

Housing Select Committee			
Title	Annual Lettings Plan 2019/20		
Key decision	Yes	Item no	5
Wards	All		
Contributors	Executive Director for Customer Services, Head of Law		
Class	Part 1		

1. Recommendations for Housing Select Committee Members

- 1.1. This report presents Housing Select Committee members with a copy of the report due to be considered by Mayor & Cabinet on 27th March 2019, entitled "Annual Lettings Plan 19/20".
- 1.2. A copy of this report can be found from point 2 below
- 1.3. Officers recommend that Housing Select Committee Members:
 - Note the content of the report; and
 - Provide comments on the report for incorporation into the report taken to Mayor and Cabinet on the 27th March 2019.

Report due to be considered by Mayor & Cabinet on 27th March 2019

2. Summary and purpose of this report

- 2.1. The Annual Lettings Plan (ALP) sets out how the Council intends to allocate the lettings that become available in 2019/20, covering 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.
- 2.2. Between 2014/15 and 2017/18 the number of available re-lets decreased by over 7%, representing a continuation of a trend stretching back to 2010/11. It is expected that this decrease in available re-lets will continue into 2019/20. Current projections are that 950 properties will become available for letting in 2019/20, comprised of an expected 875 relets and 75 new build properties which are currently projected to complete in the financial year.
- 2.3. The ALP seeks to distribute available lettings to those in most need, reducing the number of households in unsuitable and costly temporary accommodation, reducing under occupation and severe overcrowding, supporting move-on for single vulnerable households on from supported accommodation to independence and supporting the regeneration of designated housing estates.
- 2.4. The number of households in Temporary Accommodation (TA) has more than doubled since 2010/11, and since 2013/14, the number of households in TA has increased by 46%. It is proposed that the Annual Lettings Plan continue to keep the increased number of lettings to homeless households to help to manage the continued high level of homeless acceptance and reduced supply.
- 2.5. This report also presents the final lettings outcomes for 2017/18 and the position for the first nine months of 2018/19 (1st April '18 to 31st December '18). It also shows the current demand position on the housing register. This reflects performance in supply and demand management since April 2018 and informs the proposed lettings plan for 2019/20.
- 2.6. The ALP for 2019/20 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.

3. Policy Context

- 3.1. The contents of this report are consistent with the Council's policy framework. It supports the achievements of the Corporate Strategy objectives:
 - Tackling the housing crisis – Everyone has a decent home that is secure and affordable

- Giving children and young people the best start in life - Every child has access to an outstanding and inspiring education and is given the support they need to keep them safe, well and able to achieve their full potential.
- Building an inclusive local economy - Everyone can access high quality job opportunities, with decent pay and security in our thriving and inclusive local economy.

4. Recommendations

Mayor and Cabinet is recommended to:

- 4.1. Note the lettings outcomes for 2017/18 and 2018/19 to date.
- 4.2. Approve the proposed Lettings Plan for 2019/20 set out in Appendix 1 of this report.

5. Background

- 5.1. 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.
- 5.2. 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.
- 5.3. The ALP allows the Council to outline the number of properties that are expected to become available in the year and how best to distribute these amongst the groups mentioned above, and others on the Housing Register.
- 5.4. Five priority areas have been identified for the plan, as listed below in no particular order:
 - **Homeless households in temporary accommodation.** Temporary Accommodation, particularly nightly paid and shared B&B accommodation, is amongst the worst form of housing. As a key priority area, the ALP aims to

support homeless households secure accommodation so they can get on with rebuilding their lives.

- **Severe overcrowding** . Overcrowded by 2 bedrooms or more. Living in overcrowded conditions has a negative impact on health and wellbeing. Reducing overcrowding is a key local and national priority.
- **Under-occupation**. By supporting households to move out of accommodation that is larger than they need, overcrowded households have the opportunity to occupy the property that is vacated. This also helps mitigate the impact of the spare room subsidy where it applies.
- **Move-on from supported housing schemes**. Moving vulnerable households into independent homes will free up supported housing bed spaces for those with support needs waiting for accommodation
- **Decants**. These are crucial in enabling the Council and partners to move households out of properties at regeneration sites, supporting the delivery of new homes across Lewisham.

- 5.5. The annual lettings plan for 18/19 projected that 1,208 properties would become available to let. The final number of lets for 18/19 will likely be below this projection with just under 1,040 lets expected. This is largely due to a number of anticipated new build schemes not completing in 18/19, although these schemes will now be completed next year.
- 5.6. Lewisham continues to actively participate in ‘Housing Moves’, a pan-London mobility scheme launched by the Mayor of London in May 2012. Lewisham contributed 11 properties in 18/19 ranging between 1 and 4 bedrooms, fulfilling our requirement for the year.
- 5.7. Any properties offered up by Lewisham as part of the Housing Moves scheme are matched by other authorities meaning no loss of available lettings to Lewisham applicants. The scheme prioritises household moves for those needing to move elsewhere for work, and under-occupiers.

6. Lettings Outcomes for previous years:

- 6.1. A summary of the main outturn results in lettings is shown below. Full details for 17/18 and 18/19 to date are provided in Appendices 2 & 3.

	2014/15	2015/16	2016/17	2017/18	December 2018*	2019/20 Projected
General needs lets	996	1172	865	994	529	863
Special lets	152	95	94	72	80	75
Housing moves	10	12	11	12	4	12**
Total lets	1,158	1,279	970	1,078	613	950

*Not including properties that are approved to let

**Housing Moves quotas for 19/20 have not yet been published so historic figures have been used to estimate likely actual commitment

- 6.2. The projected outturn for 2018/19 is 1,039 which is 4% below the previous year and represents almost 800 fewer units than were available in 2011/12.
- 6.3. An analysis of the overall percentage of lettings to each band shows the following:

	Actual % of lets 17/18	Percentage of lets Apr – Dec '18	Percentage of lets 18/19 target
Band 1	15.4%	11.4%	17.3%
Band 2	26.3%	27.2%	23.6%
Band 3	50.5%	52.9%	47.9%
Special lets*	6.7%	7.8%	9.3%
Housing Moves	1.1%	0.7%	1.9%

*Note that special lets includes sheltered lets and disabled units

- 6.4. The large number of lets to band 3 is attributed to the high proportion of two and three bedroom properties 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.

- 6.5. Decants are broadly performing to target:

Scheme	1 Bed	2 Bed	3 Bed	4+ Bed	Total
Excalibur Phase 4	1	4	2 (1)	0	7 (1)
Excalibur Phase 5	0	4	1	0	5 (0)
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)
Total	31	39	14 (1)	5	89 (1)

- 6.6. 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.
- 6.7. 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 been increasing in recent years, and has increased by a number of months in the past two years, from an average waiting time of 100 weeks in 2017/18 to 112 weeks in 2018/19 to date. This reflects the ongoing decrease in the number of available lets and the increase in approaches to join the Housing Register.
- 6.8. Almost 93,000 bids were made by 5,300 households on the Housing Register during 2017/18, an increase of 6,000 bids compared to 2016/17. In 2018/19 to date over 4,500 households have made almost 70,000 bids. The number of bids per available property remains high, with over 239 of the properties advertised in the year to date receiving over 100 bids and 5 properties receiving more than 500 bids. It is envisaged that there will continue to be a high number of bids for properties whilst demand continues to outstrip supply.

Number of Bedrooms	17/18	18/19 YTD
Studio	13.5	9.0
1 Bed	24.4	19.9
2 Bed	175.6	187.6
3 Bed	240.1	272.2
4 Bed+	158.6	120.4

- 6.9. There are currently just under 9,665 households on the Housing Register, of which 9,190 households have been on for over 6 months. Almost 3,800 households that are active have made a bid within the past 6 months.
- 6.10. 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, which will ensure the Housing Register is an accurate reflection of those still in housing need in Lewisham.
- 6.11. This exercise has resulted in a decrease in the number on the Housing Register from over 9,900 as at March 2018 to under 9,600 in June 2018, although this has been increasing since the early tranches of the exercise have completed.

7. Proposed Plan for 2019/20

- 7.1. The Lettings Plan proposed is set out at Appendix 1. It projects a decrease in the number of relets expected to become available in 2019/20 based on the trend across recent years. This is offset by the continued delivery of new builds by the Council and Registered Providers. It is anticipated that a total of 950 properties will be available for let during the course of the year.
- 7.2. It should be noted that the continued high 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.
- 7.3. Additional analysis is currently being undertaken to consider ways to make sure that every let is utilised to maximise its impact.
- 7.4. The remaining lettings have been targeted to 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, care leavers, medical needs and households who are overcrowded by 2 bedrooms.
- 7.5. There are 766 active households registered in band 1 as under occupiers, this is a decrease of 5 from last year. The Trading Places officer works with this cohort to support those affected by the spare room subsidy alongside those who are under-occupying but not impacted by welfare reform. This remains a key priority as it mitigates the impact of government policy in households, whilst maximising the effective use of available stock. The table below represents properties released via the Trading Places officer in 18/19 and the size of the property property they moved to. Of the 18 who moved below, 8 were affected by the bedroom tax and as a consequence of this move are no longer at high risk of eviction.

Bed Size released	Bed size moved to				Total Moves
	1	2	3	4+	
2	7				7
3	5	5			10
4+	0	1	0	0	1
Total	12	6	0	0	18

- 7.6. The team has also facilitated a series of chain lettings, promoting churn within the stock by supporting transferring households to move who thus vacate a property that can be utilised elsewhere. 11 of the chain lettings enabled freed up larger sized properties that have been advertised to overcrowded tenants, ensuring that the needs of the original household moving and the overcrowded tenants that are successful in bid are both met, as well as the needs of whoever then occupies the additional property vacated.
- 7.7. Trading Places continue to work with Housing Benefit colleagues and Registered Providers to maximise the use of Discretionary Housing Payment. 130 tenants are currently being supported to move, of whom 28 are affected by the bedroom tax. Officers will continue to assist this cohort with the continued, intensive support required to help them move into more appropriate accommodation.
- 7.8. There are currently 103 cases registered with a decant need. The council's major regeneration scheme at Heathside & Lethbridge is nearly complete, and work at Excalibur and Milford Towers is ongoing, requiring an appropriate proportion of units to be made available to these households to support the continued regeneration of these areas. The development at the Deptford Southern Sites is also due to commence soon and provision will be made to facilitate this.
- 7.9. Officers are investigating the possibility of a pilot project allocating a specific number of properties to social tenants seeking to transfer, and allocating every subsequent let to transferring tenants. 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.
- 7.10. Move on within the supported housing pathway remains a core priority for Lewisham's single homeless intervention team and the supported housing 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 manage the flow of people through the supported housing pathway. These properties are currently the only form of move on from the Supported Housing Pathway, of which there are currently over 500 units of commissioned accommodation and additional private providers totalling over 150 units.
- 7.11. 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.
- 7.12. The use of supported housing pathways and initiatives such as housing first, forms a key part of the Council's efforts to address the rising number of rough sleepers in the borough.

- 7.13. Following analysis of supply and demand within the Young Persons Pathway, the Commissioning team are considering whether there is a need to increase provision within the pathway by a further ten units.
- 7.14. Care leavers that are placed in the pathway are now also coming under the Supported Housing Move On quota to ensure equitable move on options for all supported housing clients and reduce the administrative burden on Personal Assistants within Children's Services.
- 7.15. There were 134 lets to supported housing move on cases in 2017/18, and there are currently 83 supported housing move on clients on the Housing Register.
- 7.16. 531 households that were on the housing register as at the end of December 2018 lack two or more bedrooms, a slight increase from December 2017 where there were 494 such households on the register. 29 seriously overcrowded households moved between April 2018 and December 2018, representing a decrease on the same period in 2017/18. A total of 55 seriously overcrowded properties moved in 2017/18. Targets will continue to be set for this group in 2019/20 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.
- 7.17. The GLA have not yet provided detail on the number of properties that Lewisham will be expected to contribute for the Housing Moves programme in 2019/20.
- 7.18. There were 2,118 households in temporary accommodation at the end of December 2018, an increase of 64% compared to March 2013 and a 9% increase on the number of households in temporary accommodation at the end of March 2018.
- 7.19. The number of households in Nightly Paid accommodation has also increased by 25% since March 2018. 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. The increase in the use of Nightly Paid accommodation since March 2018 has started to be reversed towards the end of the financial year.
- 7.20. 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. 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.

8. Financial implications:

- 8.1. 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.
- 8.2. 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.

9. Legal implications:

- 9.1. 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.
- 9.2. 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.
- 9.3. The 'Allocation of accommodation; guidance for local housing authorities in England' was published on 29th 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

- 9.4. 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)).
- 9.5. 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.160ZA(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.
- 9.6. 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.
- 9.7. 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.
- 9.8. 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.
- 9.9. 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.
- 9.10. 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. 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:
<https://www.equalityhumanrights.com/en/publication-download/technical-guidance-public-sector-equality-duty-england>
- 9.11. The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:
- The essential guide to the public sector equality duty
 - Meeting the equality duty in policy and decision-making
 - Engagement and the equality duty
 - Equality objectives and the equality duty
 - Equality information and the equality duty

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:
<https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty-guidance>

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 and is appended at Appendix 8.
- 10.2. 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.

- 10.3. When implementing the new Allocation Policy in October 2012 the Council 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.
- 10.4. 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.
- 10.5. 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.
- 10.6. 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.

11. Crime and Disorder implications

- 11.1. 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.

12. Environmental implications

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

13. Background documents

- 13.1. There are no background documents associated with this report.
- 13.2. If you require more information on this report please contact Lee Georgiou, Housing Needs and Refugee Services Manager on 0208 314 7413.

Appendix 1 – Lettings Plan 2019/20

Band & Rehousing Reason	Bed Size					Total	% of general lets	% of all lets
	Studio	1	2	3	4+			
Band 1								
Decant	0	31	39	14	5	89	10.3%	9.4%
Un Occ High Demand	0	35	15	3	0	53	6.1%	5.6%
All other band 1	0	23	8	4	3	38	4.4%	4.0%
Total Band 1	0	89	62	21	8	180	20.9%	18.9%
Band 2						0		
Overcrowded by 2 bed or more	0	0	5	11	10	26	3.0%	2.7%
Supported Housing Move On	34	113	2	0	0	149	17.3%	15.7%
All other band 2	0	23	13	6	2	44	5.1%	4.6%
Total Band 2	34	136	20	17	12	219	25.4%	23.1%
Band 3						0		
Priority Homeless	9	35	205	117	18	384	44.5%	40.4%
All other band 3	16	45	2	16	1	80	9.3%	8.4%
Total Band 3	25	80	207	133	19	464	53.8%	48.8%
Grand Total	59	305	289	171	39	863	100.0%	90.8%
							% of Special lets	% of all lets
Special Lets								
Sheltered	5	41	2	0	0	48	64.0%	5.1%
Disabled	0	11	10	5	1	27	36.0%	2.8%
Total Special Lets	5	52	12	5	1	75	100.0%	7.9%
Housing Moves	0	4	4	4	0	12		1.3%
Overall total lets	64	361	305	180	40	950		100.0%

Appendix 2 - Total Lettings – 2017/18

Band & Rehousing Reason	Bed Size					Grand Total	% of General Lets	% of Total Lets
	0 Bed	1 Bed	2 Bed	3 Bed	4 Bed+			
Decant		8	2	1	1	12	1.2%	1.1%
Emergency		3	1	4	1	9	0.9%	0.8%
Leaving Care		51	9			60	6.2%	5.6%
Management Discretion 1		6	1	1	1	9	0.9%	0.8%
OC Una to Suc Tenanc		1				1	0.1%	0.1%
Prohibition Order		1				1	0.1%	0.1%
Starred decant priority		4	12	1		17	1.7%	1.6%
Success Too Large Pr		4				4	0.4%	0.4%
Un Occ High Demand		42	10			52	5.3%	4.8%
Band 1 Total	0	120	35	7	3	165	17.0%	15.3%
Homeless Prevention	1	5	51			57	5.9%	5.3%
Management Discretion 2	2	3				5	0.5%	0.5%
Medical High		7	8	8	2	25	2.6%	2.3%
Overcrowded by 2 bed or more		1	1	39	14	55	5.7%	5.1%
Supported Housing Move On	26	105				131	13.5%	12.2%
Band 2 Total	29	121	60	47	16	273	28.1%	25.3%
Former armed forces personnel		1				1	0.1%	0.1%
Medical Low	5	18	2	2		27	2.8%	2.5%
Overcrowded By 1 Bed	2	17	11	9	1	40	4.1%	3.7%
Priority Homeless	16	37	221	132	24	430	44.2%	39.9%
Retiring Lbl Tnt Emp			2			2	0.2%	0.2%
Welfare Affordability	7	10				17	1.7%	1.6%
Welfare Housing For Older People	5	12				17	1.7%	1.6%
Band 3 Total	35	95	236	143	25	534	54.9%	49.5%
Sheltered	8	57	2			67	71.3%	6.2%
Disabled		12	9	5	1	27	28.7%	2.5%
Special Lets Total	8	69	11	5	1	94	100.0%	8.7%
Housing Moves			5	5	2	12		1.1%
Grand Total	72	405	347	207	47	1078		100.0%

Appendix 3 – Total Lettings 18/19 to date – (1st April '18 – 30th December '18)

Band & Rehousing Reason	Bed Size					Grand Total	% of General Lets	% of Total Lets
	0 Bed	1 Bed	2 Bed	3 Bed	4 Bed+			
Decant		6	1			7	1.3%	1.1%
Emergency		1	2	1		4	0.8%	0.7%
Exceptional Homeless		1				1	0.2%	0.2%
Exceptional Medical				1		1	0.2%	0.2%
Leaving Care	1	22	2			25	4.7%	4.1%
Management Discretion 1		4	1			5	0.9%	0.8%
OC Una to Suc Tenanc		1				1	0.2%	0.2%
Retiring Lbl Tnt Emp		1				1	0.2%	0.2%
Success Too Large Pr		2				2	0.4%	0.3%
Un Occ High Demand		14	7	1		22	4.2%	3.6%
Band 1 Total	1	52	13	3		69	13.0%	11.3%
Homeless Prevention	1	4	25			30	5.7%	4.9%
Management Discretion 2	1	3				4	0.8%	0.7%
Medical High		4	4	5	1	14	2.6%	2.3%
Overcrowded by 2 bed or more			4	20	5	29	5.5%	4.7%
Supported Housing Move On	13	57	4			74	14.0%	12.1%
Band 2 Total	15	68	37	25	6	151	28.5%	24.6%
Medical Low	2	11				13	2.5%	2.1%
No Rehousing Reason				1		1	0.2%	0.2%
Overcrowded By 1 Bed	1	13		1	1	16	3.0%	2.6%
Priority Homeless	8	33	140	59	17	257	48.6%	41.9%
Welfare Affordability		4				4	0.8%	0.7%
Welfare Housing For Older People	6	12				18	3.4%	2.9%
Band 3 Total	17	73	140	61	18	309	58.4%	50.4%
Grand Total	33	193	190	89	24	529	100.0%	86.3%
Special Lets	Bed Size					Grand Total	% of Special Lets	% of Total Lets
	0 Bed	1 Bed	2 Bed	3 Bed	4 Bed+			
Sheltered	8	39	1			48	60.0%	7.8%
Disabled		14	7	8	3	32	40.0%	5.2%
Special Lets Total	8	53	8	8	3	80	137	13.1%
Housing Moves		1	0	3		4		0.7%
Total	41	247	198	100	27	613		100.0%

Appendix 4 - Average waiting times of households moved based on lettings outcomes (weeks) 2017/18

Band & Rehousing Reason	Bed Size					Grand Total
	0 Bed	1 Bed	2 Bed	3 Bed	4 Bed+	
Decant		107.3	184.7	70.9	57.6	113.0
Emergency		19.0	12.7	12.4	7.7	14.1
Leaving Care		20.4	47.6			24.4
Management Discretion 1		39.3	8.7	3.9	162.9	45.7
OC Una to Suc Tenanc		10.4				10.4
Prohibition Order		0.4				0.4
Starred decant priority		144.6	127.6	216.7		136.9
Success Too Large Pr		15.1				15.1
Un Occ High Demand		81.2	233.4			110.5
Band 1 Total		52.1	133.9	48.7	76.0	69.7
Homeless Prevention	2.3	22.9	108.1			98.8
Management Discretion 2	13.1	3.9				7.6
Medical High		121.2	175.9	149.4	313.1	163.1
Overcrowded by 2 bed or more		8.9	145.0	92.7	208.7	121.6
Supported Housing Move On	2.7	7.7				6.7
Band 2 Total	3.4	14.8	117.7	102.3	221.7	63.4
Former armed forces personnel		1.0				1.0
Medical Low	121.9	128.3	212.2	230.1		140.9
Overcrowded By 1 Bed	51.0	115.4	291.8	364.1	277.9	220.7
Priority Homeless	14.3	24.5	126.4	136.1	201.2	120.6
Retiring Lbl Tnt Emp			144.1			144.1
Welfare Affordability	133.2	140.9				137.7
Welfare Housing For Older People	77.8	133.3				117.0
Band 3 Total	64.6	86.2	135.0	151.8	204.3	129.4
Grand Total	36.9	48.3	131.7	136.3	201.9	100.8

**Appendix 5 - Average waiting times based on lettings outcomes (weeks) - April 1st 2018
– 30th December 2018**

Band & Rehousing Reason	Bed Size					Grand Total
	0 Bed	1 Bed	2 Bed	3 Bed	4 Bed+	
Decant		97.2	22.4			86.5
Emergency		6.4	9.9	35.3		15.4
Exceptional Homeless		4.6				4.6
Exceptional Medical			18.7	21.8		20.8
Leaving Care	2.7	21.0	10.0			19.4
Management Discretion 1		10.8	14.6			11.3
OC Una to Suc Tenanc		21.0				21.0
Retiring Lbl Tnt Emp		28.9				28.9
Success Too Large Pr		30.0				30.0
Un Occ High Demand		131.7	294.3	268.4		180.8
Band 1 Total	2.7	62.1	154.0	86.8		79.3
Homeless Prevention	10.7	5.4	113.8			93.2
Management Discretion 2	2.3	6.2				5.2
Medical High		202.4	156.7	143.0	90.2	165.2
Overcrowded by 2 bed or more			275.9	115.0	109.7	136.3
Supported Housing Move On	2.7	3.4	87.2			7.7
Band 2 Total	3.5	32.8	134.9	123.7	104.1	72.4
Medical Low	112.5714	114.1		167.8571		116.8
No Rehousing Reason				95.9		95.9
Overcrowded By 1 Bed	41.3	115.4		237.3	308.6	146.3
Priority Homeless	70.5	68.9	147.3	180.4	208.4	145.7
Welfare Affordability		135.6939				135.7
Welfare Housing For Older People	61.0	108.9				98.5
Band 3 Total	68.2	98.9	147.3	180.7	218.4	137.3
Grand Total	38.2	70.1	145.3	159.8	188.8	111.9

Appendix 6 - Lets to Affordable Rent properties 2017/18

Band & Rehousing Reason	Bed Size					Grand Total
	0 Bed	1 Bed	2 Bed	3 Bed	4 Bed+	
Decant		1				1
Emergency			1			1
Leaving Care		2				2
Management Discretion 1		1				1
Un Occ High Demand		23				23
Band 1 Total	0	27	1	0	0	28
Homeless Prevention		1	5			6
Management Discretion 2		1				1
Medical High		2	1	2		5
Overcrowded by 2 bed or more				4		4
Supported Housing Move On	3	7				10
Band 2 Total	3	11	6	6	0	26
Medical Low	1	3		1		5
Overcrowded By 1 Bed		3		3		6
Priority Homeless	1	13	27	22	1	64
Welfare Housing For Older People	1	1				2
Band 3 Total	3	20	27	26	1	77
Grand Total	6	58	34	32	1	131

Appendix 7 - Lets to Affordable Rent properties 2018/19 to date – (1st April 2018 to 30th December 2018)

Band & Rehousing Reason	Bed Size					Grand Total
	0 Bed	1 Bed	2 Bed	3 Bed	4 Bed+	
Exceptional Medical				1		1
Leaving Care		3				3
Un Occ High Demand		3	1			4
Band 1 Total		6	1	1		8
Homeless Prevention			5			5
Medical High		2	1	5	1	9
Overcrowded by 2 bed or more				2	3	5
Supported Housing Move On		6				6
Band 2 Total		8	6	7	4	25
Medical Low		3				3
No Rehousing Reason				1		1
Overcrowded By 1 Bed		2		1	1	4
Priority Homeless		3	29	15	6	53
Band 3 Total		8	29	17	7	61
Grand Total		22	36	25	11	94

Annual Lettings Plan 2019-20

Equalities Analysis Assessment

Author	Madeleine Jeffery	Directorate	Customer Services	
Date	15th February 2019	Service	Strategic Housing	
<p>1. The project or decision that this assessment is being undertaken for</p> <p>This Equalities Analysis Assessment is being undertaken to understand the impact of the Annual Lettings Plan 2019/20 and its effect on applicants with protected characteristics. This will form part of a report to Housing Select Committee and to Mayor & Cabinet on the above decision.</p>				
<p>2. The protected characteristics or other equalities factors potentially impacted by this decision</p>				
<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>				
<p>3. The evidence to support the analysis</p> <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.

Signature of Head of Service	

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