1 (1)	2 (2)	19 (16)
Milford Towers	17	0	0	0	17 (0)
Deptford	3	6	1	0	10 (0)
Other potential regen schemes	10	25	10	5	50 (0)
<b>Total</b>	<b>31 (0)</b>	<b>67 (30)</b>	<b>12 (1)</b>	<b>7 (2)</b>	<b>117 (33)</b>

5.6. The number of decants listed in brackets above reflects those that the decant team intend to directly match. Decanting tenants who are 'direct matched' are not included in the final outturn figures as they are not moved via Choice Based Letting.

5.7. An analysis of waiting times for lettings broken down by the various categories of need is shown at Appendix 4 and 5. The average time on the housing register for successful applicants has remained relatively static, from an average waiting time of 109.7 weeks in 2016/17 to 104.9 weeks in 2017/18 to date. It should however be noted that this in contrast to the average waiting time of 99.2 weeks in 15/16.

5.8. Over 87,000 bids were made by 5,400 households on the Housing Register during 2016/17, and in 2017/18 to date over 5,000 households have made almost 79,000 bids. The number of bids per available property remains high, and has increased across most property sizes between 2016/17 and 2017/18 to date.

<b>Number of Bedrooms</b>	<b>16/17</b>	<b>17/18 YTD</b>
Studio	13.0	13.9
1 Bed	28.3	24.7
2 Bed	177.5	168.2
3 Bed	200.8	241.1
4 Bed+	125.0	151.8

5.9. There are currently just under 10,055 households on the Housing Register, of

which 9,493 households have been on for over 6 months. Almost 4,300 households that are active have made a bid for a property in 2016/17 to date. The average number of bids per household during this period was 16.

- 5.10. Over 12,000 cases are also present on the Housing Register but at stages that do not allow them to actively bid for accommodation. The Allocations team have implemented a workflow to ensure that applications are speedily dealt with in the appropriate manner, ensuring that residents are added to the housing register as appropriate and in a timely fashion.
- 5.11. The Allocations team continue to work closely with Homeseach partners to ensure that records are up to date. A data cleansing exercise is being undertaken to support this, and partners are expected to have taken appropriate action with regards to all records on the system by the 31<sup>st</sup> March 2018.
- 5.12. It is anticipated that this exercise will lead to an increase in the number of households on the register, as records are reviewed and cases that should be on the register are formally added to it. It is also expected that a substantial number of cases will be closed, or contact made with residents for further action before approval or closure. This will ensure that the register reflects the housing need of residents more accurately, and will give officers a clear picture of demand for social housing.

## **6. Proposed Plan for 2017/18**

- 6.1. The Lettings Plan proposed is set out at Appendix 1. It projects a decrease in the number of relets expected to become available in 2018/19 based on the trend across recent years. This is offset by the expected number of affordable and social rent new builds which are expected to be completed this year. It is anticipated that 1,208 properties will be available for let during the course of the year.
- 6.2. It should be noted that the continued increased percentage of lettings to households in the homeless priority group will impact on the number of lettings available to the other four priority groups. However this is mitigated by achieving the aim of reducing the number of households in temporary accommodation.
- 6.3. The remaining lettings not targeted to priority homeless have been spread across the other priority bands to ensure that rehousing opportunities are allocated to those in the highest need. Groups in these bands 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 housing register at the end of December 2017 had 10,055 households registered. Between April 2017 and December 2017, 860 properties were advertised to let, over 60 more properties than in the same period in 2016. Whilst the number of properties advertised for let in the year to date exceeds that for the same period in 2016/17, the broader trend is one of overall declining lets which is a contributing factor in driving the increase in households in temporary accommodation and on the housing register.
- 6.5. There are 771 active households registered in band 1 as under occupiers, this is a decrease of 33 from last year. The Trading Places Team continues to work with

this group in order to release larger homes supporting the Housing Strategy. This remains a key priority for 2018/19 and the Trading Places Team continue to utilise other options to obtain moves such as facilitating mutual exchange moves and chain lettings. The table below represents properties released via the Trading Places Team and the size property they moved to.

Bed Size released	Bed size moved to				Total Moves
	1	2	3	4+	
2	22				22
3	16	7			23
4+	1	2	2	0	5
<b>Total</b>	39	9	2	0	50

- 6.6. This year the team continued supporting tenants both generally under occupying and those affected by the bedroom tax. The intensive support work carried out by the team has meant that out of the 50 tenants moved, 17 are no longer affected by the bedroom tax and as such are no longer at such a high risk of eviction.
- 6.7. The team has also facilitated a series of chain lettings. Specifically, 23 (increase of 7 from the previous year) two bedroom properties released have been advertised as preference to decant or homeless households, helping to alleviate the large numbers of homeless families in temporary accommodation. 5 larger sized properties have all been advertised as preference to overcrowded tenants which has worked to tackle both the issues of overcrowding within the borough as well as the lack of general supply and relets.
- 6.8. Trading Places continued to work effectively with Housing Benefit and the different housing providers around the more effective use of the discretionary housing payment budget and will continue to provide support to those tenants affected by the bedroom tax who are actively seeking to downsize. The project is currently supporting 133 tenants to move; 56 of which are affected by the bedroom tax and who are reliant on the continuous support provided by the team to ensure a move to a smaller, more affordable home.
- 6.9. There are currently 188 cases registered with a decant need. As the council's major regeneration schemes on Excalibur, Heathside & Lethbridge, Milford Towers, and Deptford continue to progress a percentage of lets will need to be made available to this client group.
- 6.10. Officers are investigating the possibility of a pilot project allocating a specific number of properties to social tenants seeking to transfer. This would enable greater churn within the housing stock and support clients currently in social housing but with changing needs to find appropriate alternative accommodation.
- 6.11. Move on within the supported housing pathway remains a core priority for Lewisham's single homeless intervention team and other supported providers. The supported housing move-on nominations are an integral part of the move on from the pathway and in preventing homeless applications within the single

homeless cohort. They also enable the council and partners to much better manage the flow of people through supported housing and other pathways. These properties are currently the only form of move on from the Supported Housing Pathway, of which there are currently over 530 units of accommodation.

- 6.12. Nominations are being used to support quicker hospital discharge and better health outcomes for those within the mental health supported housing cohort. This facilitates a reduction in the number using expensive registered care placements and helps to “de-silt” these schemes. This is being project managed by the Mental Health Trust in collaboration with Housing. As part of a wide-ranging review commissioned by the Council a further 300 units of mental health accommodation have been added to the pathway and limited move on nominations extended to them to help manage the flow of customers through this pathway.
- 6.13. The use of supported housing pathways and initiatives such as housing first forms a key part of the Councils efforts to address the rising number of rough sleepers in the borough.
- 6.14. Commissioning is under way to increase the Young Persons Pathway by a further ten units.
- 6.15. There were 126 lets to supported housing move on cases in 2016/17, and there are currently 68 supported housing move on clients on the Housing Register.
- 6.16. 494 households that were on the housing register as at the end of December 2017 lack two or more bedrooms, a slight increase from December 2016 where there were 452 such households on the register. 42 seriously overcrowded households moved between April 2017 and December 2017, representing an increase on the same period in 2016/17. A total of 48 seriously overcrowded properties moved in 2016/17. Targets will continue to be set for this group in 2017/18 as it remains a priority area. Trading Places are continuing to facilitate chain lets; three bedroom properties released via the scheme are advertised with preference to overcrowded households.
- 6.17. The GLA have calculated that Lewisham will be required to contribute 23 properties to the Housing Moves scheme in 2018/19. The breakdown of units is outlined below.

	Q1	Q2	Q3	Q4	TOTAL
<b>1-beds</b>	2	2	3	2	9
<b>2-beds</b>	3	3	2	2	10
<b>3-beds</b>	1	1	1	1	4
<b>TOTAL</b>	6	6	6	5	23

- 6.18. There were 1,980 households in temporary accommodation at the end of December 2017, an increase of 77% compared to March 2013 and a 6% increase on the number of households in temporary accommodation at the end of March 2017.

- 6.19. The number of households in Nightly Paid accommodation has also increased by 12% since March 2017. This is largely as a consequence of a number of long term voids awaiting allocation, an acute decant pressure at one of the regeneration schemes and the continued volume of homelessness acceptances. In recent months the number in Nightly Paid has started to decrease as the immediate and acute pressures start to ease, allowing the positive work that has been undertaken around prevention and alternatives to Nightly Paid to drive a decrease in households in this type of temporary accommodation.
- 6.20. 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 significant costs associated with housing generally, including managing the allocations service, managing the provision of council housing and providing services to those experiencing homelessness or the threat of homelessness. All of these are affected over time by the demand for housing. The lettings plan is merely the means by which that demand is allocated to existing properties. As such, changes to the plan do not have direct financial implications.
- 7.2. Council regeneration schemes are currently performing successfully. 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 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 166A (of the 1996 Act,) Lewisham Housing Authority has a scheme (Allocations Policy), "... for determining priorities..." which sets out the procedure to be followed when allocating housing accommodation.
- 8.3. The 'Allocation of accommodation; guidance for local housing authorities in England' was published on 29<sup>th</sup> June 2012. It replaced all previous guidance on social housing allocations. It expressly aims to assist local housing authorities to take advantage of the provisions within the Localism Act 2011. It also encourages authorities to make use of the existing flexibilities within the allocation legislation to ensure that social homes are allocated to people who are deemed to need and

deserve them the most, such as “hard working” families and members of the Armed Forces. Further Guidance, namely “Providing social housing for local people” [Statutory guidance on social housing allocations for local authorities in England ] was published in December 2013

- 8.4. The Localism Act 2011 introduced a number of significant amendments to Part 6 of the 1996 Act. Of particular relevance here are the following provisions: Section 160ZA was inserted by the Localism Act 2011. It established the concept of the qualifying person. 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, mean that everyone has a *right* to a home, 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 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. Equalities implications**

9.1. 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 and is appended at Appendix 8.

9.2. The lettings plan priorities have generally positive impacts, 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.

9.3. When implementing the new Allocation Policy in October 2012 we also introduced a new housing application with an updated equalities monitoring form which will

help us improve the data we capture. Consideration is to be given to how the service can encourage users to provide this data to support more accurate equalities monitoring, as there are substantial levels of non-disclosure at present.

- 9.4. There are some negative impacts to the proposal to allocate a higher proportion of social housing lettings to homeless households than other priority areas, particularly on overcrowded households within the social sector and the private rented sector where applicants are predominantly from BME origins and applications where the lead applicant is female.
- 9.5. However, this negative impact is balanced by the positive impact that will be seen on the same protected groups through the increased lettings made to homeless applicants who will then be moved on from temporary accommodation into settled housing.
- 9.6. 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.

## **10. Crime and Disorder implications**

- 10.1. 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 program. 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.

## **11. Environmental implications**

- 11.1. There are no environmental implications arising directly from this report.

## **12. Background documents:**

- 12.1. There are no background documents associated with this report.
- 12.2. If you require more information on this report please contact Genevieve Macklin, Head of Strategic Housing on 0208 314 6057.

Appendix 1 – Lettings Plan 2018/19

Band & Rehousing Reason	Bed Size					Total	% of general lets	% of all lets
	Studio	1	2	3	4+			
<b>Band 1</b>								
Decant	0	30	47	6	2	85	7.92%	7.04%
Un Occ High Demand	0	45	23	5	0	73	6.80%	6.04%
All other band 1	0	30	12	5	4	51	4.75%	4.22%
<b>Total Band 1</b>	<b>0</b>	<b>105</b>	<b>82</b>	<b>16</b>	<b>6</b>	<b>209</b>	<b>19.48%</b>	<b>17.30%</b>
<b>Band 2</b>								
Overcrowded by 2 bed or more	0	0	8	18	15	41	3.82%	3.39%
Supported Housing Move On	32	150	2	0	0	184	17.15%	15.23%
All other band 2	0	30	18	9	3	60	5.59%	4.97%
<b>Total Band 2</b>	<b>32</b>	<b>180</b>	<b>28</b>	<b>27</b>	<b>18</b>	<b>285</b>	<b>26.56%</b>	<b>23.59%</b>
<b>Band 3</b>								
Priority Homeless	8	48	247	151	23	477	44.45%	39.49%
All other band 3	15	60	3	23	1	102	9.51%	8.44%
<b>Total Band 3</b>	<b>23</b>	<b>108</b>	<b>250</b>	<b>174</b>	<b>24</b>	<b>579</b>	<b>53.96%</b>	<b>47.93%</b>
<b>Grand Total</b>	<b>55</b>	<b>393</b>	<b>360</b>	<b>217</b>	<b>48</b>	<b>1073</b>	<b>100.00%</b>	<b>88.82%</b>
Band & Rehousing Reason	Bed Size					Total	% of Special lets	% of all lets
	Studio	1	2	3	4+			
<b>Special Lets</b>								
Temp to Perm	0	5	15	7	1	28	25.00%	2.32%
Sheltered	9	55	1	0	0	65	58.04%	5.38%
Disabled	0	8	10	1	0	19	16.96%	1.57%
<b>Total Special Lets</b>	<b>9</b>	<b>68</b>	<b>26</b>	<b>8</b>	<b>1</b>	<b>112</b>	<b>100.00%</b>	<b>9.27%</b>
Housing Moves	0	9	10	4	0	23		1.90%
<b>Overall total lets</b>	<b>64</b>	<b>470</b>	<b>396</b>	<b>229</b>	<b>49</b>	<b>1208</b>		<b>100.00%</b>

## Appendix 2 - Total Lettings – 2016/17

Band and Rehousing Reason	Bed Size					Grand Total	% of General Lets	% of Total Lets
	0 Bed	1 Bed	2 Bed	3 Bed	4 Bed +			
<b>Band 1</b>								
Decant		22	12	13	5	52	6.0%	5.4%
Emergency		2	3	4	3	12	1.4%	1.2%
Leaving Care		34	5			39	4.5%	4.0%
Management Discretion 1		7				7	0.8%	0.7%
Success Too Large Pr		3				3	0.3%	0.3%
Un Occ High Demand		28	19	2		49	5.7%	5.1%
<b>Band 1 Total</b>	<b>0</b>	<b>96</b>	<b>39</b>	<b>19</b>	<b>8</b>	<b>162</b>	<b>18.7%</b>	<b>16.7%</b>
<b>Band 2</b>								
Homeless Prevention		10	34	4		48	5.5%	4.9%
Management Discretion 2	3	8				11	1.3%	1.1%
Medical High		6	3	6	2	17	2.0%	1.8%
Overcrowded by 2 bed or more			4	31	12	47	5.4%	4.8%
Priority Homeless			1			1	0.1%	0.1%
Supported Housing Move On	19	107				126	14.6%	13.0%
<b>Band 2 Total</b>	<b>22</b>	<b>131</b>	<b>42</b>	<b>41</b>	<b>14</b>	<b>250</b>	<b>28.9%</b>	<b>25.8%</b>
<b>Band 3</b>								
Former armed forces personnel	3	3	1			7	0.8%	0.7%
Improvement Order		1				1	0.1%	0.1%
Medical Low	2	14	1			17	2.0%	1.8%
Other	2		1			3	0.3%	0.3%
Overcrowded By 1 Bed	3	14		13	1	31	3.6%	3.2%
Priority Homeless	8	26	208	103	14	359	41.5%	37.0%
Retiring Lbl Tnt Emp			4	1	1	6	0.7%	0.6%
Un Occ High Demand				1		1	0.1%	0.1%
Welfare Affordability	3	19				22	2.5%	2.3%
Welfare Housing For Older People	1	4	1			6	0.7%	0.6%
<b>Band 3 Total</b>	<b>22</b>	<b>81</b>	<b>216</b>	<b>118</b>	<b>16</b>	<b>453</b>	<b>52.4%</b>	<b>46.7%</b>
<b>General Lets Total</b>	<b>44</b>	<b>308</b>	<b>297</b>	<b>178</b>	<b>38</b>	<b>865</b>	<b>100.0%</b>	<b>89.2%</b>
Special Lets	Bed Size					Grand Total	% of Special Lets	% of Total Lets
	0 Bed	1 Bed	2 Bed	3 Bed	4 Bed +			
Sheltered	7	57	3			67	71.3%	6.9%
Disabled		8	13	5	1	27	28.7%	2.8%
<b>Special Lets Total</b>	<b>7</b>	<b>65</b>	<b>16</b>	<b>5</b>	<b>1</b>	<b>94</b>	<b>100.0%</b>	<b>9.7%</b>
Housing Moves		5	5	1		11		1.1%
<b>Grand Total</b>	<b>51</b>	<b>378</b>	<b>318</b>	<b>184</b>	<b>39</b>	<b>970</b>		<b>100.0%</b>

**Appendix 3 – Total Lettings 17/18 – (1<sup>st</sup> April ‘17 – 30<sup>th</sup> December ‘17)**

Band and Rehousing Reason	Bed Size					Grand Total	% of General Lets	% of Total Lets
	0 Bed	1 Bed	2 Bed	3 Bed	4 Bed +			
<b>Band 1</b>								
Decant		5	2	1	1	9	1.7%	1.5%
Emergency		2	1	2		5	1.0%	0.8%
Leaving Care		22	3			25	4.8%	4.2%
Management Discretion 1		4	1			5	1.0%	0.8%
OC Una to Suc Tenanc		1				1	0.2%	0.2%
Starred decant priority		2	6	1		9	1.7%	1.5%
Success Too Large Pr		3				3	0.6%	0.5%
Un Occ High Demand		30	7			37	7.1%	6.2%
<b>Band 1 Total</b>	<b>0</b>	<b>69</b>	<b>20</b>	<b>4</b>	<b>1</b>	<b>94</b>	<b>18.0%</b>	<b>15.9%</b>
<b>Band 2</b>								
Homeless Prevention		2	25			27	5.2%	4.6%
Management Discretion 2	2	1				3	0.6%	0.5%
Medical High		1	3	4		8	1.5%	1.3%
Overcrowded by 2 bed or more		1	1	28	7	37	7.1%	6.2%
Supported Housing Move On	13	67				80	15.3%	13.5%
<b>Band 2 Total</b>	<b>15</b>	<b>72</b>	<b>29</b>	<b>32</b>	<b>7</b>	<b>155</b>	<b>29.7%</b>	<b>26.1%</b>
<b>Band 3</b>								
Former armed forces personnel		1				1	0.2%	0.2%
Medical Low	3	12		1		16	3.1%	2.7%
Overcrowded By 1 Bed	2	4	10	8		24	4.6%	4.0%
Priority Homeless	9	15	110	64	9	207	39.7%	34.9%
Retiring Lbl Tnt Emp			1			1	0.2%	0.2%
Welfare Affordability	7	7				14	2.7%	2.4%
Welfare Housing For Older People	3	7				10	100.0%	1.7%
<b>Band 3 Total</b>	<b>24</b>	<b>46</b>	<b>121</b>	<b>73</b>	<b>9</b>	<b>273</b>	<b>52.3%</b>	<b>46.0%</b>
<b>General Lets Total</b>	<b>39</b>	<b>187</b>	<b>170</b>	<b>109</b>	<b>17</b>	<b>522</b>	<b>100.0%</b>	<b>88.0%</b>
Special Lets	Bed Size					Grand Total	% of Special Lets	% of Total Lets
	0 Bed	1 Bed	2 Bed	3 Bed	4 Bed +			
Sheltered	6	39	3			48	81.4%	8.1%
Disabled		4	6	1		11	18.6%	1.9%
<b>Band 3 Total</b>	<b>6</b>	<b>43</b>	<b>9</b>	<b>1</b>	<b>0</b>	<b>59</b>	<b>100.0%</b>	<b>100.0%</b>
Housing Moves		5	5	2		12		2.0%
<b>Grand Total</b>	<b>45</b>	<b>235</b>	<b>184</b>	<b>112</b>	<b>17</b>	<b>593</b>		<b>100.0%</b>

**Appendix 4 - Average waiting times of households moved based on lettings outcomes (weeks) 2016/17**

Band and Rehousing Reason	Bed Size					Grand Total
	0 Bed	1 Bed	2 Bed	3 Bed	4 Bed +	
<b><u>Band 1</u></b>						
Decant	0	130.9	149.3	136.0	137.1	137.0
Emergency	0	11.8	13.7	35.9	13.0	20.0
Exceptional Medical	0	0.0	57.3	0.1	0.0	21.6
Leaving Care	0	47.0	29.5	0.0	0.0	44.7
Management Discretion 1	0	28.5	0.0	0.0	0.0	28.5
Success Too Large Pr	0	22.6	0.0	0.0	0.0	22.6
Un Occ High Demand	0	238.5	262.0	23.1	0.0	236.4
<b><u>Band 1 Total</u></b>	<b>0</b>	<b>128.4</b>	<b>184.4</b>	<b>99.1</b>	<b>90.6</b>	<b>136.7</b>
<b><u>Band 2</u></b>						
Homeless Prevention	0.0	28.3	98.0	67.1	0.0	80.9
Management Discretion 2	94.6	68.9	0.0	0.0	0.0	75.9
Medical High	23.3	25.7	160.4	109.9	99.1	91.1
Overcrowded by 2 bed or more	0.0	0.0	48.3	89.0	214.0	119.4
Supported Housing Move On	6.7	7.7	0.0	0.0	0.0	7.5
<b><u>Band 2 Total</u></b>	<b>18.9</b>	<b>14.1</b>	<b>104.6</b>	<b>90.8</b>	<b>198.7</b>	<b>53.2</b>
<b><u>Band 3</u></b>						
Former armed forces personnel	1.0	12.2	0.9	0.0	0.0	6.6
Improvement Order	0.0	35.1	0.0	0.0	0.0	35.1
Medical Low	42.4	182.6	68.1	222.4	0.0	162.3
Other	1.4	242.9	76.3	0.0	0.0	106.9
Overcrowded By 1 Bed	46.5	108.9	69.9	269.6	388.3	178.7
Priority Homeless	106.6	51.1	120.6	131.3	192.5	120.1
Retiring Lbl Tnt Emp	0.0	0.0	59.6	36.6	93.3	61.4
Welfare Affordability	155.9	114.7	0.0	0.0	0.0	118.9
Welfare Housing For Older People	50.8	67.5	36.2	0.0	0.0	62.4
<b><u>Band 3 Total</u></b>	<b>70.3</b>	<b>98.3</b>	<b>116.9</b>	<b>147.5</b>	<b>198.6</b>	<b>119.3</b>
<b><u>General Lets Total</u></b>	<b>46.6</b>	<b>75.9</b>	<b>124.0</b>	<b>128.0</b>	<b>176.5</b>	<b>104.1</b>

**Appendix 5 - Average waiting times based on lettings outcomes (weeks) - April 1<sup>st</sup> 2017  
– 30<sup>th</sup> December 2017**

Band and Rehousing Reason	Bed Size					Grand Total
	0 Bed	1 Bed	2 Bed	3 Bed	4 Bed +	
<b><u>Band 1</u></b>						
Decant	0.0	124.2	184.7	70.9	57.6	124.3
Emergency	0.0	17.1	12.7	10.7	0.0	14.2
Leaving Care	0.0	27.4	81.7	0.0	0.0	33.9
Management Discretion 1	0.0	30.5	8.7	0.0	0.0	27.8
OC Una to Suc Tenanc	0.0	10.4	0.0	0.0	0.0	10.4
Starred decant priority	0.0	134.1	157.7	216.7	0.0	159.0
Success Too Large Pr	0.0	17.3	0.0	0.0	0.0	17.3
Un Occ High Demand	0.0	90.9	125.6	0.0	0.0	96.7
<b><u>Band 1 Total</u></b>	<b>0.0</b>	<b>65.6</b>	<b>123.0</b>	<b>77.3</b>	<b>57.6</b>	<b>76.9</b>
<b><u>Band 2</u></b>						
Homeless Prevention	0.0	5.2	106.5	0.0	0.0	99.0
Management Discretion 2	13.1	15.3	0.0	0.0	0.0	13.8
Medical High	0.0	162.2	95.1	181.5	0.0	132.0
Overcrowded by 2 bed or more	0.0	8.9	145.0	99.9	219.5	121.3
Supported Housing Move On	2.9	8.9	0.0	0.0	0.0	7.9
<b><u>Band 2 Total</u></b>	<b>4.2</b>	<b>12.8</b>	<b>105.2</b>	<b>110.1</b>	<b>219.5</b>	<b>58.4</b>
<b><u>Band 3</u></b>						
Former armed forces personnel	0.0	0.6	0.0	0.0	0.0	0.6
Medical Low	72.8	123.7	83.9	197.5	0.0	118.3
Overcrowded By 1 Bed	51.0	64.4	305.8	387.2	0.0	271.5
Priority Homeless	21.5	30.7	128.3	134.8	220.4	120.5
Retiring Lbl Tnt Emp	0.0	0.0	114.4	0.0	0.0	114.4
Welfare Affordability	133.2	118.5	0.0	0.0	0.0	123.7
Welfare Housing For Older People	62.3	99.1	0.0	0.0	0.0	89.0
<b><u>Band 3 Total</u></b>	<b>65.5</b>	<b>86.6</b>	<b>141.3</b>	<b>163.8</b>	<b>220.4</b>	<b>128.8</b>
<b><u>General Lets Total</u></b>	<b>45.1</b>	<b>54.6</b>	<b>132.6</b>	<b>145.0</b>	<b>210.4</b>	<b>99.6</b>

## Appendix 6 - Lets to Affordable Rent properties 2016/17

Band and Rehousing Reason	Bed Size					Grand Total
	0 Bed	1 Bed	2 Bed	3 Bed	4 Bed +	
<b><u>Band 1</u></b>						
Decant		3	4	3		10
Emergency		1		1		2
Exceptional Medical			1	1		2
Leaving Care		9				9
Management Discretion 1		2				2
Success Too Large Pr		1				1
Un Occ High Demand		7	3	1		11
<b><u>Band 1 Total</u></b>		<b>23</b>	<b>8</b>	<b>6</b>		<b>37</b>
<b><u>Band 2</u></b>						
Homeless Prevention		2	9	1		12
Management Discretion 2		2				2
Medical High		2	6	2		10
Overcrowded by 2 bed or more			1	3	2	6
Supported Housing Move On	11	52				63
<b><u>Band 2 Total</u></b>	<b>11</b>	<b>58</b>	<b>16</b>	<b>6</b>	<b>2</b>	<b>93</b>
<b><u>Band 3</u></b>						
Former armed forces personnel	2	1				3
Improvement Order		1				1
Medical Low		13		1		14
Other						0
Overcrowded By 1 Bed		6	1	1		8
Priority Homeless	4	15	56	28	5	108
Retiring Lbl Tnt Emp			1			1
Welfare Affordability		3				3
Welfare Housing For Older People	1	4				5
<b><u>Band 3 Total</u></b>	<b>7</b>	<b>43</b>	<b>58</b>	<b>30</b>	<b>5</b>	<b>143</b>
<b><u>General Lets Total</u></b>	<b>18</b>	<b>124</b>	<b>82</b>	<b>42</b>	<b>7</b>	<b>273</b>

**Appendix 7 - Lets to Affordable Rent properties 2017/18 – (1<sup>st</sup> April 2017 to 30<sup>th</sup> December 2017)**

Band and Rehousing Reason	Bed Size					Grand Total
	0 Bed	1 Bed	2 Bed	3 Bed	4 Bed +	
<b><u>Band 1</u></b>						
Decant		1	1			2
Emergency		1		2		3
Leaving Care		2				2
Un Occ High Demand		5				5
<b><u>Band 1 Total</u></b>		<b>9</b>	<b>1</b>	<b>2</b>		<b>12</b>
<b><u>Band 2</u></b>						
Homeless Prevention		1	5			6
Management Discretion 2		1				1
Medical High		1	1	1		3
Overcrowded by 2 bed or more				2	1	3
Supported Housing Move On	1	10				11
<b><u>Band 2 Total</u></b>	<b>1</b>	<b>13</b>	<b>6</b>	<b>3</b>	<b>1</b>	<b>24</b>
<b><u>Band 3</u></b>						
Medical Low		4	1	1		6
Overcrowded By 1 Bed	2	2		1		5
Priority Homeless	3	9	10	9	3	34
Welfare Affordability		4				4
Welfare Housing For Older People	1	1				2
<b><u>Band 3 Total</u></b>	<b>6</b>	<b>20</b>	<b>11</b>	<b>11</b>	<b>3</b>	<b>51</b>
<b><u>General Lets Total</u></b>	<b>7</b>	<b>42</b>	<b>18</b>	<b>16</b>	<b>4</b>	<b>87</b>

# **Annual Lettings Plan 2018-19**

## **Equalities Analysis Assessment**

<b>Author</b>	<b>Genevieve Macklin</b>	<b>Directorate</b>	<b>Customer Services</b>	
<b>Date</b>	<b>6<sup>th</sup> March 2018</b>	<b>Service</b>	<b>Strategic Housing</b>	
<b>1. The project or decision that this assessment is being undertaken for</b>				
<p>This Equalities Analysis Assessment is being undertaken to understand the impact of the Annual Lettings Plan 2018/19 and its effect on applicants with protected characteristics. This will form part of a report to Housing Select Committee and to Mayor &amp; Cabinet on the above decision.</p>				
<b>2. The protected characteristics or other equalities factors potentially impacted by this decision</b>				
<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Ethnicity	<input checked="" type="checkbox"/> Maternity	<input checked="" type="checkbox"/> Language spoken	<input type="checkbox"/> Other, please define:
<input checked="" type="checkbox"/> Gender	<input checked="" type="checkbox"/> Gender identity	<input checked="" type="checkbox"/> Disability	<input checked="" type="checkbox"/> Household type	
<input checked="" type="checkbox"/> Religion	<input checked="" type="checkbox"/> Carer status	<input checked="" type="checkbox"/> Sexual orientation	<input checked="" type="checkbox"/> Income	
<p>This decision to specify the allocation of properties by priority housing reason could have an impact on any of the above protected characteristics or equalities factors. Households are added to the housing register on the basis of priority need, which is established based on whether the household meet the requirements of the appropriate legislation or otherwise meet the requirements of locally defined need. Some of the above protected characteristics and equalities factors are more prevalent in one or other priority housing need category than they are in others.</p>				
<b>3. The evidence to support the analysis</b>				
<p>During the process of applying to join the Housing Register, applicants are asked to provide information relating to protected characteristics to support equalities monitoring and equalities impact assessments. This information is stored against the household member record on the system, and thus can be extracted to better understand the impact of decision making on the Housing Register and on lets made to households from the register.</p> <p>Equalities information has also been taken from the 2011 Census to provide a broader understanding of the demographics of the borough.</p>				

#### **4. The analysis**

Providing this information is not mandatory and as such it is not possible to provide an exact picture of the impact that the Annual Lettings Plan might have on those identifying as having the above mentioned protected characteristics or equalities factors. However, some datasets are more comprehensive than others and it is possible to understand the potential impact that this might have based on the extrapolation of these.

The proposed Annual Lettings Plan for 18/19 allocates more properties to Homeless households and Supported Housing Move on households than any other priority category. This is reflective of the high ongoing rate of homelessness applications and demand for supported housing, and the subsequent need to find appropriate permanent accommodation for each of these priority groups to discharge our housing duty.

A substantial majority of those on the housing register have not complete the equalities monitoring assessment or have opted to not disclose their information, as is their right. This is particularly true of those on the housing register for the above mentioned priority rehousing reasons. Analysis of the ethnicity of those accepted as homeless indicates that a disproportionately large number of households accepted as homeless are BAME, and analysis of the gender of those accepted as homeless shows a disproportionately large number of female applicants.

Further proposals to mitigate this and to allow for more comprehensive equalities monitoring are suggested below.

Data is not collected on Income, Household Type nor on Carer Status as part of a Housing Register Application.

#### **5. Impact summary**

In allocating a substantial proportion of properties to those accepted as homeless, the Annual Lettings Plan is likely to have an impact on BAME households and females as per the above. This mitigates the impact of the reduction in lets to overcrowded households, who are also disproportionately likely to share those protected characteristics.

#### **6. Mitigation**

Regular reviews of the characteristics of those on the Housing Register and those that are successfully bidding for properties are to be undertaken to understand the impact that the Annual Lettings Plan is having on the above mentioned characteristics. This will enable officers to take action to ameliorate any negative impact where appropriate, and to continue to refine the lettings process.

These reviews will also consider how best to increase the availability and accuracy of equalities data to support the service to more effectively analyse the impact of decision making in future.

#### **7. Service user journey that this decision or project impacts**

The applicant comes into contact with the Allocations service and may also come into contact with our Customer Services should they require assistance, or with our Corporate Complaints service should they wish to raise a concern. The applicant will also have contact with Registered Providers of housing.

<b>Signature of Head of Service</b>	

For further information please see the full [Corporate Equality Policy](#).